

Appendix A

Tandridge District Council thank you for consulting us under Section 42 of the Planning Act 2008, regarding the emerging Development Consent Order for usage of Gatwick's northern runway. Set out below are our comments and these have been made against each chapter/other technical document, respectively.

Please note that the Council's response also includes comments submitted on our behalf by technical specialists at Surrey County Council, York Aviation and Mole Valley based Environmental Health with which Tandridge has a shared service.

We welcome further engagement and consultation with Gatwick Airport Ltd (GAL) over the course of the DCO process and look forward to seeing GAL's response on this consultation.

Consultation overview

Table 1.1 and 1.2 – Information provided is not entirely correct. Furthermore, Lingfield library was not included on the deposit locations list and this could have had an influence on the number of the community that engaged. Further, this list did not initially include Burstow as a location for the drop-ins, but it was added later following challenge from local representatives. However, disparity between the locations visited clearly exists and despite Tandridge being directly adjacent to the airport, it was not prioritised while other, less associated locations, including Brighton and Royal Tunbridge Wells, received multiple visits. Therefore, it is felt that this consultation has not been particularly inviting. Aside from the aspects of online consultation raised regarding the Statement of Community Consultation, GAL has been reluctant to allow the recording of meetings, which would benefit stakeholders in sharing the process and in compiling responses. Further, the information available at the travelling drop-ins has received criticism from some wishing to engage as those on hand at the drop-ins were not able to assist. Instead interested parties were directed to a phoneline for more technical assistance which does not present an accessible consultation and is not considered to be acceptable.

Page 12 – Map. Environmental mitigation measures appear to be negligible in comparison to the size and scope of the scheme.

Page 20 – Concerns are raised regarding the ability of GAL to present a reliable picture of noise impacts when the FASI-S programme still isn't determined. The cumulative impact could be significantly worse for those impacted. We appreciate that this consultation is about the northern runway specifically, but it is arguably misleading and only half the story.

General – There are several sweeping statements made throughout the summary document and by default the wider consultation, these should be clarified and substantiated where necessary. These particularly relate to: the impacts on highways beyond the M23, namely the M25, A22 and A264; the lack of regard to the impact on housing, how any generated demands will be met, and the constraint placed on home ownership by the lack of affordability. We also note a comment at 8.11.51 which refers to re-housing residents while noise mitigation is undertaken, yet no reference to where this temporary accommodation will be. In an area with a restriction on available homes, further detail and plans for this should be shared.

Non-technical summary

Section 3 and 4.2.5 & Section 4, table 1 – As a general comment, the baseline data and forecasting for economics, cargo, passenger needs, and general growth are strongly questioned as the data presented in GAL's arguments are based upon pre-pandemic figures. While it is not possible to say that the pandemic has altered things so significantly that a need no longer exists, it is also not legitimate to argue that needs and growth forecasts from before the pandemic remain accurate. Needs and benefit assessments need to reflect long term changes to peoples' travelling habits and working arrangements which have altered because of both the pandemic and Brexit. A commitment from GAL to carry out such a review of its data is necessary.

Section 4, table 1 and 4.3.5 – Concern is raised regarding the air traffic movements and related noise/air pollution etc. which could come about from the modernisation of the airspace (FASI-S). This could see 'stacking' on flightpaths which cannot currently be factored in as the work has not developed enough. It is entirely probable that pollution and noise etc, will impact the environment and flown-over communities very differently because of FASI, than those GAL is presenting. If you feel this is something you have catered for sufficiently, this needs to be set out more clearly. Whilst you have stated that you've prepared a Statement of Need for the Civil Aviation Authority, it remains unclear how such need aligns with a project that could entirely alter the airspace regardless of the DCO. It is suggested that the pace of the DCO process be slowed to align more closely with the FASI programme so the estimates being proposed are more reflective of the future airspace and not the old and restricted patterns which are currently used by NATS.

Section 4, table 1 – Only 6 Piers are mentioned in this table, while para 3.3.32 of the overview document refers to a new Pier 7 for new passenger growth.

5.1.14 – While it is welcomed that a Climate Change and Emissions Action Plan will be submitted with the DCO, we are disappointed that no draft is available at this pre-application stage, given the fundamental impact this scheme could have.

6.2.7 – We welcome mention of how the cumulative impacts with Heathrow's third runway will be considered. We recognise the uncertainties around the Heathrow scheme and GAL's inclusion of the best available data. Should these two schemes both go ahead, the potential cumulative impacts could be significant, and communities need to be assured that this will be fully accounted for. Is GAL able to confirm that a 'first past the post approach' will be taken by the CAA and DFT in its consideration of the separate schemes? By this we mean can we be assured that should Gatwick proceed first, Heathrow will need to re-do their evidence and environmental assessments to reflect the changes at Gatwick and not just continue to rest on their findings from earlier stages.

7.6.11 – To what extent do the upgrades to East Croydon station and the Windmill Junction impact on the ability of the Gatwick train service to be successful and cater for passenger increases? More clarity around this and the realities of those upgrades need to be set out. It also needs to be made clear what contingency will be put in place should those works not go ahead.

7.6.17 – The Council would challenge the statement that there is no traffic impact beyond local road networks. Traffic will inevitably travel in both directions on the M23, to and from the M25 to access the airport. The Council is currently grappling with capacity issues on Junction 6 of the M25 and the connecting A22. Gatwick related traffic will increase due to the DCO and the flow of traffic passing through this junction will be increased if this proposal goes ahead. This will be the same for other M25 junctions, such as 7 and 8. We do not accept that the impact will only be local.

General – With a 13-14-year programme, conflicting projects (FASI/Heathrow), the recently assented Environment Act and the challenges of Climate Change, details of mitigation for the longer term do not appear to have been sufficiently covered. While it is understood that mitigation is generally about offsetting the impact of development, there is very little detail on mitigation that would be needed/catered for, in the longer-term. It is accepted that due to the length of time the project will take some impacts may be unknown at this time, therefore a strategy which demonstrates how longer-term impacts will be monitored and mitigation implemented, should be set out.

Chapter 1: Introduction

No comments.

Chapter 2: Planning Policy Context

No comments.

Chapter 3: Needs and Alternative Options

General – GAL’s overall approach to ‘need’ is based upon a return to 2019 passenger numbers by 2030, and continuation of growth in passenger numbers. However, as stated consistently in our response, there is considerable uncertainty over forecasts of future use of airports generally, in the light of the joint impacts of the pandemic, recognition of the climate emergency and need for decarbonisation, and Brexit. GAL recognise uncertainties in the data at Para 3.2.8. While it is not possible for the Council to say that the pandemic has altered things so significantly that a ‘need’ no longer exists, it is also not legitimate to argue that ‘needs’ and growth forecasts from before the pandemic, remain accurate. A commitment from GAL to carry out such a review of its data is necessary.

3.2.26 - GAL estimates that even without the northern runway, by 2038 passenger numbers will be 62.4mppa through increased flights in the off-peak part of year, increased load factors and larger aircraft. While it is acknowledged that GAL suggests pursuing Scenario 1 would result in a reduction in market share from 26% to 23%, without a review of the baseline data, it is unknown if the growth really would be as high as 62.4mppa and whether the northern runway is still, in fact, needed. A refresh of data, could mean that Scenario 1 is more suited to growth.

Chapter 4: Existing Site and Operation

4.3.2 - The severity of the pandemic on the aviation industry and the long-lasting impacts are still emerging and for GAL to expect airline demand at Gatwick to return to previous levels over the course of the next few years could be short-sighted. The effects of the pandemic are continuing to take effect with travel restrictions still in place and passenger attitudes to air travel changing. As such, current and future passenger data cannot be easily comparable with the effects of the pandemic on the aviation industry still emerging.

4.4.3 – The Council would welcome further clarity on the impact of growth on passenger throughput using a “no northern runway project” scenario, based on the already consented schemes.

4.5.3 - Although it is accepted that FASI-S is early within the process of the review and data surrounding proposed airspace management not available, the implication of this review is due to emerge during the DCO process for the northern runway project. As such, the proposed FASI-South airspace changes should not lie outside of the scope of this project altogether.

Chapter 5: Project Description

5.2.3 - We question whether elements forming part of the project design, such as provision of additional hotel and office space and new car parks, should fall outside of the scope of the DCO process. We would like clarity as to whether all these accord with the principles of associated development set out in the Planning Act 2008, or whether separate planning applications should be submitted to the relevant authorities. This comment also reflects the points we have raised in our response around justified needs and whether such ancillary development is required.

5.2.71 - Off-airport parking is an issue for this District, with unauthorised sites appearing outside of the airport boundary but within proximity of the airport. Many of these sites increase pressure on the road network, especially the rural roads.

5.2.74 - This would be reliant on a guaranteed modal shift to more sustainable travelling behaviours for passengers and staff at Gatwick. In some circumstances it may not be possible for passengers or staff outside the proximity of Gatwick to travel sustainably due to limited public transport networks, or due to the logistics of travelling with luggage. This is particularly relevant for residents in Tandridge where direct public transport links to Gatwick Airport are limited and the reliance on private transportation to and from the airport remains.

5.2.77 - Surface access improvements do not seem to extend to Tandridge particularly along the A22 corridor, the A22/A264 Felbridge Junction and Junction 6 of the M25 during the construction and operational phase of the Project. Further details on this are to be made in our comments to Chapter 12 Traffic and Transport, below.

Appendix 5.3.1 - We would question the phasing timetable and would seek justification as to why some elements are to be constructed earlier/later than others. For example, why are the hotel and commercial facilities and car parking expected to come forward before surface access improvements and a fully operational runway?

Chapter 6: Approach to Environmental Assessment

No comments

Chapter 7: Historic Environment

While several general comments have been made below, our full comments should be read in conjunction with that of the heritage specialists from Surrey County Council who are able to offer a specialist view.

General - It is noted that this chapter recognises several heritage assets, comprising listed buildings, locally listed heritage assets, archaeological sites, conservation areas which fall within the various zones and which are located within our administrative area. Given the location of the nearest construction activities, primarily those in relation to the widening of the M23 spur, it is considered that there is unlikely to be any direct impact on heritage assets within this district. However, we would raise concern in relation to the impact upon the setting of heritage assets. The Theoretical Zone of Visibility is considered when assessing visual changes within the setting of heritage assets. This indicates that for our listed buildings, there is either no theoretical visibility, no new visibility or both new and existing elements are visible. It is recognised that given the topography of the area, the distance and intervening screening, that there are unlikely to be significantly different impacts upon their setting than at present.

General - It is noted that of those that are noise sensitive and which fall within the predicted noise change footprint, none are within this administrative area. However, this conclusion is very much reliant upon the assumptions being used in understanding noise impacts arising

from the proposal, particularly in relation to how airlines will transition to quieter fleets, being a realistic and appropriate approach.

General - In relation to road traffic noise, it is understood that modelling has focused on changes around the North and South terminal roundabouts. However, the PEIR acknowledges that much of the traffic must go through the M23 junction, and there is some concern that this approach fails to consider the cumulative impact.

General - We would also draw attention to the fact that, with Surrey County Council, a call for nominations for locally listed heritage assets is currently underway and as such a revised list with new non-designated HAs is likely to be adopted in 2022, which may introduce additional assets within the zones used.

Chapter 8: Landscape, Townscape and Visual Resources

General – This chapter is particularly difficult to navigate, entirely impenetrable in places and not considered to be user friendly. It is appreciated that there is a great deal of technical information, but if it cannot be properly interrogated by interested parties, it raises questions around whether it is effective in presenting landscape considerations.

8.2.2 - While it is recognised that the Tandridge Local Plan is not currently adopted, it is at examination and includes extensive landscape policies that should be considered. TLP30-34 are relevant and provide an up-to-date position on our much valued and high-quality landscape. Reference is made to these, but it is not clear how the various policies have been accounted for. These policies are underpinned by extensive landscape evidence¹, and we request that it is taken into account to ensure the GAL approach is consistent with our local position.

8.6.23 – 8.6.25 - Unlike other AONBs the Surrey Hills has just embarked upon a review of its boundary, led by Natural England. There is no regard to this within the text and it is essential that consideration be given to this. Candidate areas for the extension of the AONB are already available and information regarding further study areas and additional candidate areas for expansion will be available imminently.

8.6.45 - While reference is made to Reigate and Banstead, Crawley and Mole Valley, there is no reference to Tandridge, within this section of the landscape document. Tandridge landscape on the eastern side of the DCO area is noted on the corresponding map but lacks any detail. In addition, we recognise that the document states consideration is given to those areas within 5km of the application site, but why is this only 5km? Landscape is fluid and depending on the local characteristics, will be impacted differently. Much of the land between the application site and Tandridge landscapes is open, therefore a larger area of influence should be considered. As previously stated extensive landscape evidence² has been prepared for Tandridge and while a specific local landscape character assessment does not exist for Tandridge, much of the information that would be included in a specific document does exist. No regard has been had to this.

8.6.67 - Whilst Gatwick airport is not clearly identifiable from the more populated areas of Smallfield, Outwood and other settlements of the District, the landscape impact comes most notably in the form of aircraft movements which appear on the skyline. The significance of

¹ <https://www.tandridge.gov.uk/Planning-and-building/Planning-strategies-and-policies/Local-Plan-2033-emerging-planning-policies/Local-Plan-2033/Examination-library#Panelctr1510>

² <https://www.tandridge.gov.uk/Planning-and-building/Planning-strategies-and-policies/Local-Plan-2033-emerging-planning-policies/Local-Plan-2033/Examination-library#Panelctr1510>

visual intrusion in this regard is a fundamental concern and a more proactive recognition of this and the significance it represents for communities would be welcomed. Currently, it reads as a lesser consideration because it is not about the actual impact on the physical 'ground level' landscape.

8.6.165 - To state that "*It is predicted that in 2032 there would be a reduction in the area of landscape and townscape affected by aircraft noise and, therefore, the number of residents affected living in the affected area. Between 2032 and 2038 the fleet would continue to change to quieter types, resulting in further reduction in baseline levels*", is incorrect. Due to the impending FASI-S programme, it is not possible to be able to determine this. Whilst it is accepted that this document reflects on the impacts of the DCO, it is misleading when the impact is cumulative and as such it should not be considered in isolation from other known projects. To do so arguably does not represent how communities will experience being flown-over.

Table 8.7.1 - This table is not helpful and overly technical. It is unclear what it is stating and the extent of impact.

8.9.209 - This is a significant increase in flight movements, the areas and communities flown over 'South of Edenbridge and East of Gatwick Airport' includes several settlements and residential areas in Tandridge District which seemingly appears to be trivialised in the wording used. Furthermore, for communities the additional impacts of the FASI-S programme as well as the DCO, cannot be fully understood at this stage to allow GAL to assert that there will be minor adverse effects. The impact of flightpaths is cumulative and whilst it is appreciated that information on FASI-S is not currently available, this does not negate the concerns raised and seeming lack of information in the wider consultation documents, as to how this will be accounted for.

8.9.213 - See comments on 8.9.209. Same concerns apply.

Design Year: 2038 and beyond - On reflection of some of the concerns raised by the Council, it would be helpful if further information, regarding mitigation, could be set out detailing the significant forthcoming changes which are due i.e. FASI-S and Heathrow programmes. Details on how the mitigation will be reviewed to reflect these would go some way to demonstrating GAL's commitment to providing effective mitigation over changing circumstances. It is understood that GAL can only work with technical information available to them at the time, but it does not follow that it should remain focused on that evidence, given the changes likely over such a lengthy development phase. A commitment to update evidence, mitigation and information as more becomes known on FASI etc, would be welcomed.

General – It is felt that GAL should be more aspirational in terms of opportunities to improve wider green and blue infrastructure through the implementation of mitigation measures. As presented, they are relatively basic and minimum requirements and therefore a missed opportunity.

Chapter 9: Ecology and Nature Conservation

General - The Council recognises that in most instances this work is focused on land within the Project site boundaries and on species which are not particularly mobile. These factors coupled with the distance of the majority of works from our administrative areas and the presence of the M23, means that impacts would essentially be outside of our administrative area. However, the study area includes a 5km buffer for nationally and locally designated sites, a 10km buffer for bats and otters and a 2km buffer for other protected or other notable species and as such extends within our administrative area. Concern is raised regarding the data used in relation to Surrey which is from 2016, and it is suggested that more up-to-date data is

available and should be used. It is highlighted that the SNCI list has been updated since 2016 and that not all SNCIs within the 5km buffer have been considered. It is also noted that not all the Biodiversity Opportunity Areas (BOAs) affected by the Project site have been considered e.g. the River Mole (plus tributaries) BOA. Details of the BOAs covering Surrey are available online.

General - It is noted that one of the issues is the effect of nitrogen deposition in relation to sensitive receptors, which with respect to our district primarily relates to ancient woodlands, of which there are a number in proximity to this site. However, as an assessment of the effects of air quality on ancient woodland is to be included in the Environmental Statement, it is not possible to assess the impact at this stage. It is also noted that GAL has not included the third runway at Heathrow within the cumulative assessment for ecology. It is considered that the worst-case scenario should include this element.

General - In terms of species, it is recognised that bats are highly mobile and are clearly present within Tandridge district. The supporting work highlights an east-west habitat corridor and that there would be a loss of habitat along this corridor, which would be compensated for once the highway works are completed. Work to date notes that this corridor is not currently known to be used by Bechstein bats but that further surveys would be undertaken and reported in the Environmental Statement, which is supported. It is recognised that the M23 has the potential to act as a barrier/disruptor in relation to connectivity with our administrative area.

Chapter 10: Geology and Ground Conditions

While several general comments have been made below, our full comments should be read in conjunction with that of Surrey County Council (SCC) who are the Lead Local Flood Authority and are able to offer a technical specialist view.

General – The Council recognises that this chapter looks at land quality, groundwater quality, land instability and mineral resources. The study area comprises the Project site boundary plus a 500m buffer. The Project site boundary encompasses the widening of the M23 spur eastbound from two to three lanes and this falls in part within the administrative area of Tandridge. Concern is raised regarding this in terms of the potential for run-off from construction areas to soils and subsequent leaching into groundwater. The construction of the surface access works would also introduce additional surface run-off during their operational phase by introducing additional hardstanding.

General – This chapter concludes that loss of soil function would represent a low magnitude of impact, as they support a managed grassland with a low sensitivity. It also notes that the surface access works would be accompanied by the installation of drainage early in the construction process, which would manage the run-off during construction and that the drainage network, which would include filter drains, attenuation ponds etc and which would attenuate run-off, with pollution control measures, would limit the impact on surface water bodies as well as pollution to the soil. This element of the proposal could be developed with mitigation measures preventing harm to land and groundwater quality, however, such mitigation should be fully considered by the technical experts at SCC, who are the Lead Local Flood Authority.

General - There are no mineral safeguarding sites within Tandridge that are close to this site, so no further comments are made on this element, however, SCC, as the Waste and Minerals authority should be engaged as they are currently preparing a new Local Plan and will have the most current information.

Chapter 11: Water Environment

This chapter is very broad and assesses the proposal's impacts on all water related effects: water supply, wastewater, flood risk, surface water drainage, geomorphology, water quality and groundwater resources. As such it is very technical. Tandridge does not contain the technical expertise needed to critically analyse the methodologies used and as such will defer to those with the expertise in the various areas covered. It is noted that colleagues from SCC, who are the Lead Local Flood Authority (LLFA) for our area, will be responding in terms of surface water elements and that many of these impacts will fall within the remit and responsibility of the Environment Agency. The issues of water supply and wastewater fall within the respective water and sewerage companies. As such, while several general comments have been made below, our full comments should be read in conjunction with the comments of other technical specialists.

General - In terms of watercourses the Burstow Stream partially falls within the administrative area of Tandridge. It joins the River Mole to the north of Horley and our section is some distance upstream of this. The main issue of concern arising from surface access works are the potential encroachment upon floodplains and the increase in hard surfacing which in turn could increase the run-off and associated contamination. It is noted that the works to the M23 spur do not appear to fall within any flood plain and that a drainage network would be installed, which would aim to control run-off to pre-development rates, if not greenfield rates and which could be designed to manage/prevent pollution of land or watercourses. However, due to the ongoing flooding issues in Tandridge and the Burstow and Smallfield areas, the Council would request that regular information is made accessible to the Council, the LLFA, the community and ward members in those areas to ensure that they remain informed of any potential issues regarding flooding/surface water etc. This should be over and above that of formal consultation.

General - It is noted that Burstow Stream, which passes through our administrative area, was not originally scoped in in relation to geomorphology and as such has not been the subject of a site walkover, so there is no information as to its geomorphology. While we recognise that GAL has stipulated this will be visited prior to the submission of the Environmental Statement, concerns are raised as to whether this was an oversight at this stage. The proposal includes modifications to attenuation ponds, drains and including outfalls to the Burstow Stream in relation to the surface access works, which it is noted could impact on its geomorphology, although it is unclear where this would occur in the absence of further detail.

Chapter 12: Traffic and Transport

This chapter contains a lot of technical detail which will be addressed by colleagues from Surrey County Council as the Highways Authority and technical specialists for the County. West Sussex County Council will also be responding on behalf of the districts under their remit. However, in addition to the response of the highways authority we wish to highlight several issues in so far as they relate to the District of Tandridge and in our position as the local authority.

Section 12.4 – It is noted that J7 of the M25 is included within the work but not J6, however, the Area of Detailed Modelling (diagram 12.4.3) does include J6. It is recommended that J6 of the M25 be included as a study area, particularly given the capacity issues with this junction which have been identified as part of the Examination of the emerging Tandridge Local Plan; technical data exists regarding this. In addition, the Felbridge junction on the A22 has not been

accounted for but represents a significant issue on the A22/A264 and been subject to discussions regarding capacity across affected district and highway authority areas.

Table 12.4.1 - It is noted that majority of the surveys date from 2016, and whilst the disruptions to data collection since this time are understood it is recommended that this data be updated where appropriate to take account of more current travel patterns. Behavioural changes following Covid and Brexit have altered the way businesses operate, people travel and indeed the need to travel and needs to be reflected on.

12.6.58-59 – GAL has indicated that it will only support committed highway schemes, which at this stage would exclude J6 of the M25. This approach is short-sighted and potentially at detriment to the airport.

12.9.24 - Annual passenger demand for 2029, the first full year that northern runway is operational, is expected to increase from 57.3 million in the 2029 future baseline to 61.3 million with the Project. However, Table 12.8.1: Mitigation and Enhancement Measures shows that Surface Access Improvements will not be required until 2032 and will not begin until after the opening year of the project. In addition, it is noted that the hotel and car parking precede the runway becoming operational but will generate additional traffic. As such, how can the phasing be justified as the approach is out of kilter with effective offsetting of the development.

12.10.1 – The Council questions the assertion in this paragraph that climate change is not considered to have a direct impact on the traffic and transport topics addressed, but that changing travel behaviour in response to climate change concerns is expected to result in a long-term shift to more sustainable modes of transport. It is argued that this is incorrect and over-estimates the swiftness of channel shift to more sustainable modes of transport. It is also unrealistic to assume that people would rather manage their baggage on public transport, than through the ease of their own car. With the level of car parking currently in place and the increase set to come forward through the DCO, the option of parking is favourable and will impact on traffic levels and carbon emissions. It is felt that GAL has not properly considered the aspects of climate change and should be more aspirational in terms of opportunities to improve the environmental impacts of the airport in terms of its traffic and transport plans.

Chapter 13: Air Quality

General – Due to the technical nature of air quality matters, the Council response will be submitted by the Mole Valley Environmental Health team on our behalf. However, we would like to bring your attention to the existing evidence³⁴⁵ the Council has carried out regarding the

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<https://www.tandridge.gov.uk/Portals/0/Documents/Planning%20and%20building/Planning%20strategies%20and%20policies/Local%20plan/Local%20plan%202033/Examination%20library/ECOLOGY/ECO4-Tandridge.pdf>

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<https://www.tandridge.gov.uk/Portals/0/Documents/Planning%20and%20building/Planning%20strategies%20and%20policies/Local%20plan/Local%20plan%202033/Examination%20library/SSHA/SSHA6.pdf>

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<https://www.tandridge.gov.uk/Portals/0/Documents/Planning%20and%20building/Planning%20strategies%20and%20policies/Local%20plan/Local%20plan%202033/Examination%20library/SSHA/SSHA9-Tandridge-Local-Plan-Ashdown-Forest-Air-Quality-Impact-Assessment-2018.pdf>

significance of air quality issues and the impacts for the A22 as well as the Ashdown Forest Special Conservation Area and Special Protection Area.

Chapter 14: Noise and Vibration

General – Due to the technical nature of noise and vibration matters, the Council response will be submitted by the Mole Valley Environmental Health team on our behalf. However, we would like to raise concern regarding the lack of consideration of impacts on communities to the east of the airport, particularly Burstow and Smallfield. The effects of prevailing winds and travelling noise seems to have been focused to the west of the airport with little consideration of the experiences of current residents to the east who have first-hand knowledge of how the existing airport operations impact them. It is requested that the methodology and technical details regarding this be revisited.

Chapter 15: Climate Change and Carbon

Paragraph 15.1.6 – The Council is concerned that the final data and information on climate change, including action plans and mitigation will not be submitted until the Environmental Statement (ES) stage, which will be part of the DCO submission. While it is recognised that some information has been presented, there is a lack of innovate, forward thinking. More detail on actions and mitigation should be available now to demonstrate that it is a matter at the heart of the DCO. The significance of climate change cannot be underestimated and by default of the fact that the DCO will be about increasing flights and travel, the impact on climate change will be a negative one. The information provided does not present a convincing position that the plans will contribute to the national climate agenda, including meeting carbon budgets. It is unclear how GAL intend to review climate impacts as the process evolves, technical details are changed and refined and as government release further details of their climate-related targets.

Table 15.8.1, 15.8.2 and 15.8.3 - The mitigation measures GAL has referenced so far seem to refer to future technological innovation. Hence there is a chance that these innovations will not be delivered and cannot be relied upon for the short to medium terms. Instead, other known solutions should be utilised. It is considered that there are some real opportunities for GAL to show innovation and commitment to mitigating climate change and using what is already available, however, this does not currently appear to be the case.

Paragraph 15.12.5 – The Council do not consider this to be consistent with the greenhouse gas assessment conclusions in paragraph 15.12.3. GAL's model indicates that the project will lead to an increase in emissions and clarification is needed on the accuracy of the data to form the basis of this assessment.

General - A net increase in CO₂ (i.e., by intensifying and increasing aircraft movements, surface works and surface access etc.) from the proposal would not align with TDC's climate change ambitions/commitments. GAL should ideally be seeking to reduce their organisational and aircraft emissions as they stand now, as opposed to increasing them and then reducing back down to current levels. We recognise that this is a challenge but maintaining the status quo is contrary to the national and international efforts to reduce emissions.

Chapter 16: Socio-Economics

Table 16.4.2 - The effect of the development on property values on residential and commercial properties outside the Project area has not been scoped due to no change to flightpaths.

However, there is the potential for properties to be newly overflowed and for the intensification of flights on existing flightpaths, which includes routes over Tandridge.

16.4.7 and Figure 16.4.1 - We do not support how the Local Study Area has been defined. The area includes the settlement of Burstow and part of Smallfield, both within Tandridge's administrative area. It is unclear why only part of Smallfield is included, as it is the largest settlement within Burstow parish and one of our higher tier settlements in the District. Furthermore, it includes several site allocations in our emerging Local Plan 2033 which will be affected if the project is consented.

6.4.9 - There is a concern that GAL has assumed that the worst impacts from the Covid pandemic will principally be felt in 2021 and 2022 however, this may not be the case and as such there should be some alternative scenario testing based on the potential impacts over a longer period.

16.6.13 - The data does not take the pandemic and the effects of unemployment rates into account which may have been influenced by the Government's furlough scheme. The implications of this are only just emerging and potentially will not be understood for years to come.

16.6.35 - Includes data from Cambridge Econometrics which factors in the year of the pandemic, 2019-2020. This is inconsistent with the general approach GAL has taken to show a pre-pandemic position.

Figures 16.6.9-16.6.13 - Some Tandridge community facilities are missing. GAL fail to take account of the significant work that local authorities have undertaken to form part of the evidence-base for adopted and emerging Local Plans.

Table 16.8.1 – This does not go far enough to consider and explain the realities of development and build out. For example, GAL sets out that they will provide compensation to adversely affected stakeholders during construction, however, what do GAL define as "adversely affected" and what are the details of the compensation that GAL is looking to provide? Whilst we do not object to the mitigation measures set out, more work is needed to show how GAL will seek to deliver them.

16.9.11 - During the construction and operational phase, it is likely that the development could lead to difficulties when travelling through settlements neighbouring the airport. Tandridge has several strategic infrastructure issues, particularly capacity issues along the A22. The traffic implications along the A22 corridor could have a knock-on effect on local economic activity in the district.

16.11.1 and Appendix 19.4.1 - List of permissions does not accurately reflect the development coming forward, specifically in Tandridge. It is recommended that GAL ask neighbouring authorities to submit the planning permissions they are aware of in their respective areas that would have a cumulative effect on development within the vicinity of the airport.

Appendix 16.6.2 - We do not support the approach to capture the housing that may come forward in the study area to 2038. Specifically for Tandridge, the current housing trajectory and five-year housing land supply is based on what is published in the Authorities Monitoring Report (AMR) 2019-20. This report is already out of date and as such does not reflect the most up-to-date position. In addition to this, an average of housing supply is made from 2026-2038, this does not accurately reflect the scale of housing that is due to come forward from our emerging Local Plan 2033, as well as where in relation to the airport these sites are expected to be.

General - Tandridge is similar to other Surrey Authorities neighbouring the airport regarding the supply of housing. Affordability in Tandridge is a key issue, with average house prices in the district being 14 times higher than average earnings. This means it is increasingly difficult

for local people to get on the housing ladder. Growth at Gatwick will influence both the local labour market and, of particular concern to this District, the demand for housing. There is a concern that GAL assumes that housing for workers will be provided based on the uplifted numbers the Government is expecting local authorities to deliver. This excludes any work undertaken by authorities to identify key issues such as market signals, affordable housing or constraints on housing supply.

Chapter 17: Health and Wellbeing

General – Several of the issues raised in this chapter cross-reference with other chapters, particularly in relation to noise and air quality. The Council's responses to these matters are set out across the chapters.

17.2.11 - It must be recognised that night time flights are not the only airport activity to cause sleep disturbance to residents in proximity to the airport. For example, an increase in passengers using the roads to access the airport and the work during the construction phase of the project will also be a factor in sleep disturbance. This will need to be adequately mitigated against so that the health of those near to the airport is not severely impacted.

Table 17.2.2 - Does not list current planning policies for Tandridge in relation to health and wellbeing. Although the adopted Core Strategy may not have a direct policy in relation to health and wellbeing, there are several policies which set out ways that development must not be to the detriment of local communities by reason of noise, air quality and additional traffic and as such are closely related to the topic of health and wellbeing. We also note that our adopted Local Plan Part 2 – Detailed Policies (2014) was not scoped in this assessment. Some of its policies are relevant to this chapter and GAL may wish to consider them.

17.6.11 - GAL stating that there is a general improving trend in hospital stays for self-harm and suicide rates is misleading and contrary to figure 2.6.1 in Appendix 17.6.1.

17.6.12 - Same as comments above in relation to participation in physical activity in figure 2.7.3 in Appendix 17.6.1. This needs to be addressed as it shows the importance of retaining, enhancing and improving open spaces near the airport for residents in the local study area to access.

17.9.9 - No communities in Tandridge or to the east of the airport have been listed yet, have the most potential to experience localised adverse changes in noise exposure during the initial construction phase.

17.9.5 - Full assessment on the effects of construction traffic and noise is to be deferred to ES stage. This is likely to be to the detriment on the health and wellbeing of residents near to the airport and as such, we would welcome a more detailed assessment on the implications of this.

17.9.21 - It would be useful if the traffic modelling used for the basis of this statement could be shared at ES stage when full assessments on construction traffic are presented.

17.9.70 - This would be to the detriment of those residents in the south-west of Tandridge and where the health and wellbeing of those residents would be compromised.

17.9.111 - There is a correlation of an increase in passenger throughput per annum and the number of passengers who have been taken to hospital. On reflection of the pandemic, the project would exacerbate this and add to existing NHS pressures.

17.9.132 - Mitigation measures to prevent an increase in detrimental health outcomes for residents in these noise contours needs to be detailed, beyond the homeowners assisted moving scheme GAL is offering.

Chapter 18: Agricultural Land Use and Recreation

18.2.7 - There is no reference to Tandridge District here which closely borders the end of the existing runway.

18.2.2 - There is no reference to Tandridge District here which closely borders the end of the existing runway.

General – This is a confusing document and it does not make it clear as to why only 3 of the neighbouring authorities are touched upon in terms of information. There are errors in the document also, including the amalgamation of RBBC and Epsom and Ewell at Table 18.6.2

Chapter 19: Cumulative Effects and inter-relationships

19.2.6, footnote 1 - Reference is made to the fact that the National Policy Statement for National Networks (road, rail) is to be reviewed in the light of the Transport Decarbonisation Plan published by DfT in July 2021, once post pandemic demand patterns become clearer, similar arguments apply to air travel demand. As such, this, coupled with a variety of other concerns raised by the Council, including the impacts of the FASI-S programme, present an argument for slowing down the DCO process so that it can reflect more representative forecasts and other areas of work that will inevitably and cumulatively generate impacts for the DCO.

Table 19.3.1 - The cumulative impacts of Heathrow are correctly identified here as an important consideration for the northern runway DCO. Whilst GAL confirms it has used the best information available, the consultation is dismissive of the up-to-date Heathrow position and offers no context as to how this matter will be kept under review. The impacts of Heathrow, over the course of the DCO process, build out phase and beyond are likely to be significant and while GAL cannot anticipate what the extent of impacts will be with any certainty, it offers no recognition of the risk.

Table 19.4.3 - The Council seeks clarity as to why less weight is attributed to allocations in emerging Plans than Nationally Significant Infrastructure Projects (NSIP). Unless under construction, NSIPs often take time to come forward and may need to have technical alterations determined before delivery. As such, while allocations in emerging Plans are still seeking formal allocation and the undertaking of a planning application, this timescale could still be comparable to that of a granted NSIP. There are only two mentions of NSIPs in the whole document and it is insufficiently detailed to explain GAL's approach. There are proposed land allocations at Smallfield (as listed in table 19.4.5), which is a settlement very much impacted by Gatwick, that should be considered by the process to ensure that any impacts on existing and new residents are accounted for.

Table 19.4.5 - This table would benefit from an additional column which identifies the relevant local planning authority (LPA), the application relates to.

Table 19.8.1 - As raised in other aspects of our response, we do not feel that enough has been done to address the longer-term mitigation (predominantly Design Year 2038 and beyond) and aspects of this further supports that feeling. GAL must be clearer in providing context of how it reaches its conclusions and set out how this will be kept under review.

Table 19.9.2 – Given the other comments made in the Council's response, it is not possible to conclude that this table accurately represents what needs to be further considered. For example, Climate Change and Carbon. Significant concerns are raised regarding the extent to which climate change is addressed and the extent to which it impacts on the national efforts and targets to mitigate climate change. As such, the context provided is dismissive of the

further and ongoing assessment that is needed. These same comments apply to that of table 19.9.3 and 19.9.4 which fail to give sufficient consideration of inter-related impacts accurately.

19.9.10 - The assumption regarding the 5km boundary and communities not being impacted lacks context and evidence to make such an assertion. We would welcome clarity around this.

19.9.13 - This paragraph is disputed on the grounds that the Council does not feel that the noise impacts, on the communities to the east of the runway, have been sufficiently assessed, particularly regarding the impacts of prevailing winds on travelling/displaced noise impacts. Communities in Burstow and Outwood parishes are particularly impacted by this.

19.10.5 - The Council welcomes the clarity around how this assessment will be updated but requests that a review of what has been included at this first stage, is undertaken on reflection of the wider comments GAL receive on each of the relevant chapters.

Chapter 20: Summary of Effects

Comments made under relevant chapters.

Other technical documents

Outline Employment, Skills and Business Strategy

General - This strategy is informed by the projected socio-economic effects of the project and as such relates to the comments made in Chapter 16 of our response, including the unreliable use of pre-pandemic data and the lack of consideration of Brexit's impacts.

2.2.5 - The Appendix for this section groups the attendees at all meetings held in 2019, 2020 and 2021. We would like clarification on the attendees at each stage of the round table meetings and group discussions. Formal recordings of minutes from each of the meetings would help to provide an overview of the key discussion points from the meetings.

2.1.3 - This section conflicts with paragraph 16.9.10 in Chapter 16 Socio-Economics, where a proportion of construction workers would come from outside of the three study areas. With data showing 48% of construction workers in the South East travelled at least 50 miles from home to site in 2018/19.

Land use and construction phasing plans

General - There are questions regarding the build out schedule for the project, with ancillary development coming forward much earlier in the programme than the runway itself. Further details are needed setting out a justification for the proposed development trajectory. Furthermore, impacts on the road network from this ancillary development are inevitable but are not addressed until after it has been constructed. In addition, it is unclear how construction traffic will be managed on the existing network.

General - The build out trajectory should be clearly set out in a table format as the maps are challenging to read in some instances.