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1 December 2021

Dear Sir/Madam

Northern Runway Consultation September 2021 – Comments from Surrey County Council

Surrey County Council welcomes the opportunity to comment on Gatwick Airport Limited's (GAL) proposals for its Northern Runway Project. This response has been agreed by the council's Cabinet.

We recognise the importance of Gatwick's role in supporting employment for Surrey residents, generating investment in Surrey's economy and retaining and attracting major business. We also understand the significant impacts that the pandemic has had on the aviation industry. However, the council is firmly of the view that the environmental, surface access and other infrastructure issues associated with expansion must be satisfactorily addressed. The necessary infrastructure should be in place before use of the northern runway begins, together with appropriate mitigation measures and commitments to address environmental impacts particularly noise and air pollution impacts on local communities arising from construction and airport operations.

In 2019 Surrey County Council declared a climate change emergency, and over the last two years we have been developing robust and rigorous policies to meet this challenge. The environment is a key priority for us; indeed, we aim to be in the vanguard of local authorities tackling climate change. In this context, with Gatwick alone set to produce in-scope emissions equivalent to 3.9% of the national emissions target by 2038, we are very concerned at GAL's failure to provide detailed information on how these and other emissions will be substantially reduced. It is imperative that the proposed expansion demonstrates that it is within the UK's

environmental obligations, and specifically, that it is compatible with its legally binding target of net zero emissions by 2050.

We are disappointed at the lack of engagement we have had with GAL on the proposed project leading up to this consultation, especially the limited sharing of technical information, which is in contrast to our experience of working with other promoters of airport expansion schemes in recent years. This has reduced our ability to provide detailed feedback and influence the development of the project. We also expressed concerns in our response to the Statement of Community Consultation that GAL were pursuing an unnecessarily constrained approach to stakeholder engagement with too great a reliance on virtual engagement for this important statutory consultation stage of the DCO process. We have had anecdotal reports of confusion around the function of the mobile project office, with residents expecting to be able to have detailed discussions at these. Any further engagement with local communities and stakeholders should include a much greater face to face element.

We have considered the consultation documents in the context of the council's roles as the local highway authority; the minerals and waste planning authority for Surrey; a key infrastructure provider; and an authority with passenger transport and public health responsibilities. Our considerable concerns over the project are set out in Annex 1 attached to this letter. In particular, we wish to emphasise the following points:

1. There are questions around the needs case for the scheme, and it is felt that there is insufficient detail as to how the projections of future demand have been made. Significant passenger growth is assumed in advance of the scheme without any form of planning process and it is unclear whether the baseline position set out in the consultation material is appropriate.
2. The council queries whether all elements of associated development, such as parking, hotels and office space, included within the DCO scheme are justifiable as associated development.
3. It is imperative that the necessary infrastructure is in place before use of a second runway begins. It is completely unacceptable that all the road improvements required for the project are phased to be delivered after runway opening.
4. A great deal of further technical work is required in relation to transport modelling, including additional junction modelling, sensitivity testing and further details on assessment criteria. Further technical work is also required in areas such as heritage, landscape and visual impact, flood risk and drainage to inform the Environmental Statement. The council's involvement in ongoing work is requested.
5. There is real concern around the quantum and phasing of parking for the scheme and the impact this has on sustainable travel. Additional sustainable and active travel mitigation measures need to be included as part of the project.
6. The increase in greenhouse gas emissions associated with the project is a matter of serious concern, and we query the claim that this will not impact on the ability of Government to meet carbon reduction targets. Further justification is required to substantiate this claim. There are also concerns at

the potential impact on the ability of Surrey to meet its own net zero targets given the impact of road transport emissions.

7. We are concerned that GAL has simply presented its preferred option for a noise envelope with no prior engagement with representatives from local communities, local authorities and other stakeholders in its design contrary to best practice. A design group needs to be set up to test options. Independent scrutiny and enforcement of the noise envelope needs to be addressed.
8. The combined and cumulative effects of the proposed scheme on the health of specific populations, including Horley and Charlwood, should be assessed. Both these communities are close to the airport and will be exposed to more noise disturbance and likely poorer air quality arising from construction and the operation of the expanded airport. We consider that there needs to be detailed local health impact assessments for each of these communities; these assessments should fully consider noise, air quality and potential lighting impacts and combined and cumulative effects, and such assessments should inform compensation and mitigation packages. In addition, greater overflight and noise disturbance from construction could adversely affect property values and this should be scoped in and inform compensation packages.
9. We have concerns at the mismatch in timescales between the national airspace modernisation process and the DCO process. Ultimately, the overflight and noise impact experienced on the ground could differ from what is being consulted on as a result of airspace changes required as part of modernisation and to accommodate growth in the London system. Therefore, it is important that FASI-S remains 'scoped in' to the process.
10. As an affected landowner, the council contends that the level of engagement has been insufficient to enable it to fully understand GAL's proposals. Further detailed discussions are required as a matter of urgency.

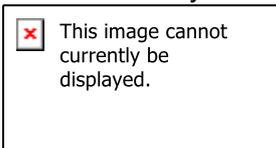
The council has commissioned technical support on a number of issues. The reports from York Aviation on need and forecasts; from Atkins on highways and transport considerations; and AECOM on noise impacts are submitted with this response and should be considered as part of the council's overall consultation response. We trust that the technical information set out within them will be taken into account as the project progresses.

Fundamentally, we need more information on key areas to enable us to understand and develop an informed view of the likely environmental and health effects on our communities as a result of construction and scheme delivery. Our response reflects this and sets out the areas where we have significant concerns and questions that need to be satisfactorily addressed. We request that this further information is made available prior to submission of the DCO application.

Given the extent of our comments, rather than addressing the specific questions in the feedback questionnaire, we have presented them in Annex 1 under the broad headings used in the questionnaire. Consideration of health impacts is not adequately included in the feedback questionnaire, so we have added another heading to capture these.

We welcome ongoing dialogue with GAL, including through our close joint working with other local authorities affected by the Northern Runway Project, as the DCO pre-application process progresses.

Yours sincerely



Matt Furniss, Cabinet Member for Transport and Infrastructure

Surrey County Council' response to the Northern Runway Consultation – December 2021

1. Northern Runway proposals overall

The following comments on this topic can be summarised in two key points:

1. Significant passenger growth is assumed in advance of the scheme without any form of planning process. There are fundamental concerns around whether this baseline position set out in the consultation material is appropriate.
2. There is insufficient detail as to how the projections of future demand have been made.

Gatwick local authorities have jointly commissioned York Aviation to review the consultation material, with a focus on the adequacy of the need case for the scheme, the demand forecasts, the validity of the assessment of capacity and the approach adopted in comparison to other recent airport applications. The York Aviation report is submitted with this response and should be considered as part of the council's overall consultation response.

There are key findings in the report that we wish to reference, given the impact that baseline information and growth forecasts have on a wide range of information and assumptions included in the PEIR, including road traffic forecasts.

Baseline growth

As set out in the work undertaken by York Aviation, the council would argue that the consultation documents lack sufficient detail to validate the need case, in particular the assumptions for capacity with and without the development and the demand forecasts. There are concerns that the baseline case set out of 67.2 million passengers per annum over the longer term is too high and may in fact be undeliverable. Further technical detail is required to justify and evidence the assumed increase in runway movement rate on the existing runway.

Growth forecasts

More fundamentally, the methodology by which the forecasts have been produced is not set out. This is material to all of the assessments made that rely on the demand forecasts. There is very limited explanation provided as to the basis upon which the projections of future demand have been made. Except in relation to fleet mix, there does not appear to be any sensitivity analysis considering different growth trajectories. As set out by York Aviation in their report, this is a major flaw and not in line with good practice. Furthermore, it is not apparent whether any account has been taken of the cost of carbon and future abatement measures in the forecasts in line with the Government's Jet Zero policy.

In policy terms, York Aviation also consider it to be a major flaw that the forecasts do not take into account the provision of a third runway at Heathrow at some point in the 2030s. This remains Government policy and airports seeking to make best use of their existing runways are required to demonstrate a need distinct from and not being met by the third runway at Heathrow. GAL fails to do this in their proposals. It also dismisses the prospect of other airports increasing their capacity, including the increase already consented at Stansted. At the very least, these should have been subject to sensitivity analyses.

2. Economic benefits: jobs and skills

The following comments on this topic can be summarised in two key points:

1. The importance of upskilling programmes in light of labour market changes.
2. Queries around whether construction skill shortages have been adequately considered.
3. We would welcome further engagement with GAL around apprenticeships and skills training and attracting inward investment.

The council recognises the significant impact that the pandemic has had on the aviation industry. It is likely that a skills mismatch will be evidenced in the area in the post -pandemic labour market reflecting the fact that people have been displaced from long term jobs and careers but will either have found new work at a similar level or remain unemployed. It would be helpful to see detail of how upskilling programmes will respond to these changes in the labour market both in the construction and operation phases. Similarly, it will be important that new training courses that recognise the upskilling needs of an adult population are established alongside the traditional 'young people's' offer which includes work placements and apprenticeships. Adult returners will need a different, more tailored offer.

We do not consider that there is sufficient consideration of the potential for construction skills shortages. Pre-pandemic there was evidence of workforces travelling from far afield to feed the demand for construction present in the south east, resulting in temporary accommodation requirements. The employment and skills plan should recognise that this may happen and consider how GAL might mitigate such an accommodation need.

In response to the outline Employment, Skills and Business Strategy, we feel that more will need to be done to attract new construction workers into the sector, including funding of a targeted campaign to bring new, previously under represented groups into the sector. There may also be other FE provision that should be considered for collaboration beyond the Crawley geography (but within a reasonable travel to learn distance). The offer to share workforce requirements with LEAs, FE, HE and schools should be extended to include other local skills partnerships.

The strategy also describes scholarships as a tool to encourage social mobility. More detail on how the proposed model would meet this objective would be welcomed.

We would welcome further engagement with GAL around apprenticeships and skills training. We would also want to explore options for supporting the supply chain in being prepared to respond to the opportunities created by the Project and ensuring Surrey is well placed to maximise inward investment opportunities which stem from the increased capacity at the airport.

3. Economic benefits: business and the economy

The following comments on this topic can be summarised in one key point:

1. The economic impact assessment is informed by the passenger growth forecasts used, which require further justification.

We acknowledge the local economic benefits in supporting trade, inward investment and tourism that the scheme would deliver, including the forecast of an additional 1,900 jobs created within Surrey. However, we note that the local economic assessment is also reliant on the passenger growth forecasts on which the scheme is based. As set out in section one, further detail on the assumptions behind these forecasts is required.

The outline Employment, Skills and Business Strategy highlights the focus on a regional identity and how inward investment will be realised. This area of work should recognise existing and future sector strengths within the Surrey economy and where they can be built upon to achieve this goal. Surrey County Council is currently working to refresh its inward investment service and consider how Surrey can be more ambitious in attracting large expanding international companies to locate here.

It will be important to ensure that investment opportunities that reflect the economy of the future are secured and consider how the balance of new investments will be encouraged across the region.

4. Airport supporting facilities

The following comments on this topic can be summarised in one key point:

1. The council remains unconvinced, on the information presented, that all elements of associated development included within the DCO scheme are justifiable as associated development. If required, it is felt that a number of elements should be taken through a Town and Country Planning Act (TCPA) route, rather than included within the DCO.

We would like to see the rationale and further evidence to justify the amount of car parking, hotel provision and office space included as associated development within the scheme. The PEIR provides no supporting evidence in terms of historic car park usage figures or hotel occupancy rates to begin to evidence need.

From information provided, it appears that a disproportionate amount of car parking, on site hotel and office provision is being included within the DCO scheme, whilst the amounts required in the preceding years to service the also considerable baseline growth are low. The table below shows how the need for supporting facilities appears to be distributed.

Growth period	Hotel space proposed	Office space proposed	Car parking proposed
Pre-DCO: Baseline – increase of 16.4 mppa without scheme	250 beds	-	6,750
DCO: With scheme – increase of 13.2 mppa through scheme	1000 beds	9000m2	18,500

If required, it is not clear why the tipping point for needing these facilities neatly aligns with the need for the DCO scheme, rather than to service the substantial pre-DCO growth. If the need is pre-DCO, clearly these elements should be taken through the standard TCPA route. Much more evidence and analysis is required to justify the quantity of these elements classified as associated development and how they are directly linked and required to cater for the increase in passengers resulting from the DCO scheme.

It is also claimed that hotel rooms will be provided based on commercial need and car parking based on demand. An indication of the controls that will be provided within the DCO to ensure this is required.

5. Landscape and ecology

The following comments on this topic can be summarised in four key points:

1. We strongly recommend further appraisal of the heritage/archaeological significance of the airport itself and areas of the operational airport (and car parks) assumed to have low archaeological potential and appraisal of the potential of sites not yet examined – particularly Longbridge roundabout and Reigate Field.
2. Ground investigation surveys should be completed at the earliest opportunity.
3. Further technical work in relation to viewpoints, visualisations, landscape character and green infrastructure is required to inform the Landscape and Visual Impact Assessment (LVIA).
4. Detailed design is required in order to fully consider surface water flood risk and sustainable drainage impact.

Landscape, townscape and visual resources

We would like to highlight areas where further work and consideration is necessary.

Firstly, the number of LVIA viewpoint locations seems on the low side for the scale and physical extent of development proposed. Taller elements of proposed infrastructure, in particular the CARE facility (but also new decked car parks, hotels and contractor compounds), are likely to be visible from a number of locations within the Surrey part of the study area. We recommend reviewing the scope for additional viewpoints within Surrey that fall within the Zone of Theoretical Visibility (ZTV); in particular potential locations along public rights of way in close proximity to the airport (e.g FP339, 340, 342, 344), PRoWs on higher ground and those representative of edge-of-settlement residential receptors, e.g. at Charlwood (which includes a Conservation Area), Horley and Smallfield. Only two viewpoints (9 & 10) cover the proposed Pentagon Field multi-storey car park and we recommend reviewing scope for additional viewpoints (e.g. mid-range views) covering this element.

We also recommend including viewpoints and visualisations covering the works to Longbridge Roundabout (which abuts a Conservation Area), and additional viewpoints and visualisations to convey the changes from new road layouts/flyovers at the North and South Terminal roundabouts. Whilst acknowledging that the proposed replacement western noise bund/wall may be visible within the view from Viewpoint 13, we recommend reviewing the scope for additional close/medium-range viewpoint(s) incorporating this feature (e.g. along Lowfield Heath Road/ PRoW FP325), whose scale is unconfirmed at this stage.

Table 8.3.1 of PEIR Chapter 8 states that 'Viewpoint photography within Kent Downs and Surrey Hills AONBs is not relevant to assessment of landscape, townscape and visual effects, due to the distance from Gatwick and lack of/limited intervisibility'. We suggest that a more detailed justification for this position is needed.

In exercising or performing any functions in relation to, or so as to affect, land in an Area of Outstanding Natural Beauty, the council has a duty under Section 85 of the CRoW Act 2000 to 'have regard to the purpose of conserving and enhancing the natural beauty of the area of outstanding natural beauty'. Whilst clearly a long distance view and outside the preliminary 5km study area, the airport is visible from Leith Hill, Surrey Hills AONB. We suggest considering a viewpoint from Leith Hill tower, as both a specific promoted viewpoint within this designated landscape, and as an illustrative viewpoint to demonstrate the extent of visibility of the airport (existing and proposed). We would question whether the preliminary study area/ZTV needs to be expanded to include important long-range views.

We query the 'low' sensitivity ratings of the landscape/townscape character areas within Surrey used within the assessment. Whilst this may be the case for areas within close or immediate proximity to the airport boundary, there is a transition to higher sensitivity landscape and townscape further away but still well within the preliminary study area. This is reflected in the existing baseline character assessments. The Surrey Landscape Character Assessment (LCA) 2015 has been discounted in favour of district-level assessments, which is understandable to an extent yet the Surrey LCA is the more recent document, with more up-to-date baseline data. We recommend that sensitivity ratings for landscape and townscape receptors and assessment are reviewed and further justification provided, including confirmation that current landscape qualities including condition and scenic value have been assessed by site appraisal across the Surrey part of the study area.

We also recommend that the potential for effects on historic or 'important' hedgerows/shaws (within the context of the Hedgerow Regulations and Surrey Historic Landscape Characterisation) is reviewed and assessed within the LVIA. These are important historic landscape features contributing positively to landscape character including landscape fabric and perceptual landscape qualities such as time depth, and their loss can only be partially mitigated. However, this may be more of an issue for land within West Sussex than Surrey.

When considering the effects on Tranquillity within Nationally Designated Landscapes paragraphs 8.13.22 and 8.13.30 state 'An increase of up to 20% in the number of aircraft following the same flight paths may be discernible to some observers or barely perceptible as an increase to other observers. The magnitude of change would be negligible'. We query the

judgement that the magnitude of change would be negligible and consider this needs further justification.

Beyond proposed replacement planting to mitigate for losses, there is limited information within the LVIA on how green infrastructure could make a positive and innovative contribution to the project, from both a design and biodiversity perspective. For example, whilst acknowledging the issues around attracting birds to an airport, there is limited commentary on potential greening measures for proposed buildings. These could take the form of green/living roofs and walls and other vertical planting such as structural planters for larger species and provision for climbing plants. Such measures are feasible on both buildings with solid elevations and open-sided buildings such as multi-storey car parks. We recommend that scope for building greening and other green infrastructure features is considered as part of detailed landscape mitigation proposals.

In addition, detailed landscape mitigation proposals should take into account:

- species of local provenance appropriate to landscape and townscape character
- current best practice on biosecurity and resilience to future climate change, pests and diseases. Particular consideration should be given to the scope for specifying large-canopy trees (at maturity) which provide the greatest multi-functional green infrastructure benefits, and the scope for sufficient species diversity.

We have a number of specific requests for inclusion in the Environmental Statement to address current omissions or inconsistencies:

- There are no figures within the LVIA confirming the extent of vegetation removal. It would be helpful if plans and associated information could be provided to confirm the locations, spatial extent and detail of proposed vegetation removals (possibly in conjunction with an arboricultural impact assessment)
- Proposed wireline visualisations are also missing for a number of viewpoint locations. Those missing within Surrey include Viewpoints 7 and 14. Winter photography is also missing for Viewpoint 13.
- That additional viewpoint photography and visualisations are produced for Viewpoint 2, showing views to the west (across the main airport area to incorporate proposed infrastructure including CARE Option 2) and to the east/south-east (to incorporate new buildings/structures around Car Park H and Pentagon Field decked car park). In addition, there is a concern that the angle of view of some other viewpoints may not be best at capturing the extent of proposed development, for example the CARE Option 2 and associated stack.
- Inclusion in the LVIA of height parameters of existing key airport infrastructure, notably the control tower, hangars and terminal buildings
- There is a general lack of visual supporting information at this stage (e.g. elevational and axonometric drawings, wirelines and photomontages) for proposed buildings, infrastructure, highway works, vegetation removals, new planting and cumulative effects from nearby consented/proposed developments which makes it more difficult to assess the likely impacts of the project. We seek confirmation that photomontage (type 3/4) visualisations will be produced for the finalised LVIA
- There is a possible conflict between visual receptor sensitivity levels set out within methodology (Table 2.2.4) and within effects assessment. Occupiers of vehicles are classed as either low or medium sensitivity depending on whether they are 'whose attention may be focused on the road' or 'within rural areas'. This distinction needs to be clarified. The assessment at some viewpoints includes low sensitivity rather than medium sensitivity road users, yet these locations are clearly within rural areas, e.g. Viewpoint 15 Norwood Hill. In addition, pedestrians are classed as medium sensitivity receptors within Table 2.2.4 yet are assessed as low sensitivity receptors within Viewpoint 1 assessment.

Ecology

We note that the PINs recommendation from the scoping report to reference Biodiversity Opportunity Areas (BOAs) has not been addressed. The missing Surrey BOA is River BOA, RO5 River Mole, which can be found on this link;

We would expect BOAs to inform ecological or mitigation plans when covered in the Environmental Statement alongside proposals for Biodiversity Net Gain (BNG). The Environment Bill recently received royal assent and extends a 10% biodiversity net gain requirement to Nationally Significant Infrastructure Projects. As such GAL will need to demonstrate how expansion proposals achieve a minimum of 10% BNG.

We also query whether air quality impact due to aircraft emissions has been adequately assessed in relation to ecological receptors, in particular areas of ancient woodland around the airport.

Heritage

The PEIR baseline assessment is generally good, providing a comprehensive appraisal of the archaeology and heritage assets in the area surrounding the airport. We largely agree with the impacts that the PEIR outlines on the heritage sites it has examined. However, areas within the operational airport and other areas such as car parks have been identified as having 'low archaeological potential' due to previous development impacts. In most cases this assumption needs to be further explored, and low potential should not automatically equal no potential.

Use of the Airports NPS (table 7.2.1) whilst obviously acceptable as the national methodology, leads to what we consider to be an inappropriately downgraded assessment system for heritage assets. Locally significant sites are rated as low, meaning that we disagree with some of the "significance" assessments in the baseline study and therefore feel that there is a potential lack of appreciation of potentially significant local and regionally important archaeology.

Within the PEIR, operational impacts on archaeology have been 'scoped out'. However, we would like to highlight a couple of potential operational impacts which should be considered. This includes areas highlighted as having the potential for palaeochannels, where if waterlogged, could experience potential impacts post-construction and therefore, will require ongoing monitoring. The impacts of environmental mitigation such as tree planting will also likely have archaeological effects during the operation stage, and these also will need to be addressed.

It is disappointing that Ground Investigation surveys have not been completed already, and we would encourage that this work be completed at the earliest opportunity.

On next steps, we look forward to the continuation of archaeological evaluation work to better appraise and define the potential of sites not yet examined – particularly Longbridge roundabout and Reigate Field. We trust that borehole and geotechnical information promised will take the form of a comprehensive survey.

Where potential impacts are identified, further evaluation work is proposed to support the EIA which is appropriate. While the proposed mitigation measures may well be appropriate, the key risk is in the discovery of nationally important remains where preservation in situ would be the preferred option. Where mitigation is required, there will need to be the assurance that the necessary timescales and resources are available in order to fully complete this work.

There are a number of specific inaccuracies or deficiencies within the text of the PEIR that we wish to highlight:

- Table 7.2.1 sets out that "no situations have been identified in which a visualisation has been considered necessary". However table 7.7.1 identifies sites listed as being harmed visually. Despite PINs request in the scoping report, no visualisations have been provided.
- The PEIR provides what appears to be a good catalogue of what is likely to be in the ZTV, but without visualisations, it is difficult to assess. Again we note suggestions from PINs that these be included.

- Paragraph 7.9.111 indicates that no future monitoring is proposed with regard to the historic environment. Please note our comment on palaeochannels and potential waterlogged sites. Future monitoring may be necessary
- Table 7.15.1 mistakenly names a CSAI as a “County Site of Archaeological Interest”, rather than “Importance”.
- Paragraph 6.3.117 – “Crawley AHAP”. It is actually a Surrey one (site 498).

Flood risk and drainage

The council has reviewed the relevant chapters with regards to surface water flood risk and sustainable drainage. The proposals submitted so far are very high level, with no real detailed design included within the consultation documents. It is difficult to assess the impact of proposals as the level of detail is not sufficient to scrutinize and further information is requested.

The over-arching principles are what we would expect to see – i.e. discharge is to be at or below pre-development greenfield run-off rates. However, there will be restricted discharge and surface water attenuated on site to help reduce surface water flood risk on and off site. Again, no real detail is provided and we request that further information is made available.

There are some drainage plans for the highway alterations. Some of these appear to fall outside the Surrey boundaries, but consideration should be given to maintenance of drainage features. Lay-bys should be included for maintenance access and inspection of drainage assets (attenuation ponds etc).

6. Landuse: overall

The following comments on this topic can be summarised in one key point:

1. As an affected landowner, the level of engagement has been insufficient to fully understand the proposals. Further detailed discussions are required as a matter of urgency.

SCC owns land within the proposed scheme boundary, namely the council’s land holdings at Bayhorne Farm and Gatwick Dairy Farm in addition to land within the adopted SCC highway and non-adopted highway verge land. As an affected landowner, we feel that engagement to date has been lacking, and the level of detail included in the consultation material is insufficient to be able to fully consider the implications and provide comment. Only as of early November has further detail been provided to answer fundamental questions relating to timescales for land take and the category of land acquisition. This information is not easily available within the consultation material published. A number of questions remain:

- Given that the land at Bayhorne Farm is required for a surface access compound, it is still unclear why land is required from 2024 given that surface access works are currently phased to start from 2029?
- From the consultation material, it is not immediately apparent that a permanent balancing pond is to be provided on the Bayhorne Farm site, but again this has latterly been referenced by GAL. It is now known that there is in fact an element of permanent land take here. It appears that this is required for highway drainage works associated with the surface access improvements, however no detail is provided. Detailed discussions will be required with our Flood and Climate Resilience team so we can understand more about the need and engage on design requirements.

The Council is supportive of Reigate & Banstead Borough Council’s Development Management Plan Policy HOR9 - Horley Strategic Business Park allocation, which includes the Bayhorne Farm site. GAL land acquisition proposals here conflict with access arrangements needed to support and deliver Policy HOR9. We therefore require GAL to:

- Provide more technical detail on access arrangements for the surface access construction compound at Bayhorne Farm

- Commit to further detailed engagement regarding access aspects as a matter of urgency.

7. Getting to and from the airport: our approach

The following comments on this topic can be summarised in three key points:

1. A great deal of further technical work is required in relation to transport modelling, including additional junction modelling, sensitivity testing and detail on assessment criteria.
2. It is unacceptable that all road improvements required for the scheme are phased to be delivered after the northern runway is due to come into routine use.
3. There is real concern around the quantum and phasing of parking and the impact this has on sustainable travel.

SCC has engaged Atkins to review the consultation material from a highways and transport perspective. Their full analysis is submitted with this response and should be considered as part of the council's overall consultation response. Key points are summarised below.

Modelling

The model outputs provided are limited to high level data; therefore further detail is sought including junction modelling. We require further detail to understand how GAL intends to improve the highway model performance to increase confidence in the results, as well as discussion as to how uncertainty in the model results arising from such a limited satisfaction of calibration and validation criteria can be reflected in the assessment.

We are concerned that the VISSIM corridor model is concentrated on the east/south with limited extent to the north/west. However the future baseline network appears to show that queuing goes beyond the extent of the model to the north and west. We are therefore requesting that a number of A23 and A217 junctions are included in the VISSIM corridor model.

We are concerned that the study area for the Transport Assessment is assumed to be the same as for the Environmental Impact Assessment (EIA). While the IEMA guidelines are considered appropriate for defining the EIA study area and associated Affected Road Network, they are not considered appropriate for defining the Transport Assessment study area. For example, there may be locations that do not meet the above criteria but that are already nearing or at capacity where even a small increase in traffic would be considered a significant impact and that should be included in the Transport Assessment Study Area.

We request that information for junctions forecasted to operate at over 80% vehicle to capacity ratio (V/C) is provided to have confidence that the model is reflecting known problems on the highway network.

As set out in section 1 – Northern Runway proposals overall, GAL also need to provide further detail on passenger growth forecasts and how in turn this translates into surface access demand.

Significant project related effects

We are not satisfied with the assessment criteria and assignment of significance applied. We are concerned that the screening thresholds used could be excluding sensitive locations, for example a location that is already nearing or at capacity and susceptible to small traffic increases or a local road with low existing flow. We would therefore like further detail on the basis for these thresholds. We would welcome the opportunity to see the full range of model outputs and ascertain whether the 'rules' selected are sufficient to highlight existing and future issues and thus provide confidence that the impact of the scheme is accurately detected. Once this has been undertaken, we can understand whether the magnitude and severity of impact set out for the local road network is appropriate.

Sensitivity tests

We have specific requests for a number of sensitivity tests that should be undertaken to improve confidence in the assumptions and results:

- around busy airport days and busy highway and public transport network days as a hybrid approach to the core scenario, which appears to have been adopted by applying an August airport day to a June traffic day
- mode shares and travel patterns are most likely to have changed in the five years since 2016 (the main model data source), not least to reflect a long-term shift to more sustainable modes of travel, lower emission vehicles and advances in technology, which in turn will support improved telecommuting and flexible working to combat climate change
- further to changes due to Covid-19, the applicant should consider possible delayed delivery of proposed road and rail enhancements
- only one modeshare scenario has been tested and we request that sensitivity testing aimed at producing different modeshare scenarios is undertaken to understand what mitigation may be required under different circumstances. This should include one scenario with a lower sustainable modeshare than targeted and one scenario following the decide and provide approach of meeting mode share targets; which might focus on sensitivity to parking and forecourt charges as these are variables that GAL retain control over.

The above areas of work need to be undertaken and further detail provided before SCC can agree that the transport modelling is appropriate.

Parking

Car parking availability numbers associated with the proposals show that:

- Staff parking supply is unchanged, but demand increases so the ratio of spaces per staff drops;
- Passenger parking supply increases more than demand, so the ratio of spaces to passengers increases; and
- Overall parking supply increases more than demand, so the ratio of spaces to passengers/staff increases.

Therefore, while the reduction in staff parking ratio could encourage sustainable mode share, we are concerned that the parking provision ratio for passengers and overall is increasing, which will lead to even more private car use in accessing the airport overall.

Although it is not proposed that road improvements will be in place prior to the northern runway coming into routine use, of the 18,000+ parking spaces that it is claimed are necessary for the scheme, almost half are to be delivered by 2029. This is inconsistent on a number of levels. Firstly, it operates as a disincentive to mode shift, and secondly there would be no logic in providing this rapid increase in parking without delivering road improvements to improve capacity.

Both the quantum and phasing of parking are therefore of concern. The consultation overview document claims that it is “our intention to provide only those spaces that are required to meet demand” but we query how a mechanism to ensure this will be built into the DCO and what oversight will be provided to ensure that.

We also note that provision of onsite parking is partly justified by a decrease of offsite car parking, but question what guarantees there are that this will happen and in the same numbers.

8. Road improvements

The following comments on this topic can be summarised in two key points:

1. It is unacceptable that road improvements required for the scheme are phased to be delivered after the northern runway is due to come into routine use.
2. Highway improvements do not facilitate access by active travel.

Surface access is a priority for this council in relation to any increased operational activity. It is imperative that the necessary infrastructure is in place before use of the runway comes into operation. It is completely unacceptable that the road improvements required for the scheme are phased to be delivered after runway opening.

Indeed, it is not clear whether the highway mitigation would be needed in any case irrespective of the DCO scheme, given the substantial pre-DCO growth forecast. Confirmation is sought on this issue.

On design, we note that the access to the north terminal does appear very complex given that many motorists will only be accessing the airport infrequently.

We are also concerned that the highway improvements do not facilitate access by active travel.

9. Public and sustainable transport

The following comments on this topic can be summarised in two key points:

1. Further detail is required within the public transport model on rail and bus and coach provision.
2. There are grave concerns around predictions that modeshare targets will not be met and a view that mitigation proposed is therefore inappropriate and insufficient.

We wish to highlight a number of areas relating to the public transport model where further detail will be required:

- We note that rail capacity relies on schemes that are scheduled to be undertaken in the coming years. We request that the list of schemes is reviewed in light of the industry's review of Covid-19, and sensitivity tests are undertaken that exclude those schemes least likely to go ahead.
- In the PEIR, it is expected that bus and coach operators will increase services to meet demand; however, no detail has been provided on what has been assumed in this instance.

The mode share targets are very ambitious and a step change from previous trends. We note in fact that it is predicted that the Airport Surface Access Strategy (ASAS) modeshare targets will not be met and therefore argue that the mitigation proposed is:

- not appropriate
- too focused on vehicles/not enough on sustainable modes, and
- not aligned with SCC's emerging LTP4 and goal to significantly reduce transport carbon emissions to meet the net zero challenge.

That GAL presents no evidence for how these targets will be met is a real concern. There is limited detail on activities and measures to promote modal shift. Other than the introduction of two specific bus services and an assumption that public transport providers will modify services to match demand (but not detailed in the PEIR), the development relies heavily on the delivery of existing public transport proposals. Consequently, we feel that there is a need for further provision for sustainable modes to contribute to ASAS modeshare targets.

For example, as set out in the October 2021 Bus Service Improvement Plan for Surrey, the Redhill – Horley – Gatwick Airport (Metrobus 100 corridor) has the scope, with investment, for further growth to become a Superbus network.

Electric vehicles are included as contributing to sustainable transport modes; however, it should be acknowledged that they have no impact on reducing congestion.

The North Downs Line is a key element of Surrey's rail strategy and could help increase modal shift to public transport for trips to and from Gatwick. We would like to see GAL recognise the

potential for electrification and service improvements as a means of contributing to modeshare targets.

We would like to see details on what monitoring is proposed, independent scrutiny and what the consequences could be if targets are not achieved.

10. Construction: managing impacts

The following comments on this topic can be summarised in one key point:

1. There is conflict between the surface access satellite contractor compound and access for Horley Business Park. As a landowner we request further engagement with GAL on access issues as a matter of urgency.

As referenced previously in relation to SCC landholdings, further detail is now required on access arrangements for the surface access construction compound.

We welcome GAL's commitment to managing all waste generated by the proposal (including operational waste associated with the airport) in accordance with the Waste Hierarchy unless it can be demonstrated that the alternative is the best overall environmental outcome. This includes proper application of the CL:AIRE Code of Practice to manage excavation material so as to prevent waste.

Notwithstanding the above, GAL references 'existing waste management facilities' in the Draft Waste Strategy (Table 4.1.1) based on Environment Agency (EA) data. In our role as Minerals and Waste Planning Authority (MWPA), we would urge GAL, before commissioning the services of any waste management facility, to undertake due diligence to ensure that such facilities benefit from appropriate planning consent, and not just an Environmental Permit issued by the EA.

Comments relating to air quality, noise and lighting are considered in relation other sections of this response.

11. Construction: transport

The following comments on this topic can be summarised in one key point:

1. SCC will require detailed input to the Construction Management Plan as questions remain in relation to timing and the specific construction routings shown.

The construction assessment assumes that the main highway construction is undertaken in winter to avoid peak traffic. However, we query what happens if timings change and the peak of construction activity coincides with summer traffic.

We are also concerned by the construction routing proposed as it involves all construction traffic making a U-turn at the Longbridge Roundabout, which will add to congestion and delays at the roundabout. It is also not clear why the routing is shown beyond Longbridge Roundabout and thus further information is requested. Indeed, we note that HGVs will increase by more than 30% in the vicinity of the roundabout during construction. As such, it is key that the following are considered: alternative routing to spread the impact; measures to ensure the avoidance of peak hours; movement of materials by rail; park and ride for construction staff; and tailoring of the construction programme to reduce impact.

12. Managing and mitigating effects: climate change and carbon

The following comments on this topic can be summarised in two key points:

1. The council questions the claim that the increase in greenhouse gases associated with the project will not impact on the ability of Government to meet carbon reduction targets. Further justification is required to substantiate this claim.
2. There are concerns at the potential impact on the ability to meet Surrey's own net zero targets given the impact of road transport emissions.

Impact of Gatwick's organisational emissions

The cumulative impacts from construction is 1.7MtCO₂e, with an annual peak of 389,000t CO₂ by 2025. Mitigating options could be significantly improved by reducing the impact of diesel from vehicles and on-site generation, which would significantly reduce construction impacts.

We note that GAL's greenhouse gas emission reduction targets seek an 80% reduction by 2030 and net-zero by 2040 for scope 1 and 2 and that greenhouse gas emissions for the operation of Gatwick airport are predicted to reduce over from 71,000tCO₂e in 2018 to 61,000tCO₂e in 2038. However, many details about how this could be achieved are expected to be set out in later design stages, in the Energy Strategy and in the Carbon and Climate Change Action Plan. As a result, it is not possible to consider the approach in any detail. Depending on the content of the Carbon and Climate Change Plan, scope 3 emissions may need more detailed consideration.

Impact of the scheme on meeting the National Carbon Budgets

The council considers that the increase in greenhouse gas emissions associated with Gatwick's expansion plans is a matter of serious concern. Compared to the last year of the Sixth Carbon Budget (2037), the in-scope emissions (domestic and international) for 2038 are estimated as 7.575 MtCO₂e per year, equivalent to 3.9% of the national emissions target for that year. As a proportion of the national carbon budget, this is extremely significant and runs contrary to the decarbonisation agenda.

The Airports National Policy Statement (para 5.82) notes that whilst an increase in carbon emissions alone is not a reason to refuse development consent to a project, such increase can be a reason to refuse consent if that increase is so significant that it would have a material impact on the ability of Government to meet its carbon reduction targets, including carbon budgets.

The PEIR concludes that the project would not have a material impact on the ability of the Government to meet its carbon reduction targets, including carbon budgets as they stand at present. In part, this conclusion was based on plans to introduce measures to reduce emissions from aviation as set out in the recent DfT Jet Zero consultation. At present, the policies are not in place and the technologies to reduce emissions from jet fuel are not commercially available, so it is too early to be confident that the proposed strategy will deliver the levels of reduction needed. This is particularly the case when considering the advice given to Government by the Climate Change Committee which states that current Government policies (which considering the carbon budget as a whole) fall significantly short of being able to meet the sixth carbon budget.

Therefore, we fundamentally query the claim that this will not have a material impact on the ability of Government to meet its sixth carbon budget.

In addition, the report excludes some impacts of climate change that are not caused by greenhouse gases counted as part of the national/ international carbon accounting because their effects at this stage are too uncertain. Ideally, as these impacts are still known to contribute to global warming, they should be estimated in some form and included in the report.

Impact of the proposal on Surrey's net-zero targets

Total emissions from surface transport that result from Gatwick's planned expansion are estimated to be an additional 0.5M tonnes per year above the baseline by 2029, and will rise further as Gatwick reaches its peak of operation in 2047. A proportion of these emissions arise in

Surrey and have a direct impact on Surrey's ability to meet its net-zero targets. Transport emissions arising from within the county have the main impact on Surrey's net-zero targets. There are concerns about the ability for Surrey's residents to reduce their wider carbon footprint by taking more sustainable travel options to the airport if GAL's plans go ahead as proposed.

Mitigation

The PEIR sets out that "the majority of mitigation opportunities through both construction and operation will be reflected in the Carbon and Climate Change Action Plan currently in development". There is therefore no detail provided on the mitigation actions that are being proposed. It does not appear that the carbon management includes the main sources of emissions, which are the flights themselves.

13. Managing and mitigating effects: noise envelope

The following comments on this topic can be summarised in two key points.

1. We are concerned that GAL has simply presented its preferred option for a noise envelope with no prior engagement with representatives from local communities, local authorities and other stakeholders in its design contrary to best practice. A design group needs to be set up to test options.
2. Independent scrutiny and enforcement of the noise envelope needs to be addressed.

The proposal for a noise envelope is welcome, but we are disappointed at the lack of ambition particularly around securing a continual reduction in air noise impacts in the future and sharing the benefits of new aircraft technology with local communities. We are also concerned that GAL has simply presented its preferred option with no prior engagement with representatives from local communities, local authorities and other stakeholders in its design. This is contrary to our experience with Heathrow Airport where a design group with a broad range of relevant stakeholders was set up as part of its recent expansion proposals following Government recommendations in the Airports National Policy Statement.

We would like to see such a group set up for Gatwick to enable a full exploration and sensitivity testing of the options and merits of different approaches, various noise metrics and future fleet mix to underpin design because of the impacts of noise on health including mental health. This should include consideration of WHO guidelines and levels below 51dBLAeq16h, frequency of overflight and Lmax. We consider that the noise envelope should set future reductions in limits with regular reviews once the expanded airport is fully operational. This could include day and night quota counts as well as area contours to drive improvements. A mechanism to be agreed through the DCO is also needed to share the benefits of technological improvements between communities and growth.

The current proposal is weak on independent scrutiny and enforcement of the noise envelope to ensure it is robust and effective and further details and discussion are needed. Enforcement should include monitoring against a broad range of measures and limits which reflect the impact experienced by communities and not just LOAEL and SOAEL limits.

14. Managing and mitigating effects: noise mitigation

The following comments on this topic can be summarised in two key points.

1. We have specific concerns for the communities of Charlwood and Horley where the combined noise impacts of overflight and construction will be felt.
2. The council has concerns at the mismatch in timescales between the national airspace modernisation process and the DCO process. Ultimately the overflight and noise impact could be very different to what is set out in the DCO information.

Although the county council is not the responsible authority for noise, we do regularly receive complaints from residents who suffer from the impacts of aircraft noise. The PEIR sets out that there will be increased noise impacts on communities located closer to the north of the runway

and its approach path, including settlements in Surrey. Some Surrey communities will also experience noise impacts associated with construction, particularly given the impact of night time construction. As a result, we have a particular concern for the communities of Charlwood and Horley, especially the combined impacts arising from aircraft, operations and construction and query whether the mitigation measures are adequate. Further, greater overflight and noise disturbance from construction could adversely affect property values and this should also be scoped in and inform compensation packages.

There is ongoing uncertainty in relation to overflights given the disconnect between the DCO process and the national airspace modernisation programme, being progressed through the FASI South programme. The fact there is no alignment means that the overflight and noise impact experienced on the ground could differ from what is being consulted on as a result of airspace changes required as part of modernisation and to accommodate growth in the London system. In other words, there could actually be different flightpaths operating to the information presented in relation to the DCO project once it is built out. While we acknowledge the difficulty of taking this future airspace redesign into account in the DCO process, it is important that FASI-S remains 'scoped in'. As a minimum, the insulation scheme agreed through the DCO should be flexible enough to mitigate different impacts post FASI-S.

Further comments on noise impacts made by our consultants, AECOM, are submitted with this response and should be considered as part of the council's overall consultation response.

15. Consultation process

The following comments on this topic can be summarised in one key point.

1. The level of technical information provided has in a number of areas been insufficient to form a fully evidenced view on proposals.

The council feel that insufficient technical information has been provided by GAL in advance of publication of the PEIR. This has made consideration of the huge amount of PEIR information during the consultation period more difficult. In a number of areas, the level of information provided within the PEIR has been insufficient to fully assess the impact of proposals.

Our consultation response sets out the areas where we feel further detail is required. We request that this information be made available prior to the DCO submission.

Our response to the earlier consultation on the Statement of Community Consultation did question GAL's reliance on virtual engagement for this important statutory consultation stage of the DCO process. For instance, we have had reports of confusion around the function of the mobile project office, with residents expecting to be able to have detailed discussions at these. Any further engagement with local communities and stakeholders should include a much greater face to face element.

16. Other considerations – health impacts

The following comments on health and wellbeing can be summarised in three key points:

- 1 Further mitigation and enhancement measures must be considered in relation to air quality.
2. The health impact of ultrafine particles has not been considered to date and should be addressed.
3. The combined and cumulative effects (air quality, noise and light) on the health of specific populations, including Horley and Charlwood, should be assessed.

SCC has a number of Public Health functions and we wish to comment on specific areas from this perspective.

It is noted that even with the growth of the airport, the PEIR shows an overall improvement in air quality. However, the majority of this improvement (between 2018 and 2032) comes from the expected reductions in both non-airport and airport road traffic pollution sources, while pollution sources from the airport operations increase. The improvements in air quality from the forecasted reduction in road traffic pollution sources, would be a benefit to the health of the local population. However, this improvement in air quality appears to be negated by the forecasted increase in the airport pollution sources, thus impacting on any potential health benefits from reduced road traffic pollution sources.

Nitrogen dioxide

Nitrogen dioxide is recognised today as a 'no threshold' pollutant – one where there is no safe level of exposure, and therefore there is no level below which it does not have health effects. In 2021, the World Health Organisation (WHO) reduced the recommended annual limit value from $40 \mu\text{g m}^{-3}$ to $10 \mu\text{g m}^{-3}$ which reflects a better understanding of the impact of nitrogen dioxide on human health.

It is noted that by 2032 the modelled nitrogen dioxide concentrations at residential properties to the north of the airport are expected to be in the range $20 - 27 \mu\text{g m}^{-3}$, with around 50% of the exposure due to the airport. These levels are above those recommended by WHO, with potential health effects on the local population. We would therefore expect there to be mitigation and enhancement measures for air quality.

Particulates

GAL will be aware that the new Environment Act requires Government to deliver a target on ambient PM_{2.5} concentrations.

There is no mention in the PIER of ultrafine particles of which airports are a significant source. Ultrafine particles present a known health risk, and while there is no current standard, WHO defines average ultrafine particle counts as 'high' when over 10,000 particles/cm³/24-hour period. Local 2019 monitoring data for 205 days at the Horley Garden Estate, showed that 35.6% of days were classed as high and none were classed as low (<1,000 particles/cm³).

We would expect there to be ultrafine particle monitoring to establish a baseline prior to the project, and throughout the project.

Light

It is noted that permanent lighting will affect 95 properties on the Horley residential edge, for which planned mitigation is by planting, which is not expected to mature until 2048. Light pollution that prevents/interrupts sleep can impact on health and further mitigation may be required in the period proceeding planned planting reaching maturity.

Further, we would expect permanent lighting to be included in the Local Health Impact Assessment covering these 95 properties in Horley.

Combined and cumulative impact

In addition to air quality and light, the noise impact has already been referenced. We would expect to see the cumulative and combined effects on the health of specific populations needs to be clearly assessed, through separate local health impact assessments undertaken for communities most affected around the airport at both construction and operational stages. Within Surrey, this should include Charlwood and Horley. Both these communities are close to the airport and will be exposed to more noise disturbance and likely poorer air quality arising from construction and the operation of the expanded airport.

Active travel

While it is noted that the provision of cycle and pedestrian routes is currently minimal on affected roads, we would expect an overall increase in the provision of more of these facilities within the project, to encourage physical activity within the local population.

Lifestyle

It is noted that the Surrey Joint Strategic Needs Assessment (JSNA) informs the Health and Wellbeing baseline. The JSNA shows that participation in physical activity has decreased in recent years in the relevant LSOA and wider study area. It is also noted that there will be the permanent loss of land at Riverside Garden Park and reduction of National Cycle route 21, with an equivalent new public open space provided that is not contiguous with the park.

We would expect the provision of the new public open space to be easily accessible for the local population, and suitably located to encourage physical activity.

It is noted that the forecast of Port Health statistics based on passenger throughput in 2038 will be explored at the Environmental Statement stage. This may have implications for local healthcare capacity.