

APPENDIX 1: Comments on Written Representations

AIPUT have reviewed the relevant Written Representations submitted by Interested Parties and Statutory Parties at Deadline 1 and set out their comments below.

Interested Party	Written Representation Extract	AIPUT Comments
CAGNE (Appendix 2: Sterling Surface Transport Report)	<p><i>“(18) As the model is used to dynamically assign traffic to routes on the basis of journey costs (predominantly related to journey time and congestion effects) the model does cover many of the routes available via cross-country or minor roads. In reality, the model’s coverage will not enable analysis of many car movements on local, potentially unsuitable, roads”.</i></p>	<p>Motion Consultants Limited (“Motion”) were instructed by AIPUT to undertake an analysis of GAL’s transport proposals in their Written Representation. Motion raised similar concerns regarding the assumption of travel costs and the subsequent impacts on the accuracy of traffic modelling within their Deadline 2 submission:</p> <p><i>“Of note is that Annex B of the Transport Assessment makes several assumptions on travel costs including costs for car parking / access charges. GAL should provide a summary table of these cost assumptions and provide a commitment that these are the charges that would apply during operation of the Northern Runway. In the absence of such a commitment little weight can be placed on the forecasting methodology which relies on future charges being implemented at a certain level (for example see Annex B Table 24)”.</i></p>
	<p><i>“(19) The applicant presents in its strategic modelling report the validation outcomes in summary form only. No detailed Local Model Validation Report (LMVR) is available”.</i></p>	<p>Motion (on behalf of AIPUT) requested the VISSIM Model in Appendix 1 of AIPUT’s Written Representation at Deadline 1:</p> <p><i>“There is a separate Local Model Validation Report (LMVR) for the VISSIM model does not appear to have been submitted with DCO application. It is essential that PINS, interested parties and the wider public has access to the LMVR and any correspondence from “key stakeholders” demonstrating that the models are acceptable to them in order to arrive at a conclusion regarding the veracity of the modelling undertaken”.</i></p>
	<p><i>“(27) The local traffic modelling is based on VISSIM software that provides micro-simulation assessment of junctions in close proximity to the airport.</i></p> <p><i>The results presented highlight the positive effect of the scheme mitigations when considered at a local level. Journey times, vehicle delay and speeds all improve in 2032 and 2047 with scheme assessments. This is unsurprising given the concentration of scheme</i></p>	<p>In AIPUT’s Written Representation submitted at Deadline 1, Motion raised similar criticisms of relying on the VISSIM modelling and identified the potential impacts this could have on road and junction operations:</p> <p><i>“The VISSIM modelling covers a quite limited network with no route choice. This could result in underestimation of how background traffic on these routes which have no origin or destination at</i></p>

<p><i>mitigation in the modelled area which only covers the airport campus and immediately adjacent junctions”.</i></p>	<p><i>the airport will respond to the uplift in passenger numbers arriving by road. The consequence is that significant volumes of traffic might choose to avoid the Terminal North and South roundabouts in preference to alternative routes such as London Road via Lowfield Heath and Gatwick Road roundabouts. This would cause an adverse impact on the operation of this route and junctions”.</i></p>
<p><i>“(61) The transport policy framework in the wider south east region and nationally has been applied inconsistently by the applicant. This shows in the submitted Transport Assessment where no formal hierarchy of travel modes has been established.</i></p>	<p>In AIPUT’s Written Representation submitted at Deadline 1, Motion also noted the lack of formal hierarchy of travel modes and further suggested that appropriate delivery targets should be explored to incentivise sustainable mode split targets.</p> <p><i>“More detail is required on mode split targets and penalties for not hitting mode split targets. GAL have demonstrated a predict and provide approach to planning for travel to and from the airport. By default, this will tend to replicate existing patterns rather than plan for more people to travel by sustainable modes. Whilst the DCO documents refer to mode split targets and timescales within which they are to be delivered, these are all post completion and opening of the new runway”.</i></p>
<p><i>“(62) The validation reporting for the strategic model is not sufficiently comprehensive to allow a definitive view to drawn on its accuracy and reliability”.</i></p>	<p>Motion agrees with the overall view that the strategic modelling is not acceptable for the scale of the Northern Runway Project. This is set out in AIPUT’s Written Representation submitted at Deadline 1:</p> <p><i>“There is insufficient evidence to allow a conclusion that the traffic modelling is acceptable. The Applicant is relying on “key stakeholders” having accepted the modelling. This is not acceptable; The Planning Inspectorate (PINS) and interested parties should be provided with the evidence. This is particularly given the reliance on multiple models and hence a significantly increased risk of significant errors creeping in”.</i></p>
<p><i>“(66) The Airport’s proposed sustainable transport mitigations are limited in scope and local in nature. The ‘backing off’ of incentives and active travel measures to an undefined and therefore unfunded”.</i></p>	<p>As mentioned in AIPUT’s Deadline 2 submission, Motion have concerns with the lack of incentives for GAL to achieve sustainable transport goals:</p> <p><i>“AIPUT would therefore raise their concern with the lack of penalties in the event that GAL did not achieve their modal split targets during operation. AIPUT would suggest that appropriate penalties to incentivise sustainable transport through modal splits should be considered within the Development Consent Order”.</i></p>

<p>Tim North & Associates Limited on behalf of Holiday Extras Ltd</p>	<p><i>“(2.27) The DCO application involving London Gatwick Airport does not embody within its terms, any monitoring or enforcement regarding the appropriateness, effectiveness and environmental impacts associated with surface mode share targets, whether aspirational or not, through the Airport Transport Forum.</i></p>	<p>As mentioned in AIPUT’s Deadline 2 submission, Motion have concerns with the lack of incentives for GAL to achieve sustainable transport goals:</p> <p><i>“More detail is required on mode split targets and penalties for not hitting mode split targets. GAL have demonstrated a predict and provide approach to planning for travel to and from the airport. By default, this will tend to replicate existing patterns rather than plan for more people to travel by sustainable modes. Whilst the DCO documents refer to mode split targets and timescales within which they are to be delivered, these are all post completion and opening of the new runway. AIPUT would therefore raise their concern with the lack of penalties in the event that GAL did not achieve their modal split targets during operation. AIPUT would suggest that appropriate penalties to incentivise sustainable transport through modal splits should be considered within the Development Consent Order”.</i></p>
	<p><i>“(9.09) It remains my client’s view that the details which have now been set out in Table 5.2.4 of Document APP 030 are equally confusing, unclear and in certain cases incorrect, with the only exception to this criticism being the explanation being afforded in relation to Purple Parking and the displacement of spaces on Car Park X referred to in paragraphs 5.2.86 to 5.2.88 of Document APP 030”.</i></p>	<p>AIPUT raised similar concerns with the lack of clearly stated parking figures in their Relevant Representation and Written Representation, submitted at Deadline 1. AIPUT also raised further concerns with the impacts this may have on traffic modelling:</p> <p><i>“AIPUT understands from the figures provided in both the Design and Access Statement and the Planning Statement (Document Ref. 7.1, paragraph 4.5.79) that there will be a net decrease of 425 parking spaces between Purple Parking and Car Park X. AIPUT requests confirmation that this figure is correct.</i></p> <p><i>No detail has been provided on the split of staff parking or passenger parking at the proposed Car Park X location. The application proposes that staff and passengers would use separate accesses, via Perimeter Road South and Charlwood Road, respectively, AIPUT would request forecasts for vehicle movements egressing from Car Park X via these accesses. More specifically, AIPUT would request confirmation that trip generations from the increased size of car park X is not detrimental to operations at Viking House and Gatwick Gate with and/ or without the proposed access from Charlwood Road. Moreover, it is unclear whether ‘staff parking’ would entail airline employees or airport associated services (or both). AIPUT would</i></p>

		<p><i>request more information on this as well. At this point AIPUT has a concern that operations at Viking House could be detrimentally affected by increased road traffic from these elements of the Project. These concerns and other overarching traffic implications are further discussed below”.</i></p>
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