



# Gatwick Airport Northern Runway Project

Environmental Statement

Appendix 5.4.1: Surface Access Commitments –  
National Highways Commentary of Surface Access  
Commitments Response Table

**Book 5**

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## 1 National Highways Commentary of Surface Access Commitments – Response Table

| Paragraph reference <sup>1</sup> | Comment ID number | Applicant's response   |
|----------------------------------|-------------------|--|
| 2.1.4                            | HR1               | Accepted.  |
| 3.1.1                            | BDBP2             | Amendment not accepted. Compliance with the Surface Access Commitments is secured in Requirement 20 of the Development Consent Order which is considered the appropriate securing mechanism in the context of this document.   |
| 3.1.2                            | HR3               | Amendments not accepted. This amendment introduces confusion as to the scope. The mode share commitments relate to air passenger and staff journeys and the NH amendments do not alter that.   |
| 4.1.3                            | HR4               | Partially accepted. NH have access to the CAA data which GAL provides to the TFSG. One of the issues with the CAA data is the quarterly information is issued as "draft" and may subsequently be updated to give the "final" annual data. GAL have opted to use a moving annual average based on the latest and preceding quarters, which avoids reliance on data that is yet to be finalised and which is considered to be an appropriately robust approach when producing monitoring data. |

<sup>1</sup> Note this is the paragraph reference to NH's commentary on the Surface Access Commitments (Post-Hearing submissions - ISH4: Action Point 9: Commentary on Surface Access Commitments [[REP2-056](#)]).

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| 4.2.1 | BDBP5 | Amendments not accepted. Amendments have been made to the "shared travel" definition to address NH's concerns. It is therefore considered appropriate to include shared travel within this commitment and these amendments are not accepted.  |
| 4.2.1 | HR6   | Accepted. Amendments have been made to clarify this applies to journeys both to and from the Airport.   |
| 4.2.2 | BDBP7 | Amendments not accepted. Not all journeys to and from airport hotels are by air passengers and those that are not so will not be captured in the CAA data (but would be included in traffic flow data). Air passengers travelling to a hotel by car and then using a bus (or taxi) to the airport from the hotel are classed as park & fly trips that park off-airport. Air passengers travelling to a hotel by rail/bus and then to the airport will be classed as a public transport trip. Therefore passengers using hotels are already captured in the calculation of mode shares and this amendment is not required. |
| 4.2.2 | BDBP8 | Amendments not accepted. NH's proposed wording introduces uncertainty and inconsistency with CAA data which is used to measure these journeys. It would be unclear how a journey would be classified which involves a passenger that walks a short distance to a local bus stop, travels an hour by bus to a stop near the airport and walks to the terminal. Although the majority of the journey has been by bus (a public transport  |

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|       |        | <p>journey), the first and last elements are not so it would not fit within the amended definition. Nor would it fit within the definition of an active travel journey because the majority of the journey is not made on foot or cycle. The existing drafting is considered appropriate and aligns with the data on which the commitments are based.</p>  |
| 4.2.2 | HR9    | As above.  |
| 4.2.2 | BDBP10 | Accepted. Amendments made to the proposed text for clarity to address the concerns raised.   |
| 5.2.2 | HR11   | Accepted. Text added for clarity.  |
| 5.2.2 | HR12   | Accepted. Text added for clarity.  |
| 5.2.2 | HR13   | Partially accepted. Text added in respect of agreements for financial support.   |
| 5.2.2 | HR14   | <p>Amendments not accepted. The minimum five year period is to allow such services sufficient time to develop and show they are sustainable, or for funding to be reallocated to an alternative that may perform better. Funding has been secured in the section 106 agreement to support bus and coach services and is considered to be an appropriate sum, how those funds are allocated after the initial 5 years will be determined by the performance and sustainability of those services and will need to be monitored during the initial 5 year term. The framework for mitigation has been put in place and it is</p> |

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|       |        | <p>important to allow appropriate flexibility to ensure the funding can respond to any changing impacts.</p> <p>In respect of the proposed text regarding disputes, the commitments are clear and provision for disputes is dealt with by the drafting which enables funding to be provided to other services which provide an equivalent level of improved public transport accessibility (now defined). These agreements will be subject to commercial negotiations between GAL and the service operators, it is not considered appropriate for NH to have a role in arbitrating these commercial arrangements.</p> |
| 5.2.4 | HR15   | Accepted. Text added for clarity.   |
| 5.2.4 | HR16   | Partially accepted. Text added in respect of agreements for financial support.  |
| 5.2.4 | HR17   | See response to HR14 above.   |
| 5.2.4 | BDBP18 | Amendments not accepted. Funding for this commitment is secured in Schedule 3 of the draft DCO Section 106 Agreement.   |
| 5.2.8 | HR19   | Accepted. Amendments made to the proposed text for clarity to address the concerns raised. Note also the addition of " <u>parking capacity on-airport</u> " to the scope of the AMR at Commitment 16. GAL considers the commitment should apply to the additional parking over and above that required to replace capacity lost as a result of construction in connection with the Project.   |

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| 5.2.9  | BDBP20 | Amendments not accepted. This process is addressed by the Transport Mitigation Fund (TMF) which is secured in the draft DCO Section 106 Agreement (and NH is a member of the decision making group to allocate TMF funds).                              |
| 5.2.10 | BDBP21 | See response to BDBP20 above.   |
| 5.2.10 | BDBP22 | Accepted. Amended to require consultation with the TFSG (of which local highway authorities and NH are members).  |
| 5.2.12 | BDBP23 | Partially accepted. Amended to require consultation with the TFSG (of which local highway authorities and NH are members).  |
| 5.2.12 | HR24   | Amendment not accepted. The draft DCO Section 106 Agreement ringfences 50% of the STF to initiatives in the SACs. Drafting has been included to require consultation with the TFSG in respect of the measures in Commitment 12(1).                      |
| 5.2.12 | HR25   | Amendment not accepted. GAL has a range of measures and tools to meet the SACs; it is not solely for the initiatives funded by the STF to achieve the SACs. It is therefore inappropriate to include this provision.                                    |
| 5.2.12 | HR26   | Amendment not accepted. If the TMF Decision Group (of which NH is a member) decides that funding will be allocated to measures for the SRN, GAL will need to enter into appropriate agreements with NH in any case. These amendments are not considered |

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|        |        | necessary.   |
| 5.2.12 | HR27   | Amendment not accepted. These matters are set out in Schedule 3 of the draft Section 106 Agreement.  |
| 5.2.12 | HR28   | Amendment not accepted. The TMF is considered appropriate in light of it being a contingency fund to meet potential unforeseen impacts related to the Project.                                 |
| 5.2.12 | HR29   | Amendment not accepted. GAL has engaged with NH separately regarding the inclusion of a DCO provision addressing these works and so it is not considered that duplication here is appropriate. |
| 6.2.5  | HR30   | Accepted.  |
| 6.2.5  | HR31   | Accepted.  |
| 6.2.5  | HR32   | Accepted.  |
| 6.2.5  | HR33   | Accepted.  |
| 6.2.6  | HR34   | Accepted.  |
| 6.2.6  | HR35   | Accepted.  |
| 6.2.6  | BDBP36 | Accepted.  |
| 6.2.7  | HR37   | Accepted.  |
| 6.2.7  | HR38   | Amendment not accepted. The TFSG is an existing group. The membership of the TFSG  |

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|       |        | is set out in the TFSG Terms of Reference which included as Appendix 3 to the draft Section 106 Agreement and it is therefore not necessary to duplicate here.   |
| 6.2.7 | BDBP39 | Amendment not accepted. The achievement of the mode share commitments is part of the package of mitigating impacts on the SRN (together with the surface access works and other obligations/requirements, including the provision of a TMF which is provided in order to mitigate potential unforeseen impacts as a result of the Project and which would include impacts on the SRN). The Applicant considers that an appropriate mitigation package has been proposed and the additional monitoring requested here is not necessary. |
| 7.1.3 | HR40   | Amendment not accepted. This is not considered to be an appropriate aspirational commitment as the unintended consequences of promoting this target may result in a transfer from bus, rail, cycling and walking and be counter to the stated aim of promoting public transport and active travel as the most sustainable modes.   |
| 7.1.3 | HR41   | Accepted. Amendments made to the text for clarity.   |