

Gatwick Northern Runway

TR020005

National Highways Comments on any Submissions Received by Deadline 2

April 2024

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1 **Comments on any Submissions Received by Deadline 2**

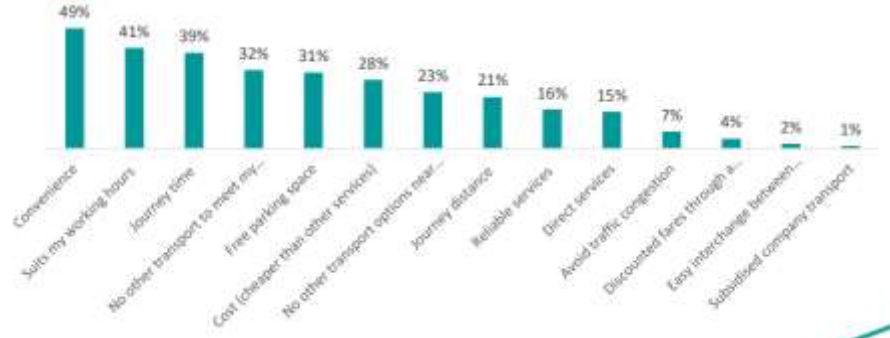
This document has been prepared by National Highways to set out its position in respect to matters raised by either the Applicant or other Interested Parties as part of their Deadline 2 submissions. National Highways position has been provided in order to provide clarity to the Examining Authority on points of agreement, disagreement or where additional clarity is being sought in order to resolve the matters raised by National Highways as part of its Relevant Representation **[TR020005/RR/3222]** and Written Representation **[TR020005/REP1/088]**. These can be found in Table 1.1 below.

Table 1-1 National Highways Comments on any Submissions Received by Deadline 2

Reference	Examination Library Reference Number	Statement	National Highways Comment
5.3 Environmental Statement Appendix 5.2.3: Mitigation Route Map (Tracked) – Version 2			
General & EC-1	REP2-012	<p>Management of pre-construction surveys</p> <p>The locations of all pre-construction archaeology, ground investigation and unexploded ordnance surveys would be assessed for their potential impacts on ecology and nature conservation and appropriate mitigation would be implemented. This would include altering survey locations to avoid damage to features of high value and watching briefs to ensure such features are not impacted upon</p>	<p>National Highways has reviewed the updated Mitigation Route Map document and notes that in a number of areas the Applicant refers to surveys that will be required prior to construction (archaeology / ground investigation etc). However, there is no commitment identified in this report to capture the need to undertake drainage surveys as noted in the Applicant’s response to Statement of Common Ground Reference 2.22.3.5 [TR020005/REP1/036]. Whilst this commitment to undertake survey’s is in reference to existing drainage assets EX-CU2 and EX-CU4, this principle will need to extend to all National Highways existing drainage infrastructure and undertaken in accordance with DMRB CS551.</p>
5.3 Environmental Statement Appendix 9.9.2: Biodiversity Net Gain Statement (Tracked) – Version 2			
Section 3.1.2 and Table 3.2.1	REP2-029	<p>The description below (Table 3.2.1) relates to each row in the baseline of the Defra Metric 4.0 for the areas impacted (Annex 1).</p> <p>The total area which would be impacted is 230.99 ha (Table 3.2.1).</p>	<p>National Highways requests that the Applicant confirms whether Table 2.5.1 on page 2 of the updated Biodiversity Net Gain Statement should instead read as Table 3.2.1 as referred to in Section 3.1.2.</p> <p>In addition, National Highways queries whether the total area which would be impacted noted in Section 3.1.3 remains as 230.99 ha given the areas that have been added as part of the updated document. It is further noted that Table 3.2.1 currently amounts to a total of 241.6 ha so National Highways requests clarification from the Applicant as to the true value of areas impacted.</p>
Section 3.1.8	REP2-029	<p>The hedgerow component of the metric is currently being updated to account for minor hedgerow loss. These data will be incorporated into the next version of this report.</p>	<p>National Highways requests clarity from the Applicant on the timeframes for the updated version of this report being submitted into the examination.</p> <p>Furthermore, National Highways requests that any update to incorporate minor hedgerow loss is accompanied by a narrative outlining any change in terms or biodiversity unit loss on National Highways estate.</p>
Section 2.3.2	REP2-029	<p>A similar survey of the Burstow Stream will be completed and the river component of the BNG assessment updated accordingly.</p>	<p>National Highways requests clarity from the Applicant on the timeframes of the survey of the Burstow Stream being completed.</p>
Overall Report	REP2-029	N/A	<p>National Highways notes that the Biodiversity Net Gain Assessment focuses upon areas of impact. However, for those areas that have not been impacted, were these areas considered for potential enhancement where applicable?</p>
Section 4.4.3 & Annex 2 Section 6.1.3	REP2-029	<p>4.4.3 - Pre development, the River Mole scored 4.20 watercourse units. Post development, the newly-created areas of the River Mole will deliver circa 4.90 watercourse units, a net gain of 0.70 watercourse units or 16.70% (see Annex 1 Metric).</p> <p>6.1.3 - Using the river condition assessment methodology it was determined that River Mole and Gatwick Stream will contribute 1.84 and 1.38 baseline river units respectively to the overall Biodiversity Net Gain site baseline calculation. The suggested action in the Biodiversity Metric 3.1 for increasing the score is to restore the existing channel.</p>	<p>National Highways requests clarification on the discrepancies in units that are being afforded to the River Mole between the main body of the report and Annex 2. Furthermore, the main body of the report makes no mention of the Gatwick Stream.</p>
7.3 Design and Access Statement Appendix 1 – Design Principles (Tracked) – Version 2			
Surface Access DBF17	REP2-037	<p>Local highway authority roads are to be designed in accordance the relevant local design standards, including the Manual for Streets</p>	<p>National Highways requests that an additional design principle is added to the section titled “Surface Access” to reference that any highway that forms part of the Strategic Road Network is to be designed in accordance with the Design Manual for Roads and Bridges and Manual of Contract Documents for Highway Works.</p>

Reference	Examination Library Reference Number	Statement	National Highways Comment
Comments on Submissions at Deadline 1 – Crawley Borough Council, West Sussex County Council, Horsham District Council and Mid-Sussex District Council			
2.35	REP2-042	Additionally, as previously stated in the authority's comments on the draft DCO there appears to be an error in relation to page 66 of the draft DCO. The draft DCO refers to the A23 London Road Diverge to North Terminal Roundabout as being shown by green striped hatching (indicating National Highways responsibility) but on the associated Rights of Way and Access Plans it is shown as a blue hatched plan (indicating Local Highway Authority maintained). These latest Rights of Way and Access Plans continue to indicate the A23 London Road Diverge to North Terminal Roundabout as Local Highway Authority maintained. However, WSCC would envisage that the A23 London Road Diverge to North Terminal Roundabout would be managed and maintained by National Highways and therefore clarification should be provided by the Applicant and the plans amended to accord with the wording in the draft DCO.	National Highways agrees with the position stipulated by the respective council's in their Deadline 2 submission. National Highways understands that the A23 London Road Diverge to North Terminal Roundabout will be National Highways responsibility to operate and maintain following the construction and handover into maintenance of the surface access works. This is subject to the Applicant discharging its requirements in accordance with the Development Consent Order and having paid the necessary commuted lump sum for ongoing operation and maintenance.
3.5	REP2-042	The Authorities remain concerned about a lack of suitable control, should the Surface Access Commitments not be met, and would look for the Applicant to propose further sustainable transport mitigation and advocate a Green Controlled Growth approach, like that adopted by the Applicant for the Luton Airport DCO (TR020001)	National Highways notes the position of the respective council's, National Highways has submitted a mark-up version of the Surface Access Commitments Document at Deadline 2 [TR020005/REP2/056] . This mark-up has been prepared to establish the amendments that National Highways believe are required to ensure that the Applicant's surface access commitments are suitably secured.
The Applicants Response to Actions – ISH 2-5			
4.2.3	REP2-005	The strategic modelling work was based on an extensive travel survey undertaken in 2016 (a more targeted survey was undertaken in 2019 and is referred to in the 2023 survey results but this had a significantly lower number of respondents and a narrower range of questions). The main differences between 2016 and 2023 staff mode share are an increase in car drivers (+15%), and a reduction in bus (-6%) and company transport (-6%). Rail increases by +1%. There are a number of reasons which can explain these results, including that buses have not returned to the same level of service as pre-pandemic levels and company transport provided by airlines is not currently running. The effects of the current reduction in rail services compared to pre-pandemic levels and the impact of ongoing industrial action can be seen when comparing the 2019 rail mode share with the 2023 rail mode share	National Highways notes the Applicant's conclusions that a reduction in the level of service of public transport results in a subsequent increase in car journeys which would likely utilise the Strategic Road Network. It is therefore National Highways view that the surface access commitments need to be suitably robust in order to ensure that these modal share commitments are attained and therefore maximise the use of public transport, shared travel or active travel journeys. National Highways has submitted a mark-up version of the Surface Access Commitments Document at Deadline 2 [TR020005/REP2/056] . This mark-up has been prepared to establish the amendments that National Highways believe are required to ensure that the Applicant's surface access commitments and modal share aspirations are suitably secured.
4.2.4	REP2-005	The staff survey suggests that the airport is in recovery and there are measures set out in the current Gatwick Airport Surface Access Strategy (ASAS) (2022- 2030) action plan to improve sustainable mode shares. The latest ASAS sets a target of 48% of staff journeys to work by public transport, shared travel and active travel by 2030, which is an increase from the previous ASAS published in 2019. The ASAS includes actions to complete a strategy for staff travel by public transport in consultation with operators (to cover discounts, ticketing, information provision, marketing and offers), and trial new and enhanced bus and coach services funded through the Sustainable Transport Fund.	National Highways has submitted a mark-up version of the Surface Access Commitments Document at Deadline 2 [TR020005/REP2/056] . This mark-up has been prepared to establish the amendments that National Highways believe are required to ensure that the Applicant's surface access commitments and modal share aspirations are suitably secured.
4.4.9	REP2-005	As part of ongoing discussions with National Highways, GAL is committed to sharing the latest developments on any discussions with other parties including Network Rail and will provide any further updates relevant to the rail and traffic forecasting assumptions as they materialise.	National Highways will monitor the outcomes of the Applicant's discussions with Network Rail and reserve the right to amend or make any further representations.
4.6.5	REP2-005	MSCP7 is still due for completion this year; however, GAL understands that the Hilton permission has now lapsed after further delays to its construction post Covid. As such, as matters stand, that permission/parking provision of 820 additional spaces no longer forms part of the Future Baseline, nor (by consequence) the parking provision on airport as part of the Project scenario. However, the Hilton car	National Highways notes the response made by the Applicant addresses the matter that National Highways raised in its response to comments at Deadline 1 to the Legal Partnership Authorities Post Hearing Submission Issue Specific Hearing 4 [TR020005/REP2/055] relating to the planning status of the 820 additional parking spaces.

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		park area is co-located (in terms of access points) with other car parks so the loss of spaces is not considered to lead to any potential traffic redistribution effects and the loss of 820 spaces is not significant within the wider parking capacity on offer for passengers and does not materially impact on traffic volumes or mode shares.	
Appendix C Technical Note: Rail Passenger modelling Clarification Note 6.1.2 and 6.1.3	REP2-005	<p>GAL has undertaken detailed passenger modelling of Gatwick Airport station using the Network Rail GRIP53 Legion model for 2036, developed for testing the Gatwick Station Project. The model provides an assessment of both walkways (areas where a pedestrian would expect free movement) and queues/waiting areas (where pedestrians experience higher densities and still consider their environment comfortable). GAL held meetings with NR's Station Planning team prior to submitting the Application to verify the modelling approach and assessment.</p> <p>The assessment in the Application (Transport Assessment Annex D: Station and Shuttle Legion Modelling Report [APP-262]) shows that the station would continue to operate satisfactorily overall in 2047 with the demand from the Project. GAL is continuing to discuss the station and rail crowding analysis presented in the Application with NR.</p>	<p>National Highways seeks clarification on whether the GRIP53 Legion model for 2036 is the appropriate model to be used when considering the operation of the rail network in 2047.</p> <p>National Highways will continue to review the status of agreements between Network Rail and the Applicant where any issues which may affect the modal share aspirations of the Applicant may give rise to an increase in vehicles on the Strategic Road Network.</p>
Appendix C Technical Note: Rail Passenger modelling Clarification Note 7.1.1	REP2-005	<p>In relation to proposed construction activities, as set out in ES Appendix 5.3.2: Code of Construction Practice Annex 3: Outline Construction Traffic Management Plan [APP-085], although some generalised discussions have been held with Network Rail, it is too early to be able to agree specific proposals or railhead locations or to confirm that suitable train paths will be available. GAL has therefore not relied on rail transport for its construction assessments. Nevertheless, GAL recognises the sustainability benefits of reducing the volume of road traffic associated with construction and with its contractors will therefore continue to explore the feasibility of having some materials delivered by rail if consent is granted for the Project.</p>	<p>National Highways recognises the advantages that construction material deliveries via rail freight could provide and will keep abreast of these discussions as they continue.</p> <p>National Highways has raised a number of concerns in relation to the safe operation of the Strategic Road Network during the construction of the surface access works as listed in the Statement of Common Ground with the Applicant [TR020005/REP1/036]. Any reduction in construction traffic volume through the use of the rail network would be welcomed by National Highways, as it would reduce the interaction of construction vehicles with other road users.</p>
Appendix C Technical Note: Rail Passenger modelling Clarification Note 8.1.3 and 8.1.4	REP2-005	<p>GAL will continue to fund the STF (draft DCO s106 Agreement (Doc Ref. 10.11) and is committing to achieve specific public transport mode shares within three years of dual runway operations commencing (as part of the Surface Access Commitments (SACs) [APP-090] secured through Requirement 20 of the draft DCO [REP1-004]. In pursuit of achieving those commitments, GAL will continue to consider providing funding for enhancements to the rail network where they increase the use of rail.</p> <p>As part of the SACs and secured in the draft DCO s106 Agreement, 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. This fund is to provide mitigation of an unforeseen or unintended transport impact from the Project. Decisions on allocation from the TMF would be made by a Transport Mitigation Fund Decision Group (TMFDG), details of which will be contained in the draft DCO s106 agreement</p>	<p>National Highways has submitted a mark-up version of the Surface Access Commitments Document at Deadline 2 [TR020005/REP2/056]. This mark-up has been prepared to establish the amendments that National Highways believe are required to ensure that the Applicant's surface access commitments and modal share aspirations are suitably secured.</p> <p>National Highways is seeking assurances that the Transport Mitigation Fund will be suitably funded to ensure that any interventions required to either road or rail infrastructure as a consequence of the operation of the airport can be addressed in full.</p>

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Appendix D 2023 Travel to Work Survey Slide 7	REP2-005	<p>Employees travelling by local bus to Gatwick increased by 5% in 2023; the majority continue to travel by car (72%)</p> <table border="1" data-bbox="647 363 1478 779"> <thead> <tr> <th>Made of Transport to/from Work</th> <th>2019 (n=1000)</th> <th>2020 (n=1000)</th> <th>2023 (n=2014)</th> <th>% Change 2023 vs. 2019</th> </tr> </thead> <tbody> <tr> <td>Car driver – on your own</td> <td>62%</td> <td>67%</td> <td>67%</td> <td>0%</td> </tr> <tr> <td>Car share – as a driver or passenger with others that work at Gatwick</td> <td>6%</td> <td>7%</td> <td>4%</td> <td>-3%</td> </tr> <tr> <td>Car – as a passenger – dropped off by someone not working at Gatwick</td> <td>2%</td> <td>1%</td> <td>1%</td> <td>0%</td> </tr> <tr> <td>CAR: All those traveling by car</td> <td>68%</td> <td>75%</td> <td>72%</td> <td>-8%</td> </tr> <tr> <td>Local bus</td> <td>-</td> <td>5%</td> <td>10%</td> <td>+10%</td> </tr> <tr> <td>Coach</td> <td>-</td> <td>1%</td> <td>0%</td> <td>-1%</td> </tr> <tr> <td>Public Bus/ Coach</td> <td>1%</td> <td>6%</td> <td>10%</td> <td>+4%</td> </tr> <tr> <td>Train</td> <td>12%</td> <td>13%</td> <td>13%</td> <td>0%</td> </tr> <tr> <td>Company Transport</td> <td>6%</td> <td>6%</td> <td>0%</td> <td>-6%</td> </tr> <tr> <td>Cycle/ e-cycle/ scooter</td> <td>2%</td> <td>3%</td> <td>1%</td> <td>-2%</td> </tr> <tr> <td>Walk/ run/ wheel</td> <td>1%</td> <td>1%</td> <td>1%</td> <td>0%</td> </tr> <tr> <td>Motorbike/ moped</td> <td>1%</td> <td>1%</td> <td>1%</td> <td>0%</td> </tr> <tr> <td>Plane</td> <td>1%</td> <td>0%</td> <td>0%</td> <td>0%</td> </tr> <tr> <td>Taxi/ Uber</td> <td>1%</td> <td>0%</td> <td>0%</td> <td>0%</td> </tr> <tr> <td>Other</td> <td>-</td> <td>-</td> <td>0%</td> <td>-</td> </tr> </tbody> </table>	Made of Transport to/from Work	2019 (n=1000)	2020 (n=1000)	2023 (n=2014)	% Change 2023 vs. 2019	Car driver – on your own	62%	67%	67%	0%	Car share – as a driver or passenger with others that work at Gatwick	6%	7%	4%	-3%	Car – as a passenger – dropped off by someone not working at Gatwick	2%	1%	1%	0%	CAR: All those traveling by car	68%	75%	72%	-8%	Local bus	-	5%	10%	+10%	Coach	-	1%	0%	-1%	Public Bus/ Coach	1%	6%	10%	+4%	Train	12%	13%	13%	0%	Company Transport	6%	6%	0%	-6%	Cycle/ e-cycle/ scooter	2%	3%	1%	-2%	Walk/ run/ wheel	1%	1%	1%	0%	Motorbike/ moped	1%	1%	1%	0%	Plane	1%	0%	0%	0%	Taxi/ Uber	1%	0%	0%	0%	Other	-	-	0%	-	<p>National Highways notes that the Applicant is seeking to commit via the surface access commitments [TR020005/APP/090] to achieve a minimum 55% of airport staff journeys to and from the airport via public transport and active travel modes. However, in the 2023 survey 72% of airport staff commuted to work via car (with only 4% of that figure being via a car-share system), which emphasises the scale of the change in staff commuter habits that will be required.</p> <p>National Highways submitted at Deadline 2 a mark-up of the surface access commitments [TR020005/REP2/056] produced by the Applicant. Within this mark-up, National Highways has included an additional section to commitment 5 as noted below:</p> <p>“(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.”</p> <p>National Highways believes this text is required in order to ensure that the Applicant’s commitment to fund services does not automatically end after 5 years. To guarantee a sustainable shift in employee travel habits, a long-term commitment is essential to ensure that accessible services are available to employees and members of the public.</p>
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Appendix D 2023 Travel to Work Survey Slide 9 and 10	REP2-005	<p>Reasons for Travel – usual mode of transport (all modes)</p>  <p>Reasons For Mode Choice</p> <table border="1" data-bbox="647 1455 1478 1801"> <thead> <tr> <th>Mode</th> <th>Reasons</th> </tr> </thead> <tbody> <tr> <td>Car</td> <td> <ul style="list-style-type: none"> Convenience Suits my working hours Journey time Free parking space (40%) No other transport options </td> </tr> <tr> <td>Train</td> <td> <ul style="list-style-type: none"> Journey time (37%) Convenience (33%) No other transport options (32%) Direct services (29%) Avoid traffic congestion (25%) </td> </tr> <tr> <td>Bus</td> <td> <ul style="list-style-type: none"> Convenience Cost (cheaper than other services) Direct services No other options Suits my hours </td> </tr> </tbody> </table>	Mode	Reasons	Car	<ul style="list-style-type: none"> Convenience Suits my working hours Journey time Free parking space (40%) No other transport options 	Train	<ul style="list-style-type: none"> Journey time (37%) Convenience (33%) No other transport options (32%) Direct services (29%) Avoid traffic congestion (25%) 	Bus	<ul style="list-style-type: none"> Convenience Cost (cheaper than other services) Direct services No other options Suits my hours 	<p>National Highways notes that convenience and free car parking facilities offered to members of staff provides a strong incentive to continue travelling by car.</p> <p>Does the Applicant propose to continue free parking for staff as part of its strategy and could it be considered that this incentive undermines the aims of increasing modal share of staff travelling by public transport?</p>																																																																								
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<p>Appendix D 2023 Travel to Work Survey Slide 12 and 13</p>	<p>REP2-005</p>	<p>Price would be the primary factor to encourage more staff to travel by train</p> <p>Direct services between home and work and cheaper fares would be the most likely factors to encourage more bus use</p> <p>Price of travel, level of discount and easier access to the staff discount scheme all came out as significant factors in potentially encouraging more train use by airport staff.</p> <p>Government is continuing to support bus operators to cap prices for single fares at £2 until 31 December 2024.</p> <p>In-app verification of airport ID's launched in September, meaning staff no longer have to go to a travel shop.</p>	<p>It is noted that costs are a key consideration of Airport Staff in their choice of travel, has there been any negotiation between the Applicant and either Network Rail or Govia Thames Link to offer an increased subsidy to Airport Staff in order to promote the increase in the modal shift required in line with the Surface Access Commitments [TR020005/APP/090]?</p>
<p>Appendix D 2023 Travel to Work Survey Slide 15</p>	<p>REP2-005</p>	<p>Over half of airport staff might be encouraged to car share</p> <p>Nothing would encourage me to car share to work 45%</p>	<p>National Highways, as part of its Deadline 2 submissions, provided a mark-up of the Surface Access Commitments [TR020005/REP2/056]. As part of this submission, National Highways requested that Commitment 2 is split into Commitment 2A and 2B, with 2B focusing upon a minimum percentage of airport staff journeys to and from the Airport to be made by Shared Travel.</p> <p>Noting that the 2023 staff travel survey outlines that over 50% of staff might be encouraged to car share, National Highways would expect the Applicant to set an ambitious but practical percentage target for Commitment 2B.</p>

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Appendix D 2023 Travel to Work Survey Slide 19	REP2-005	<p>Awareness of Staff Discounts</p> <p>79% of staff are aware of at least one of the staff travel schemes (bus, train, Ride to Work, coach).</p> <ul style="list-style-type: none"> 51% were unaware of the rail staff discount or discounts on Metrobus services 37% were aware but had never used it 11% have used it (7% in the past, 5% currently using it) <p>Awareness of the Ride to Work scheme was highest, while awareness of discounts on National Express were lowest (64% unaware).</p> <p>This suggests there are opportunities to raise awareness of all discount schemes and increase uptake.</p>	<p>National Highways notes that awareness of the full range of staff discounts available to Airport Staff is low. As part of the Applicant's desire to achieve its modal shift commitments, what measures is the Applicant proposing to increase awareness and engagement with this discount benefit?</p> <p>Furthermore, as discounts offer an incentive for staff to transition to public transport, how are these staff discounts to be secured in the long term with the respective public transport companies?</p>
Appendix D 2023 Travel to Work Survey Slide 21	REP2-005	<p>Next Steps</p> <ul style="list-style-type: none"> Undertake further analysis, particularly using staff postcode data Determine an Active Travel Target for airport staff journeys Once ready, share data with transport operators and other stakeholders to support service improvements Develop and communicate a new Staff Travel Plan and Active Travel Strategy, including new initiatives Reintroduce a staff car sharing scheme 	<p>National Highways queries whether the Staff Travel Plans and Active Travel Strategy, being a key component of how the Applicant aspires to achieving its Surface Access Commitments, should not form part of the suite of documents that encapsulates the Annual Monitoring Report, and updates submitted for consultation with the Transport Forum Steering Group.</p>
Appendix 5.3.2 Code of Construction Practice Annex 7 – Construction Communications and Engagement Plan			
Section 3	REP2-015	Community Relations and Stakeholder Engagement	<p>For the respective working groups and forums that will be established to manage communications and engagement, National Highways requests that the respective consultees should be identified in the Construction Communications and Engagement Plan and should continue to be updated with any newly identified consultees prior to construction.</p> <p>It should be noted that a Traffic Management Working Group does not have the primary function of being a communications meeting, as this group will be more technical based. However National Highways notes that a communications sub-group could form part of this structure. This group would need to include as a minimum National Highways, the Traffic Operations Centre, Network Rail and any Local Planning and Highways Authorities.</p>
7.1.2	REP2-015	A community email address will be maintained. The email will be monitored by the CLO during office hours to deal with enquiries and issues arising from members of the public and local businesses.	<p>National Highways notes that the Applicant is proposing to undertake a series of works outside of normal working hours. Therefore, National Highways would expect the Applicant to ensure that a CLO is in place during these works in order to deal with any issues that may arise from members of the public and local businesses.</p>
Updated Principal Areas of Disagreement Summary Statement (PADSS) – West Sussex County Council			
46: Outline Construction Traffic Management Plan (CTMP)	REP2-067	The OCTMP identifies risks associated with construction traffic utilising routes through the J10 M23 and Hazelwick Air Quality Management Areas in Crawley. Reference is made to a monitoring system that 'it is envisaged' will be developed in the CTMP. However, no details on this monitoring system are provided.	<p>National Highways notes the concerns raised by West Sussex County Council. In the Outline Construction Traffic Management Plan [TR020005/APP/085], the Applicant outlines that the primary construction access route will be via M23 Junction 9, with M23 Junction 10 identified as a contingency access route.</p>

Reference	Examination Library Reference Number	Statement	National Highways Comment
		Further details are requested on the proposed monitoring system and how this would protect air quality. More clarification is required regarding the additional traffic that would be expected in the future situation.	National Highways notes that in Section 6.3.1 of the Outline Construction Traffic Management Plan, the Applicant outlines that "situations in which it envisaged that construction traffic would be authorised to use a contingency access will be provided in the CTMP". National Highways requests greater clarity on what situations could give rise to the contingency access being utilised and how this would be communicated to all affected parties.
58: Road traffic noise – noise monitoring duration	REP2-067	<p>One 20-minute survey and one 10- minute survey is not sufficient to provide data suitable for validation of the road traffic noise model and indeed these data are not used as such. There is therefore no validation of the road traffic noise model in terms of measured levels.</p> <p>Longer term monitoring, close to the A23 or M23 where road traffic noise can be said to dominate over aircraft noise, would be preferable. Alternatively, the applicant could explain what steps they have taken to independently validate the road traffic noise calculations.</p>	<p>National Highways has raised similar representations in its Statement of Common Ground with the Applicant [TR020005/REP1/036] under Reference 2.16.1.1.</p> <p>National Highways awaits the publication of the technical note outlined in Gatwick's position statement and National Highways requests clarity on when this technical note will be entered into the examination for review</p>
Comments on any submissions received by Deadline 1 – Surrey County Council on behalf of Legal Partnership Authorities			
Table 6 - 3.1.5	REP2-081	SCC is concerned that the M25 around Junction 8 is at capacity, which means more traffic would transfer onto SCC's network. Furthermore, should it not prove possible to enhance rail services as proposed or should the Applicant otherwise fail to meet the mode share targets, then the "without NRP" demand would not be able to be accommodated on the transport networks without significant impacts.	National Highways notes the concerns of Surrey County Council and has submitted a mark-up version of the Surface Access Commitments Document at Deadline 2 [TR020005/REP2/056] . This mark-up has been prepared to establish the amendments that National Highways believe are required to ensure that the Applicant's surface access commitments are suitably secured.
Table 7 Action Point 1	REP2-081	The Authorities are broadly supportive of the response from the Applicant in that the Environmental Statement has provided a "description of the relevant aspects of the current state of the environment (baseline scenario) and an outline of the likely evolution thereof without implementation of the development..." (Para 2.2.2). This was as anticipated by the Authorities. However, the Authorities remain concerned about some of the assumptions in this future baseline, such as the assumed recovery of rail services to pre-Covid levels and planned service enhancements as well as congestion issues on the M25 around Junction 8. The first point is likely to result in lower public transport mode share than planned and both points will combine to create a greater traffic and wider environmental impact within the county.	<p>National Highways notes the concerns of Surrey County Council and has submitted a mark-up version of the Surface Access Commitments Document at Deadline 2 [TR020005/REP2/056]. This mark-up has been prepared to establish the amendments that National Highways believe are required to ensure that the Applicant's surface access commitments are suitably secured.</p> <p>National Highways has outlined a number of concerns in respect to transport modelling in its Statement of Common Ground with the Applicant [TR020005/REP1/036] and is also keeping abreast of the status of negotiations between the Applicant and Network Rail [TR020005/REP1/090], who have similar concerns relating to the modal shares outlined in the Applicant's Surface Access Commitments. National Highways are therefore reliant on Network Rail being satisfied that the rail assumptions align to their requirements and as a result are valid assumptions to input into the highway modelling.</p>
Updated Principal Areas of Disagreement Summary Statement (PADSS) – Kent County Council			
11: Surface Access – Public Transport	REP2-048	<p>Kent County Council (KCC) support the inclusion of regional coach services to locations in Kent and Medway within the proposals. However, KCC is concerned that Route 4 will not extend to Ebbsfleet as first proposed and will no longer extend into Kent, instead stopping at Bexley. KCC feel this is short sighted and fails to consider the additional passengers who would be able to access Ebbsfleet from elsewhere in Kent and East London.</p> <p>Updated position (V2): KCC's concern previously outlined is maintained.</p> <p>Further to this, not all the proposed enhanced coach services appear to have been carried over from Transport Assessment to Surface Access Commitments [APP-090] Table 1. Proposed enhancements to the Uckfield-East Grinstead Gatwick and the Romford-Upminster-Dartford Gatwick coach services are missing, which would have a negative impact on the Applicant's 55% public transport mode share targets as well</p>	<p>National Highways notes the representations made by Kent County Council, which reinforces the need for the surface access commitments to be suitably secured as part of the Development Consent Order. National Highways has submitted a mark-up version of the Surface Access Commitments Document at Deadline 2 [TR020005/REP2/056]. This mark-up has been prepared to establish the amendments that National Highways believe are required to ensure that the Applicant's surface access commitments are suitably secured. National Highways reiterates that it has not seen sufficient evidence from the Applicant to demonstrate the achievability of the mode share commitments, which would have a subsequent impact on the operation of the Strategic Road Network.</p> <p>If the Applicant were to undertake the additional sensitivity testing requested by Kent County Council, National Highways requests that these results are entered into the examination for review by other interested parties.</p>

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		<p>as travellers from Kent. Also, the enhanced Romford-Upminster-Dartford-Gatwick coach service will continue to suffer from existing and worsening congestion at the Dartford Crossing until Lower Thames Crossing is open.</p> <p>KCC agrees that coach supply should be determined by the operators / market forces but requests the Applicant to confirm that sufficient kerb space would be available to accommodate the significant increases in forecast coach arrivals & departures.</p> <p>KCC notes that the 55% public transport mode share targets assume a nearly three-fold increase in total air passenger coach services between 2016 and 2047. This is supported by a fifteen-fold increase in air passenger coach services for Kent. If this ambitious patronage is not realised 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.</p> <p>KCC request that Route 4 be extended to Ebbsfleet International Station as originally proposed.</p> <p>Previous airport coach services have failed to be retained in Kent. As such the ongoing provision of these services should be secured within the DCO process.</p> <p>Updated position (V2): KCC's previous request is maintained. KCC further requests: - Temporary mitigation for the Gatwick to Romford route until the Lower Thames Crossing is operational. - Royal Tunbridge Wells-East Grinstead-Gatwick coach service is rerouted to avoid unsuitable narrow roads.</p> <p>KCC request further information on existing and proposed kerb space provision for air passenger coaches at the two terminals, to better understand whether the forecast increases in supply can be accommodated.</p> <p>Furthermore, KCC have concerns around what constitutes "reasonable financial support". KCC's experience is that coach services between Kent and Gatwick do not work without subsidy. KCC ask the Applicant to provide further information on what they deem "reasonable financial support" and to work with KCC to develop the proposals for coach services to and from Kent to ensure they are successful.</p> <p>Furthermore, to better understand the impact of the public transport mode share targets on the Strategic Road Network, we request a sensitivity test on public transport mode share forecasts.</p> <p>We request a model sensitivity test on the implications of a continuation of the flat public transport mode share of "around 45%" for air passengers prior to the pandemic, which Diagram 6.2.4 of the Transport Assessment [AS-079] indicates has been fairly consistent since 2012.</p> <p>KCC would appreciate receiving model results in the form of shape files for such an assessment, including traffic speeds and volume / capacity ratios, so we can better appreciate the effects on the road network.</p>	

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Updated Principal Areas of Disagreement Summary Statement – Surrey County Council			
Ref 20 – Securing Mitigation	REP2-064	<p>SCC is concerned about the impact of construction of the SAC on its road network.</p> <p>SCC wishes to see mitigation during the Longbridge Roundabout construction, A23 reconstruction and Balcombe Road Bridge installation. SCC require the Applicant's construction to operate as per the proposed routing via the M23 spur with minimal use of SCC's network.</p>	National Highways has raised a number of concerns in respect to the impacts during construction as part of its Relevant Representation [TR020005/RR/3222] and Written Representation [TR020005/REP1/088]. National Highways has requested VISSIM modelling be undertaken by the Applicant for a range of construction traffic management phases to demonstrate the impacts on the Strategic Road Network and whether any additional mitigation is required. These traffic management periods are outlined in National Highways Cover Letter to its Deadline 3 submission.
Tandridge District Council - Updated Principal Areas of Disagreement Summary Statement (PADSS)			
AQ08	REP2-066	TDC disagrees that enough details is provided on the restrictions and monitoring of construction traffic utilising routes through the J10 M23. Reference is made to a monitoring system that 'it is envisaged' will be developed in the full CTMP. Further details are requested during the examination.	National Highways refers the reader to National Highways response to Reference Point 46 in this document in respect to National Highways comments to West Sussex County Council's updated Principal Areas of Disagreement Summary Statement [TR020005/REP2/067].
Updated Principal Areas of Disagreement Summary Statement (PADSS) (Crawley Borough Council)			
Noise and Vibration REF 3	REP2-041	The construction vibration assessment only considers effects from sheet piling and does not consider vibration effects from vibratory compactors and rollers used in highway construction	National Highways agrees with the statements made by Crawley Borough Council in its updated Principal Areas of Disagreement Summary Statement that the potential impact of vibratory compactors/rollers should be assessed. The default construction vibration study area defined in DMRB LA 111 is 100m and this should be considered.
Cumulative Assessment and Impacts REF 3	REP2-041	The date of construction of Gatwick Green was assumed in Table 12.11.1 of Chapter 12 of the ES to be 20% complete in 2029, 50% in 2032 and 100% in 2047. However, evidence submitted to the Crawley Borough Local Plan Examination identifies the completion date as 2035. The Crawley Infrastructure Delivery Schedule December 2023 identifying on site delivery from 2027/28, indicating construction could commence in 2025. The Gatwick Green allocation is sited immediately east of the Project, and there is considerable potential for overlaps to occur with the construction of the modified M23 Spur and particularly with the Balcombe Road bridge widening which is in close proximity to the northern access to the Gatwick Green site. This would create unassessed impacts to occur on the local highway network, particularly Balcombe Road, and/or on the operation of this Strategic Site.	National Highways shares the concerns of Crawley Borough Council and, if there is going to be a considerable overlap of construction between Gatwick Northern Runway and Gatwick Green, the impacts during construction will need to be understood and assessed.
Principal Areas of Disagreement Summary Statement (PADSS) (Horsham District Council)			
2.5	REP2-045	<p>The Council has a number of concerns with regard to the core modelling scenario. There is concern that the exclusion of certain developments, such as Land West of Ifield and Heathrow R3, but the inclusion of transport improvements such as the SMART motorway improvements on the M25 (J10-16) (which has now been cancelled), may skew the results of the transport assessment. The concern is that the scenario assessed may not provide a realistic worst-case assessment.</p> <p>The Council does not agree that sites, such as Land West of Ifield, should be excluded from the core modelling scenario while growth from future housing trajectory is being relied upon in the socio-economic assessment.</p>	<p>National Highways in its Relevant Representation [TR020005/RR/3222] requested a cumulative sensitivity test be prepared by the Applicant to remove the M25 Junction 10-16 Scheme as noted by Horsham District Council.</p> <p>The Applicant has submitted an updated Transport Assessment [TR020005/AS/079] in response to Procedural Decision Letter provided by the Examining Authority to request that the Applicant account for Covid-19 in transport modelling, which also considers the removal of the M25 Junction 10-16 Scheme.</p> <p>National Highways has requested VISSIM modelling data in order to fully review the updated models to satisfy itself that the Strategic Road Network will continue to operate safely and effectively as a consequence of the Applicant's proposals.</p>
3.4	REP2-045	<p>Construction traffic will use the strategic route network in the District.</p> <p>Although commitment to adopting London Low Emission Zone standards was made at the PEIR stage, Appendix 13.8.1 advises the standards will be used "where applicable" while Paragraph 7.2.15 of Appendix 5.3.2 states that "Low emission</p>	National Highways notes the matter raised by Horsham District Council in its updated Principal Areas of Disagreement Summary Statement and will keep abreast of the Applicant's response, noting that the utilisation of London Low Emission Zone Standards and the adoption of a Fleet Recognition Scheme as part of construction would reduce the overall carbon impact of the development.

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		<p>plant would be encouraged and used where practicable [...] but provides no further details and makes no commitment to using London Low Emission Zone standards and adopting a Fleet Recognition Scheme.</p> <p>Lack of Emissions Monitoring Strategy for the Construction Phase.</p> <p>No specific details for the construction phase monitoring strategy were provided. Although it is expected that a dust monitoring plan and a monitoring plan will be provided at a later date, key points and decisions should have already been made available.</p>	