

## **Gatwick Airport Northern Runway Project Development Consent Order application**

### **East Sussex County Council: Relevant Representation**

**19 October 2023**

This Relevant Representation sets out a summary of East Sussex County Council's ("ESCC") concerns with the Gatwick Airport Northern Runway Project Development Consent Order ("DCO") application. The concerns are set out under relevant topic headings which reflect the key points arising from ESCC's attendance at various Topic Working Group meetings with Gatwick Airport Limited ("GAL"), a review of the DCO technical documents, and the outcome of a Full Council debate held on 10 October 2023.

#### Surface transport:

##### **General**

1. If the application is approved, there will be a need for the timely delivery of supporting infrastructure i.e. in advance of the northern runway being in full operation.
2. The Mode Share Commitments, set out in the Surface Access Commitments, are not considered to be sufficiently ambitious, especially for passenger travel.
3. There is insufficient mitigation proposed to encourage substantial modal shift towards sustainable travel to and from an expanded airport.
4. The focus of mitigation has been on the provision of services rather than implementing measures, within GAL's control, to increase the attractiveness of alternative modes of travel, i.e. bus priority measures to deliver journey time savings.

##### **Highways**

5. GAL needs to mitigate the impacts of the approaching traffic from the surrounding road network, including routes in East Sussex such as the A22 and A264, which feed into the A23/M23 corridor. GAL must also assess the impacts of airport growth on the strategic road network (e.g. M25) and ESCC's highway network beyond the immediate environment of the airport.
6. ESCC requires measures that reduce traffic through sensitive locations near and through Ashdown Forest Special Area of Conservation (SAC) / Special Protection Area (SPA) and along the A22.

##### **Rail**

7. It is necessary to ensure that rail infrastructure and service provision has been properly considered by GAL and Network Rail and can accommodate the increase in demand and capacity from passengers that will arise should the NRP go ahead. This must be considered alongside wider demands for rail travel.

##### **Public Transport**

###### **Bus/Coach service between Gatwick and Uckfield**

8. The proposed new coach route to/from the airport to Uckfield would only have a 2 hourly frequency off-peak, though hourly at peak time. ESCC requests an hourly service at all operational times.
9. It is unclear why the Uckfield route is categorised as a 'coach' route. This should be provided as a bus service, permitting local travel between bus stops.

10. GAL should consider extending the proposed Uckfield to Gatwick service to Heathfield. It is important to integrate this with the existing ESCC funded bus service between Heathfield and Uckfield (which ESCC proposes to increase from 2 hourly to hourly).
11. 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).
12. ESCC recommend extending the 261 route beyond East Grinstead to provide a direct service between Uckfield and Gatwick Airport. ESCC wish to see the operational hours of the service extended to include early mornings, evenings and weekends. We would require GAL to fund this.

#### **Crowborough – Gatwick service**

13. ESCC consider there is scope for a Gatwick to Crowborough service which could 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. We would require GAL to liaise with the appropriate operator to agree and fund this.

#### **Demand Responsive Transport**

14. ESCC considers any new services with Demand Responsive Transport (DRT) in mind should:
  - be wholly integrated with conventional public transport (i.e. integrated ticketing and service design).
  - complement existing bus services, i.e. only run at times/to places when conventional bus services are not available; and
  - where feasible, feed into conventional services (i.e. first mile/last mile principles). This requires a high level of integration, service reliability, public information, waiting facilities and ticketing.
  - in the context of Gatwick, ESCC envisages DRT in East Sussex potentially feeding the proposed Uckfield and Crowborough bus/coach links using the above principles, with the appropriate interchange hub facilities, rather than running all the way to/from the Airport.

#### **Other**

15. GAL should engage with Metrobus or the appropriate operator, as they run bus services in the Forest Row, East Grinstead, Crawley and Gatwick areas.
16. There is a need for a process whereby GAL liaises with the rail, coach and bus operators, as well as the local transport authorities, to get a better understanding of future travel behaviour and how this will influence any changes in demand for services. This needs to form part of GAL's Airport Surface Access Strategy.

#### **Electric Vehicle (EV) Charging**

17. GAL must ensure that EV charging in airport car parks meets anticipated demand, using scenarios for EV adoption from the Government's 2023 Transport Decarbonisation Plan.
18. GAL must work with both third-party parking providers and local authorities to boost charging facilities in the area around the airport.

#### **Transport modelling**

19. There is a concern about the project's impacts on additional car journeys to the airport via Ashdown Forest which is an area of European Ecological Importance, SAC, and a Site of Special

Scientific Interest (SSSI). As a consequence, there is a need for GAL to consider these impacts in respect of air quality and nitrogen deposition issues as part of their modelling work.

### **Assessment methodology**

20. The Traffic & Transport Chapter of the Environment Statement has been undertaken in accordance with rescinded guidance by IEMA: *Guidelines for Environmental Impact Assessment of Road Traffic* (1993). This was replaced in July 2023 by *Environmental Assessment of Traffic and Movement*. Therefore, if there are future updates to the Environmental Statement, this should be reviewed against the latest guidance and amended as necessary.
21. Since emerging from the pandemic more representative transport data continues to become available and therefore this data should be used to validate that the proposed approach is robust and takes accounts of changes since the 2016 base and any travel changes due to Covid 19. The applicant should also review the latest Department for Transport (DfT) guidance *TAG Unit M4, Forecasting and Uncertainty*, and ensure the modelling takes account of it.

### **Economy**

22. GAL must set out the economic impacts of the project.
23. There is a need to better understand the employment and skills offer arising from the project. ESCC would expect a substantial number of jobs and apprenticeships ring-fenced for East Sussex workforce; and that GAL would work with local training providers and colleges in East Sussex to ensure that training, pathways and career opportunities are offered.
24. GAL should seek to ensure that subcontractors deliver social value in employment and skills (i.e. subcontractors should offer recruitment offers, apprenticeships and upskilling of staff).
25. Sub-contractors should work to the Construction Industry Training Board (CITB) national skills academy for construction framework benchmarks, and the same in relation to non-construction procurement.
26. The Employment Skills and Business Strategy (“ESBS”) should include links to Careers Hubs working with schools across Surrey, West Sussex and East Sussex.
27. In non-construction, the option should include upskilling the existing workforce, including residents of East Sussex.
28. There is a need for GAL to ensure that SMEs and subcontractors include social value measures in their contracts with GAL that are consistent with those in GAL’s ESBS, and that work is undertaken with local authority Careers Hubs to engage with schools.
29. GAL should develop an Inward Investment Service and Strategy, working in partnership with Sussex Chamber of Commerce and other partners which includes the delivery of initiatives that develop (not just promote) international trade opportunities with destinations aligned to Gatwick’s route network.
30. GAL should continue to sponsor events and fund community-related projects in local communities affected by the Airport.
31. GAL should ensure there a sustained promotion of East Sussex at the airport to support the visitor economy.

### **Noise**

32. Due to the effects of overflight and noise disturbance on people’s health and wellbeing, ESCC expects GAL to provide greater clarity on how many more flights would be passing over East Sussex, which locations would be the most affected, and how this would be mitigated.

33. There is a need for assurances on the accuracy and reliability of the estimated overflight mapping, and we will require East Sussex to be included as part of this assessment.
34. Air noise relates to noise from aircraft in the air, or departing or arriving on a runway, generally assessed to a height up to 7,000 feet above ground level. It is understood that some aircraft (Gatwick related air traffic) pass over parts of East Sussex below 7,000 feet. ESCC requires such areas to be included as part of the air noise modelling work.
35. 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.
36. Night flights will need to be restricted / capped, and the Northern Runway should not operate, between the hours of 23:00 and 06:00. ESCC needs assurances that there are no dispensations that allow GAL to routinely operate within this restricted nighttime period, notwithstanding use of aircraft at night for emergencies.
37. The report states that flight paths above 7,000 feet would not be affected by the project. Crowborough is 794 feet above sea level – has this been considered? What is the impact of noise on Ashdown Forest which is a noise sensitive area.

### **Climate change (impacts)**

38. The climate impact statements documented in both ES Chapter 15: 'Climate Change' and in Appendix 15.8.1 'Climate Change Resilience Assessment' are lacking in consistency in that some are missing an 'impact'. All climate impact statements should have a clear end impact, and risk ratings should be reviewed and revised accordingly.
39. Additional mitigation / adaptation measures need to be considered as part of the Climate Change Resilience Assessment and the Urban Heat Island Assessment. Climate scenarios contain uncertainty in both emissions scenarios and the modelling process itself. Therefore, whilst the assessment does not raise any 'significant' climate risks, it should identify further measures that can increase asset resilience in the design, construction and operational phases.

### **Carbon emissions**

40. Assessment of carbon impacts:
  - The environmental statement does not calculate well-to-tank emissions (WtT), which is non-compliant with the globally recognised GHG Protocol Corporate Accounting Standard and goes against the UK Government's carbon accounting methodology (BEIS, 2022). Using WtT emissions methodology would raise GHG emissions associated with aviation by approximately 20.77%.
  - It is not clear if a conversion was undertaken from CO<sub>2</sub> to CO<sub>2</sub>e for aviation emissions, which would result in a 0.91% increase in all aviation emissions (BEIS, 2023). This needs to be clarified.
  - Further clarity is required on whether embodied carbon from construction materials has been considered in the assessment.
41. Use of offsets and off-site renewable generation, including the following three points.
  - The environmental statement suggests reliance upon Renewable Energy Guarantees of Origin (REGO) certificates to achieve net zero emissions. REGOs do not guarantee that additional renewable generation will be brought online to match demand. Guidance in the UK Government's Streamlined Energy and Carbon Reporting (SECR) should be followed to accurately report emissions from electricity consumption.
  - The Environmental Statement describes use of carbon offsets. Various risks have been identified by the scientific community around offsetting schemes. GAL should specifically

state which offset scheme they intend to use so research can be conducted into the robustness of the scheme.

- The Environmental Statement assumes that the Government's Jet Zero Strategy will ensure aircraft emissions remain compatible with the UK's net-zero targets. Recent developments call this assumption into question, most notably advice from the Climate Change Committee in their 6th Budget Report. Further sensitivity analysis should be undertaken, exploring scenarios where uptake of Sustainable Aviation Fuels and electric aviation take place at slower rates or, in the latter case, fail to achieve commercial uptake.

### **Air quality**

42. Further clarity is needed on the baseline information that has been used to assess air quality.
43. Further clarity needed is needed on the air quality assessment scenarios; how air quality will be monitored, evaluated and reported to local authorities, as well as the robustness of the air quality model that has been used.

### **Air quality assessment**

44. Assessment scenarios utilised in the air quality assessment need clarification. In particular, scenarios have been provided where both construction and operational activities are underway at the same time, but the assessment has treated them separately. ESCC is concerned that the scenarios assessed in the Environmental Statement do not provide a realistic worst-case assessment.
45. Further information is needed on road traffic study areas, to understand which routes will be affected by changes in traffic in the construction and operational phases. Without this information, it is not possible to fully understand the air quality assessment.
46. Further information is required on receptor locations and results to be able to link scenarios and results to specific receptor locations. For example, the air quality assessment notes the potential for likely significant affects at receptors in the Ashdown Forest SPA/SAC; however, ESCC do not have information on the location of the receptors or the size of the impact.

### **Operational reporting, mitigation and uncertainty:**

47. Information is needed on how sensitive predictions are to modal shift objectives, and the impact on air quality if these are not achieved.
48. Further information is needed to understand how air quality will be monitored, evaluated, and reported to local authorities. A process is also needed to review actions in the event that air quality deviates for the worst from modelled predictions.
49. A combined operational air quality management plan has not been prepared to draw together measures presented elsewhere with a specific focus on local air quality. Providing one would provide more clarity on the proposed package of measures.

### **Environment**

50. Clarification is required on how the proposal aligns with dark skies polic Outlined in local protected landscape strategies e.g. High Weald, South Downs National Park.

### **Nature**

51. The wider biodiversity net gain impacts on environmental designated areas in the county, such as the Ashdown Forest, need to be considered.

### **Health**

52. The noise and vibration impacts on health and well-being of local communities need further consideration and appropriate mitigation measures need to be identified. There is a need to consider vulnerable groups within this, that may be more affected by the impacts of noise (and vibrations).
53. A Health Impact Assessment should outline population health impacts for East Sussex and appropriate mitigations proposed and provided to protect population health and any impact on local services and infrastructure.

**Other comments**

54. ESCC wants to be party to legal agreement to secure required and appropriate mitigation should the project be approved.
55. ESCC wants assurances that should a second runway option come forward in the future, that the use of the northern runway for departures would cease to operate.