



Deadline 3 Response on behalf of CAGNE to Deadline 1 and 2 submissions on Surface Transport
Sterling Transport Consultancy Limited

CAGNE WR Issue	Applicant Response (if any) D1 / D2	IP response D1 / D2	CAGNE based on D1 and D2 material
Failure to apply relevant guidance documents	No specific comment in response to IP RR's.	<p>ESCC</p> <p>It recognises sources of air pollution around airports include aircraft engines, airport related traffic on local roads and surface vehicles at the airport. The DfT requires all proposals for airport development to be 'accompanied by clear surface access proposals which demonstrate how the airport will ensure easy and reliable access for passengers, increase the use of public transport by passengers to access the airport, and minimise congestion and other local impacts' (para 5.11), and that developers should pay the costs of upgrading or enhancing road, rail or other transport networks or services where there is a need to cope with additional passengers travelling to and from expanded or growing airports'.</p> <p>NPPF An increase in car journeys across Ashdown Forest would negatively exacerbate the existing</p>	<p>The applicant is still failing to apply the requirements of key policies in the surface access space.</p> <p>The WR makes clear that the scheme transport impacts are used to generate a series of further assessments relating to environmental matters. The failure to apply the relevant policy framework to these assessments must place in doubt their validity .</p> <p>The statutory bodies responsible for transport</p>

		<p>impacts on the Special Protection Area. The NPPF requires that harm to biodiversity, from development, should be avoided or adequately mitigated and should not result in the loss or deterioration of irreplaceable habitats unless there are wholly exceptional reasons (para 186). REP 1-070</p> <p>WSCC</p> <p>No comment (REP 1-068)</p> <p>National Highways</p> <p>National Highways requests that the Applicant and ExA consider the DfT’s policy paper, “Strategic road network and the delivery of sustainable development” (DfT Circular 01/2022). That document makes clear at para 44 that “development promoters must put forward clear targets and commitments to manage down the traffic impact of development and maximise the accessibility of and within sites by walking, wheeling, cycling, public transport and shared travel. Targets for achieving a modal shift to sustainable transport will need to be subject to sustained monitoring and management.”</p>	<p>matters in the application are noted to have raised concerns in relation to the application of policy by GAL.</p>
Traffic Modelling Scope	The modelling work is considered adequate and in keeping with guidance as set out in the responses above.	<p>ESCC</p> <p>GAL needs to mitigate the impacts of the approaching traffic from the surrounding road network, including</p>	<p>CAGNE commented that the scope of the local traffic modelling is too limited in nature to be useful in terms</p>

		<p>routes in East Sussex such as the A22 and A264, which feed into the A23/M23 corridor. GAL must also assess the impacts of airport growth on the strategic road network (e.g. M25) and ESCC's highway network beyond the immediate environment of the airport. Instead of GAL committing to achieve annualised mode share targets by the third anniversary of the commencement of dual runway operations and on an annual basis thereafter, GAL should not start operations until the commitments are met, with subsequent passenger growth being constrained until targets are met again. This way the same outcomes are delivered, without uncertainty, and would ensure that the impacts that have been presented are the likely worst case. Gatwick are proposing ambitious coach targets from Kent to Gatwick. If these are not achieved this could have significant implications on the road network from Kent to West Sussex, impacting on East Sussex roads also. East Sussex County Council support Kent CC's request for Gatwick to undertake a sensitivity test on a particular section of the M25 if the modal targets aren't achieved.</p> <p>GAL must also assess the impacts of airport growth on the strategic road network (e.g. M25) and ESCC's highway network beyond the immediate environment of the airport. REP 1-070</p>	<p>of assessing community level impacts.</p> <p>All three highway authorities share concern about traffic model with its scope and assumptions not agreed by any of the three authorities.</p>
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		<p>WSSC</p> <p>The Authorities also have some specific concerns about some of the assumptions which have featured in the modelling.</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. REP 1-068)</p> <p>National Highways</p> <p>National Highways are reviewing the traffic modelling. National Highways continues to engage with the Applicant to review the traffic model, baseline and forecast assessments to confirm that the impacts of proposals on the Strategic Road Network are understood, and appropriate mitigation is included in the DCO, where necessary. REP 1-086</p>	
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<p>Traffic Modelling Uncertainty log</p>	<p>The modelling that has been undertaken is in accordance with guidance provided in the DfT's Transport Appraisal Guidance and is explained in the Transport Assessment [AS-079] and detailed information is provided in Transport Assessment Annex B - Strategic Transport Modelling Report [APP260].</p>	<p>ESCC</p> <p>No specific comment</p> <p>WSSC</p> <p>No specific comment on the uncertainty log but quotes the level of demand being too high <i>“There are however concerns that the level of growth assumed by the Applicant is too high, these concerns are supported by the assessment made by York Aviation (see Chapter 6 and Appendix F). This could result in an over forecast of the demand and therefore an over provision of car parking (potentially presenting implications for GAL in achieving its sustainable mode share obligations for surface access) and highway elements of the infrastructure” REP 1-068)</i></p> <p>Surrey CC</p> <p>For both the future baseline and NRP scenarios, the sensitivity tests show a small reduction in the public transport mode shares driven primarily by reduced congestion on the road network and potentially also a result of the post-Covid rail timetable. As a result, the public transport mode share for air passengers is lower than estimated in the Application and Table 32 and Table 33 of TR020005 AS-121 shows that in 2032, GAL is not able to meet the mode share targets set</p>	<p>The CAGNE position remains that the uncertainty log and the scenarios for low and high traffic growth which evolve from it are not truly reflective of how uncertainty should be dealt with in DfT TAG Unit M4.</p> <p>It is noted that further work has now been completed by GAL (AS-121) that deals with the matter of covid-19 effects. This analysis has removed certain schemes from the ‘committed’ list of schemes included in the traffic model.</p> <p>The sensitivity test (AS-121) shows less rail use and concern over mode</p>
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		<p>out in the SACs for both passengers and staff. REP 2-061</p> <p>National Highways</p> <p>National Highways are reviewing the traffic modelling.</p> <p>National Highways continues to engage with the Applicant to review the traffic model, baseline and forecast assessments to confirm that the impacts of proposals on the Strategic Road Network are understood, and appropriate mitigation is included in the DCO, where necessary. REP 1-086</p>	
Traffic Model Validation Incomplete	<p>The modelling that has been undertaken is in accordance with guidance provided in the DfT's Transport Appraisal Guidance and is explained in the Transport Assessment [AS-079] and detailed information is provided in Transport Assessment Annex B - Strategic Transport Modelling Report [APP260].</p> <p>Sensitivity testing results (AS-121)</p>	<p>ESCC</p> <p>No specific comment REP 1-070</p> <p>WSSC</p> <p>Further work in relation to the forecast traffic modelling is required as set out in the Procedural Matters letter (PD-006) from the ExA on 24th October 2023. The Highway Authority are currently assessing this further work, recently submitted by the Applicant, including the document entitled, Accounting for Covid-19 in Transport Modelling (AS-121 and AS-122). REP 1-068)</p>	<p>CAGNE notes that the LMVR for the strategic transport model has not been exposed to examination.</p> <p>It is noted that following parameters / values have been updated in the covid sensitivity test AS-121)</p> <ul style="list-style-type: none"> Road Traffic Forecasts 2018 (RTF) has been updated with National

	<p>7.6.1 The reference case demand shows that highway demand would be 14% lower by 2047 than forecast in the DCO Application at a 24-hour level. Reference case rail demand is projected to be 15% lower by 2047 at a 24-hour level than forecast in the DCO Application.</p>	<p>Kent CC</p> <p>A Local Model Validation Report (LMVR) is mentioned in the Annex B text but does not appear in the Examination Library. In our Written Representation, KCC requests this being made available, so the performance of the model in the vicinity of M25 Junction 7 (M23) can be confirmed. REP 1-079</p> <p>National Highways</p> <p>National Highways continues to engage with the Applicant to review the traffic model, baseline and forecast assessments to confirm that the impacts of proposals on the Strategic Road Network are understood, and appropriate mitigation is included in the DCO, where necessary. REP 1-086</p>	<p>Road Traffic Projections (NRTP) 2022</p> <ul style="list-style-type: none"> • National Trip End Model (NTEM) 7.2 has been updated to the latest version 8.0 • TAG Databook has been updated from version 1.17 to 1.21 <p>The revised FY DM models now conveniently show less background traffic than previously but with certain previously ‘committed’ schemes removed from the modelling (e.g. lower thames crossing) removed.</p> <p>The worker data has been revised in the covid test but with employee numbers below previous estimates; again this reduces traffic impacts in the FY DM scenarios. The jobs analysis seeks to claim that numbers of jobs FY DM to DS is a negligible change due to the application. This</p>
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			<p>emphasises the impact of the additional jobs / parking consented by non-DCO means.</p> <p>The sensitivity test still springs from the unverified base model – no LMVR etc as noted above.</p>
Scope of local traffic modelling	The modelling work is considered adequate and in keeping with guidance as set out in the responses above.	<p>ESCC</p> <p>The modelling is not approved. REP 1-070</p> <p>WSSC</p> <p>No direct comments REP 1-068</p>	CAGNE has recorded in its RR and WR the view that the coverage of local traffic modelling is inadequate.
(Traffic) Growth Factors to 2029, 2032 and 2047	The modelling that has been undertaken is in accordance with guidance provided in the DfT's Transport Appraisal Guidance and is explained in the Transport Assessment [AS-079] and detailed information is provided in Transport Assessment Annex B - Strategic Transport Modelling Report [APP260].	<p>ESCC REP 1-070</p> <p>WSSC</p> <p>Further work in relation to the forecast traffic modelling is required as set out in the Procedural Matters letter (PD-006) from the ExA on 24th October 2023. The Highway Authority are currently assessing this further work, recently submitted by the</p>	<p>All three highway authorities share concern about traffic model with its scope and assumptions not agreed by any of the three key highway authorities.</p> <p>CAGNE agrees with these positions and awaits further detail including exposing to</p>

		Applicant, including the document entitled, Accounting for Covid-19 in Transport Modelling (AS-121 and AS-122). REP 1-068	the examination the LVMR for the strategic model. CAGNE is conducting a detailed review of AS1-121 which details new assumptions etc .
Non-incinerating waste disposal plant, freight movements	Increases in freight movements have been considered as set out in Chapter 16 of the Transport Assessment [AS079] and these movements are included in the strategic modelling work. Overall, the strategic modelling shows that the additional traffic demand associated with the Project, taking into account the highway improvement works which form part of the Project, can be accommodated on the wider highway network and no significant effects are identified.	ESCC No comments REP 1-070 TfSE referred by ESCC Improvements in public transport access to Gatwick Airport initiatives that will help address key international gateway and freight journey challenges have been identified as a strategic priority (page 88 and 98). WSCC No comments REP 1-068	CAGNE has highlighted the limitations of the freight analysis in respect of the revised scheme scope. The TfSE / ESCC position appears to suggest that use of public transport by airport users and staff has a positive effect on freight movements generated by the scheme. This is not demonstrated by the GAL analysis other than in the most general of terms.
Rail capacity	The Project includes surface access improvements, as summarised in Section 2.2 of the Transport Assessment [AS-079]. These improvements include new and improved layouts for the	Network Rail NR recognises and supports the role that the rail network can play in supporting sustainable transport movements to and from the airport.	The applicant does not address the points made by CAGNE. The responses made by the sector participants reflect

	<p>South Terminal, North Terminal and Longbridge roundabouts, as well as enhancements to the A23 London Road and M23 Gatwick Spur.</p> <p>A comprehensive assessment has been undertaken for rail capacity and this is set out in Chapter 9 of Transport Assessment [AS-079] and the full set of rail data, including off-peak loading information, is included in Environmental Statement - Appendix 12.9.2 Rail Passenger Flows [APP-154]</p> <p>Rail assessments have been undertaken for two peak periods, Network and Project peak, as described in paragraph 9.3.21 of the Transport Assessment [AS-079]. The Project peak reflects the hour with the highest increase in rail passengers as the result of the Project, which tends to be outside the network peak.</p> <p>The assessment shows that the Project would increase the</p>	<p>However, the applicant has not proposed any investment in the rail network to meet the additional demand arising from the Northern Runway Project. Without this investment, NR are concerned that the rail system will not have sufficient capacity and reliability at key times to ensure that Gatwick's sustainable mode share targets are realised, and rail passenger experience is maintained or improved.</p> <p>NR's concerns, and the steps that it expects the applicant to take to address those concerns, are set out in detail in the PADSS at Appendix A of its written representation. In particular, Network Rail expects the applicant to provide a reasonable and proportionate contribution to mitigate the effects of airport-driven rail demand growth.</p> <p>NR objects to the compulsory acquisition of operational land and rights that it relies on for the carrying out of its railway undertaking.</p> <p>NR requires the applicant to commit to entering into any asset protection agreement(s) and any other documents required by Network Rail for the benefit and protection of its railway. REP1-090</p> <p>GTR</p> <p>GTR original response to Gatwick Airport Limited (GAL) consultation raised concerns regarding capacity</p>	<p>the CAGNE concerns in respect of capacity, contractual certainty and funding. The applicant has delegated responsibility for delivery of these vital mode shift outcomes to third parties with no financial or other mechanism to guarantee delivery.</p> <p>The question of passenger capacity and constraints on the BML is understood to be under examination by Network Rail. Whilst this may identify issues with rail operations it does not address the funding and delivery challenges highlighted by CAGNE.</p> <p>The lack of commitment by GAL to consider serving by rail locations other than on the BML is clear as are the challenges the relevant stakeholders identify.</p>
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	<p>number of rail passengers across the day and across the assessment years, but no significant increase in crowding on rail services is expected as a result of the Project. Where standing is expected, spare standing capacity would remain available. The rail crowding assessment indicates that no mitigation is required.</p>	<p>of the Brighton-Gatwick-London railway (Brighton Mainline BML) that have not been addressed. The 3 paragraphs under Rail Strategy state (they are in discussion about rail improvements outside peak times, that service levels are lower, but a significant number of rail related journeys could be attracted to rail), despite the GTR consultation response stating additional capacity was required and providing details of off peak crowding.</p> <p>The only additional trains in the peak are 2 per hour stopping trains that attach to another train at Redhill with a very slow journey time to London Victoria, and an additional fast train that doesn't stop at Gatwick Airport to London Bridge. These additional trains fill the space for perturbation when trains run late, and if ran all day would be very high risk as it would not be possible to recover from small delays all day, with the delays getting exported to much of the national rail network as trains from the BML line run to other mainlines including interaction with trains to the Midlands, North and Scotland. Unless additional capacity is provided to accommodate the additional passengers comfortably, expanding use of Gatwick Airport will result in even worse crowding of trains.</p> <p>This will suppress the economic growth required to support the additional population from housebuilding currently underway in Sussex and result in significant increase of car use and road</p>	<p>The attempt by GAL to focus on off peak travel is flawed in CAGNE's view. Whilst marginal gains in capacity may be possible off peak this does not address peak time issues. The GAL view that scheme related peak hour rail travel is likely to be marginal in operational capacity terms is unsubstantiated.</p> <p>The transport authorities identify the concern made by CAGNE that rail access outwith the BML is not possible at times of airport demand to use rail to meet both passenger and staff travel requirements.</p> <p>This therefore places in doubt whether the rail service proposition advanced is sustainable and capable of delivering the mode share anticipated.</p>
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		<p>congestion undermining GAL's ability to reach its target for rail mode share of surface access.</p> <p>Additional passengers using Gatwick Airport will significantly increase passenger use on the BML. This railway has significant passengers standing in uncomfortable crowded conditions both peak and off peak and the track is at full capacity, unable to reliably increase the train service. REP 1-185</p> <p>ESCC</p> <p>Rail access to the airport is predominantly via the Brighton Main Line, however, poor rail infrastructure - from the largely rural nature of the county - linking East Sussex to the airport, means that rail travel from elsewhere in the county to the airport rarely takes place due to the multi modal nature of journeys and the need to change trains, which increases end to end journey time. 4.6.3 There is no funding associated with rail mitigation in GAL's proposals (like there is for highways). We would wish to see Gatwick's level of commitment to highways also given to rail, especially given their sustainable modal share targets. Gatwick could take a more proactive role in driving mode shift to rail. GAL state that the rail network has sufficient capacity. However, we understand NR will be doing their own modelling to assess this. ESCC support Network Rail's independent modelling work to identify what the impacts of the NRP would have on</p>	<p>As indicated by National Highways a failure to secure and then meet the GAL claimed mode share has further and unassessed consequences for the highway network. CAGNE's view is that this exposes analysis in other areas, notably noise and air quality to a high degree of circumspection in respect of surface access.</p>
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		<p>the rail network, and consideration will subsequently need to be given as to how the impacts could be mitigated. 4.6.4 Along with the other local transport authorities affected by Gatwick's NRP, ESCC are supportive of an approach whereby growth of the airport is only permitted when surface access commitments / targets have been met. This could easily fit within the existing SAC framework and would still deliver the outcomes that GAL desire. An approach has similarly been considered in respect of the Luton Airport DCO and is referred to as Green Controlled Growth, whereby growth is only permitted after targets have been met. REP 1-070</p> <p>WSSC</p> <p>Train access is a key transport mode to ensure sustainable travel to and from the airport is maximised. However, trains are less utilised for staff and early morning flights, as train services in the early morning and late evenings are insufficient. The Applicant should consider, with the relevant organisations', improvements to the coverage of rail services, including earlier morning/late evening services and include any additional mitigation within a revised Service Access Commitments document (APP-090). (REP 1-068)</p> <p>National Highways</p>	
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		<p>National Highways shares the concerns of GTR in respect of railway capacity, specifically the risk of a lack available rail capacity to achieve modal shift targets. Should the modal shift targets not to be achieved there is a high probability that GAL customers will access the airport via other means, including by road and private car. As a result, the Applicants Transport Assessment may underrepresent the impact of the proposals on capacity, congestion, safety and journey time reliability on the Strategic Road Network. REP 1-086</p> <p>Kent CC</p> <p>The Applicant has not proposed any investment in the rail network to meet the additional demand arising from the Northern Runway Project. Without this investment, Network Rail are concerned that the rail system will not have sufficient capacity and reliability at key times to ensure that Gatwick's sustainable mode share targets are realised, and rail passenger experience is maintained or improved.</p>	
Airport has no or limited influence	No comment – applicant solely comments on the BML issues as set out above.	<p>ESCC</p> <p>No direct comment REP 1-070</p>	CAGNE notes that the local authorities have significant concerns about the

<p>on the rail timetable</p>	<p>A comprehensive assessment has been undertaken for rail capacity and this is set out in Chapter 9 of Transport Assessment [AS-079] and the full set of rail data, including off-peak loading information, is included in Environmental Statement - Appendix 12.9.2 Rail Passenger Flows [APP-154]</p>	<p>WSCC</p> <p>No direct comment REP 1-068</p> <p>Network Rail</p> <p>In particular, Network Rail expects the applicant to provide a reasonable and proportionate contribution to mitigate the effects of airport-driven rail demand growth. REP 1-090</p>	<p>deliverability of the proposed rail service changes. This reflects the CAGNE stated concerns in our RR and WR. Network Rail have only provided their views in respect of rail infrastructure and potential timetable options. The reasonable and proportionate contribution does not guarantee that the trains GAL expect will be operational it only seeking funding for the infrastructure capability to operate the level of capacity suggested. Ultimately, it remains CAGNE's view that only the Secretary of State can guarantee the services whether through contractual commitment or by way of requirement in the DCO.</p>
<p>Lack of east-west rail connectivity and the fixed hours of operations</p>	<p>No comment – applicant solely comments on the BML as set out above.</p> <p>A comprehensive assessment has been undertaken for rail capacity</p>	<p>ESCC</p> <p>Rail access to the airport is predominantly via the Brighton Main Line, however, poor rail infrastructure - from the largely rural nature of the county - linking East Sussex to the airport, means that rail travel from</p>	<p>CAGNE provided a detailed assessment of this limitation in REP1-139. The concern has not been addressed by GAL but has been</p>

	<p>and this is set out in Chapter 9 of Transport Assessment [AS-079] and the full set of rail data, including off-peak loading information, is included in Environmental Statement - Appendix 12.9.2 Rail Passenger Flows [APP-154]</p>	<p>elsewhere in the county to the airport rarely takes place due to the multi modal nature of journeys and the need to change trains, which increases end to end journey time.</p> <p>The applicant should include the East Coastway line between Brighton and Hastings as a key corridor to join the BML for access to GAL. Any identified pressure(s) on the rail network should be mitigated accordingly, including through improved infrastructure and services (where possible and in liaison with Network Rail and the train operator (Southern – GTR). There is concern that rail infrastructure and service provision is not fully captured by GAL, and there is a risk that Network Rail’s infrastructure and the service pattern GTR can operate on this infrastructure may not be able to accommodate the increase in demand and capacity from passengers that will arise should the NRP become operational. REP 1-070</p> <p>TfSE quoted by ESCC</p> <p>In terms of rail, orbital connectivity to Gatwick Airport from the east and the west is poor in comparison to the radial connectivity to the airport from the north and the south. REP 1-070</p> <p>WSSC</p>	<p>commented by the relevant IPs.</p> <p>The comments above about GAL’s level of commitment to rail service delivery, above, is repeated.</p>
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		<p>No comments REP 1-068</p> <p>Kent CC</p> <p>The Applicant has not proposed any investment in the rail network to meet the additional demand arising from the Northern Runway Project. Without this investment, Network Rail are concerned that the rail system will not have sufficient capacity and reliability at key times to ensure that Gatwick's sustainable mode share targets are realised, and rail passenger experience is maintained or improved.</p>	
<p>Market forces will dictate service delivery for bus and coach</p>	<p>ES Appendix 5.4.1: Surface Access Commitments [APP-090] sets out the bus and coach improvements identified and included in the modelling work, and GAL is committed to provide reasonable financial support in relation to these services, or others which result in an equivalent level of public transport accessibility.</p>	<p>ESCC</p> <p>ESCC considers GAL should provide a Sustainable Transport Fund and this should be used to help deliver improvements to bus services from East Sussex to the airport. ESCC requests that GAL provide a long term Masterplan which will consider surface access improvements from East Sussex to Gatwick Airport and how the above bus service mitigation requirements will be funded.</p> <p>WSSC</p> <p>It is the view of the Authorities that additional measures are required to ensure that the Applicant mitigates both the impact of construction and operational phases of the Project. This includes</p>	<p>The local transport authorities have notable concerns that the bus and coach offer is at best reactive to events.</p> <p>Each has requested that bus improvements are in place prior to the development becoming operational through a clear DCO requirement.</p> <p>In the alternative, the Councils have suggested a sustainable travel fund is established to guarantee the</p>

		<p>providing further specific mitigation measures during the construction phase and also providing additional sustainable and active travel mitigation to ensure that the number of journeys made to the airport by sustainable modes of transport is maximised, as much as possible.</p> <p>Increased levels of crowding on local bus services due to a forecast increase in demand for bus and coach services from 8,600 daily passengers in 2029 to 13,400 in 2047. REP 1-068</p> <p>Kent CC</p> <p>KCC notes from Transport Assessment [AS-079] Table 11.3.4 (and Annex B Tables 128 & 178) that the 55% public transport mode share targets assume a nearly three-fold increase in total air passenger coach services between 2016 and 2047 with Project but this is supported by a fifteen-fold increase in air passenger coach services for Kent. If this ambitious patronage is not realized there is an associated negative risk that private traffic levels between Kent and Gatwick are higher than forecast, taking the merges & diverges of the M25 Junction 7 (M23) intersection over capacity. To better understand this impact, we make a request for a sensitivity test on public transport mode share forecasts in our Written Representation. REP 1-079</p>	<p>proposed level of bus service. CAGNE believes that the bus and coach service offer is not sufficiently developed in scope or commitment to ensure that the proposed mode share targets are achieved.</p>
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		<p>TfL</p> <p>TfL state that the aspirations to increase public transport mode share are not matched by the committed interventions to achieve this. TfL have called for an increase in the quantum and scope of the sustainable transport fund to help secure important rail interventions, alongside support for coach, bus and active travel. REP 1-105</p>	
<p>Sustainable transport mitigations are limited in scope and local in nature</p>	<p>Active travel routes benefiting from the surface access improvement works (as set out in Section 2.2 of the Transport Assessment [AS-079]) include those between Longbridge roundabout, North Terminal and South Terminal; southern Horley and the Airport; and between Balcombe Road and South Terminal. They also offer further benefits for active travel users on and around Longbridge roundabout and those travelling between Longbridge roundabout and Riverside Garden Park.</p> <p>The proposed facilities selected for active travel routes have been</p>	<p>ESCC</p> <p>Along with the other local transport authorities affected by Gatwick’s NRP, ESCC are supportive of an approach whereby growth of the airport is only permitted when surface access commitments / targets have been met. This could easily fit within the existing SAC framework and would still deliver the outcomes that GAL desire. An approach has similarly been considered in respect of the Luton Airport DCO and is referred to as Green Controlled Growth, whereby growth is only permitted after targets have been met.</p> <p>Along with the other local transport authorities affected by Gatwick’s NRP, ESCC are supportive of an approach whereby growth of the airport is only permitted when surface access commitments / targets have been met. This could easily fit within the</p>	<p>CAGNE has highlighted the local and limited nature of the proposed sustainable travel mitigations.</p> <p>The real issue in surface access terms is the mechanism to deliver surface access by non-car modes. At present inadequate security exists to ensure the (self selected by GAL) targets are met.</p>

	<p>based on expected demand levels and guidance in the DfT's Local Transport Note 1/20 has been applied to determine the appropriate widths provided for cyclists.</p>	<p>existing SAC framework and would still deliver the outcomes that GAL desire.</p> <p>TfSE quoted by ESCC</p> <p>The Strategy supports the introduction of more direct east-west (rail and coach) services to Gatwick Airport (page 77). Improvements in public transport access to Gatwick Airport initiatives that will help address key international gateway and freight journey challenges have been identified as a strategic priority (page 88 and 98).</p> <p>National Highways</p> <p>Should the modal shift targets not to be achieved there is a high probability that GAL customers will access the airport via other means, including by road and private car. As a result, the Applicants Transport Assessment may underrepresent the impact of the proposals on capacity, congestion, safety and journey time reliability on the Strategic Road Network. REP 1-086</p>	
<p>Applicant's flawed transport analysis has material implications for</p>	<p>The modelling work is considered adequate and in keeping with guidance as set out in the responses above.</p>	<p>ESCC</p> <p>Link to other policy areas noted:</p>	<p>CAGNE has made clear in its RR and WR the crossover between assessments and the need for an accurate analysis of the surface</p>

<p>other parts of the ES, including air quality and noise</p>		<p>It recognises sources of air pollution around airports include aircraft engines, airport related traffic on local roads and surface vehicles at the airport. The DfT requires all proposals for airport development to be ‘accompanied by clear surface access proposals which demonstrate how the airport will ensure easy and reliable access for passengers, increase the use of public transport by passengers to access the airport, and minimise congestion and other local impacts’ (para 5.11), and that developers should pay the costs of upgrading or enhancing road, rail or other transport networks or services where there is a need to cope with additional passengers travelling to and from expanded or growing airports’.</p> <p>NPPF An increase in car journeys across Ashdown Forest would negatively exacerbate the existing impacts on the Special Protection Area. The NPPF requires that harm to biodiversity, from development, should be avoided or adequately mitigated and should not result in the loss or deterioration of irreplaceable habitats unless there are wholly exceptional reasons (para 186).</p>	<p>transport impacts of the development.</p> <p>GAL seek to reassure the ExA that the analysis presented is robust yet fails to expose to the examination critical information such as the LMVR for the strategic traffic analysis. It is therefore unclear how the applicant can confidently claim that the assessments in other area of analysis are based on a robust foundation of transport evidence.</p>
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Provided on 19 April 2024