

The Planning Inspectorate  
 National Infrastructure Applications Team  
 Temple Quay House  
 Temple Quay  
 Bristol  
 BS1 6PN

FAO: Kevin Gleeson (Lead Member of the Examining Authority)

14 November 2023

Dear Mr Gleeson,

**Application for a Development Consent Order by Gatwick Airport Limited for the Gatwick Airport Northern Runway Project (Ref. TR020005) – Response to a Procedural Decision made by the Examining Authority under section 89(3) of the Planning Act 2008**

We are writing in response to your Procedural Decision letter of 24 October 2023 [\[PD-006\]](#) in which the Examining Authority has requested further information. In responding to it we have retained the subject headings from your letter.

**Accounting for COVID-19 in transport modelling**

The Examining Authority has requested a high-level indicative programme for updating the transport model with present day observations in line with the updated Department for Transport Guidance published in May 2023 (TAG Unit M4: Forecasting and Uncertainty (May 2023)).

The Applicant has already made substantial progress in considering how to address this revised guidance. To provide the Examining Authority with context for the programme and information to assist in understanding the stages of work required, **Annex A** of this letter contains a more detailed explanation of the work that has been undertaken to date and the work that is still to be undertaken.

The Applicant proposes the following high-level programme for this work to be undertaken:

<b>Activity</b>	<b>Proposed date</b>
Engagement with National Highways on methodology and initial model development outcomes	19 September, 5 October and 25 October (occurred)
Engage with Surrey County Council and West Sussex County Council on the approach and work undertaken to date (with National Highways).	10 November (occurred)
Run model for new forecast years (including 2029, 2032, 2038 and 2047).	w/e 8 December
Analysis of model outputs to identify impacts indicated by new forecast models and comparison against the application assessment.	End December

Engage with National Highways, Surrey County Council and West Sussex County Council on the findings from the new forecasts.	Mid December and mid January
Provide technical note for submission into the examination of the DCO application.	End January

### Environmental Statement (ES) Chapter 12 – Transport

The Examining Authority has requested a detailed response on the implications of guidance contained in “Environmental Assessment of Traffic and Movement” published by the Institute of Environmental Management and Assessment (IEMA) in July 2023, together with a programme for any necessary review of the assessment presented in ES Chapter 12: Traffic and Transport (**Doc Ref. 5.1 v2**).

The Applicant is undertaking a review of the recent IEMA guidance. **Annex B** of this letter contains a detailed response discussing the new guidance, changes from the previous guidance that was used for the assessment in ES Chapter 12: Traffic and Transport (**Doc Ref. 5.1 v2**) and the Applicant’s proposed actions and programme.

The Applicant proposes to provide a further submission covering the review and any updates that are necessary to the assessment in the week ending 22 December 2023.

### Application document formatting

The Applicant notes the Examining Authority’s request for future submissions of documents to comply with Advice Note 6. As part of this submission, the Applicant has submitted revised copies of the Transport Assessment (**Doc Ref. 7.4 v2**) and ES Appendix 11.9.6: Flood Risk Assessment (**Doc Ref. 5.3 v2**) that comply with the requirements of Advice Note 6 as per the Examining Authority’s request.

### Surface Access Highway Plans

The Examining Authority has requested the preparation of new Highway Layout Outline Plans to assist with the interpretation of the proposed scheme and its elements within the existing topography. The Applicant has prepared Surface Access Highways Plans – General Scheme Outline (**Doc Ref. 8.3**) in accordance with the requirements set out in the Procedural Decision letter [[PD-006](#)], and has supplied these plans as part of this submission.

There are no viaducts or tunnels proposed as part of the surface access works and therefore these are not shown on the plans or labelled in the legend. The active travel routes are within the markings for "Proposed Works" shown in blue. The drawing labels provide additional context and further detail is included in the Rights of Way and Access Plans [[APP-018](#)].

### Errata

The Applicant notes Horsham District Council’s submission [[AS-059](#)] where two errors have been identified in ES Chapter 12: Traffic and Transport [[APP-037](#)] and the Transport Assessment [[APP-258](#)] in which Horsham District Council was omitted from the parties noted as invited to attend the Topic Working Group meetings. This omission was in error and has been corrected in the updated versions of ES Chapter 12: Traffic and Transport (**Doc Ref. 5.1 v2**) and the Transport Assessment (**Doc Ref. 7.4 v2**).

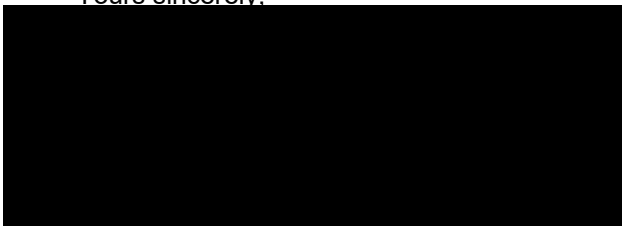
**Submission of Updated and Additional Documents**

The table below sets out the updated application documents and additional documents submitted as part of this response for ease of reference, including the reason for submission.

<b>Updated or Additional Document</b>	<b>Document Title and Reference</b>	<b>Reason for Submission</b>
Updated	Navigation Document (tracked change version Doc Ref. 1.3 v4 and clean version Doc Ref. 1.3 v4)	To include the updated and additional documents submitted as part of this response.
Updated	ES Chapter 12: Traffic and Transport (tracked change version Doc Ref. 5.1 v2 and clean version Doc Ref. 5.1 v2)	To correct the errata identified by Horsham District Council.
Updated	ES Appendix 11.9.6: Flood Risk Assessment (Doc Ref. 5.3 v2)	Reformatting in response to the Examining Authority's request.
Updated	Transport Assessment (tracked change version Doc Ref. 7.4 v2 and clean version Doc Ref. 7.4 v2)	To correct the errata identified by Horsham District Council and reformatting in response to the Examining Authority's request.
New	Surface Access Highways Plans – General Scheme Outline (Doc Ref. 8.3)	To respond to the Examining Authority's request for further information.

The Applicant considers that the above addresses the requests for information issued by the Examining Authority in the letter dated 24 October 2023. However, if the Applicant can be of any further assistance or the Examining Authority considers any further clarification is required in response to the information and documentation submitted as part of this response, please do not hesitate to contact the Applicant using the details already provided.

Yours sincerely,



**Jonathan Deegan**  
**NRP Programme Lead**  
**Gatwick Airport Limited**

Enclosed as part of this letter:

- Annex A: Accounting For Covid-19 In Transport Modelling
- Annex B: Environmental Statement Chapter 12 – Transport: Revised IEMA guidance

Enclosed separately:

- Navigation Document (tracked change version Doc Ref. 1.3 v4 and clean version Doc Ref. 1.3 v4)
- ES Chapter 12: Traffic and Transport (tracked change version Doc Ref. 5.1 v2 and clean version Doc Ref. 5.1 v2)
- ES Appendix 11.9.6: Flood Risk Assessment (Doc Ref. 5.3 v2)
- Transport Assessment (tracked change version Doc Ref. 7.4 v2 and clean version Doc Ref. 7.4 v2)
- Surface Access Highways Plans - General Scheme Outline (Doc Ref. 8.3)

## Annex A: Accounting For Covid-19 In Transport Modelling

### 1. Overview

- 1.1. The strategic transport modelling used in the Application was undertaken during 2022 in order to inform the assessment of environmental effects presented in the Environmental Statement.
- 1.2. In May 2023, the Department for Transport (DfT) issued updated advice within its Transport Appraisal Guidance (TAG) Unit M4: Forecasting and Uncertainty<sup>1</sup>. This included guidance on how scheme promoters should consider post-COVID travel behaviours, where modelling had been prepared on the basis of pre-pandemic conditions.
- 1.3. Paragraph 5.3.26 of the Transport Assessment [**Doc Ref. 7.4 v2**] acknowledged the release of the new guidance and that we planned to review it and the need for any updates to the transport modelling resulting from it.
- 1.4. We have already made substantial progress on this review since the Application was submitted. In particular, we have considered the example approaches set out in Appendix B of TAG Unit M4. We consider a full rebasing exercise to be disproportionate. We have therefore adopted a methodology which:
  - retains the 2016 base year used for the Application;
  - produces a 2023 forecast model from the Application modelling and compares this with observed 2023 data; and
  - identifies appropriate adjustments to the Application modelling inputs so that the 2023 forecast model outputs align closely with present-day conditions.
- 1.5. We have discussed this approach and the derivation of the appropriate adjustments with National Highways, which has agreed that this approach is appropriate.
- 1.6. The work undertaken to date suggests that the Application modelling outputs are likely to be conservative. The Application models assumed that background traffic would continue to increase from 2016 (the base year for the Application modelling), whereas observed data shows that traffic flows across the network in 2023 are on average 3% to 5% lower than they were in 2016. Our work suggests that the future year forecast models used in the Application are thus likely to be overestimating traffic flows, potentially in the order of 10% to 15%.
- 1.7. We are now using the adjusted 2023 forecast model to create revised future year forecast models for the assessment years used in the Application (2029, 2032 and 2047 future baseline and with Project). We anticipate that this will be complete in early December 2023.
- 1.8. As the revised model outputs become available, we will review them in the light of the assessment criteria used in ES Chapter 12: Traffic and Transport (**Doc Ref. 5.1 v2**) to determine whether the conclusions of the assessment might change as a result. Because the Application modelling is expected to be conservative, we do not anticipate that the revised future year forecast models will result in any new significant effects, but nevertheless we will undertake a full exercise to confirm whether this is the case. We expect this work to be complete by the end of December 2023.
- 1.9. We plan to engage further with stakeholders on the outcomes of the revised modelling in mid-January 2024, in parallel with the preparation of a report on the revised model outputs and the

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<sup>1</sup> Department for Transport (2023): Transport Appraisal Guidance Unit M4: Forecasting and Uncertainty  
<https://assets.publishing.service.gov.uk/media/6483097ab32b9e0012a964d9/tag-unit-m4-forecasting-and-uncertainty.pdf>

review of the assessment conclusions. We plan to submit the report to the Examining Authority by the end of January 2024.

- 1.10. In the following paragraphs we provide a more detailed discussion of the DfT guidance, the work we have done to date and the remaining steps which we plan to take.

## **2. Department for Transport guidance**

- 2.1. On 31st May 2023, the DfT released the latest update to TAG Unit M4 which included guidance on how scheme promoters should consider transport modelling to reflect changes in travel behaviour caused by the COVID-19 pandemic.

- 2.2. Appendix B of TAG Unit M4 includes the following statements:

*“Analysts are advised to assess the validity of the trip matrices developed in the past against present day observations. Where there are significant changes from when the matrix was developed and the present day, the model should ideally be rebased. More proportionate approaches may be acceptable if sufficient evidence is provided that these appropriately cover most of the risks of not rebasing.”* (paragraph B.2.1)

*“Rebasing of models takes time and resources; the Proportionate Update Process in TAG allows judgments of proportionality to be made when considering to what extent models need to be updated relative to the scope of decisions required and the surrounding risks. Indeed, it is very plausible that travel patterns at the current time are in themselves subject to some change in following years (such changes being outside of the direct scope and functionality of the model). Therefore the Department accepts that, in many circumstances, the practical course of action is to make proportionate and transparent adjustments at this time.”* (paragraph B.3.1)

*“The summary recommendation is, where model rebasing is judged not to be practical, for analysts to assess the extent of the divergence of travel patterns and volumes from pre-pandemic projections, using the best available data and evidence.”* (paragraph B.3.2)

- 2.3. The guidance also provides three example approaches to revising transport models, in paragraph B.3.4 of TAG Unit M4 are as follows:

*“There are several options as to how appropriate adjustments to transport models may be accomplished. There are examples of possible approaches set out below. It should be noted that other approaches may be acceptable, based on the best judgement and careful consideration of the analyst. Either way, it is important to clearly set out the assumptions and evidence used for any approach.”*

*“1. Create a forecast to the present day by applying adjustments to include a COVID-19 impact, based on observed data. This forecast can be used as a “new base year” as a substitute basis for scheme forecast...”*

*2. Apply adjustments to a forecast year model to produce a new scheme opening year forecast, or the first required forecast year, that include a COVID-19 impact to that point. This will be the new pivot off which further forecast years are based...”*

*3. Apply the adjustment globally to model results as a post-model adjustment.”* (paragraph B.3.4)

## **3. Identifying a proportionate approach for the Project**

- 3.1. We have already undertaken a substantial amount of work to explore the implications of the DfT guidance, particularly in relation to the outputs of the highway model.
- 3.2. Section 5 considers each of the DfT examples in the context of the Project in detail. In summary:

- Example 1 would mean creating a fully calibrated and validated revised base year model for 2023, using observed data, and producing new forecasts for all future years from that new base year model.
- Example 2 would mean creating a model forecast for an opening year (which in this case would be 2029) using the 2016 base year model and applying adjustments to that forecast to reflect post-Covid behaviour. The adjusted future year model would then become the basis for forecasting all other future years.
- Example 3 would mean deriving a suitable factor or factors to reflect post-Covid behaviour which would then be applied to all the model forecasts which have already been used for the Application.

#### 4. Review of observed trends

- 4.1. Our first step was to undertake a review of observed trends in traffic flow data to understand the actual scale of change between 2016 (the year on which the strategic transport model is based) and 2023 (present day).
- 4.2. We obtained the latest available traffic count data from the National Highways WebTRIS database<sup>2</sup>, West Sussex County Council, Surrey County Council and East Sussex County Council. We compared this with data for 2016 at equivalent locations, which had been used to validate the base year model for the Application.
- 4.3. Table 1 summarises the change in traffic flows between 2016 and 2023. The observed data shows an overall reduction between 2016 and 2023 in the order of 3% to 5% across all road types. Similar degrees of change have occurred on motorways. On A-roads the reductions are between 2% and 6%; and on B-roads reductions are between 4% and 9%. The greater variability on B-roads reflects a smaller available dataset and roads which generally carry lower traffic volumes, meaning that changes in flow can be proportionally greater than would be the case on roads with higher traffic volumes.

**Table 1: Change in traffic flow from 2016 to 2023**

Road type	No. of sites	AM1	AM2	IP	PM
All	232	-4%	-5%	-3%	-5%
Motorways	36	-3%	-3%	-3%	-5%
A-roads	140	-5%	-6%	-2%	-5%
B-roads	46	-5%	-7%	-4%	-9%

Note: negative figures indicate flows in 2023 are lower than those in 2016

Note: AM1=0700-0800 AM2=0800-0900 IP=1000-1600 PM=1600-1800

#### 5. Review of modelling approaches

- 5.1. Having understood the scale of change, we considered each of the example approaches given in the DfT guidance in the context of the availability of suitable observed data, the amount of work required, the degree of risk associated with the outcomes and the overall timescale needed to update the modelling.

##### **Example 1 – full rebasing**

- 5.2. Example 1 suggests a full model update to create a new 2023 base year model, from which future year forecasts can then be created. This would be a substantial undertaking and would require

<sup>2</sup> <https://webtris.highwaysengland.co.uk/>

extensive new data collection and a significant amount of work to create, calibrate, validate and agree a new base model with stakeholders.

- 5.3. In addition, given the observed reductions in traffic flow from the available data, we also anticipated that the Application models would be over-estimating traffic flows in future years. Consequently, models updated to account for post-pandemic behaviour would not show a worse position than has already been identified in the Application.
- 5.4. We concluded that Example 1 was not a proportionate or feasible approach, nor one which would readily align with the anticipated timescales for the Examination.

### **Example 3 – factoring outputs**

- 5.5. Example 3 suggests applying appropriate factors to the outputs which are already available from the Application future year models. Whilst a simpler approach, we concluded that there are several reasons why this approach is less appropriate. These include:
- the strategic highway model is a dynamic model which assigns traffic to different routes taking account of the travel demand and generalised travel cost. Factoring the Application model outputs means that this dynamic assignment element would not be applied, instead assuming that the choice of route in a post-pandemic case would be the same as the choice prior to the pandemic. Although this may be true for some journeys, different routes have experienced different degrees of traffic change and in many places traffic flows are lower than the Application model would predict. It is thus highly likely that some journey choices would be different under post-pandemic conditions.
  - the review of the observed data between 2016 and 2023 clearly indicates that different road types and different locations have experienced different degrees of traffic flow change over this period. A set of simple factors applied to the Application model outputs would not reflect these differences.
  - although different factors could be developed for different road types and locations, this would become complex, in terms of how they are derived, applied and demonstrated to be appropriate. Furthermore, this would still not reflect the dynamic route choice aspects of the strategic highway model.
- 5.6. The approach suggested in Example 3 could therefore result in a less representative forecast of traffic flows on the highway network in future years. TAG M4 Appendix B notes some of these limitations and suggests that “*a series of sensitivity tests might need to be undertaken to mitigate the risks around potentially unreliable model results*” (paragraph B.3.4).
- 5.7. We concluded that Example 3 was therefore not a sensible approach as it introduces additional risk and uncertainty into the model outputs.

### **Example 2 – creating a revised forecast year**

- 5.8. Example 2 envisages creating a new opening year forecast that includes the effects of post-pandemic behaviour, by applying a series of adjustments to that forecast model, and subsequently using that revised opening year forecast to produce new forecasts for other years.
- 5.9. There are also some limitations with this approach. TAG Unit M4 notes that “...it comes with the significant disadvantage that there will be no existing observed data (trips and traffic) to ensure validity of the opening year forecast. Analysts should ensure that the model assumptions made are sufficiently transparent and tested and that the arising uncertainty is explored and clearly presented in an appraisal.” (paragraph B.3.4)





- 5.10. We therefore determined that rather than produce a new opening year forecast for 2029, there would be benefit in creating a new forecast year model for 2023. This addresses the limitations noted in TAG Unit M4 and introduces additional robustness. Whereas there would be no observed data available to verify a new opening year forecast, our approach allows us to test the accuracy of the forecast and develop appropriate adjustments to the 2023 forecast model. The adjusted 2023 forecast model will then be used to create future year forecasts for 2029 and beyond.

## 6. Model development

- 6.1. Having determined that we would adopt the Example 2 approach and produce a new 2023 forecast year model, we have progressed the work to develop and verify that model. We describe below the steps that have already been completed.

### ***Initial 2023 forecast model performance against observed conditions***

- 6.2. We used the 2016 base year Application model to create a new 2023 forecast model for the highway network only, taking account of expected demand from the Airport in 2023 and known changes to transport schemes in the Uncertainty Log, but without altering other growth assumptions.
- 6.3. We compared the output of this 2023 forecast model with available observed traffic counts from National Highways (WebTRIS), West Sussex County Council, Surrey County Council and East Sussex County Council. This allowed us to understand how closely the 2023 forecast model, based on pre-pandemic growth assumptions, aligned with observed conditions.
- 6.4. The outcome of this initial exercise showed that on average the initial 2023 forecast model outputs were forecasting traffic flows some 10% to 15% higher than those actually observed in June 2023.

### ***2023 forecast model adjustments***

- 6.5. We undertook a further exercise to identify how the 2023 forecast model could be adjusted appropriately to improve the alignment of the model outputs with observed data.
- 6.6. To do this, we applied a set of adjustments to the 2023 forecast model over several iterations that allowed us to refine the adjustments in response to the model outputs. These included:
- adjustments to reflect changes in trip-making patterns and frequency since the pandemic, based on documented DfT research (2022 National Travel Survey<sup>3</sup>) into changes in travel behaviour.
  - updates to Airport demand in 2023 (without the Project) and changes to transport schemes in the Uncertainty Log.
  - a review of signal timings at M23 Junctions 9 and 10 to improve model performance locally at Junction 9 and to improve the robustness of the forecasts for future traffic flows, particularly those on the Strategic Road Network.
  - updates to background growth forecasts and related data by incorporating the latest version of the National Trip End Model (NTEM v8), the National Road Traffic Projections (NRTP 22) and the latest version of the TAG Databook (v1.21), all of which had been released by the DfT since the Application modelling was produced.

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<sup>3</sup> <https://www.gov.uk/government/statistics/national-travel-survey-2022>

- applying the adjustments through the full strategic model suite (including the Variable Demand Model, highway and public transport models) to ensure that the revised future year forecast models appropriately reflect the available transport capacity across all modes of transport.
- 6.7. All of these adjustments will also be present in the future year forecast models derived from this adjusted 2023 forecast model.
- 6.8. Table 2 summarises the differences between traffic flows from the adjusted 2023 forecast model and those shown in the available observed data.

**Table 2: Difference between 2023 modelled and observed flows (adjusted 2023 forecast model)**

Road type	No. of sites	AM1	AM2	IP	PM
All roads	224	+0.1%	-2.6%	-2.8%	+0.3%
Motorways	36	+0.9%	-2.6%	-1.6%	+2.2%
A-roads	136	-1.2%	-2.9%	-4.1%	-1.7%
B-roads	42	+1.6%	-0.2%	-6.2%	-1.4%

Note: negative figures indicate flows in the 2023 forecast model are lower than those observed in 2023

Note: AM1=0700-0800 AM2=0800-0900 IP=1000-1600 PM=1600-1800

- 6.9. Table 2 shows that averaged across all road types, the adjusted 2023 forecast model is producing traffic flows which are between 0.3% more and 2.8% less than observed data. Flows on motorways and A-roads are between 2.2% more and 4.1% less than observed data. The variation in flows on B-roads is greater, at between 1.6% more and 6.2% less than observed data, which is not unexpected given the more diverse nature of the B-road network and that it generally carries lower volumes of traffic than higher classifications of road.
- 6.10. This work has produced an adjusted 2023 forecast model which we consider to be sufficiently reflective of observed data to allow us to produce revised future year forecast models with confidence.

## 7. Engagement to date

- 7.1. We have engaged with National Highways in the course of developing the approach and refining the adjustments to the 2023 forecast model. Discussions were held on 19 September, 5 October and 25 October 2023.
- 7.2. We presented the proposed approach and the emerging outcomes of the adjustment process to National Highways during these meetings, and shared information with them for further review. The engagement has allowed for iteration and the ability to demonstrate to National Highways the improving performance of the adjusted model.
- 7.3. Following our latest engagement meeting on 25 October, National Highways has indicated that it is content with the approach we have proposed and that the outputs from the verification exercise provide sufficient confidence that we can move forward to forecasting the future years for assessment purposes.
- 7.4. We have also engaged with the local highway authorities (Surrey County Council and West Sussex County Council) on this approach in a meeting held 10 November 2023 where we presented the work we have done to date.

## 8. Work still to be undertaken

- 8.1. The remaining work involves:
- producing new future year forecast models, from the adjusted 2023 forecast model.

- comparing the revised model outputs with the Application modelling and reviewing the implications for the assessment reported in the Application.
- further engagement with stakeholders.
- preparing a report for submission to the ExA.

***Produce revised future year forecast models***

- 8.2. We have commenced the work to produce revised forecast models for the assessment years used in the Application (2029, 2032 and 2047) for both future baseline and with Project scenarios. These will be derived from the adjusted 2023 forecast model.
- 8.3. The revised future year forecasts will also include changes to anticipated delivery dates for future transport infrastructure schemes and services that have occurred since the Application modelling was produced. Where possible these have been checked with relevant stakeholders. Changes to major schemes include:
- inclusion of the A27 Arundel Bypass as complete by 2032 (this was not included in the models for the Application as it was considered insufficiently certain).
  - change in completion date for the Lower Thames Crossing to 2032 (this was assumed in the Application models to be complete in 2029).
  - removing schemes related to the Smart Motorway Programme following the Government's announcement of the cancellation of the programme (the proposed scheme for M25 Junctions 10-16 was assumed to be in place by 2029 in the Application modelling).
- 8.4. We will also include updates to the public transport timetable to reflect anticipated services in future years.
- 8.5. We anticipate that these revised future year forecast models will be completed in the **week ending 8 December 2023**.

***Review of implications for assessment of environmental effects related to traffic and transport***

- 8.6. The work to develop the adjusted 2023 forecast model suggests that the Application models could be overestimating traffic flows in future years by something in the order of 10% to 15%. We therefore anticipate that the revised model outputs are unlikely to lead to new significant effects being identified in a review of the assessment conclusions.
- 8.7. We will nevertheless review the revised future year forecast model outputs in the light of the criteria for assessing environmental effects related to traffic and transport which are set out in section 12.4 of ES Chapter 12: Traffic and Transport (**Doc Ref. 5.1 v2**). This review will identify whether the outputs from the revised models might alter the conclusions of the assessment presented in the Application. Where necessary, we will undertake a further assessment to establish whether any new or different significant effects might arise under post-pandemic transport conditions.
- 8.8. We anticipate that this review of the assessment, using the revised model outputs, will be completed in the **week ending 22 December 2023**.

***Engagement***

- 8.9. We will hold further engagement with National Highways and the local highway authorities to present and discuss the outcomes of the revised modelling (including comparisons with outputs from the Application models) and any potential implications for the conclusions of the assessment.

8.10. We anticipate that this engagement will take place in **mid-December** and **mid-January** (with exact dates to be confirmed with the relevant stakeholders).

**Reporting**

8.11. In parallel, we will prepare a stand-alone report which explains in detail:

- the technical work that has been done to produce the revised models
- the review of the assessment outcomes based on the outputs from the revised models, including identification of any different or significant effects that are implied by those outputs.

8.12. We anticipate that the report will be ready for submission to the Examining Authority in the **week ending 26 January 2024**.

**Programme**

8.13. Table 3 summarises our anticipated programme to complete the remaining work.

**Table 3: Programme**

		Nov				Dec				Jan			
	Week ending	10	17	24	1	8	15	22	29	5	12	19	26
Task													
A	Engage with stakeholders on approach and work to date												
	This response to the ExA												
B	Run new forecast years (2029, 2032, 2047 future baseline and with Project)												
C	Identify impacts indicated by new forecast models and compare with assessment in Application												
D	Engage with stakeholders on findings from new forecasts												
E	Prepare detailed report												
F	Submission to ExA												

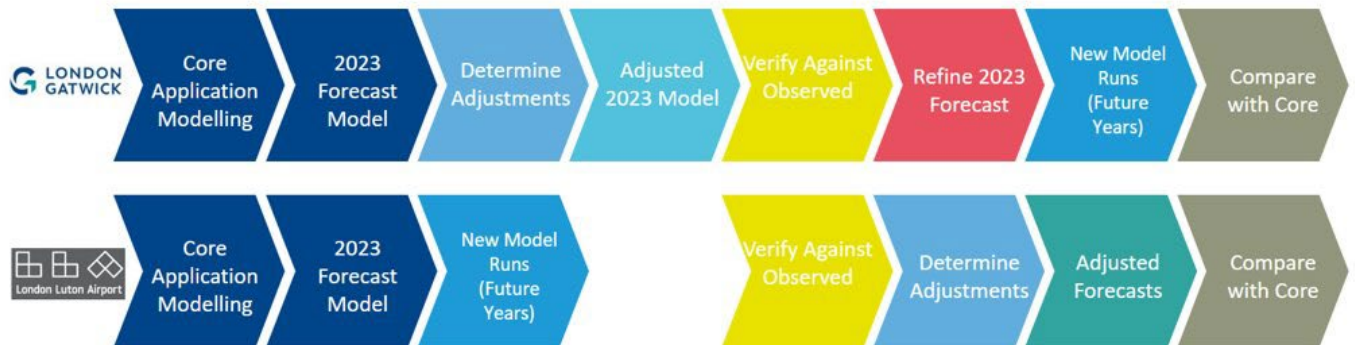
**9. Comparison with the approach proposed for Luton Airport**

9.1. The methodology we have adopted is very similar to that proposed by Luton Rising in response to a similar question from the Examining Authority for the Luton Airport DCO Examination (see Luton Rising’s letter of 27 June 2023, PINS document reference [TR020001-001095](#)).

9.2. Both we and Luton Rising have concluded that the approach of fully rebasing the models would require a significant timescale and is not a proportionate response.

9.3. Each approach involves gathering available data for the 2016 to 2023 period, updating the relevant Uncertainty Logs and including the latest growth forecasts from NTEM8 and NRTP22. The main difference between the two approaches arises in the sequence of model creation and verification and the way in which adjustments are applied to the models for the assessment years. This is illustrated in Figure 1.

**Figure 1: Comparison of approaches for Gatwick Airport and Luton Airport**



- 9.4. The Luton Rising approach creates all the revised future year forecast models at the same time. Verification of the 2023 forecast model takes place and any adjustments needed to better reflect observed conditions are identified. Those adjustments are then applied directly to the outputs of the other future year forecast models.
- 9.5. Our approach produces a single new forecast year (2023) model first, which is then adjusted and verified against observed data until adequate alignment is achieved. The adjustments are thus embedded in the 2023 forecast year model which is then used to generate the revised future year forecast models. This means that the outputs of those models include the dynamic response element of the strategic model suite to respond to network conditions in each of the future years. This reduces the degree of risk associated with factoring model outputs.

## Annex B: Environmental Statement (ES) Chapter 12 – Transport: Revised IEMA guidance

### 1. Overview

- 1.1 The assessment presented in ES Chapter 12: Traffic and Transport (**Doc Ref. 5.1 v2**) is based on guidance from the Institute of Environmental Management and Assessment (IEMA) which was issued in 1993, in particular ‘Guidance Note No.1: Guidelines for the Environmental Assessment of Road Traffic’<sup>4</sup> (GERTA 1993).
- 1.2 In July 2023 the IEMA issued updated guidance entitled ‘Environmental Assessment of Traffic and Movement’<sup>5</sup> (EATM 2023). The general principles set out in EATM 2023 remain similar to those in GERTA 1993. EATM 2023 also provides amended or additional guidance on the assessment of certain topics, which was not contained in GERTA 1993 and therefore was not considered in the assessment submitted with the Application.
- 1.3 Our review of EATM 2023 and the implications for the assessment presented in the Application is set out in detail in the following paragraphs and summarised in Table 4.

**Table 4: Summary of actions required to respond to EATM 2023**

Topic	Action
Study area	No change required
Assessment years	No change required
Receptors	No change required
Severance	Review method in light of EATM 2023 and update assessment if necessary
Road vehicle driver and passenger delay	No change required
Non-motorised user delay	Review method in light of EATM 2023 and update assessment if necessary
Non-motorised user amenity	No change required
Fear and intimidation on and by road users	Review method in light of EATM 2023 and update assessment if necessary
Road user and pedestrian safety	Review method in light of EATM 2023 and update assessment if necessary
Hazardous / large loads	No change required
Effects on public transport users	No change required (not covered in EATM 2023)

- 1.4 As Table 4 shows, we propose to review certain elements of the assessment in the light of the new guidance and update them where necessary, so that we can provide the Examining Authority with a full explanation of whether and how the latest guidance affects the conclusions reported in the Application.
- 1.5 We propose to complete this review and provide the Examining Authority with a consolidated update on the implications of EATM 2023 **in the week ending Friday 22 December**.

<sup>4</sup> Institute of Environmental Assessment (now IEMA) (1993) Guidelines for the environmental assessment of road traffic. Institute of Environmental Assessment. (IEA Guidance Notes, 1).

<sup>5</sup> Institute of Environmental Management and Assessment (2023) Environmental Assessment of Traffic and Movement

## 2. Review of guidance in EATM 2023 and GERTA 1993

- 2.1 Much of the guidance contained in GERTA 1993 is reiterated in EATM 2023, confirming that the general approach to assessing the environmental effects associated with traffic and movement remains consistent with that used in the Application and on many other schemes over the last 30 years.
- 2.2 Both GERTA 1993 and EATM 2023 cover the identification of the study area, assessment years and relevant receptors and provide guidance on the approach to a number of aspects of the assessment:
- Severance of communities
  - Road vehicle driver and passenger delay
  - Non-motorised user delay
  - Non-motorised user amenity
  - Fear and intimidation on and by road users
  - Road user and pedestrian safety
  - Hazardous / large loads
- 2.3 We deal with each of these aspects below.
- 2.4 EATM 2023 also contains guidance relating to the relationship between future baseline and cumulative scenarios in an assessment, which was not part of GERTA 1993. Although this does not relate directly to the assessment of effects, it is potentially relevant to the way in which the transport modelling scenarios have been developed for the Application. We have therefore provided a commentary on this aspect of the new guidance.

### *Identifying the study area*

- 2.5 GERTA 1993 identified two 'Rules' which form the basis for identifying the geographic coverage of the study area for the assessment of environmental effects:
- Rule 1 – Where the change in total traffic is more than 30%, include links where the absolute difference is greater than two vehicles per minute and on links where the model is showing at least one vehicle in the future baseline (ie excluding routes with zero traffic). Where the change in HGVs is more than 30%, include links where the absolute difference is greater than one HGV every five minutes.
  - Rule 2 – Where the change in total traffic is more than 10%, include links where the absolute difference is greater than two vehicles per minute, on links where the model shows at least one vehicle in the future baseline (ie excluding routes with zero traffic) and where there are sensitive receptors along the link's frontage.
- 2.6 These two Rules formed the basis for identifying the study area used in the assessment of transport-related effects for the Application, as described in paragraphs 12.4.9 to 12.4.15 and Diagrams 12.4.3 to 12.4.5 of ES Chapter 12: Traffic and Transport (**Doc Ref. 5.1 v2**).
- 2.7 The two Rules are reiterated in EATM 2023 as being appropriate for determining the geographic scope of the assessment, and therefore the study area does not require amendment following the publication of EATM 2023.

### ***Selecting assessment years***

- 2.8 Guidance on selecting assessment years in EATM 2023 is unchanged from that in GERTA 1993. The assessment years used for the Application are described in paragraph 12.4.4 of ES Chapter 12: Traffic and Transport (**Doc Ref. 5.1 v2**) and cover a series of different stages in the delivery of the Project, in line with the guidance suggested in EATM 2023. The assessment years therefore remain appropriate following the publication of EATM 2023.

### ***Identifying relevant receptors***

- 2.9 GERTA 1993 contained advice on identifying 'affected parties' who would form the relevant receptors for the assessment.
- 2.10 The assessment in the Application drew on the guidance in GERTA 1993 and identified the following receptors (paragraph 12.4.33 of ES Chapter 12: Traffic and Transport (**Doc Ref. 5.1 v2**)):
- pedestrians and cyclists using roadside footways;
  - rail passengers; and
  - car drivers and passengers, including taxis and private hire vehicles, servicing vehicles.
- 2.11 Paragraph 12.4.34 of ES Chapter 12: Traffic and Transport (**Doc Ref. 5.1 v2**) noted that effects on the users of Public Rights of Way and open space are dealt with in ES Chapter 19: Agricultural Land Use and Recreation [**APP-044**].
- 2.12 Table 12.4.3 of ES Chapter 12: Traffic and Transport (**Doc Ref. 5.1 v2**) sets out the criteria used for identifying the sensitivity of receptors.
- 2.13 EATM 2023 provides very similar guidance to GERTA 1993 in relation to identifying potential receptors, although it introduces income and social disadvantage characteristics into the considerations that may be relevant. There is, however, no substantive change to the approach.
- 2.14 The methodology used for ES Chapter 12: Traffic and Transport (**Doc Ref. 5.1 v2**) and the receptor categories that are identified for assessment therefore remain appropriate and there is no need for amendments to the receptors to be considered in the assessment.

### ***Assessing severance***

- 2.15 GERTA 1993 made reference to changes in traffic flow of 30%, 60% and 90% as producing 'slight', 'moderate' and 'substantial' changes in severance.
- 2.16 The assessment in ES Chapter 12: Traffic and Transport (**Doc Ref. 5.1 v2**), which addresses severance effects for those using routes adjacent to public highways, has identified highway links in the study area based on Rules 1 and 2 as set out in EATM 2023. The sensitivity of pedestrians and cyclists using each of those links was identified using the criteria in Table 12.4.3 of ES Chapter 12: Traffic and Transport (**Doc Ref. 5.1 v2**) and is set out in ES Appendix 12.9.1: Highway Flows and Driver Delay Review [**APP-153**] for each of the links in the study area.
- 2.17 The magnitude of impact of the Project on severance was identified based on the percentage change in traffic flow as a result of the project, using thresholds of 30%, 60% and 90% change as recommended in GERTA 1993.
- 2.18 The effects of the Project on recreational receptors, including severance effects for people using Public Rights of Way and open spaces, is covered in ES Chapter 19: Agricultural Land Use and



Recreation [APP-044] using criteria drawn from Design Manual for Roads and Bridges LA112: Population and Human Health<sup>6</sup>.

- 2.19 The thresholds of a 30%, 60% and 90% change in traffic flows are reiterated in paragraph 3.16 of EATM 2023. EATM 2023 also refers to other resources to “*augment historic thresholds and assist... judgement in determining the significance of severance effects*” (paragraph 3.18 of EATM 2023). It mentions DfT TAG Unit A4-1: Social Impact Appraisal<sup>7</sup> and DMRB LA112.
- 2.20 DMRB LA112 provides guidance on assessing the effects of schemes on accessibility to different types of land use and in changing the provision of routes for walkers, cyclists and horse riders (WCH). It provides advice on *determining* the sensitivity of relevant receptors (Table 3.11 of DMRB LA112). This includes considerations for different locations based on the nature of the surrounding land uses and the type of route being used by WCH. DMRB LA112 also provides guidance on the magnitude of impact on receptors and includes suggested thresholds of change in journey length for WCH.
- 2.21 TAG Unit A4-1 describes an alternative method for assessing severance effects in paragraphs 5.2.1 to 5.2.4 and Table 5.1. It notes that “*severance will only be an issue where either vehicle flows are significant enough to significantly impede pedestrian movement or where infrastructure presents a physical barrier to movement*” (paragraph 5.1.1 of TAG Unit A4-1). This method classifies severance into four broad levels (none, slight, moderate, severe) based on the degree of hindrance to pedestrian and cyclist movements. Changes in the severance classification resulting from the Project are used to determine the magnitude of impact, which should also consider the number of people that may be affected. TAG Unit A4-1 also notes that the method in DMRB LA112 can be used to support the classification of severance.
- 2.22 The assessment in ES Chapter 19: Agricultural Land Use and Recreation [APP-044] uses the criteria from DMRB LA112 and therefore does not need further review.
- 2.23 Because EATM 2023 now references the additional guidance in DMRB LA112 and TAG Unit A4-1, we propose to review the methodology used for the assessment presented in ES Chapter 12: Traffic and Transport (**Doc Ref. 5.1 v2**) and, if necessary, undertake an updated assessment.

**Assessing driver delay**

- 2.24 Guidance in EATM 2023 about assessing driver delay is unchanged from that in GERTA 1993. It indicates that driver delay is often best assessed using the technical work developed for the Transport Assessment for a scheme. This is the approach which has been taken for the Application, as described in paragraph 12.4.9, paragraphs 12.2.47 and 12.4.48 and Table 12.4.6 of ES Chapter 12: Traffic and Transport (**Doc Ref. 5.1 v2**).
- 2.25 The publication of EATM 2023 does not therefore require effects related to driver delay to be reviewed.

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<sup>6</sup> Highways England, Transport Scotland, Welsh Government and the Department for Infrastructure Northern Ireland (2020b) Design Manual for Roads and Bridges LA112 Population and Human Health.  
<https://www.standardsforhighways.co.uk/tses/attachments/1e13d6ac-755e-4d60-9735-f976bf64580a?inline=true>

<sup>7</sup> Department for Transport (2022) Transport Appraisal Guidance Unit A4-1: Social Impact Appraisal  
[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/1126362/TAG\\_Unit\\_A4.1\\_-\\_Social-impact-appraisal\\_Nov\\_2022\\_Accessible\\_v1.0.pdf.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1126362/TAG_Unit_A4.1_-_Social-impact-appraisal_Nov_2022_Accessible_v1.0.pdf.pdf)

***Assessing delay to non-motorised users***

- 2.26 Guidance in GERTA 1993 indicated that while delay to non-motorised users could be affected by changes in traffic volume, composition or speed, there are no qualitative criteria that can readily be used to assess changes in delay.
- 2.27 The assessment for the Application therefore applied professional judgement to determine the likely magnitude of any changes to non-motorised user delay, by considering the availability of pedestrian and cycle route and crossing facilities on links in the study area (paragraph 12.4.49 of ES Chapter 12: Traffic and Transport (**Doc Ref. 5.1 v2**)). The study area links were themselves identified on the basis of changes in traffic flow due to the Project, as explained above.
- 2.28 Guidance in EATM 2023 is substantially unchanged and notes that setting definitive thresholds for assessing non-motorised user delay is unwise, instead recommending that professional judgement is used to determine the significance of any changes in delay, in the context of the particular location affected (paragraphs 3.26 of EATM 2023).
- 2.29 EATM 2023 also refers to TAG Unit A4-1 and DMRB LA112 as being useful resources to assist the assessment. As noted earlier, DMRB LA112 includes criteria for WCH which consider the change in journey distance experienced by those users in order to determine the magnitude of impact of a scheme.
- 2.30 Because EATM 2023 now references the additional guidance in DMRB LA112 and TAG Unit A4-1, we propose to review the methodology used for the assessment presented in ES Chapter 12: Traffic and Transport (**Doc Ref. 5.1 v2**) and, if necessary, undertake an updated assessment.

***Assessing non-motorised user amenity***

- 2.31 To assess non-motorised user amenity GERTA 1993 indicated that the threshold at which changes to non-motorised user amenity might occur is where traffic flows, or heavy goods vehicle flows, either halve or double as a result of the scheme being assessed.
- 2.32 This is the basis used in the assessment in the Application (paragraphs 12.4.50 to 12.4.51 of ES Chapter 12: Traffic and Transport (**Doc Ref. 5.1 v2**))
- 2.33 Guidance in EATM 2023 is substantially unchanged and confirms that those thresholds remain appropriate for assessment. The publication of EATM 2023 does not therefore require effects related to non-motorised user amenity to be reviewed.

***Assessing fear and intimidation***

- 2.34 Guidance in GERTA 1993 for assessing fear and intimidation noted that there are no commonly agreed thresholds but that consideration of the degree of hazard to pedestrians could be relevant, based on traffic flow, speed and the number of HGV present.
- 2.35 In the assessment for the Application, fear and intimidation caused to receptors by road traffic were considered as part of assessing effects on pedestrian and cyclist amenity, as described in paragraph 12.4.51 of ES Chapter 12: Traffic and Transport (**Doc Ref. 5.1 v2**). Professional judgement was applied to determine the magnitude of impact on pedestrian and cyclist amenity by considering the degree of hazard presented by road traffic in particular locations, the scale of change in traffic flows and the availability of facilities for pedestrians and cyclists.
- 2.36 The underlying approach for assessing fear and intimidation in EATM 2023 remains the same as in GERTA 1993. However, EATM 2023 introduces a weighting system to support the assessment (paragraphs 3.32 to 3.40 and Tables 3.1 to 3.3 of EATM 2023). This creates a more structured approach than in GERTA 1993 by scoring the 'degree of hazard' in a particular location based on traffic speed and traffic and HGV flow. This produces an overall score for the level of fear and

intimidation and the guidance suggests how changes in that overall score, resulting from the Project equate to different magnitudes of impact.

- 2.37 We propose to undertake a review of the assessment of fear and intimidation on the highway links in the study area using the weighting system set out in EATM 2023 and, if necessary, undertake an updated assessment.

**Assessing road safety**

- 2.38 GERTA 1993 recommended that effects related to accidents and safety were assessed with reference to local or national accident rates, to provide an estimate of the change in the number of accidents that might be expected with a scheme in place.
- 2.39 The assessment for the Application used professional judgement to determine the magnitude of impact of the Project on accidents and safety. This considered changes in traffic flows and to the physical highway infrastructure (paragraph 12.4.53 of ES Chapter 12: Traffic and Transport (**Doc Ref. 5.1 v2**)), together with a review of collision clusters (paragraphs 12.6.19 to 12.6.22 of ES Chapter 12: Traffic and Transport (**Doc Ref. 5.1 v2**)).
- 2.40 EATM 2023 now makes explicit reference to the use of Road Safety Audits as part of reviewing any highway layout changes associated with a scheme. We have already undertaken a Road Safety Audit of the proposed highway works which form part of the Project, which has been shared with National Highways, Surrey County Council and West Sussex County Council as the affected highway authorities.
- 2.41 EATM 2023 makes reference to collision clusters as a means of considering the potential impacts of a scheme. It also references the use of a ‘Safe System’ approach and suggests that this could be used to consider the road safety impacts of a scheme and ultimately the proportionate changes in likelihood of fatal and serious injuries as a result of the scheme (paragraphs 3.43 to 3.46 of EATM 2023).
- 2.42 The detailed methodology for such an approach is not clearly set out in EATM 2023. We therefore need to review the methodology alongside that used for the Application, to determine whether the assessment presented in the Application requires any update and to undertake that update if necessary.

**Assessing hazardous and large loads**

- 2.43 GERTA 1993 suggested that “where the number of [hazardous load] movements is considered to be significant, the [ES] should include a risk or catastrophe analysis to illustrate the potential for an accident to happen and the likely effect of such an event” (paragraph 4.44, GERTA 1993). EATM 2023 sets the same context (paragraph 3.50 of EATM 2023).
- 2.44 GERTA 1993 suggested that the risk of accidents involving hazardous loads should be assessed using national accident rates as a basis for considering how often an accident might occur, considering the number of such loads that are expected for a scheme and the distance those loads might have to travel.
- 2.45 EATM 2023 notes that environmental assessments should consider major accidents and disasters. It recognises that “it is best practice for an assessment of transport-related hazards and accidents to be included as part of a project-wide major accident and disaster assessment.” (paragraph 3.51, EATM 2023).
- 2.46 The Project is not expected to generate any significant number of hazardous loads (paragraph 12.4.54 of ES Chapter 12: Traffic and Transport (**Doc Ref. 5.1 v2**), although it may be necessary to transport large loads on some occasions (for instance for equipment involved in construction and commissioning). ES Chapter 12: Traffic and Transport (**Doc Ref. 5.1 v2**) nevertheless contain some

commentary on the effects on hazardous load movement caused by changes to the highway network arising from the Project, should those movements occur.

- 2.47 The Application includes an assessment of environmental effects in relation to major accidents and disasters, which can be found in ES Appendix 5.3.4: Major Accidents and Disasters [\[APP-089\]](#). This includes consideration of transport accidents.
- 2.48 The Application therefore addresses the guidance set out in EATM 2023 in relation to hazardous and large loads and no further review is necessary.

***Effects on public transport users***

- 2.49 The assessment presented in ES Chapter 12: Traffic and Transport (**Doc Ref. 5.1 v2**) considers the effects of the Project on rail users and on users of other public transport services.
- 2.50 Neither GERTA 1993 nor EATM 2023 provide any guidance in relation to assessing the effects of schemes on public transport users. The assessment presented in the Application is therefore unaffected by the publication of EATM 2023.

**3. Future baseline and cumulative scenario considerations**

- 3.1 EATM 2023 contains new commentary on the relationship between the future baseline and cumulative scenarios in an assessment.
- 3.2 Paragraph 2.28 of EATM 2023 notes that “Transport and movement assessments within EIA/non-statutory environmental assessment are inherently cumulative, as the traffic data used to inform such assessments should include data from other relevant developments.”
- 3.3 Paragraph 2.29 of EATM 2023 goes on to say that “Future baseline and cumulative assessment should not be confused. They are two different considerations within the environmental assessment process. Derived forecast traffic growth (e.g. TEMPro) should be utilised to derive future year baseline traffic conditions. However, discrete projects within the agreed study area that are existing, approved or likely to come forward (where sufficient certainty and relevant information about the project exists) should not be added to the baseline scenario and should be considered in the cumulative scenario. The competent traffic and movement expert should exercise care to ensure:
- *‘Double counting’ is avoided when applying growth factors to the baseline that may have been influenced by approved projects that are being considered in the cumulative scenario,*
  - *The proposed transport model has adequate scope to model cumulative scenarios (as they may differ from those required in the Transport Assessment).’*
- 3.4 The transport modelling used for the assessment in the Application has been developed using the guidance set out in the DfT’s Transport Appraisal Guidance. This is the recommended basis for developing complex transport modelling and has been agreed with stakeholders as being appropriate. The methodology is summarised in paragraphs 12.4.25 to 12.4.31 and Section 12.5 of ES Chapter 12: Traffic and Transport (**Doc Ref. 5.1 v2**) and in further detail in Sections 3 to 9 of the Transport Assessment Annex B – Strategic Transport Modelling Report [\[APP-260\]](#).
- 3.5 The transport model scenarios are derived from a ‘base year’ model (in this case for 2016). That base year model includes all existing development that was operational at that time and has been validated and calibrated against observed data. This approach aligns with the approach set out in the DfT’s Transport Appraisal Guidance (TAG) for the development of transport models.
- 3.6 In line with TAG advice, an Uncertainty Log was developed which identifies planned development and transport infrastructure changes in the modelled area. Each development was allocated a degree of certainty of implementation, based on its current status within the planning regime. Developments and schemes classified as ‘near certain’ or ‘more than likely’ were included in future

baseline models, as advised in TAG, whereas those classified as ‘reasonably foreseeable’ or ‘hypothetical’ are not.

- 3.7 Future growth in population and employment, and therefore in trip-making, can also be derived from the DfT’s TEMPro software. This was used for the modelling in the Application to derive general forecasts of growth in each of the local authority districts covered by the transport model. Care was taken to ensure that where specific developments were identified in the Uncertainty Log, factors derived from TEMPro were adjusted to avoid double-counting.
- 3.8 EATM 2023 says that “discrete projects...that are existing, approved or are likely to come forward...should not be added to the baseline scenario...”. However, this does not align with the approach set out in TAG.
- 3.9 Guidance in TAG suggests that ‘existing’ projects (i.e. those already operational) should clearly form part of the baseline, as trips related to them are already on the transport networks at the time the models are developed and validated.
- 3.10 ‘Approved’ projects should also form part of future baseline scenarios; if they have the necessary permissions, it is highly likely that they will come forward and it is therefore appropriate to include them in future baseline scenarios, based on the best information available about the timing of their delivery.
- 3.11 Projects which are ‘likely to come forward’ may have varying degrees of certainty based on their progress through the planning system. Where they are sufficiently certain, using the TAG classifications, they should be included in the appropriate future baseline year(s). Where they are less certain, specific allowance for them is not included in the future baseline, although the effect of those developments may be part of the growth assumed in broader growth factors such as those derived from the National Trip End Model (NTEM) and available through the DfT’s TEMPro software.
- 3.12 The core future baseline and with Project model scenarios used in the Application specifically exclude potential major development sites at West of Ifield, Gatwick Green and Horley Business Park. None of these three sites is considered sufficiently certain, using TAG criteria, to be included in these core scenarios. Specific adjustments were made to the TEMPro growth factors used in the core models to remove the contribution that these developments might make to future growth.
- 3.13 However, we recognised that if they were to come forward, these three developments might create more substantive changes in transport trips on the networks around the Airport because of their size and proximity. Discussions with stakeholders also confirmed that they were keen to understand the cumulative impacts of the Project with these other three major developments. The three sites were therefore included in a series of cumulative model scenarios, and an assessment of cumulative effects was reported in Section 12.11 of ES Chapter 12: Traffic and Transport (**Doc Ref. 5.1 v2**).
- 3.14 Having considered the advice provided in EATM 2023 on the topic of future baseline and cumulative scenarios, we consider that the methodology used for the transport modelling which informs the assessment in the Application remains sound and we do not propose to undertake further review of or amendments to it as a consequence of EATM 2023.

#### 4. Programme

- 4.1 We have already commenced work on the review of the assessment methodology for those aspects that require it.
- 4.2 The review will identify whether a revised methodology would be needed for certain elements of the assessment presented in the Application in the light of EATM 2023 and if so, apply the revised methodology to produce an updated assessment.



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- 4.3 We will provide the Examining Authority with a technical paper which explains the review that has been undertaken, its conclusions and any further implications for the material reported in the Application.
- 4.4 We propose to provide this in the week ending Friday 22 December.