

Gatwick Northern Runway Project (Project Reference: TR020005)
Principal Areas of Disagreement Summary Statement (PADSS) – Version 1
West Sussex County Council
October 2023



Introduction

This report has been prepared by West Sussex County Council (WSCC), with input from the joint authorities and appointed consultants where required. WSCC is a host authority for the Gatwick Northern Runway Project DCO, which was accepted by PINS for Examination on 3 August 2023. This document identifies the initial principal areas of disagreement that have been identified when reviewing the DCO documentation.

WSCC appreciates this document is long; however, its length is a reflection of the scale of its main concerns with the application. In the light of these concerns, WSCC considers the length of the document to be reasonable.

Unless a fuller explanation is provided, the following terms have been used in the column headed 'Likelihood of concern being addressed during the Examination':

- **Likely** – where agreement should be possible, or a relatively simple change is required.
- **Uncertain** – where an issue is being, or will be, discussed and the Council intends to provide an update on the position in due course.
- **Unlikely** – where agreement on an issue is unlikely or it is difficult to identify a solution.

Forecasting and Capacity

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 Project.	Modelling by the Applicant of the capacity deliverable with the Project has assumed that one-minute separations can be achieved between all departing aircraft using the two runways. This is not possible with the existing structure of SIDS, particularly given the commitment not to use WIZAD SID in the night period, and so additional delays to aircraft will arise so increasing delays above those stated in the Application documents. As a consequence, the achievable capacity, at a level of delay acceptable to the airlines, will be lower than stated.	Full modelling of the interaction between the use of the two runways and the respective departure routes needs to be undertaken and the delay information provided at a sufficiently granular level (hourly) to enable the delays to be properly understood and the capacity attainable validated.	Uncertain
2.	The forecasts for the use of the Project are not based on a proper assessment of the market for Gatwick, having regard to the latest Department for Transport forecasts and having regard to the potential for additional capacity to be delivered at other airports. The demand forecasts are considered too optimistic.	The demand forecasts have been developed 'bottom up' based on an assessment of the capacity that could be delivered by the Project (see Ref 1). It is not considered good practice to base long term 20-year forecasts solely on a bottom-up analysis without consideration of the likely scale of the market and the share that might be attained by any particular airport. In this case, top-down benchmarking against national forecasts has failed	Robust market analysis and specific modelling of the share of demand that might be achieved at Gatwick Airport in competition with other airports, not limited simply to traffic, including that from other regions of the UK, which has historically used the London airports.	Uncertain

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		to properly allow for the developments that may take place at other airports and the extent to which the overall level of demand across the London system is reliant on the assumption that a third runway would be delivered at Heathrow.		
3.	Overstatement of the wider, catalytic, and national level economic benefits of the Project.	The methodology used to assess the catalytic employment and GVA benefits of the Project 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 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. The national economic impact assessment should robustly test the net impact of expansion at Gatwick Airport having regard to the potential for growth elsewhere and properly account for Heathrow specific factors, such as hub traffic and air fares.	Uncertain

Assessment of Alternatives

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4.	Lack of detailed evidence with regards environmental and social criteria for	Without further evidence of environmental and social criteria influencing the options appraisal	Applicant to present supporting constraints and opportunities mapping, along with further evidence on scoring	Likely

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	assessment of Project options.	process, stakeholders cannot be satisfied that the least impactful option has been taken forward.	narrative, to support the conclusions of the assessment work.	

Project Description

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5.	The Applicant has proposed a significant amount of development to support the increase in passenger throughput.	WSCC questions whether the inclusion of new hotels and office blocks is relevant or directly related to this growth.	Justification is therefore needed for the required supporting infrastructure and its necessity to facilitate the required passenger throughput. The Applicant is asked to justify and make clear what is part of the 'Authorised Development' in the NSIP and what is considered to be the 'Associated Development' and how this does/does not relate to the future baseline.	Uncertain
6.	Lack of construction phasing information.	Further information is needed to satisfy stakeholders correct levels of mitigation have been put in place through the lengthy construction phase, including traffic management.	Production of more detailed construction phasing information	Likely
7.	Community engagement through the construction phase.	Lack of clarity or outline control document with regards community engagement through the construction phase	The production of an outline community engagement plan and its securement through the Code of Construction Practice (CoCP) (APP-082)	Likely

Historic Environment

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
8.	Management of Historic Environment effects.	The CoCP does not reflect the archaeological work proposed. The objective should be to protect or mitigate the setting of built heritage and the recording of affected archaeological deposits. It also does not detail a Heritage Clerk of Works.	Further information is needed which should be related to the methodology proposed within the submitted WSI. A Heritage Clerk of Works should be appointed	Likely
9.	Lack of historic background to the Airport.	No clear understanding or description of the history of the airport development.	Provide an appropriate history of the development of the Airport and relate this to the potential archaeological impact of the Project	Likely
10.	Lack of archaeological evaluation within the Airport perimeter.	The scheme of archaeological investigation undertaken to date, has been focused on areas within the Project that were easily accessible and has not covered all potential areas of impact.	Appropriate commitment within the WSI to undertake investigations in all areas under threat from the Project.	Likely
11.	Proposed mitigation on areas already evaluated.	The proposed mitigation identified within the WSI on areas that have been evaluated is not sufficient and will need to be expanded.	Improved and expanded mitigation strategy within the WSI.	Likely
12.	Proposed building recording of control tower.	Proposed level 2 recording not appropriate for this type of rare structure.	Needs to be increased to a level 3 record and should be identified as a heritage asset.	Likely
13.	No proposals for heritage community outreach.	No potential heritage community engagement identified in the CoCP.	Identify an outreach programme to inform the community of the archaeological findings.	Uncertain
14.	Clarity in sign off for archaeological mitigation.	Failure to define a procedure for the monitoring and signing-off of the archaeological works.	Clear sign off procedure needed, detailed within the WSI	Likely

Landscape, Townscape and Visual Assessment

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
15.	Lack of Zone of Theoretical Visibility (ZTV) for project elements.	Although stated in the application that a separate ZTV for the CARE flue is provided, no evidence of this is included within the documentation. No ZTVs are produced for the construction compounds.	To produce ZTVs for the CARE facility and construction compounds. Further assessment is required to understand how construction phase visual effects will be mitigated.	Likely
16.	Lack of certainty high quality design will be secured.	The design principles, upon which the detailed design would be secured against, have had no input from stakeholders and are currently not detailed enough for each element of the Project	Further development of the design principles and content of the DAS to secure better outcomes in detailed design for Project infrastructure	Uncertain

Ecology and Nature Conservation

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
17.	The extent of loss of mature broadleaved woodland (net loss over 5 ha).	Although some woodland will be re-planted along the new highway alignment it will be years before bat foraging and roosting habitat, and habitat connectivity are fully reinstated. The assessment concludes there is a significant effect on bat behaviour until new woodland planting had established. Current mitigation and compensation measures are insufficient to maintain bat foraging habitat and commuting routes over the short and medium term.	The Applicant should seek additional compensation measures, if necessary off-site, to ensure no adverse impacts on broadleaved woodland habitat and bats.	Uncertain

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18.	Lack of approaching assessing and addressing ecological impacts at a landscape scale.	Ecological impacts will extend beyond the DCO limits with potential impacts on bat populations, riparian habitats downstream of the Airport and the spread of non-native aquatic species. Disturbance and habitat severance within the Airport will impact the functioning of wildlife corridors, notably bat commuting routes, both within the Site and the wider landscape. Maintenance of habitat connectivity across the airport and wider landscape remains a concern.	The Applicant should adopt a landscape scale approach to assessing and addressing ecological impacts, including the need to provide off site mitigation, compensation, and Biodiversity Net Gain. Enhancements are required to green corridors and improved habitat connectivity to extend beyond the confines of the airport, along key corridors such as the River Mole and Gatwick Stream.	Uncertain
19.	Lack of opportunities for biodiversity enhancement.	Many potential opportunities for biodiversity enhancement, both within and outside the DCO limits, were never explored.	Explore further opportunities for biodiversity enhancement e.g., conversion of 'amenity grassland' on road verges and roundabouts to wildflower grassland, and the improved management of Gatwick Stream and Crawter's Brook.	Uncertain
20.	Need for security of long-term positive management of the two biodiversity areas - the North West Zone and Land East of the Railway Line.	These areas are of considerable biodiversity value and key components of the ecological network. Any loss or degradation could have significant impacts on the effectiveness and viability of the proposed mitigation areas.	A legal commitment to provide certainty that these two biodiversity areas will continue to be managed for wildlife	Uncertain

Arboriculture

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
21.	Evidence for null findings of ancient or veteran trees, as well as important hedgerows.	No demonstration that these receptors have been appropriately surveyed, nor followed appropriate methodology.	Demonstrate the methodology used to survey and identify potential ancient and veteran trees as defined by the NPPF (2021) which could be impacted within or surrounding the project boundary, as well as providing the survey data findings (including for important hedgerows).	Uncertain
22.	Lack of demonstration that arboricultural features have been considered, designed for and appropriately avoided, mitigated or compensated for.	Potential impacts multiple to arboricultural features of unknown value.	Provide a full arboricultural assessment for all arboricultural features in line with BS5837:2012 (inclusive of an impact assessment, outline method statement and tree protection plans).	Uncertain
23.	The OLEMP and CoCP do not demonstrate appropriate outline methodology for tree protection and ancient woodland buffer zones.	Potential impacts multiple to arboricultural features due to a lack of tree protection.	Produce an arboricultural assessment and tree protection measures referred to within the OLEMP and/or CoCP.	Uncertain
24.	The OLEMP does not provide clarity that detailed arboricultural method statements and planting plans and aftercare management will be provided within proposed LEMPs.	Potential impacts multiple to arboricultural features due to a lack of tree protection, and unclear proposed compensatory soft landscaping.	The OLEMP should identify that the following will be produced in detail and refer to best practice or guidance in which they should adhere to: arboricultural method statements; tree protection plans, tree/vegetation removal plans and tree work schedules; detailed planting and specification plans; and, planting aftercare and management plans.	Uncertain
25.	Inadequate consideration and demonstration for the	Potential impact to ancient woodlands receptors where	Where barriers are specified to form buffer zone protection, spacing/distance of buffer	Uncertain

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	protection of ancient woodland. Conflicting with the finding of 'no impact' occurring to these receptors.	barriers are specified to form buffer zone protection. This is of principle concern for Horleyland Wood due to the adjacent proposed works area for the new foul water pipeline.	should follow recommendation withing statutory guidance provided by Natural England and Forestry Commission 2022. The specification and methodology for the proposed barriers and need to be demonstrated. Further, the appropriate positioning of barriers needs to be identified on tree protection plans.	
26.	Compensation strategies for tree, woodland and hedgerow loss not demonstrating adequate compensation, and that proposed compensation being recognised as a significant long-term impact.	The net loss of woodland, the fragmentation of habitat connectivity, and the long-term effect from the time required to establish new planting.	An increased compensation strategy for compensatory woodland planting.	Uncertain

Minerals Safeguarding

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27.	The CoCP and Construction Resources and Waste Management Plan (CRWMP) will be used to secure any prior extraction of	There is no reference to relevant mineral safeguarding polices within the CoCP or CRWMP. Reference is made to the Weald Clay formation and use of clays (CoCP para 5.5.12, and CRWMP Para 4.5.14). Without	Reference to the relevant local (West Sussex Joint Minerals Local Plan, Policy M9) and national policies on safeguarding minerals should be included, and clarity provided on how	Likely

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	safeguarded mineral resources.	clarity on why Weald Clay is being identified, it is not clear how the requirement will ensure that needless sterilisation is avoided.	needless sterilisation of safeguarded minerals will be avoided through the requirements.	

Operational Waste

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
28.	Baseline information on current waste operations.	Information is lacking on the existing waste management operations at Gatwick Airport. Without this, it is not possible to determine whether the proposals are required (citing, scale, technology etc).	Provide clear baseline information about the current operations.	Likely
29.	Waste forecasting/projections.	There are no waste forecasts provided on operational waste arisings, setting out the amounts and types of waste that would be expected at various points through the Project.	Forecasts are required, with and without the NRP, in order to understand the needs of the airport for managing operation waste.	Likely
30.	Limited information is provided on the proposed CARE facility.	There is little information provided on proposed technologies and management methods, including whether they are consistent with the Waste Hierarchy. The assessment for the CARE facility have focused on the location only, and not the technologies that could be employed at the airport to manage waste.	Justification is required for the waste management methods and technologies that are proposed, including the consideration given to alternatives waste management methods.	Uncertain

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31.	Limited information provided on the design of the CARE facility	The DAS and design principles for the CARE facility are limited.	The DAS and design principles should be strengthened to include how the building will be designed to limit the impacts associated with operating waste facilities.	Uncertain
32.	No links to local waste planning policy in relation to the CARE facility	The DAS sets out local government design guidance, that excludes key information on design of waste facilities, as presented in The West Sussex Waste Local Plan and associated SPD on High Quality Waste Developments.	The Waste Local Plan and High Quality Waste Developments SPD provide guidance on the designing of waste facilities, and mitigation measures, that should be considered as part of the DCO, with key principles applied to the DAS to ensure the CARE is designed to minimise harm upon sensitive receptors.	Uncertain

Construction waste

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33.	Construction waste management at the temporary construction compounds will give rise to noise and dust pollution.	The Project Description states that the compounds will be determined post consent, and in accordance with the COCP. It is important that beyond gaining permits to manage emissions from crushing activities, proper consideration to mitigation measures.	Controls and measures (through strengthening of the DAS and CoCP) are required on the heights of stockpiles, hours of crushing, and other suitable mitigation measures to minimise the impact upon sensitive receptors from the temporary compounds.	Uncertain

Water Environment

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
34.	Confidence in surface water drainage hydraulic model	It is not clear whether the surface water drainage hydraulic model has used the most up-to-date FEH2022 rainfall data.	The Applicant should confirm if FEH2022 rainfall data has been used within the drainage model. If not, the model should be updated.	Likely
35.	Consideration of drainage hierarchy	The drainage hierarchy must be followed with infiltration to ground considered before other drainage options. If infiltration is considered to be feasible as part of the detailed design, the drainage strategy will require many changes.	High level infiltration testing should be carried out to determine if infiltration would be feasible.	Likely
36.	New pumping station proposed in the southwest zone, south of the existing runway in the former Pond A catchment.	The pumping station is proposed, however pumping stations are not preferred as they require failure and emergency procedures.	The Applicant should consider if changes to the drainage design could be utilised in place of a new pumping station, as pumping should only be used if necessary.	Likely
37.	Drainage layout.	The drainage strategy proposes to use underground attenuation features. Other source control SuDS features should be used to discharge water to the underground features.	The Applicant should clearly identify the use of carrier drains, filter drains, ditches and swales as part of the drainage strategy. The Applicant should provide a plan of all the drainage features proposed.	Likely

Transport and Surface Access

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38.	ES Chapter 12 assessment undertaken in accordance with historical but not replaced IEMA guidance	The assessment has been undertaken in accordance with guidance contained within Guidelines for the Environmental Assessment of Road Traffic (IEMA 1993). New IEMA guidance entitled, ' <i>Environmental Assessment of Traffic and Movement</i> ', which updates and replaces the referenced 1993 guidance, was issued in July 2023.	Ensure ES Chapter 12 is reviewed and updated where required to accord with the relevant latest IEMA guidance.	Likely
39.	Traffic Assessment Methodology	<p>The Applicant is reliant on 2016 data to inform the baseline assessment and since the emerging from the pandemic more representative transport data continues to become available. The Applicant is in receipt of initial results of the 2023 Staff Travel Survey which show changes in staff travel habits since 2016 and therefore there is a question as to how robust the use of 2016 data is.</p> <p>The potential implications of the over-estimation of demand are that the benefits of the Project are being claimed to be higher than could occur and that the scale of infrastructure required may also be too high, to cater for an artificial level of demand.</p>	The use of the most relevant and representative travel data should be used to ensure an appropriate baseline assessment is developed and all. Whilst plausible and justified forecasts of airport capacity and resultant demand should be provided and as necessary the transport modelling work and the resultant highway mitigation amended.	Uncertain
40.	Concerns with Surface Access improvements – highways (primary mitigation).	<p>WSCC has the following concerns in relation to the highway works to the WSCC highway network:</p> <ul style="list-style-type: none"> Speed limit reductions are proposed on London Road (A23) to 40mph are proposed 	The Applicant should provide relevant information including justification and review of the proposed speed limit changes against the relevant guidance and policy, submit a Stage 1 Road Safety	Uncertain

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		<p>and no justification has been provided or review against WSCC’s Speed Limit Policy.</p> <ul style="list-style-type: none"> • Stage 1 Road Safety Audit, whilst an audit has been undertaken it has not been submitted as part of the DCO and not all the auditor’s recommendations have been satisfactorily addressed in the form of a designer’s response. Concerns remain that it has not been demonstrated that safe and suitable access can be provided. • Suitable justification for some of the proposed sustainable transport infrastructure, to ensure it accords with the current relevant guidance such as LTN 1/20, has not been provided. <p>No design review appraising the design of the proposed highway works has been submitted to check that it accords with the relevant design standards.</p>	<p>Audit and Designers Response, undertake a Design Review of the proposed works and demonstrate how it accords with the relevant highway design standard.</p>	
41.	<p>Concerns with Surface Access Commitments (SACs) and target mode shares.</p>	<p>Concerns are held about the SACs that underpin the creation of a new Surface Access Strategy and the approach to meeting and monitoring these targets. Some of the concerns include:</p> <ul style="list-style-type: none"> • Commitment 1, to ensure 55% of passenger journeys is made by public transport is not considered ambitious or of sufficient challenge. Prior to the Pandemic the airport achieved 47.8% public transport modal share in the 12 months up to March 2020. 	<p>SACs and associated mitigation to be reviewed and amended.</p>	<p>Uncertain</p>

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		<ul style="list-style-type: none"> • Target mode shares set out as Commitments are only set out as percentages. The percentages masks trends in absolute numbers and permit significant increases in car trips to and from the airport. • Insufficient evidence and justification are provided to demonstrate how the mitigation proposed can provide sufficient sustainable and active travel infrastructure to successfully meet the some of the target modal splits. • Commitments are made in relation to bus and coach service provision. Determination of mode of travel takes into a variety of factors rather than just provision of service. The Applicant has not assessed or considered the attractiveness of modes or how this could be increased. 		

Public Rights of Way

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42.	Concerns about elements of the PRow Strategy	WSCC has concerns about: <ul style="list-style-type: none"> • timescales for temporary closure of PRowS. • reference to permanent diversions of PRowS. 	Further details and amendments to PRow Strategy are needed.	Uncertain

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		<ul style="list-style-type: none"> lack of clarity about indefinite closures of PRowWs. concerns about reinstatement of PRowWs. 		
43.	FP346/2sy – reference to diversion onto new shared route.	This is not an improvement for pedestrians as they go from having a route for walkers only to have to then contend with cyclists.	This will likely lead to conflict between users. Also clarification needs to be provided as to whether this will retain its PRowW status or not.	Uncertain
44.	Lack of public access improvements	No proposed public access improvements on the PRowW network as part of the Project.	The Project offers an opportunity to improve a number of the footpaths locally, which need to be discussed with WSCC.	Uncertain

Air Quality

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45.	Air Quality and Emissions Mitigation Guidance for Sussex.	The Applicant has not clearly demonstrated regard to the Sussex Air Quality and Emissions Mitigation Guidance or the Defra air quality damage cost guidance in assessing air quality impacts and mitigation measures.	The Transport Analysis Guidance (TAG) assessment identifying the air quality damage costs of the Project should be clearly presented in the application documents.	Uncertain
46.	Lack of specific Air Quality Action Plan (AQAP).	There is no AQAP which clearly sets out the range of measures that have been considered to specifically address local air quality. This approach differs from discussions during 2 years of consultation where a draft AQAP was provided in the air quality Topic Working Group (21.10.22)	A combined operational air quality management plan should be provided which specifically focuses on local air quality, and which draws together measures aimed at local mitigation to reduce the health impacts from emissions, in addition to those outlined in the SAS and the CAP.	Uncertain

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		<p>and an AQAP was listed in item 19 of Schedule 2 (Requirements) of the draft DCO (28.04.23). The CAP and ASAS do not specifically or adequately address air quality mitigation measures based on health, and both lack the means to measure short-term exposure or provide monitoring to check compliance.</p>		
47.	Lack of Dust Management Plan (DMP).	<p>There is no DMP which clearly sets out the implementation of the specific mitigation measures that will be used to ensure that any potential adverse impacts from dust arising during construction and demolition activities are avoided during all construction stages.</p>	<p>The Applicant promises a DMP once detailed design plans are available. A DMP is therefore requested for the examination, and to provide additional confidence in the control measures and monitoring for the construction phase.</p>	Uncertain
48.	Outline Construction Traffic Management Plan (CTMP).	<p>The OCTMP identifies risks associated with construction traffic utilising routes through the J10 M23 and Hazelwick Air Quality Management Areas in Crawley. Reference is made to a monitoring system that 'it is envisaged' will be developed in the CTMP. However, no details on this monitoring system are provided.</p>	<p>Further details are requested on the proposed monitoring system and how this would protect air quality. More clarification is required regarding the additional traffic that would be expected in the future situation.</p>	Uncertain
49.	Operational Air Quality Monitoring.	<p>There are concerns regarding the measurement accuracy of the AQ Mesh low-cost sensors which the Applicant is proposing to use to monitor operational phase impacts. AQ Mesh monitors are not approved by Defra for the monitoring of air quality and as such they are not sufficient to demonstrate compliance with air quality standards.</p>	<p>Further information is requested to understand how air quality will be monitored, evaluated, and reported to local authorities.</p>	Uncertain

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50.	Funding for Local Ambient Air Quality Monitoring.	The ES does not specifically identify which of the existing LA continuous air quality monitoring stations on and around the Airport will be funded.	Further clarification on the funding for the LA monitoring stations on and around the Airport.	Uncertain
51.	Uncertainty and Controlled Growth.	There is insufficient information on how sensitive future air quality predictions are to modal shift objectives being achieved.	Further information is needed to understand how reliant on modal shift assumptions future air quality predictions are. Further information on the performance indicators to deliver against targets, and how the monitoring strategy should be linked to controls if modal shift targets are not met.	Uncertain
52.	Assessment Scenarios (including 2047 Full Capacity)	<p>The concern is that the scenarios assessed in the ES do not provide a realistic worst-case assessment. This is particularly the case for those scenarios where both construction and operational activities are underway at the same time, but the assessment has treated them separately.</p> <p>The same concerns apply to the emissions ceiling calculations as to how realistic these are, particularly when there are construction and operational activities ongoing, and the emissions ceiling calculations treat these separately.</p> <p>In addition, there is no operational assessment for the final full-capacity assessment year of 2047.</p>	<p>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 ANPS.</p> <p>A modelled assessment for the final full-capacity assessment year of 2047 is required.</p>	Uncertain

Noise

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53.	Local planning policies.	Local planning policies are set out in Table 14.2.2 but no information is provided on how these policies are addressed in the ES.	Details should be provided on how local planning policies are addressed in the ES.	Likely
54.	Assessment periods (Construction noise).	Table are provided for daytime and night-time construction noise predictions. However, no identification of evening construction works has been provided.	Details of any evening works should be provided	Likely
55.	Assessment of vibration effects from road construction.	The assessment only considers effects from sheet piling and does not consider vibration effects from vibratory compactors and rollers used in highway construction	Vibration effects from vibratory compactors and rollers used in highway works should be assessed	Likely
56.	Air noise - No assessment criteria is provided for the assessment of effects on non-residential receptors.	Assessment criteria based around the LOAEL and SOAEL focuses on noise effects at residential receptors. Non-residential receptors should be considered on a case-by-case basis	Provide an assessment of likely significant air noise effects on non-residential receptors.	Likely
57.	Air noise - Only 2032 assessment year is assessed as a worst-case.	The assessment only covers 2032 as it is identified as the worst-case; however, identification of significant effects for all assessment years should be provided	Identify significant effects during all assessment years to help understand how communities would be affected by noise throughout the project lifespan.	Likely
58.	Air noise - No attempt has been made to expand on the assessment of likely significant effects through the	Context is provided to the assessment of ground noise through consideration of the secondary LA _{max} , overflight, L _{den} and L _{night} noise metric; however,	Provide some commentary about how secondary metrics relate to likely significant effects and whether the	Uncertain

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	use of secondary noise metrics.	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.	assessment of secondary metrics warrant identifying a likely significant effect.	
59.	Air noise - No details of the noise modelling or validation process are provided. No details of measured Single Event Level or LAS _{max} noise data from the Noise-Track-Keeping are provided.	Provision is needed of the assumptions and limitation that have been applied in the validation of the noise model and production of noise contours.	Details of the validation process, noise modelling process along with any assumptions and limitations applied should be provided. This should include Single Event Level and LAS _{max} noise data for individual aircraft variants at each monitoring validation location.	Uncertain
60.	The assessment of ground noise should also consider the slower transition case as per the aircraft noise assessment. It is not clear why 2032 is considered worst-case for ground noise. Ground noise contours are not provided.	Higher levels of ground noise will be identified in the Slower Transition Case. Consequently, there is potential for receptors to experience significant noise effects that are identified in the Central Case assessment. Whilst 2032 provides the highest absolute noise levels, there appears to be larger increases in noise at some receptors during other assessment years. No noise contours are provided for ground noise.	An assessment of Slower Transition Case ground noise effects should be provided to identify the potential for exceedances of the SOAEL at sensitive receptors. Likely significant effects for all assessment years should be identified in the ground noise assessment. Provide LA _{eq} and LA _{max} noise contour plots to supplement the ground noise assessment. Contour plots should be provided for Do-minimum and Do-something scenarios for each assessment year.	Likely
61.	Road traffic noise - Noise monitoring duration.	One 20-minute survey and one 10-minute survey is not sufficient to provide data suitable for validation of the road traffic noise model and indeed these data are not used as such. There	Longer term monitoring, close to the A23 or M23 where road traffic noise can be said to dominate over aircraft noise, would be preferable. Alternatively, the applicant could explain what steps they	Uncertain

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
		is therefore no validation of the road traffic noise model in terms of measured levels.	have taken to independently validate the road traffic noise calculations.	
62.	The Noise Envelope - sharing the benefits.	<p>Paragraph 14.2.44 – sharing the benefits has been removed from the ES. This is a fundamental part of the Noise Envelope so it should be demonstrated how benefits of new aircraft technology are shared between the airport and local communities. 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 Project.</p> <p>The Applicant 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>	Details on how noise benefits are shared should be provided in accordance with policy requirements set out in the Aviation Policy Framework. Noise contour area limits should be based on the Central Case. There should be no allowance for the Noise Envelope limits to increase.	Uncertain
63.	Noise Envelope Regulation.	It is not clear in the DCO whether there would be any role for local authorities and key stakeholders in the Noise Envelope, if the Civil Aviation Authority (CAA) is the independent reviewer.	A mechanism should be included to allow the local authorities to scrutinise noise envelope reporting and take action in the case of any breaches.	Uncertain

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
64.	Prevention of Noise Envelope breaches.	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. No details are provided on what kind of actions are proposed for an action plan to achieve compliance. 24 months of breach would be required before capacity declaration restrictions for the following were adopted so it would be three years after the initial breach before capacity restrictions were in place. Capacity restrictions 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	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. Adoption of thresholds that prompt action before a limit breach occurs would provide confidence in the noise envelope. Slot restriction measures should be adopted in the event of a breach being identified for the previous year of operation.	Uncertain
65.	Lack of detail regarding the Noise insulation scheme.	It is not clear how the noise insulation scheme would prioritise properties for provision of insulation. Residents of properties within the inner zone will be notified within six months of commencement of works; however, it is not clear what noise contours eligibility would be based upon. Lack of detail on the noise insulation measures in the Outer Zone. Schools are included in the Noise insulation Scheme, but it is unclear if other community buildings	Provide details on how the scheme would roll out. Clarify what noise contours would be used to define eligibility. Clarify on the flexibility of the noise insulation scheme. Provide details on what community buildings would be eligible for noise insulation and what level of insulation would be provided. Provide details on how monitoring of ground noise would be undertaken and	Likely

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
		would be eligible for noise insulation. It is unclear how noise monitoring would be undertaken to determine eligibility through cumulative ground and air noise.	how a property would be identified as appropriate for monitoring of ground noise.	

Greenhouse Gases

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
66.	The impact of EU's Emissions Trading System (ETS) / international Civil Aviation Organization's Carbon Offsetting and Reduction Scheme for International Aviation (CORISA).	It is not clear if the aviation forecasts used to develop the 'need case' has considered the impact of ETS/CORISA.	Evidence is required that this has been taken into account in the forecasts.	Likely
67.	UK Climate Change Committee (CCC) Progress in reducing emissions report, published in June 2023.	The latest CCC Progress Report (2023) identified their main concerns and criticisms of the current UK Aviation climate change policy and risks to achieving net zero.	The Applicant needs to assess the concerns and issues raised by the CCC regarding the Jet Zero Strategy and consider how this could compromise the UK's net zero trajectory, in alignment with the IEMA GHG Assessment Guidance (2022).	Likely
68.	GHG emissions from airport buildings and ground operations in the ES does not appear to include maintenance, repair,	The scope of the GHG emissions from airport buildings and ground operations does not appear to cover maintenance, repair, replacement or refurbishment	The Applicant needs to clarify if maintenance, repair, replacement or refurbishment emissions were calculated and, if not, justify why.	Likely

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
	replacement or refurbishment emissions.	emissions. This would under account operational GHG emissions.	It is not clear what emission sources are defined under "other associated businesses".	

Appendix 16.9.1 Assessment of Construction Greenhouse Gas Emissions

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
69.	It is not clear if carbon calculations were carried out during the construction lifecycle stage in the ES for well-to-tank (WTT) emissions.	Not accounting for WTT is non-compliant with the GHG Protocol Corporate Accounting standard (referenced in the GHG ES Methodology).	The Applicant needs to update the GHG Construction assessment to account for WTT emissions.	Likely
70.	Royal Institute of Chartered Surveyors (RICS) transport distances have not been applied comprehensively.	Concern with under accounting the construction transport emissions.	The Applicant needs to conduct a comprehensive transport assessment in alignment with the RICS transport distances	Likely

Appendix 16.9.2 Assessment of Greenhouse Gas Emissions for Airport Buildings and Ground Operations (ABAGO)

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
71.	Carbon calculations do not include well-to-tank (WTT) emissions, which is not aligned to the GHG Protocol Standard mentioned in the GHG ES Methodology.	Not accounting for WTT is non-compliant with the GHG Protocol Corporate Accounting standard (referenced in the GHG ES Methodology).	The Applicant needs to update the GHG ABAGO assessment to account for WTT emissions.	Likely
72.	It is not clear if carbon calculations are carried out for maintenance, repair, replacement or refurbishment emissions.	These emissions are not indicated to be scoped into the assessment. These emission sources could potentially account for a significant portion of the ABAGO emissions.	The Applicant needs to provide a justification for why these were not calculated within the GHG ABAGO Assessment.	Likely

Appendix 16.9.4 Assessment of Aviation Greenhouse Gas Emissions

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
73.	It is not clear how or if Applicant converted CO ₂ emissions from aircraft to CO ₂ e.	It is not clear if the Applicant undertook a conversion from CO ₂ to CO ₂ e as this would impact the aviation emissions by around a 0.91% increase BEIS (2023) ¹ . Therefore, if not accounted for, this would increase aviation GHG emissions by approximately 48,441 tCO ₂ e in 2028 in the most carbon-intensive year where 5.327 MtCO ₂ e was estimated to be released (Table 5.2.1).	Confirmation is needed, if not, the Applicant is required to update the GHG Aviation Assessment to account for this.	Likely

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

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
74.	WTT emission sources are not confirmed to be accounted for which is against the GHG Protocol Standard mentioned in the GHG ES Methodology.	Not accounting for WTT is non-compliant with the GHG Protocol Corporate Accounting standard. Furthermore, this also contradicts the GHG ES Methodology referenced. This would result in an underestimation of the GHG emissions associated with aviation since a 20.77% (BEIS, 2023 ²) uplift would be required on all aviation emissions. Therefore, this would result in 1,106,530tCO ₂ e not being accounted for in 2028 (the most carbon-intensive year), where 5.327 MtCO ₂ e was estimated to be released (Table 5.2.1).	Confirmation is needed, if not, the Applicant is required to update the GHG assessment to account for WTT emissions.	Likely

Climate Change

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
75.	Given the expected lifetime of the Project assets, the time periods considered for climate change projections are not adequately far enough into the future to represent the worst-case scenario.	The most distant time period chosen for assessment was 2040-2069 (2060s) (as detailed in paragraph 15.5.2), however, some asset components are assumed to be operational in perpetuity, and therefore these climate change projections are not adequately far enough into the future to represent the worst-case scenario.	The Applicant should collect additional data from the furthest time period available e.g. 2100 to ensure the most conservative projections are taken into account.	Likely

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

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
76.	Identification of construction risks is limited	The construction risks identified are limited. Construction flooding risks should be addressed in more detail.	A more detailed identification and assessment of construction related climate risks and distinguish areas that are particularly vulnerable and may require specific adaptation measures to be in place.	Uncertain
77.	Inconsistency and lack of detail in some climate impact statements	The climate impact statements 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'. This end result is what should determine the consequence rating and could have led to an underestimation of risk.	All climate impacts statements to be updated to have a clear end impact and so that all risks are articulated in a consistent way.	Uncertain
78.	Lack of identification of additional mitigation / adaptation measures.	Whilst the Applicant may not have assessed any of the risks as 'significant', the identification of further mitigation or adaptation measures is an omission.	The Applicant should identify further adaptation measures that can be implemented in design, construction or operation to further reduce the Project's vulnerability to climate change.	Uncertain
79.	Mitigation measures should be proposed to reduce the impact of Urban Heat Island (UHI) effect.	The UHI Assessment states that 'mitigation of UHI is essential to ensure future resilience as the climate changes' and that the Project could 'exacerbate the increase in UHI effect' but does not propose the implementation of any specific mitigation measures.	Identification of further adaptation measures that can be implemented in design, construction or operation to further reduce the UHI effect.	Uncertain

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
80.	Lack of consideration of storm events, wildfires and fog.	Storm events are not considered sufficiently in this assessment. Wildfire is not mentioned as a possible climate hazard to impact the Airport's operation. Risks associated with fog were not included in the risk assessment.	The Applicant should give further consideration to be given to these events and risk description and rating to be revised.	Uncertain
81.	Not sufficient detail on the climate change impact on critical airport equipment and infrastructure.	Consideration to be given to how climate change could impact critical equipment and infrastructure e.g. power, telecommunications as well as the embedded and additional mitigations to reduce this risk.	The Applicant should include risk and mitigation details regarding the climate change impact on critical airport equipment and infrastructure.	Likely
82.	Disagree with the assessment that 'cumulative effects are not relevant'.	It is disagreed that 'An assessment of cumulative effects is not relevant'. For example, nearby projects could exacerbate the urban heat island impact of the project or increase the impact of flooding to the site or access to the site.	The assessment should be reconsidered and reworded to reflect that it is not irrelevant.	Likely

Major Accidents and Disasters – West Sussex Fire and Rescue

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
83.	Increased risk of potential terrorist activity.	With the increase in the terminal forecourt areas and increased passenger number throughput, there is concern this could increase the risk of	Details of the current systems in place to address impacts for terrorist related threats/activities and describe any	Likely

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
		potential terrorist activities taking place in these locations.	changes required to account for the Project are required.	
84.	Potential impact to emergency response times.	Relocation of RVPs would impact emergency services and possibly the attending appliances	The Applicant to provide details of any intended changes to the current and future arrangements/procedures for nominating RVPs when requesting a response from FRS and other emergency services to an airport emergency incident.	Likely
85.	Potential requirements or increased humanitarian support (and subsequent demands upon services).	In the event of a major incident or disaster, there will be an increased demand for humanitarian support, putting higher demands and pressures on acute hospitals/local authorities and Rest Centre requirements. Clarity on whether there is enough capacity at local A&E departments and within the broader emerging ICS (Integrated Care System) to cope with the demand of an additional passengers passing through the airport every year is needed.	The Applicant to provide mapping of passenger throughput in the Airport following the Project to identify numbers of passengers in any given area at one time	Likely

Economic Development

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
86.	Incomplete consideration of local planning policies.	The review of policies is considered incomplete and provide limited analysis of how the Project aligns with the	Applicant should include a full list of adopted and emerging policies and how	Likely

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
		policies of host and neighbouring authorities.	the project aligns with those policies and strategies.	
87.	Comments raised by local authorities not sufficiently captured.	The chapter does not capture the significant extent or detail of comments raised by the local authorities particularly on the scope of the assessment, assessment approach and study area.	The Applicant should clearly set out in detail all of the issues raised by the local authorities and how they were being dealt with in the ES.	Likely
88.	Confirmation on which projects informed the methodological approach.	The methodology has been based on accepted industry practice, a review of socio-economic assessments for other relevant projects including other airport or significant infrastructure schemes, and feedback received by PINS and local authorities during the consultation process, this is not evidenced.	The Applicant should clarify which relevant projects were drawn upon, setting out why they are relevant, to inform the development of the methodology for this assessment.	Likely
89.	Clarification on use of pre-Covid data.	2019 data was primarily used given concerns with the Covid pandemic potentially affecting baseline data. However, some of the data sources used are post Covid and it is not clear why the Applicant has applied this approach.	The Applicant should source up-to-date data to inform the socio-economic baseline. If there are concerns with any of the data sources the Applicant can retain the pre-Covid baseline for context.	Likely
90.	Magnitude of impacts definition.	The use of numbers and percentages to quantify impact can be challenging especially given all study areas are different and can be influenced by a number of different factors. It is not clear how these the ranges were defined to inform the assessment.	The Applicant should review these numbers to determine their appropriateness given the study areas for the Project. The Applicant should also provide the rationale for the job ranges provided.	Unlikely

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
91.	Use of up-to-date information sources.	Data from the 2021 Census has been used, where available, at the relevant spatial scale. The baseline assessment presented comprised the most up-to-date position at the time of writing, however newer data is now available.	The Applicant should source up-to-date data to inform the socio-economic baseline. If there are concerns with any of the data sources the Applicant can retain the pre-Covid baseline for context.	Likely
92.	Consideration of worst-case scenario for employment benefit.	The construction assessment presented focuses on the Project’s potential maximum effects. Whilst it is important in terms of potential implications on local areas, it is also important to present a worst-case scenario in terms of employment benefit.	The Applicant should clarify whether they have estimated a worst-case scenario for numbers of construction workers.	Unlikely
93.	Workplace earnings trends and impact on affordability.	Workplace earnings are shown to be growing at a higher rate than resident earnings and it is implied this may lead to less out-commuting. This trend could impact the affordability ratio, which would have implications elsewhere in the socio-economic evidence, for example, assumptions on future housing growth and demand for affordable housing.	The assumption needs to be evidenced. This should include a trend analysis as well as consideration of likely variances at a local authority level.	Unlikely
94.	Assessment of sensitivity of receptors.	WSCC question the sensitivity grading for employment and supply chain impacts, labour market impacts, disruption of existing resident activities, housing supply in the HMAs	The Applicant should revisit the sensitivity gradings for this receptor.	Unlikely

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
		relevant to LSA and FEMA, community facilities and services.		
95.	Assessment of construction effects.	The magnitude of effects on construction employment for all study areas, and magnitude of labour market effects based on magnitude criteria being used needs clarification. There are also potential data limitations in relation to construction employment calculations. The Applicant has not undertaken any assessment at local authority level which is considered essential given existing constraints on labour supply for Crawley, Mid Sussex, and Horsham.	The Applicant should revisit this assessment. The Applicant should also undertake an assessment of impact at local authority level for those authorities based in the FEMA.	Unlikely
96.	Assessment of construction effects during the first year of operation.	Assessment of construction effects during the first year of operation need to be revisited. The number of construction jobs would appear unlikely to have a significant beneficial effect in the FEMA and LMA. It should also be noted that the construction jobs calculation appears to be based on a 'maximum' scenario.	The Applicant should revisit this assessment based on the comments. The Applicant should also undertake an assessment of impact at local authority level for those authorities based in the FEMA.	Unlikely
97.	Operational effects.	Assessment of operational labour market effects, effects on housing, population and community facilities and services need to be revisited. We have outlined our concerns above in relation to the magnitude criteria being used for this assessment and the sensitivity	The Applicant should revisit this assessment based on the comments made. The Applicant should also undertake an assessment of impact at local authority level for those authorities based in the FEMA.	Unlikely

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
		grading of this receptor for the LMA and FEMA.		
98.	Cumulative effects.	The conclusion that in the absence of information, it is not possible to provide a cumulative assessment for all construction effects, is simplistic and given the significant concerns raised with the main assessment, a comprehensive cumulative assessment should be undertaken to establish if there are potential issues within the study areas.	The Applicant should revisit and undertake a comprehensive cumulative assessment. The Applicant should undertake an assessment at local authority level for those authorities based in the FEMA.	Unlikely

Appendix 17.9.3: Assessment of Population and Housing Effects

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
99.	The approach to analysis of housing delivery does not analyse the full range of inputs required when determining local housing needs or requirements at a housing market area or local level	A more granular assessment of housing delivery in the area is needed, in particular of future supply, as well as the unmet affordable housing need to inform the assessment.	The Applicant should revisit the assessment and undertake a more granular assessment of housing delivery (including affordable housing) to take account of existing constraints. Further justification should be provided and reviewed against past performance to substantiate the conclusions.	Unlikely
100.	Assessment of impacts on labour supply.	The Applicant states that the Project is only expected to be a determinant in whether there is labour shortfall or surplus in the HMA for one area	Given the limitations in its approach, the Applicant should justify the basis of the assessment which concludes that the Project is only expected to be a	Unlikely

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
		(Croydon and East Surrey) where the Project tips surplus into supply in a single year. The basis for this conclusion does not appear robust, as based on the analysis the project is shown to exacerbate labour shortfall issues across multiple areas. Furthermore, if underlying inputs in the model are changed to reflect the fact that the labour market is already more constrained as has been modelled, it is likely shortfalls would be greater across many of the areas.	determinant in whether there is labour shortfall or surplus in the HMA for one area. The Applicant should revisit the assessment which should be undertaken at a local authority level.	

Appendix 17.9.1: Gatwick Construction Workforce Distribution Technical Note

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
101.	Distance travelled to work data	The application of a regional estimate to capture numbers of home-based workers can be problematic given the considerable differences that exist within local geographies.	Applicant should review their approach to this assessment and apply relevant assumptions to the modelling to take account of local variations.	Unlikely
102.	Labour supply constraints	The Gravity Model used to identify the split of construction workers as 80% home-based and 20% as non-home based does not appear to have taken account of current labour supply constraints within the local authorities located in the FEMA. Given these	The Applicant should revisit their approach and include a worst-case scenario which assumes all construction workers will be non-home based.	Unlikely

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
		constraints, an assumption of 80% home-based construction workers is not realistic or a worst-case approach.		

Appendix 17.8.1 Employment, Skills and Business Strategy

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
103.	Lack of information on implementation plan, performance, measurable targets, funding and financial management, monitoring and reporting. Route map from ESBS to Implementation Plan is not identified.	Options identified in the ESBS are not necessarily directly aligned with local specific issues and need. The document states that performance, financial management, monitoring and reporting systems will be set out in detail in the Implementation Plan. It is unclear why the Applicant is unable to provide further details on these arrangements within the ESBS in order to provide sufficient reassurance that appropriate systems will be in place. The ESBS also provides no explanation on whether it would differentiate between the provision and outputs offered through the DCO vs. provision and outputs offered in a Business as Usual (BAU) scenario.	The Applicant as part of ESBS should provide more detail on potential tailored initiatives that would specifically align with and support local communities. This should include relevant baseline information to demonstrate local need, which should appropriately consider the variations between local authorities. The Applicant should provide some details on performance, financial management, monitoring and reporting which can be developed further as part of an Implementation Plan. The Applicant should also clearly explain the difference of BAU and DCO scenarios in terms of provision & outputs. A route map should be provided which explains the process from ESBS to Implementation Plan, aligned to areas of identified local need and outcomes.	Uncertain

Appendix 17.6.1: Socio-Economic Data Tables

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
104.	Out-of-date data.	Several Baseline Data Tables are out of date and don't use the most recent data sources available at the time. This includes education data on shortfall/surplus which needs to be tested with relevant local education authorities.	The Applicant should be using the most up-to-date sources.	Likely

Appendix 17.9.2 Local Economic Impact Assessment

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
105.	Additionality assumptions.	It is unclear to what extent additionality assumptions have been accounted for in the estimates of GVA and employment effects including direct, indirect, induced and catalytic effects. Paragraph 6.3.5 states that estimating net direct, indirect and induced impacts requires assumptions on displacement that are difficult to determine robustly. Whilst it is acknowledged that estimating levels of displacement can be tricky, assumptions can still be applied through the application of a precautionary approach and use of benchmarks.	The Applicant to clarify its approach to additionality. The Applicant should apply displacement (and other additionality assumptions) to the various calculations to align with Green Book guidance.	Unlikely

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
106.	Basis for distribution assessment of direct impacts.	Paraph 5.3.9 states that the impact estimates on the basis of residency distribution of direct impacts are presented. GAL has provided pass holder address information to inform this. It is not clear when this information was obtained therefore the local authorities cannot be certain the information used is up-to-date.	The Applicant to confirm the date of pass holder information used.	Unlikely

Health and Wellbeing

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
107.	Loss of public open space.	It is stated that as a mitigation measure, new areas will be created to serve all users but will not be immediately contiguous with area lost. This does not provide enough reassurance that mitigation measures will be targeted at communities or groups impacted by the loss.	The Applicant should further demonstrate that this will be easily and equally accessible to current users and communities. Evidence of the consultation and the feedback from this community that use the area.	Likely
108.	Lack of an Equality Impact Assessment.	Though Equality is stated as a baseline there is no Equality Impact Assessment of the effects of the Project. This would aid in the understanding of how the project may impact on different groups and ensure that certain individuals are not put at a	It would be beneficial for the Applicant to undertake an Equality Impact Assessment.	Uncertain

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
		disadvantage or discriminated against as a result of the project activities. This would also ensure that mitigation measures can be tailored to avoid harm to equality.		
109.	Lack of evidence of how local services will be affected.	WSCC is concerned that the impact of the Project on local health services is currently not considered. This is particularly important, as from practical experience in West Sussex, a higher throughput at Gatwick Airport has often led to an increased demand for health services.	Evidencing the predicted increase in footfall due to the Project and how this may impact on acute care.	Uncertain
110.	Lack of evidence of engagement and results from that engagement with the communities/ receptors.	Results should be presented with a detailed description of the statistical methods used, including all variables accounted for and those not included in the analysis models. This would enable a better interpretation of the results, which seem not to be in line with what should be expected. A detailed definition of the populations in the study area and a clear description of evidence supporting each assumption made have not been demonstrated.	WSCC would expect to see data on engagement with the affected communities demonstrating their concerns and implications to them.	Uncertain
111.	Lack of evidence of improvements to social mobility.	There is no indication that consideration has been given to the impact on small and medium sized businesses, or where this is cross referenced from other chapters. It is advised that this is included,	This information to be evidenced in the Employment, Skills and Business Strategy.	Uncertain

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
		<p>considering the influence it could have on health and well-being. It is vital to consider the nature and quality of work and how this benefits residents and future generations when discussing the economic benefits of the Project.</p>		
112.	<p>Lack of evidence to support professional views and assumptions made in the documentation.</p>	<p>Evidence used to substantiate assumptions should incorporate feedback from communities likely to be impacted by the Project.</p> <p>For example, it is claimed that expected increases in walking journey times are not considered to be 'onerous' and would contribute to physical activity levels, it is also possible for longer journey times to discourage people from active travel - having a negative and perhaps rebound impact on active travel. There is insufficient information to allow an understanding of the conclusions made around this or if the diversions have disproportionate impacts on certain groups.</p>	<p>The Applicant should provide further evidence that the Project will not have a disproportionate impact upon vulnerable groups. Evidence such as community feedback on implications to their journey times.</p>	<p>Uncertain</p>

Overarching areas of concern

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
113.	Concerns about dDCO wording.	WSCC have provided initial comments on the dDCO and the Applicant has amended some elements to take account of these comments. Principal areas of disagreement remain in relation to various articles and schedules within the dDCO.	The Applicant to engage in discussions regarding the current dDCO wording.	Uncertain
114.	Proposed S106 agreement Heads of Terms.	Planning Statement (Table 5.2) sets out proposed Heads of Terms for a S106 Agreement. WSCC has concerns regarding the limited scope of the proposals.	The Applicant to engage in discussions regarding a future S106 Agreement.	Uncertain
115.	The proposals to mitigate impacts of airport growth.	WSCC has concerns that the proposals to mitigate the impacts of airport growth are not environmentally focussed.	The proposals to mitigate should be delivered following the environmentally-focused principles of 'Green Controlled Growth', as proposed in the recent Luton Airport DCO.	Uncertain

Gatwick Airport Northern Runway Project (Project Reference: TR020005)
 Relevant Representation
 West Sussex County Council
 Submitted on 27 October 2023