

East Sussex County Council (ESCC) Issues Tracker comments

18 September 2023

The following table comprises comments raised by East Sussex County Council as part of the Preliminary Environmental Impact Report (PEIR) consultation (2021), the Highway Project and Improvements Update consultation (2022), and comments raised through GAL NRP Topic Working Group meetings.

Topic	Date raised	Method raised	ESCC concerns
Transport (includes surface access, public transport, modelling)			
Transport	Jul-22	Gatwick Airport's Consultation: Highway Improvement Changes and Project Update (Summer 2022)	Need a process whereby GAL liaises with the rail, coach and bus operators to get a better understanding of travel behaviour and how this may look in the future, and that this is taken into consideration when GAL develops their ASAS.
Transport	Jul-22	Gatwick Airport's Consultation: Highway Improvement Changes and Project Update (Summer 2022)	Improve bus connections to East Sussex to reduce car use and to enable longer distance inter-urban journeys to be undertaken by public transport rather than by car.
Transport	August 2022	Comments in response to Transport TWG meeting	Unclear as to why the Uckfield route is categorised as a 'coach' route. This should be provided as a bus service, permitting local travel between bus stops.
Transport	August 2022	Comments in response to Transport TWG meeting	There needs to be an integrated approach to public transport provision as there is an ESCC funded local bus service running parallel to the proposed coach route for the greater part of the route, between Uckfield and East Grinstead (this is currently the 2 hourly Monday to Friday daytime only route 261).

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Transport	August 2022	Comments in response to Transport TWG meeting	Recommend extending the 261 route beyond East Grinstead so as to provide a direct service between Uckfield and Gatwick Airport. We wish to see the operational hours of the service extended to include early mornings, evenings and weekends. This would need a funding contribution from Gatwick Airport.
Transport	August 2022	Comments in response to Transport TWG meeting	<p>Scope for a Gatwick – Crowborough service; suggest a separate ‘new’ route due to its geographical location and the limitations of the road network.</p> <p>There would be scope for a Crowborough – Gatwick route to run via Forest Row and East Grinstead thereby, in combination with an Uckfield – Forest Row – East Grinstead – Gatwick service, doubling the frequency between Forest Row and Gatwick.</p> <p>Metrobus should be engaged with, as they run bus services in the Forest Row, East Grinstead, Crawley and Gatwick areas.</p>
Transport	August 2022	Comments in response to Transport TWG meeting	<p>Any new services, with Demand Responsive Transport (DRT) in mind, should:</p> <ul style="list-style-type: none"> • be wholly integrated with conventional public transport (i.e. integrated ticketing and service design) • complement existing bus services, i.e. only runs at times/to places when conventional bus services are not available • Where feasible, feed into conventional services (i.e. first mile/last mile principles). This does require high levels of integration, service reliability, public information, waiting facilities and ticketing. <p>In East Sussex we would see DRT potentially feeding the proposed Uckfield/Crowborough links using the above principles, rather than running all the way to/from the Airport.</p>
Transport	August 2022	Comments in response to Transport TWG meeting	Consideration given to Heathfield being an extension to the Uckfield – Gatwick service. Important to integrate this with the existing ESCC funded bus service between Heathfield and Uckfield.

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Transport	Jul-22	Gatwick Airport's Consultation: Highway Improvement Changes and Project Update (Summer 2022)	Concern over the impacts of the NRP on additional car journeys to the airport via Ashdown Forest which is an area of European Ecological Importance, Special Area of Conservation, and a Site of Special Scientific Interest (SSSI). Need to consider these impacts as part of the modelling work being undertaken (air quality - nitrogen deposition issues).
Economy (includes employment, skills, businesses)			
Economy	September 2023	NRP ESBS topic working group response	For construction related procurement GAL should seek to ensure that contractors (including any sub contractors) deliver social value in employment and skills (i.e. contractors/subcontractors also to offer recruitment offers, apprenticeships and upskilling of staff).
Economy	September 2023	NRP ESBS topic working group response	Sub-contractors should work to the CITB national skills academy for construction framework benchmarks, and the same in relation to non-construction procurement.
Economy	September 2023	NRP ESBS topic working group response	The Employment Skills and Business Strategy (ESBS) should include specific mention of links to Careers Hubs working with schools across Surrey, West Sussex and East Sussex.
Economy	September 2023	NRP ESBS topic working group response	In non-construction, the option should include upskilling existing workforce.
Economy	September 2023	NRP ESBS topic working group response	Ensure that SMEs and subcontractors include social value measures in their provision that echo those of GAL's ESBS and that work is undertaken with LA Careers Hubs to engage with schools around the careers agenda.

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Economy	September 2023	NRP ESBS topic working group response	We are also keen that GAL uses its unique position in the region to develop an Inward Investment Service and Strategy, and that the development and delivery of initiatives led by the Sussex Chamber of Commerce and other partners should <i>develop</i> (not just promote) international trade opportunities with destinations aligned to LGW's route network.
Environment (air quality, carbon emissions and air quality)			
Climate change			Question of whether Gatwick expansion is compatible with the Government's legal commitments on climate change – the Government's own advisory body (the Climate Change Committee) has expressed caution on airport expansion (not specifically at Gatwick, just generally).
Carbon Emissions and Climate Change	Nov-21	East Sussex County Council response to the proposed Gatwick Northern Runway Project (consultation on the PEIR)	Due to the lack of detail on identified Green House Gas (GHG) mitigation we have been unable to determine the full impact of the proposed scheme on the climate.
Carbon Emissions and Climate Change	Nov-21	East Sussex County Council response to the proposed Gatwick Northern Runway Project (consultation on the PEIR)	Due to the lack of detail on identified CCR mitigation we have been unable to fully assess the climate change resilience of the NRP.
Climate Change	Jul-22	Gatwick Airport's Consultation: Highway Improvement Changes and Project Update (Summer 2022)	The negative impacts of emissions on climate change arising from aircraft flights and the ancillary operations and traffic movements associated with air travel (at Gatwick) need careful consideration. Need reassurances that the forecasts and values used by GAL in the preliminary economic impact assessment have been assessed appropriately.

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			In the Gatwick aircraft emissions modelling only two scenarios have been modelled: one where technologies unproven at scale are rolled out quickly, and one where the same technologies are adopted a little more slowly. A wider range of scenarios, for example ones where those unproven technologies have little impact, should be modelled.
Climate Change	Jul-22	Gatwick Airport's Consultation: Highway Improvement Changes and Project Update (Summer 2022)	GAL need to work with key stakeholders on the Carbon Action Plan to consider ways to reduce carbon emissions that are in and outside of their control, such as those arising from aircraft at take-off, and from vehicles undertaking surface access trip to/from the airport.
Noise (includes flights over local communities)			
Noise	Nov-21	East Sussex County Council response to the proposed Gatwick Northern Runway Project (consultation on the PEIR)	<p>Due to the effects of overflight and noise disturbance on people's health and wellbeing, it is very important for us to gain an accurate understanding of how many more flights would be passing over East Sussex and which locations would be the most affected.</p> <p>There is insufficient detail in the PEIR regarding the increase in flights passing over East Sussex and are concerned about the accuracy and reliability of the estimated overflight mapping.</p>
Noise	Nov-21	East Sussex County Council response to the proposed Gatwick Northern Runway Project (consultation on the PEIR)	It is understood that an online map tool (18,000 post codes), which will enable people living further from the airport (up to 35 miles) to look up the change in the numbers of overflights would be developed and made available. We were unable to find any reference to this in the PEIR. Please can clarification be provided on when this will be developed?

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Noise	Jul-22	Gatwick Airport's Consultation: Highway Improvement Changes and Project Update (Summer 2022)	The Terms of Reference for the noise envelope review should be clearly defined and include a requirement for engagement and consultation with key stakeholders as part of the review process.
Health and well-being			
Health	Feedback at 8 Nov Health TWG meeting	8 Nov Health TWG meeting	Noise impacts to include vibration impacts
Health	Oral feedback at 8 Nov Health TWG meeting	8 Nov Health TWG meeting	With an increase in flights (and passengers) need to consider the impact on blue light services as well as on 'health services' etc. To cover major incidents.
Health and Wellbeing	Nov-21	East Sussex County Council response to the proposed Gatwick Northern Runway Project (consultation on the PEIR)	Greater clarity is needed on justification for supporting infrastructure: <ul style="list-style-type: none"> • the assessment of the 'waste' facility, including proposed technology; • clarity on the suggested socioeconomic benefits, including the number, type, quality, and location of jobs created; • the link between current labour supply and jobs created, and local economic benefits; • the need for new homes and associated infrastructure; concerns relating to traffic and transport, including assumptions about mode share for both passengers and staff; impacts on noise and air quality from both construction and operational phases;

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			<ul style="list-style-type: none"> concerns about greenhouse gas emissions and impacts on climate change, and understanding how airport expansion can be justified given national and international carbon reduction targets; and the need for enhancement measures.
Forecasting and capacity			
Aviation Forecasts	Nov-21	East Sussex County Council response to the proposed Gatwick Northern Runway Project (consultation on the PEIR)	<p>Insufficient information has been provided by GAL to enable the basis of its demand forecasts, and how these relate to the capacity that may be provided through the simultaneous use of the Northern Runway, to be properly understood in adequate detail for the local authorities to be able to comment on the impact of the proposals.</p> <p>York Aviation requested further information from GAL regarding the basis of the demand forecasts and the assessment of capacity with and without development, but this has not been forthcoming.</p>
Future baselining forecasts	Nov-21	East Sussex County Council response to the proposed Gatwick Northern Runway Project (consultation on the PEIR)	<p>In the absence of further information, we are concerned that GAL has put forward a Baseline Case that may be undeliverable, particularly in relation to the assumed increase in runway movement rate on a single runway, and this potentially undermines the validity of the assessment of the effects of the development if the Baseline Case is set too high.</p> <p>Further technical discussion with the local authorities (jointly) is required prior to (and subsequent to) the submission of the DCO, to understand how the baseline capacity would be delivered. It is also not clear if the works required to support the baseline would require planning permission and so are, in effect, part of the project.</p>
Capacity (hourly movements)	Nov-21	East Sussex County Council response to the proposed Gatwick Northern Runway	GAL has not demonstrated that 70 movements per hour is attainable through using the northern runway along the main runway, which has implications for the validity of the forecasts 'With Development'.

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		Project (consultation on the PEIR)	If the increase in hourly movements is not achievable then the assessed impacts, positive and negative, will have been wrongly stated. Based on our current assessment of the information provided, we would not be confident that either the Baseline Case or 'With Development' capacities have been robustly assessed.
Demand Forecasts	Nov-21	East Sussex County Council response to the proposed Gatwick Northern Runway Project (consultation on the PEIR)	Although some information is provided on current operations at the Airport and some greater explanation about the characteristics of demand and its profile in the Baseline Case, there is 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 and we strongly suggest that this additional analysis needs to be undertaken.
Forecasts, Heathrow third runway and other airports increasing capacity	Nov-21	East Sussex County Council response to the proposed Gatwick Northern Runway Project (consultation on the PEIR)	We are concerned that the forecasts as presented do not take into account the likely provision of a third runway at Heathrow at some point in the 2030s as 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. The forecast assessment has not taken this into account and also does not consider the prospect of other airports increasing their capacity, including the increase already consented at Stansted. At the very least, these potential increases in capacity elsewhere should have been subject to sensitivity analyses.
Forecasting methodology	Nov-21	East Sussex County Council response to the proposed Gatwick Northern Runway Project (consultation on the PEIR)	Concerns about the consistency of the assumptions used to derive specific outputs for assessment, in particular the assumption of the reduced seasonality of demand, the daily profile of demand relative to the use of the runways and the optimisation of aircraft departure routes. Further detailed explanation is required so that the realism of the forecasts and the assessments deriving from them can be verified.
Future airspace change	Nov-21	East Sussex County Council response to the proposed Gatwick Northern Runway	Whilst the proposal to make simultaneous use of the northern runway will not require airspace change, realising the overall growth in aircraft movements envisaged, particularly when growth in activity at other airports across the South of England is taken into account, will necessitate some changes to airspace in the vicinity of Gatwick as part of the modernisation process.

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		Project (consultation on the PEIR)	Although the effect of these changes cannot currently be assessed as part of the DCO application, GAL should acknowledge this overall dependency in order not to mislead the public.
Fleet mix	Nov-21	East Sussex County Council response to the proposed Gatwick Northern Runway Project (consultation on the PEIR)	<p>We consider that the fleet mix assumed in the Central Case for assessment is somewhat optimistic, particularly in the early years given the deferral of aircraft orders that has occurred during the pandemic, but that the Slower Transition Case represents a robust worst case.</p> <p>However, this comment needs to be caveated by the confusion regarding which aircraft mix has actually been assessed as two different fleet mixes are presented in the PEIR.</p>
UK level assessment of the economic impact	Nov-21	East Sussex County Council response to the proposed Gatwick Northern Runway Project (consultation on the PEIR)	<p>The evidence base relies heavily on the UK level assessment of the economic impact of the proposal in its Need Case, citing at para. 1.19 of the Overview Consultation Document that the benefits are greater than those assessed for Crossrail.</p> <p>Whilst our analysis would suggest the assessment is generally technically robust, there may be areas where the assessment may have been under or over-stated. Nonetheless, a fundamental concern is in relation to the demand forecasts and the risk that demand growth may be slower than expected so impacting on the discounting of benefits, which could be overstated relative to the costs to some degree.</p>
Capacity Assessments	Nov-21	East Sussex County Council response to the proposed Gatwick Northern Runway Project (consultation on the PEIR)	<p>Lack of information or detail on how capacity has been assessed and validated across the airfield as a whole.</p> <p>The Baseline forecast is presented as a capacity constrained forecast so verifying the level of this constraint is key. The 'With Development' forecast appears to be unconstrained and assumes that the capacity delivered by the proposals will be sufficient to meet demand.</p>

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Overflight maps in the PEIR	Nov-21	East Sussex County Council response to the proposed Gatwick Northern Runway Project (consultation on the PEIR)	<p>The overflight mapping is lacking in specific detail. Regarding the legend and the scale used for the overflight figures, a very broad range is used i.e. Orange represents 100-200 overflights. This is not a fine enough grain of detail for us to gain an understanding of how many additional overflights there will be with the NRP.</p> <p>To give a better indication of how overflight is expected to change, information should be provided for different months of the year. It should also show any difference between mid-week and weekend periods.</p>
Overflight: Assessing the increase in flights over local communities Figure 14.9.28 (2032 Departure Overflights from the Main and Northern Runways)	Nov-21	East Sussex County Council response to the proposed Gatwick Northern Runway Project (consultation on the PEIR)	<p>This doesn't cover any areas of East Sussex – we would strongly suggest that this information is provided unless clarification can be provided as to whether the altitude of flights is above 7,000ft by the time they fly over East Sussex.</p>