



**Horsham  
District  
Council**



## **Gatwick Airport Northern Runway Project**

Planning Inspectorate's Reference: TR020005

### **Issue Specific Hearing 4: Surface Transport Post Hearing Submission**

**Deadline 1: 12 March 2024**

Crawley Borough Council (GATW-AFP107)  
Horsham District Council (20044739)  
Mid Sussex District Council (20044737)  
West Sussex County Council (20044715)  
Reigate and Banstead Borough Council (20044474)  
Surrey County Council (20044665)  
East Sussex County Council (20044514)

**Issue Specific Hearing 4 (“ISH4”) on Surface Transport – 05 March 2024**

**Post Hearing Submissions including written summary of the Legal Partnership Authorities’ Oral Case**

**Note:** These submissions are made by the Legal Partnership Authorities. The Legal Partnership Authorities are comprised of the following host and neighbouring Authorities who are jointly represented by Michael Bedford KC and Sharpe Pritchard LLP for the purposes of the Examination:

- Crawley Borough Council
- Horsham District Council
- Mid Sussex District Council
- West Sussex County Council
- Reigate and Banstead Borough Council
- Surrey County Council
- East Sussex County Council

In these submissions, the Legal Partnership Authorities may be referred to as the “*Legal Partnership Authorities*”, the “*Authorities*”, the “*Joint Authorities*” or the “*Councils*”. Please note that Mole Valley District Council is also part of the Legal Partnership Authorities for some parts of the Examination (namely, those aspects relating to legal agreements entered into between the Applicant and any of the Legal Partnership Authorities) but not all parts and were therefore separately represented in relation to ISH4.

**Purpose of this Submission**

The purpose of these post-hearing submissions is to provide a written summary of the Legal Partnership Authorities positions on the Agenda Items discussed at the ISH. This includes both a summary of the Legal Partnership Authorities oral representations and, in some cases, further comments on the oral representations made by the Applicant at the ISH.

Whilst the structure of these submissions follows the order of the Agenda Items, they do not include all of the Legal Partnership Authorities’ concerns in relation to each Agenda Item as not all of these positions were rehearsed orally at the ISH due to the need to keep oral representations succinct.

Where the Legal Partnership Authorities positions were not rehearsed orally, these submissions sometimes include references to the relevant sections of the Local Impact Reports (“LIRs”) where a position is set out in further detail. The Legal Partnership Authorities would also be happy to provide answers in writing to any specific further questions which the Examining Authority (“ExA”) may have.

**Attendance:** ISH4 was attended by Michael Bedford KC for the Legal Partnership Authorities, instructed by Alastair Lewis, Partner and Parliamentary Agent, of Sharpe Pritchard LLP. The ISH was attended by various other representatives from the Legal Partnership Authorities who did not make oral representations.

Examining Authority's Agenda Item / Questions	Legal Partnership Authorities Post-Hearing Submissions	References
<p><b>1. Strategic Transport Modelling</b></p> <p><b>1.1. Future Baseline</b></p> <p><b>1.2. Assessment period</b></p> <p><b>1.3. Vissim Modelling – Extent</b></p>	<p><b><u>Future Baseline</u></b></p> <p>The Authorities share the concerns expressed on behalf of National Highways and have similar concerns in relation to the local road network, for which the County Councils have responsibility.</p> <p>The Authorities have a wider concern, as discussed at ISH1, about the wider modelling of the future baseline scenario and its realism and they echo the concerns raised at that hearing by York Aviation. Whilst those concerns were being expressed in the context of aviation need and demand, there is necessarily an interlinkage with the surface transport consequences of the true level of demand, particularly in the future baseline. The Authorities would like to see what the Applicant says by way of its explanation to the concerns and questions in relation to particular aspects of their modelling approach and will provide comments on that.</p> <p>The Authorities are aware of the sensitivity test exercise that the Applicant has presented through the recent post Covid 19 modelling but are not yet in a position to provide a detailed position on that and would hope to provide a full response at Deadline 2.</p> <p>The Authorities also have some specific concerns about some of the assumptions which have featured in the modelling. This is in particular in the modelling of the baseline in chapter four, particularly with regard to some of the assumptions that are made for the baseline scenarios as to the quantum of car parking that would be available. There are two particular locations where the Authorities are not currently persuaded that what the Applicant proposes ought to be included in a baseline scenario:</p> <ol style="list-style-type: none"> <li>1) The first of those is the Applicant's ability to achieve 2,500 spaces via robotic parking, which the Applicant is suggesting it could do in the exercise of its permitted development rights under Class F of the GPDO 2015. The exercise of that PD right requires consultation with the local planning authorities and in the exercise of that consultation, the Authorities would want, if consulted, to understand how such a scale of increase could be consistent with the surface access obligations which are set out in the current section 106 agreement; and</li> </ol>	<p>TR020005 AS-121 Accounting for Covid-19 in Transport Modelling Section 4.2.3 to 4.2.11</p> <p>TR020005 APP-260 Table 148</p> <p>TR20005 APP-260 Section 7.12 of Transport Assessment Annex B: Strategic Transport Modelling Report [APP-260]</p> <p>Section 4.4.6 in APP-029</p>

2) The second point relates to the Hilton Hotel where there is a multi-storey car park which in the future baseline is proposed to provide some 820 spaces. The Authorities are not persuaded that the planning permission for that car park has been implemented, and so they do not think that it should form part of the future baseline.

The Authorities will review further information submitted by the Applicant in relation to the revised future baseline scenario, as requested by the ExA once it has been submitted.

**Assessment Period**

The Authorities have some concerns about how background traffic has been modelled, particularly in relation to what it was showing on the strategic road network, including the M25. The Authorities want to understand more about the Applicant's choice and would welcome the opportunity to review the clarification note proposed by the Applicant. The Authorities' concern is that if there is excess traffic on the SRN that takes it beyond its capacity there are potential implications for the local road network of traffic departing therefrom.

**Vissim Modelling – Extent**

The ExA's raised a specific query about Surrey County Council's relevant representations about the Vissim modelling not extending to the local road network in Horley.

The extent of the Vissim model is shown on diagram 13 .4.1 of the Transport Assessment. The Longbridge roundabout sits towards the edge of that model network but what is not modelled are the interactions with the junctions that then feed in traffic to that roundabout. The Authorities are concerned the Vissim modelling is not necessarily picking up what is actually happening at that junction, because the Applicant has not modelled the interactions with the next junctions along the line. The Authorities have a concern with that and consider it is capable of being addressed by the Applicant and would urge the Applicant to give that some further consideration.

In view of these considerations, Surrey County Council requests that the VISSIM model include, at the very least:

- A23/Massetts Road;
- A23/Victoria Road;
- A217/Tesco roundabout; and
- A217/Hookwood Roundabout

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<p><b>2. Rail Modelling</b>  <b>2.1. Station Modelling</b>  <b>2.2. Passenger Modelling</b></p>	<p><b><u>Station Modelling</u></b>  The Authorities share concerns expressed by Network Rail at the ISH and echo comments expressed by others at the ISH requesting that the Applicant carries out further work to resolve the concerns expressed by Network Rail.</p> <p><b><u>Passenger Modelling</u></b>  In the Authorities', passenger modelling forms a critical part of the jigsaw because of the interaction with other forms of surface transport access and therefore it is of some concern to hear the strength of issues being raised both by the train operating company and by Network Rail, about the robustness of the modelling that has been presented.</p>	<p>TR020005 APP-260  Transport Assessment  Annex B Strategic Transport  Modelling Report  Appendix A Table 13</p>
<p><b>3. Car park assessment</b></p>	<p><b><u>Controls on Increases to Parking</u></b>  The Authorities have concerns about the degree of control. The Authorities understand that there is proposed to be a net increase of 1100 parking spaces, and currently do not understand the rationale for that increase. Table 70 and Table 133 of APP-260 appear to show the proportion of passengers at 2047 who would be park and fly passengers, i.e. passengers who would generate a need for a parking space themselves, as opposed to the other ways of arriving at the airport. The Authorities' understanding of that information is that it is suggested that there will be 36,500 park and fly passengers in the baseline scenario and that would be 36,300 park and fly passengers with development scenario. If that is the case, the Authorities do not therefore understand why the 'with development' scenario has a 1,100 increase in parking spaces. Therefore, in the SAC there is a need for stepped controls to ensure that if there is a justified case for an increase, then that may be so, but there should not be provision without there being a justified case for an increase.</p> <p><b><u>Off Airport Parking</u></b>  There is a separate concern relating to how off airport parking is to be monitored, which is to ensure that demand is diverted to the on-airport car parks rather than to fly parking and so on. That relates also to discussions that the Authorities are having about levels of funding for enforcement of parking controls. Effectively the Authorities see a need for greater control, and do not see why in particular, it would not be appropriate to take up the ExA's suggestion of bringing controls on the quantum of parking into the DCO via a requirement, as opposed to simply relying on the Surface Area Commitments (SAC) mode share commitments.</p>	<p>TR020005 APP-260 Table  70 and 133</p>

	<p>The Authorities will review and where necessary comment upon the car parking note that has been requested from the Applicant by the ExA. This note will include details of car park occupancy to justify the need for the additional car parking proposed.</p>	
<p><b>4. Modal targets and controls</b></p>	<p>The Authorities have already set out their concerns about the lack of robustness in the surface access commitments and their enforceability and what needs to be done about that.</p> <p>The Authorities acknowledge that, not least because, unlike some other airports, Gatwick has the rail station embedded within it, and is achieving what may be a better modal share than some of the other London airports. The Authorities consider that when dealing with the human behaviours and all the other variables, there may be a suggestion of not necessarily a ceiling, but that the further up the gradient you go, the harder and harder it gets to get to the last element. That is why the Authorities are concerned that the reference to achieving the 55% modal share target will be a challenge and they do not see it as being regulated.</p> <p>The Authorities also note that, from the Applicant's perspective, at the time that it produced the Preliminary Transport Assessment Report in September 2021, it had an ambition for a 60% mode share, both for sustainable travel for passengers and for staff journeys, by 2030. However, in the application that has been downgraded to 55% by 2032. This would seem to imply that the Applicant itself has entered a note of caution about its ability to achieve those higher mode shares which again suggests that there really needs to be some teeth or checks or mechanisms to ensure that the mode shares are achieved. If they are not achieved, there need to be sanctions rather than the preparation of action plans, and then the review and subsequent preparation of further action plans and so on, which the Authorities do not regard to be sufficient to be effective. That brings the Authorities back to the idea of a controlled growth approach, a stepped approach, rather than simply relying on the SAC commitments.</p>	<p>DCO documents Transport Assessment (TR020005 APP-258) Section 14.4</p> <p>Rights of Way and Access Plans - For Approval (TR020005 APP-018)</p> <p>Surface Access Highways Plans – General Arrangements - For Approval (TR020005 APP-020)</p>
<p><b>5. Pedestrians and cyclists – movement frameworks</b></p>	<p>There has been discussion between the Authorities and the Applicant through the working groups on the movement framework, and concerns have been expressed by the Authorities about particular locations. In headline terms, there are concerns in relation to the Longbridge roundabout, in relation to active travel between Horley and Gatwick, and in relation to the ability to cross the Brighton main line. There are also issues in relation to the permissive and public rights of way network which the Authorities will set out. The Authorities have discussed</p>	

	<p>those with the Applicant and hope to see progress made on those discussions and dialogue to get a better position. Whilst it is probably more relevant to the employees than it is to the passengers, active travel as a mode is an important part of the overall strategy.</p> <p>The Applicant is to submit a clearer movement framework to indicate pedestrian, cycle, and shared routes, which includes details of locations of on-airport cycle parking and entrances. This movement framework will be assessed and commented upon as necessary.</p>	
<b>6. Actions Points</b>	<p>There were no action points for the Authorities to address at ISH4.</p>	