



Gatwick Northern Runway TR020005

**ISH4: ACTION POINT 9: COMMENTARY ON
SURFACE ACCESS COMMITMENTS**

March 2024

NATIONAL HIGHWAYS LIMITED
PROPOSED GATWICK AIRPORT NORTHERN RUNWAY PROJECT
ISH4: ACTION POINT 9: COMMENTARY ON SURFACE ACCESS COMMITMENTS
[APP-090]

1. At Issue Specific Hearing 4, National Highways confirmed that it would provide a marked up copy of the Applicant's Surface Access Commitments [APP-090] document. This mark up and commentary is set out below. Amendments proposed to the document are set out in red (tracked changes). Commentary on these changes is set out in adjacent comments.
2. National Highways would like to make the following overarching points:
 - a. National Highways' key concerns have been raised with the Applicant and are set out in the Statement of Common Ground [TR020005/REP1/031] and Written Representation [TR020005/REP1/088] submitted at Deadline 1.
3. Please note that minor formatting changes have been made to allow for the insertion of comments, and updated page numbers have been inserted for ease of reference. Only the changes in track (in red and underlined) are proposed by National Highways.
4. National Highways would emphasise that it is within the power of the Examining Authority to recommend, and the Secretary of State to direct, changes to control documents under the terms of article 52(2) of the draft Development Consent Order.
5. Please further note that the amendments shown below are what National Highways considers necessary at minimum, and would not resolve the concerns relating to the traffic modelling for the construction and/or operation of the proposed Scheme.

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No figures.

1. Introduction

- 1.1.1 This document forms the Environmental Statement (ES) Appendix 5.4.1: Surface Access Commitments. The ES presents the findings of the Environmental Impact Assessment (EIA) process of the proposed Northern Runway Project ("the Project").
- 1.1.2 This document is the Surface Access Commitments ("SACs") which Gatwick Airport Limited ("GAL") is committing to in relation to surface access at Gatwick Airport, as part of the Project.



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2. Context

- 2.1.1 Surface access refers to all the ways in which passengers, visitors, employees and goods/cargo traffic travel to or from an airport except when they are in an aircraft. This includes travelling to or from the airport by public transport, taxis, cars, lorries, walking, and cycling.

- 2.1.2 Since 2000, the Government has required every major airport in the UK with over 1,000 annual passenger air traffic movements to prepare an Airport Surface Access Strategy ("ASAS") setting out the measures to be taken to increase the proportion of trips made to and from that airport by sustainable transport modes, including public transport, cycling and walking. This is a continuing requirement of the 2013 Aviation Policy Framework (Ref 1-1) and of the more recent Flightpath to the Future (Ref 1-2), which states that Government expects "...airports, through their surface access strategies, to set targets for sustainable passenger and staff travel to and from the airport".
- 2.1.3 GAL has an existing ASAS (Ref 1-3), published in October 2022, which sets out targets and action plans for increasing the proportion of passenger and staff journeys using sustainable transport modes to and from Gatwick Airport. The action plans set out how a range of measures will be deployed to achieve the targets. Not all of those measures are within GAL's control; several require working in partnership with infrastructure providers and/or service operators.
- 2.1.4 The ASAS (Ref 1-3) also describes the approach to monitoring progress through an Airport Transport Forum, which has existed at Gatwick since 1998 and meets annually. The Transport Forum Steering Group (TFSG) meets quarterly and is responsible for monitoring and challenging GAL's progress against its existing ASAS action plans and targets, and for supporting a collaborative approach with local authorities, transport agencies and service providers. The TFSG consists of GAL, local highway and planning authorities, [National Highways](#), transport operators and agencies, business and passenger representatives and other interested parties.
- 2.1.5 In pursuing an increase in public transport mode share, Gatwick has consistently out-performed other major UK airports over the last 10-15 years, seeing considerable growth in the percentage of trips using sustainable modes, where other London airports have experienced lower or little improvement in mode shares. GAL has achieved this whilst working with stakeholders and service providers to deliver successive ASAS objectives and targets. This has been largely due to our successful promotion and support for rail travel to and from the airport and is reflected in our Decade of Change (Ref 1-4) targets for sustainable travel. GAL also has a Section 106 commitment regarding managing on-airport car parking to avoid excess capacity and also to use a levy on car parking to provide funding for sustainable travel initiatives aimed at both passengers and staff (our Sustainable Transport Fund or "STF").
- 2.1.6 Gatwick's ASAS (Ref 1-3) is purposely ambitious in tone and intended to set the strategic vision and framework within which sustainable travel to the Airport is promoted. It is also a product of a policy requirement that exists independently of the Project proposals. As such, rather than update the existing ASAS (Ref 1-3) to incorporate measures specific to the Project and commit to the same in the DCO (which would inevitably change the narrative and tone of the document), it was considered more appropriate to instead commit separately to specific surface access outcomes identified through the development and assessment work which has informed the Project (the SACs). These will then be subject to separate scrutiny, monitoring and reporting obligations outside of, but complementary to, the existing ASAS process with the TFSG described above.
- 2.1.7 This document is secured as a legally binding commitment under the DCO, providing an additional level of assurance and security to stakeholders as to GAL's commitment to its specified surface access outcomes.
- 2.1.8 This document does not include the highway improvement works which form part of the design of the Project and are secured separately as part of the draft DCO. These works are described in the **Environmental Statement, Chapter 5: Project Description** (Doc Ref. 5.1) and are secured in the draft DCO.
- 2.1.9 Looking forward, GAL will produce a new ASAS in line with the existing policy requirements. Subject to the DCO consent being granted, any future ASAS will be developed in full cognisance of the commitments GAL is making about surface access outcomes and measures as part of the

Commented [HR1]: National Highways included here to ensure it is clear that NH will be a party to the TFSG (and further set out in the commitments below). This inclusion is necessary as no definition is provided for "transport operators" and National Highways is not a "local highway" authority.

Project, as secured by this document, and become the means through which those commitments are delivered. However, for the avoidance of doubt, this document and its commitments would remain in full force and effect, independent of that future ASAS, and GAL would continue to need to demonstrate compliance with its terms.

3. Objectives of the SACs

3.1.1 The objectives of this document are as follows:

- to ensure that GAL's commitments to sustainable travel, made as part of the Project, and the core surface access outcomes which have been identified in the **Environmental Statement** (ES) (Doc Refs. 5.1-5.4) and **Transport Assessment** (TA) (Doc Ref. 7.4) are delivered. This will provide assurance that the surface access related environmental effects forecast through the assessment are not exceeded and includes measures identified to reduce surface access related Greenhouse Gas (GHG) emissions arising from the Project; ~~and,~~
- ~~to provide the monitoring and governance framework for reporting on, and ensuring compliance with, the SACs; and-~~
 - Without limitation to the specific commitments below, GAL must use all reasonable endeavours in complying with, and reasonably ensuring, these objectives are met in the delivery of the authorised development, and the operation of the airport.

3.1.2 The SACs comprise commitments to:

- achieve specific passenger ~~and~~ staff and other sustainable travel mode shares;
- implement certain measures and interventions which GAL will use to achieve the mode share commitments; and
- implement and follow a specified monitoring and reporting process in relation to the SACs to provide assurance that the commitments are being complied with.

Commented [BDBP2]: This provides an overarching commitment that GAL will seek to ensure that "that the surface access related environmental effects forecast through the assessment are not exceeded".

Commented [HR3]: Updated to address the suite of other measures.



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4. Mode Shares

4.1 Background

- 4.1.1 The proportions of air passenger and staff journeys by different transport modes vary daily, weekly, monthly and annually. They are influenced by the volume of air passenger movements, the balance of business and leisure travel and the mix of short haul and long haul flights as well as by airport operations. They reflect the geographic distributions of passengers and staff, and the modes available to them providing reasonable access to and from the airport.
- 4.1.2 The preferred choice of mode is based on many behavioural factors, some of which GAL can influence but are outside GAL's control.
- 4.1.3 GAL currently monitors quarterly mode shares based on air passenger surveys undertaken independently by the Civil Aviation Authority (CAA) and measures its mode share outcomes as an annual average to smooth out the variations that occur across the year. GAL proposes to adopt a quarterly average rather than annual going forwards in order to ensure issues arising during peak seasons are taken into account. ~~retain the same reporting basis for its mode share commitments associated with the Project.~~ The commitments also cover staff travel, which is not captured by the CAA and reporting a greater level of detail.

Commented [HR4]: Updated to avoid over reliance on annual data which may not account for significant issues arising at peak times. It is reasonable for these peaks to be specifically accounted for and it is more likely that they will be accounted for in quarterly averages.

4.2 Mode Share Commitments

- 4.2.1 GAL ~~commits to achieving~~must achieve the following annualised mode shares by the third anniversary of the commencement of dual runway operations and on an annual basis thereafter:
- **Commitment 1** - A minimum of 55% of air passenger journeys to and from the Airport to be made by public transport;
 - **Commitment 2A** - A minimum of 55% of airport staff journeys to and from the Airport to be made by public transport, shared travel and active modes;
 - **Commitment 2B** – A minimum of [X]% of airport staff journeys to and from the Airport to be made by shared travel;
 - **Commitment 3** - A reduction of air passenger drop-off and pick-up car journeys at the Airport to a mode share of no more than 12% of surface access journeys; and
 - **Commitment 4** - At least 15% of airport staff journeys originating within 8km of the Airport (such journeys being those to and from the Airport) to be made by active modes.
- 4.2.2 The terms used in the mode share commitments are defined as follows:
- "commencement of dual runway operations" means the first day on which commercial air transport movements are scheduled to depart from both the northern runway and the current main runway as notified by GAL to the relevant planning authority in accordance with Requirement 20 of the **DCO** (Doc Ref. 2.1);

Commented [BDBP5]: See comments below. The definition of "shared travel" is so broad that this would cover any journey by any private vehicle provided there was someone other than the driver in the vehicle. A public transport commitment should stand alone to ensure that impacts on the wider road network are minimised.

Commented [HR6]: Updated for clarity as "journeys originating" did not expressly include return journeys from the airport

- "Air passengers" are those travelling to or from the Airport, or Airport related facilities, using the surface access networks. They do not include passengers transferring between flights within the Airport;
- "Airport related facilities" means those hotels which are within 1 mile of the airport, and provide accommodation to passengers prior to departure;
- "Airport staff" are those who are employed directly by GAL or any other employer at Gatwick and who class the buildings and operational areas of the airport as their main place of work (in accordance with employer and employee travel surveys) within the Airport boundary;
- A "public transport" journey is one where the majority of the journey (measured by proportion of overall travel time) is made by rail, local bus, regional/express bus or coach or any other commercially operated shared transport services available for public use provided that the last or first element of the journey is made rail, local bus, regional/express bus or coach or any other commercially operated shared transport services;
- An "active travel" journey is one where the majority of the journey is made on foot or by cycle modes provided that the last or first element of the journey is made on foot or by cycle;
- A "shared travel" journey is one where the majority of the journey is made by a private car or other road vehicle containing more than one person-staff member (including the driver), all of and those staff members are whom are-travelling to or from the Airport or Airport related facilities. This includes company transport provided by an employer to enable group travel for staff working within the Airport boundary, for example a minibus, as well as those who use a private car to take them to train stations, bus stops etc. to conclude their journey; and
- "Mode share" is the proportion of the total number of journeys made to and from the Airport by a particular mode of transport.

Commented [BDBP7]: These changes are required as trips to hotels should be in the scope of the mode share targets.

Commented [BDBP8]: These insertions are necessary because the SRN could still be affected in circumstances where 'most' of the journey was on public transport, but the last leg was on car. Equally, some may travel by car and conclude their journey by public transport to avoid drop off fees. The specific assumptions in the TA do not support the Applicant's wider definition. In order to provide comfort that the commitments actually control the transport impacts around the airport, the definitions have been amended.

Commented [HR9]: National Highways requests that the Applicant clarify how this is being assessed and the threshold (e.g. 51%)

Commented [BDBP10]: Under the proposed definition, any taxi would fall under the definition of "shared travel", and most, if not all, journeys would be included. This intended to be used for staff members only (see commitment 2 above) and so it should not so widely defined.

5. Measures and Interventions

5.1 Background

- 5.1.1 GAL has the ability to use a number of different surface access related measures and interventions to achieve its committed mode share outcomes set out above. These range from those which GAL has direct control over (for example, car park pricing and forecourt charging to deter non-sustainable travel), to others which necessarily rely on some degree of collaboration with third parties (for example, new bus and coach routes or alterations to rail services).

- 5.1.2 The mode share commitments set out above are proposed to provide confidence and assurance as to the ultimate outcome that will be achieved, whilst maintaining flexibility as to the measures which GAL will utilise to do so. This is appropriate considering the medium to long-term nature of these mode-share commitments, which makes specifying the combination of measures at this stage impractical and unrealistic. It also recognises the need for further refinement, following consent, to respond to circumstances as they arise in the future, through discussions with third parties who would be GAL's partners in delivering certain interventions (e.g. new bus or coach routes).
- 5.1.3 Notwithstanding this flexibility, GAL is committing to a number of specific interventions which are sufficiently certain and will be integral features of GAL's achievement of the mode share commitments. They are though only a sub-set of the toolbox of interventions which GAL expects to be able to draw upon in the future and so will be supplemented with additional interventions in the future in order to deliver or where possible improve upon the mode share commitments in the SACs.

5.2 Intervention Commitments

Enhanced regional express bus or coach services

- 5.2.1 Analysis of our catchment areas for passenger and staff journeys to and from the airport identified those locations where there is significant trip-making but relatively low public transport mode share, largely in areas not well served by rail services to and from Gatwick. Our proposal is to fill these gaps by providing new and enhanced regional express bus or coach routes in partnership with a suitable service provider. This follows GAL's established approach for subsidising the public transport network serving the airport via its Sustainable Transport Fund, which is set out in GAL's current Section 106 Agreement. The STF provides financial support to services ensuring 24/7 access from local areas and has previously supported services to East Sussex, Surrey and Kent.
- 5.2.2 The following regional bus and coach enhancements are proposed as shown in **Table 1**.

Table 1: Proposed routes and frequencies for new regional bus or coach services

Indicative Route	Frequency in future baseline	Indicative Frequency with Project
Chatham – Maidstone – Sevenoaks – Gatwick	Two-hourly	Half-hourly daytime, hourly early/late
Bexley – Footscray – Gatwick	-	Hourly
Tunbridge Wells – East Grinstead – Gatwick	-	Half-hourly
Worthing – Horsham – Gatwick	-	Hourly

Commented [HR11]: National Highways requests that the Applicant define these terms for clarity or otherwise explain where they are set out

Commitment 5 – (1) GAL ~~will~~ must provide reasonable financial support to enable the services detailed in Table 1 above, or others which result in an equivalent level of improved public transport accessibility, to sustain their operation and promote their use for a minimum of five years. GAL recognises that agreement with operators and/or local authorities will be needed on the detail of each route.

(2) ~~No~~ part of the second runway operations may begin until an agreement on financial support relating to the proposed routes in Table 1 above (or where applicable, for other routes) has been entered into between GAL and the relevant local authorities and transport operators, following consultation with National Highways by GAL. [Such] agreement to include provision for the continuation of reasonable financial support beyond the minimum five years.

Commented [HR12]: National Highways requests that the Applicant define accessibility, or otherwise amend accessibility to "use"

Commented [HR13]: Required to ensure that works that may disrupt mode share do not commence until an agreement has been entered into securing financial support for bus services.

Without this new commitment (2), the Applicant is not obligated to enter into such an agreement.

Commented [HR14]: This text is required to ensure that GAL's commitment to fund services for five years does not automatically end

[\(3\) Where an agreement cannot be reached on reasonable financial support, the dispute may be resolved by reference of either GAL, the relevant highway authorities and transport operators through arbitration under article \[55\] of the DCO provided that such arbitration affords National Highways with the ability to make representations.](#)

Enhanced local bus services

5.2.3 Analysis of our staff journeys to and from work at the airport is an established method that supports GAL's approach to subsidising local services, particularly early morning, late night and weekend services, via the STF. Our proposal is to further strengthen the bus network within areas close to the airport where large numbers of staff are resident, based on the distribution and mode share of existing journeys, and extend or improve the frequency of key services with a suitable provider.

5.2.4 The assessment assumes the local bus route enhancements shown in **Table**

2. Table 2: Proposed routes and frequencies for enhanced local bus services

Route	Indicative Frequency with Project
4/5	6 bph daytime; 4 bph early/late
10	10 bph daytime; 6 bph early/late
20	6 bph daytime; 4 bph early/late
22	2 bph in peaks, 1 bph other times
100	6 bph daytime; 4 bph early/late

bph: buses per hour

Commented [HR15]: As above, National Highways requires clarity on the definition of these terms from the Applicant

Commitment 6 -- (1) GAL ~~will~~ **must** provide reasonable financial support in relation to the services detailed in Table 2 above, or others which result in an equivalent level of public transport accessibility, to sustain their operation and promote their use for a minimum of five years. GAL recognises that agreement with operators and/or local authorities will be needed on the detail of each route.

[\(2\) No part of the second runway operations may begin until an agreement on financial support relating to the services in Table 2 above \(or where applicable, for other services\) has been entered into between GAL and the relevant local authorities and transport operators. Such agreement to include provision for the continuation of reasonable financial support beyond the minimum five years.](#)

Commented [HR16]: As above, needed to ensure GAL are committed to entering into agreements for such services

Commented [HR17]: As above

[\(3\) Where an agreement cannot be reached on reasonable financial support, the dispute may be resolved by reference of either GAL, the relevant highway authorities and transport operators through arbitration under article \[55\] of the DCO provided that such arbitration affords National Highways with the ability to make representations.](#)

Commitment 7 - GAL ~~will~~ **must** also provide reasonable financial support in the amount of £[] for direct services from Crawley Down and Copthorne to Gatwick to improve local accessibility to the airport. Whilst not required to deliver the mode share commitments, the intention will be to extend existing routes to continue non-stop from Crawley to Gatwick.

Commented [BDBP18]: This commitment is undefined, and does not comply with the requirements that planning obligations must be reasonable, precise, and enforceable. GAL should be required to enter a specific sum.

Active Travel

5.2.5 The highway proposals which form part of the Project include physical improvements to active travel infrastructure at Longbridge Roundabout, alongside the A23 London Road and Longbridge Way, between South Terminal, Gatwick Airport railway station and Balcombe Road and alongside

Perimeter Road North between North and South Terminals. These improvements supplement the existing active travel routes, which are already largely off-road and will be retained.

5.2.6 The physical improvements as part of the Project form part of our commitment to supporting more active travel by employees living close to the airport, which includes a specific mode share target. A wider package of measures will be delivered to help achieve Commitment 4 including additional signage, promotion, staff incentives and information. GAL will also enhance on-site facilities to ensure sufficient cycle storage, changing facilities, lockers and showers are available and these support the aim of encouraging more staff to walk and cycle.

Air passenger car parking

5.2.7 As part of its 'business as usual' operations, GAL proposes to provide up to 6,570 additional car parking spaces, making a total of approximately 53,270 spaces available for staff and passenger parking. The Project contains proposals for up to a further 1,100 car parking spaces, bringing the total to approximately 54,370 spaces. GAL will provide these spaces over a period of time as demand requires.

5.2.8 GAL is committed to ensuring that the Project does not lead to traffic nuisance in the surrounding neighbourhood, including indiscriminate and unauthorised parking and waiting.

Commitment 8 - GAL therefore commits to provide funding for:

- Support for effective parking controls and/or monitoring on surrounding streets if considered necessary by the relevant local authority; and/or
 - Support local authorities in their enforcement actions against unauthorised off-airport passenger car parking.
- [Commitment 8A](#) GAL shall assess the need for additional parking and develop and annually update a strategy in consultation with the TFSG to provide additional parking.

Air passenger car parking charges

5.2.9 GAL regularly reviews and amends its parking charges in response to anticipated demand at different times of year and needs to be able to retain the flexibility to do this for commercial reasons.

Commitment 9 - Nevertheless, GAL ~~commits to using~~**must use** parking charges to influence air passenger travel choices and support its approach to sustainable surface access, to the extent necessary to achieve the mode share commitments, and avoid adverse impacts on the Strategic Road Network (SRN) in excess of those forecast. Where an impact on the SRN arises above the forecast assessment contained in the Transport Assessment, GAL must submit to National Highways evidence (for approval) of how it will remove the impact on the SRN, and such evidence may include details of GAL's parking charge measures.

Forecourt charging

5.2.10 GAL regularly reviews and amends the forecourt access charge and needs to be able to retain the flexibility to do this for commercial reasons.

Commitment 10 - Nevertheless, forecourt charges are an important influence on mode choice and GAL commits to using forecourt charges to influence passenger travel choices and support its approach to sustainable surface access, to the extent necessary to achieve the mode share commitments and avoid adverse impacts on the Strategic Road Network (SRN) in excess of those forecast. Where an impact on the SRN arises above the forecast assessment

Commented [HR19]: This new commitment has been added to ensure that the need for additional car parking is adequately planned by the Applicant in consultation with relevant stakeholders

Commented [BDBP20]: This ensures that there is (1) specific consideration on the impact on the SRN and (2) an independent process for utilising the car parking charges to avoid an adverse impact on the SRN.

contained in the Transport Assessment, GAL must submit to National Highways evidence (for approval) it will remove the impact on the SRN, and such evidence may include details of GAL's parking charge measures.

Commented [BDBP21]: As above.

Staff Travel

Commitment 11 - GAL commits to maintaining the number of parking spaces allocated for staff use at or below current levels (6,100 spaces). There will therefore be no increase in staff parking provision as part of the Project.



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Commitment 12 -- (1) GAL commits to introducing measures to discourage single-occupancy private vehicle use by staff. GAL also commits to implementing incentives for active travel and increasing discounts for staff using public transport. The precise nature of those measures will need to be defined in due course, in consultation with employers and staff.

(2) No part of the second runway operations may begin until the measures under paragraph (1) have been approved by the local highway authority and National Highways.

Commented [BDBP22]: This insertion is necessary as there is no independent oversight nor approval over the undefined measures. It would be acceptable to remove this if the measures were defined but as they are not, its imperative that the measures are not solely determined by GAL.

Sustainable Transport Fund

5.2.11 GAL's existing Sustainable Transport Fund (STF) is used to create a funding stream for initiatives aimed at increasing the use of sustainable transport modes, in support of the measures contained in the current ASAS. Initiatives that are part or wholly funded through the STF are discussed and agreed with the TFSG. The STF is currently administered under periodic Section 106 commitments, which are regularly reviewed and renewed.

5.2.12 The STF is calculated as a levy on the number of available air passenger car parking spaces and the number of staff parking permits issued each year. The tariff charged on each air passenger space increases each year. Since 2020 there is also a financial contribution from forecourt charges in to the STF.

Commitment 13 -- (1) GAL will continue to use the STF to support measures that will help to achieve the mode share commitments and the measures shall be determined following consultation with local highway authorities and National Highways. GAL will maintain the annual increase in the tariff value on air passenger spaces and the allocation of funds shall be agreed with the TFSG.

(2) GAL will ensure that the STF has sufficient funds to address any initiatives reasonably agreed by the TFSG

Commented [BDBP23]: There is no security independent scrutiny of how these funds are to be spent. National Highways requests that consultation on how the funds are expended is included as a minimum.

Commented [HR24]: Required to ensure that funds are not ringfenced for specific mode shares without agreement

Commented [HR25]: Required to ensure that the fund is usable and not in deficit

Transport Mitigation Fund

Commitment 14 -- (1) GAL will also set aside a Transport Mitigation Fund (TMF) to support further interventions, particularly should the need arise for additional measures in the area surrounding

the Airport as a direct result of airport-related growth. The intention of this fund is to give assurance that resource will be available for additional interventions in support of the commitments set out in this document, or to provide mitigation of an unforeseen or unintended impact from the Project. This may relate to physical infrastructure, changes to public transport services or facilities off-airport. Requests for and decisions on allocation from the TMF would be addressed through the TFSG and sub-groups of it.

(2) Prior to establishing the TMF, GAL shall enter into an agreement with National Highways ensuring that (i) National Highways may enforce any provisions relating to the TMF to the extent that they relate to the Strategic Road Network or the operations of National Highways.

Commented [HR26]: This text has been added to ensure the TMF is enforceable by National Highways

(3) Any agreement with National Highways shall set out the process and criteria for establishing the TMF, including:

Commented [HR27]: This commitment is required to ensure that the TMF has a clear scope and this is understood by NH (who are not a party to the s106 which secures the TMF)

- a) its scope;
- b) the level of commitment within the TMF;
- c) the relevant thresholds that would activate the TMF;
- d) the parties to be consulted on during its development and implementation (which for the avoidance of doubt shall include National Highways); and
- e) the parties that would act as an approval body.

(4) GAL will ensure that the TMF has sufficient funds to address any interventions reasonably agreed by the TFSG

Commented [HR28]: Required to ensure that the fund is usable and not in deficit

Business as Usual works

Commitment 14A – GAL shall not commence any part of the authorised development until the North Terminal and South Terminal roundabout signalisation scheme is completed and open to traffic.

Commented [HR29]: As National Highways has set out previously (e.g. at para 2.7.1.7 of the Statement of Common Ground submitted at Deadline 1 [REF]), as reported in Section 8 of the Applicant's Strategic Transport Modelling Report [TR020005/APP/260], business as usual works are factored into the Future Baseline and would include, but are not limited to, the signalisation of both the North and South Terminal Roundabout. However, there is no commitment on the Applicant to deliver such works as they are not authorised by the DCO.

National Highways requires these works to be secured and carried out prior to commencement of any works under the DCO in order to ensure the Future Baseline is reliable.

6. Monitoring and Reporting

6.1 Background

6.1.1 GAL recognises that it is necessary to monitor the actual outcomes that are anticipated to result from deploying the measures listed above and to provide periodic review of whether, and assurance that, the committed mode shares are being achieved. The Transport Assessment demonstrates that the mitigation put forward as part of the application for development consent for the Project (including those measures/commitments made in this document) are appropriate in mitigating the potential impacts of the Project.

- 6.1.2 The **Transport Assessment** (Doc Ref. 7.4) sets out how we have modelled these interventions and assessed how well they contribute to the proposed outcomes. This analysis has been compared against existing behaviour and mode share trends and with our future baseline, which is informed by our existing ASAS. We are confident that the committed mode shares are challenging but achievable. The measures secured as part of this document will be brought forward iteratively, informed by the rate of passenger growth and performance against the headline mode share targets identified through annual monitoring.
- 6.1.3 GAL already collects data on travel and transport from a number of industry sources and its own data collection programmes. This will continue and GAL will collect or commission additional data to ensure sufficient information is available to capture the scope of the commitments, as part of monitoring progress on the committed mode shares. GAL also commits to a formal, structured approach to reporting monitoring data with independent verification.
- 6.1.4 The objectives of the proposed monitoring exercise are to measure progress on achieving mode share targets consistent with the Environmental Assessment and DCO commitments, and support the identification of impacts on surrounding communities and transport networks that should be reflected in the Surface Access Commitments.

6.2 Monitoring Commitments

Commitment 15 – GAL commits to undertaking a comprehensive monitoring exercise based on the data sources listed in **Table 3**. Not all of these sources are in GAL's control; some would need to be provided by service operators and GAL will reach agreement with those operators on any commercial confidentiality considerations. GAL commits to fund any additional surveys and counts as reasonably required to complete this monitoring exercise.

Table 3: Sources of monitoring information

Type of information	Source	Frequency
Passenger travel data	CAA passenger surveys	Quarterly
	GAL 'Profiler' passenger surveys	Quarterly
Car park usage	Continuous barrier counts at all car parks	Continuous
Forecourt usage	Continuous road traffic monitoring (Automatic Number Plate Recognition)	Continuous

Type of information	Source	Frequency
Traffic flows	Continuous road traffic monitoring sites operated by GAL	Continuous
	Continuous road traffic monitoring sites* operated by highway authorities (<i>*with agreement</i>)	Continuous

Rail passenger data	Gatwick Airport station passenger gateline data* <i>(*under the terms of confidentiality agreements with operators)</i>	Monthly / quarterly (to be agreed)
Bus and coach passenger data	Ticket / boarding data* for Gatwick services <i>(*under the terms of confidentiality agreements with operators)</i>	Monthly / quarterly (to be agreed)
Staff travel	GAL regular staff travel survey On-airport staff parking surveys Regular walking / cycling surveys Audits of use of on-airport active travel facilities	Every 2 years Monthly Twice a year Monthly

Commitment 16 – GAL will prepare an Annual Monitoring Report (AMR) which will contain information about:

- The data collected in the preceding year;
- Outcomes from the staff travel survey (every other year);
- The number and mode share of journeys made by air passengers;
- The number and mode share of journeys made by airport staff;
- The measures currently in use, including the committed interventions and any additional measures which GAL has chosen to implement to achieve its mode share commitments;
- Any identified trends from the latest and previous data;
- The anticipated future trajectory of mode shares and progress towards achieving the committed mode shares; and
- Proposals for introducing, changing or withdrawing certain measures or interventions.

6.2.1 The first AMR will be produced no later than six months before the commencement of dual runway operations.

6.2.2 The AMR will be provided to the TFSG prior to publication so that it can provide a response. Once received, GAL will publish on the GAL website both the AMR and the TFSG's response at the same time.

6.2.3 In addition to the AMR, GAL will report quarterly to the TFSG, who will also be given access to data collected for the purposes of monitoring except those which are commercially sensitive. GAL will seek to agree appropriate aggregation and summaries of any sensitive data in a form such that it can be shared.

6.2.4 GAL will also identify whether there are circumstances beyond its control (for example extreme weather events or industrial action disrupting transport services) which have impacted on its ability to achieve its commitments in the SACs and will advise the TFSG that those events may affect the outcomes reported in the AMR.

6.2.5 If the AMR shows that the mode share commitments have not been met or, in GAL's [or the TFSG's](#) reasonable opinion, suggests they may not be met (having regard to any circumstances

Commented [HR30]: This amendment is required to ensure the monitoring provisions bite and the TFSG's view is taken in account by GAL. Otherwise, the decision to prepare an action plan is wholly in GAL's hands when GAL may be responsible for not meeting the mode share commitments

beyond GAL's control which may be responsible), GAL will, in consultation with the TFSG, prepare an action plan to identify such additional interventions which are considered reasonably necessary to correct such actual or potential non-achievement of the mode share commitments. The action plan shall be subject to approval by the TFSG (such approval not to be unreasonably withheld). These actions will apply to measures in GAL's control, or those actions that can be agreed with third parties such as service providers (and GAL shall use reasonable endeavours to agree such measures with third parties). GAL will implement the measures in the action plan once approved with the TFSG.

Commented [HR31]: If GAL have failed to meet commitments, it is reasonable for any action plan to be created with input from the TFSG

Commented [HR32]: TFSG will need an approval role over the action plan, otherwise, GAL are not obliged to follow their recommendations

Commented [HR33]: Without this commitment, GAL are not obligated to attempt to enter into such agreements

6.2.6 If two successive AMRs continue to show that the mode share commitments have not been met or, in GAL's or the TFSG's reasonable opinion, suggests they may not be met (having regard to any circumstances beyond GAL's control which may be responsible), GAL will prepare a further action plan and will provide this to the TFSG, together with additional data if necessary and possible, in order that the TFSG can consider, comment on and approve or reject the action plan. The TFSG may propose additional or alternative interventions it believes to be necessary to achieve the mode share commitments. GAL will either must incorporate these interventions into the action plan; or provide valid reasons why it does not consider they are necessary to achieve the mode share commitments; or offer suggestions for alternative actions where there is evidence they will achieve or exceed the same goal. GAL will implement the measures in the action plan once approved with the TFSG. Where the TFSG does not agree with any reasons put forward for the non-inclusion of the proposed measures, the action plan and the proposed measures must be submitted to the Secretary of State who will approve the action plan with or without the measures. All representations submitted by the TFSG must be included in the submission to the Secretary of State. This approach builds on the existing process for monitoring ASAS targets and the development of Actions Plans in consultation with the Transport Forum Steering Group, which has seen GAL continue to invest in achieving sustainable transport mode shares.

Commented [HR34]: As above

Commented [HR35]: The language has been tightened here to ensure GAL incorporate these interventions

Commented [BDBP36]: This ensures there is independent scrutiny and approval in connection with an action plan.

6.2.7 An action plan submitted to the TFSG must include, as a minimum:

- a) details of specific proposed measures;
- b) a programme for the implementation of such measures;
- c) how the proposed measures will ensure meeting the mode share, and minimising so far as reasonably practicable adverse impacts on the operation of the strategic road network; and
- d) how GAL have had due regard to representations from the TFSG.
- e) how the measures will be monitored, assessed to gauge performance, reported and the frequency of updates to the TFSG

Commented [HR37]: This has been added to ensure it is clear what an action plan comprises

The TFSG shall comprise as a minimum:

- a) GAL,
- b) National Highways
- c) local highway and planning authorities,
- d) transport operators and agencies,
- e) business and passenger representatives and
- f) other interested parties.

Commented [HR38]: National Highways requests this amendment to ensure that the Applicant is required to include National Highways within the TFSG as membership of this group is not secured for any party

Commitment 17: Operational impacts on the Strategic Road Network: GAL must every 5 years carry out an updated assessment of the likely impacts of the operation of the authorised development on the performance of the highway network. Based on the outcomes of that assessment, GAL must submit a scheme of mitigation which mitigates the impacts on the Strategic Road Network to National Highways for approval. In the event that National Highways refuses the scheme of mitigation, GAL must submit the scheme of mitigation, along with National Highways representations on the draft scheme, to the Secretary of State for approval. GAL must implement the scheme of mitigation as approved.

Commented [BDBP39]: In light of the specific requirements of the Airports National Policy Statement, and the fact that the Proposed Development is a trip-generating private sector development, National Highways considers there is a requirement for a robust monitoring and management regime for impacts which are forecast to, or may otherwise, arise on the SRN

This commitment is necessary to avoid adverse impacts on the wider SRN. It is noted that commitment is broadly about modal share targets, and not specifically about the impact arising on the SRN.



7. Further Aspirations

- 7.1.1 GAL is making the commitments in this document to ensure that GAL's commitments to sustainable travel, made as part of the Project, and the core surface access outcomes which have been identified in the **Environmental Statement (ES)** (Doc Refs. 5.1-5.4) and **Transport Assessment (TA)** (Doc Ref. 7.4) are delivered.
- 7.1.2 However, GAL aspires to go beyond the committed mode shares set out in this document where this is possible, in line with its wider aspirations for sustainable aviation, including its Decade of Change (Ref 1-4) and in line with the Government's Jet Zero Strategy (Ref 1-5).
- 7.1.3 GAL has identified the following aspirational mode share targets, which indicate GAL's longer-term goals. These are not commitments under this document (which is intended to mirror and secure the outcomes shown in the Transport Assessment) but will provide context for future actions in relation to surface access interventions and for the development of future ASAS action plans and targets:
- A minimum of 60% of air passenger journeys to and from the Airport to be made by public transport;
 - A minimum of 60% of airport staff journeys to and from the Airport to be made by public transport, shared transport and active modes;
 - A reduction of air passenger drop-off and pick-up car journeys at the Airport to a mode share of no more than 10% of surface access journeys;
 - A minimum of [X]% of airport staff journeys to and from the Airport to be made by shared travel;
 - At least 20% of airport staff journeys originating within 8km of the Airport to be made by active modes (such journeys being those to and from the Airport); and
 - At least 50% of airport staff journeys originating within 16km of the Airport to be made by public transport (such journeys being those to and from the Airport).
- 7.1.4 To achieve these aspirations, GAL expects to work in partnership with other organisations, particularly public transport operators and other service providers.
- 7.1.5 The range of potential opportunities includes:
- **Further enhancements to regional express bus or coach and local bus services:** This will continue to focus on areas where increased accessibility, either directly to the airport or via interchange can achieve mode shift and provide sustainable services;
 - **Further enhancements to rail services:** Working with train operators, Network Rail and Great British Railways to enable greater rail mode share and provide improved services covering more of the airport's 24-hour operations;
 - **Enhancing the staff travel offer:** Providing incentives and support for sustainable travel, making it easier to choose and afford public transport and active travel whilst also discouraging journeys by car where reasonable alternatives exist;
 - **Further enhancements to active travel:** Promotion of active travel within the local staff population, including improved on-airport facilities such as a new Cycle Hub, better information, wayfinding and maintenance of routes and additional incentives to choose active travel regularly or as a seasonal mode choice; and

Formatted: English (United Kingdom)

Commented [HR40]: National Highways considers that there should be a shared travel aspiration too

Commented [HR41]: Updated for clarity as "journeys originating" did not expressly include return journeys from the airport

Making best use of electric vehicles: Working with service providers to speed the transition of the GAL vehicle fleet, taxis and car rental vehicles to electric vehicles and ensure available charging for staff and passengers where and when they need it.

8. Glossary

Table 4: Glossary of Terms

Term	Description
AMR	Annual Monitoring Report
ASAS	Airport Surface Access Strategy
bph	Buses per hour
CAP	Carbon Action Plan
ES	Environmental Statement
GAL	Gatwick Airport Limited
SAC	Surface Access Commitment
TA	Transport Assessment
TFSG	Transport Forum Steering Group

9. References

- 1-1 Department for Transport (2013) Aviation Policy Framework. Available at:
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/153776/aviation-policy-framework.pdf
- 1-2 Department for Transport (2022a) Flightpath to the Future. Available at:
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1079042/flightpath-to-the-future.pdf
- 1-3 Gatwick Airport Ltd (2022) Airport Surface Access Strategy 2022-2030. Available at: [surface-access-strategy.pdf \(gatwickairport.com\)](#)
- 1-4 Gatwick Airport Ltd (2023) Our Second Decade of Change to 2030. Available at:
<https://www.gatwickairport.com/globalassets/company/sustainability/reports/2021/decade-of-change-policy-to-2030.pdf>
- 1-5 Department for Transport (2022b) Jet Zero Strategy: Delivering net zero aviation by 2050. Available at:
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1095952/jet-zero-strategy.pdf