

Gatwick Northern Runway Project (Project Reference: TR020005)
East Sussex County Council Registration Identification Number: 20044514
Deadline 4 [REP4-] Submission

D4.A - The Applicant's comments of the East Sussex Local Impact Report [REP1-070]:

A1. The Applicant has responded to the Local Impact Reports at Deadline 3 [REP3-078] which were submitted by the Local Authorities at Deadline 1. The document also focuses on the principal points cited by the Local Authorities and seeks to comment on any matters than may require clarification or correction where it may assist the ExA and Interested Parties.

A2. The table contained within the LIR - that Gatwick commented on - has been extracted, and an additional column added with our response to Gatwick's comments. The following matters raised in our LIR, that have been considered by and commented on by Gatwick, and our response to these comments can be seen in the table below:

Reference	ESCC comment	Gatwick's response	ESCC further comments at Deadline 4
N1	Although aircraft noise is audible in Wealden District, it is not of sufficient magnitude to result in adverse effects on health and quality of life. Whilst we acknowledge this assessment, we remain cautious of the impacts of aircraft noise on local communities, particularly in Wealden – and wish for our concerns to be recorded in the event unacceptable levels of noise are recorded in the future.	<p>The Applicant has updated the cited requirement (now numbered Requirement 19(2)) in version 6.0 of the Draft Development Consent Order (Doc Ref. 2.1 v6) submitted at Deadline 3 to remove the word "routinely" given that this does not alter the meaning of the provision.</p> <p>However, it is important that the Applicant is able to continue to use the northern runway when the southern runway is unavailable for reasons other than planned maintenance or engineering works and for this purpose "for any reason" must be retained. For example, if there was an incident on the southern runway or damage to that runway, the Applicant would use the northern runway as it does currently using the same flight paths.</p>	<p>Note: AECOM unable to advise.</p> <p>We will provide a response at Deadline 5.</p>

<p>Of greatest concern would be if aircraft operated on the northern runway because it is vague and so unlikely to satisfy the test of precision in Circular 11/95: Use of conditions in planning permission. In addition, the term “for any reason” is too broad and ESCC considers the use of the northern runway between these times should only be used when the southern runway is not available because of planned maintenance and engineering works.</p> <p>In the light of the above, ESCC considers Requirement 19(3) should be redrafted as follows – “The northern runway (Work No.1) must not be used between the hours of 23:00 – 06:00 but may be used between these hours where the southern runway (being the airport’s main runway at the date of this Order is made) is not available for use because of planned engineering and maintenance works”.between the hours of</p>	<p>This would not result in any increase of movements and associated noise within those hours by comparison to use of the southern runway.</p> <p>The Council's proposed wording in this respect is unduly restrictive, and it is not agreed that the form of words used in Requirement 19(2) lacks precision or would result in any instance of unassessed impacts arising.</p> <p>The central purpose of Requirement 19(2) is to ensure that only one runway will ever operate between 23:00 – 06:00, and the southern runway will continue to be the primary runway, which is used during those hours, preserving the status quo. The current wording achieves this.</p>	
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	<p>23:00 and 06:00. ESCC notes Requirement 19(3) provides that the northern runway must not be routinely used between the hours of 23:00 – 06:00; however, it can be Used between those hours when the southern runway is not available for any reason.</p> <p>ESCC is not satisfied with the requirement and considers “routinely” should be omitted</p>		
N2	<p>Providing alternative public transport options to private car use would reduce the number of vehicles on the road network to Gatwick Airport, and therefore reduce road traffic noise.</p> <p>For public transport improvement (mitigation) please refer to Table 5 (T1) of the LIR.</p>	<p>The Applicant is committed to supporting alternative transport options to private car use and we have made binding requirements on mode shares under the DCO.</p> <p>These are set out in the ES Appendix 5.4.1: Surface Access Commitments (SAC) [APP-090] document.</p>	<p>ESCC want more definitive commitments to alternative public transport options to private car use, notably those in T1 of this table. There are no commitments for East Sussex in <u>ES Appendix 5.4.1: Surface Access Commitments (SAC) [APP-090]</u>.</p> <p>Reference is made to Gatwick previously supporting services from East Sussex in ES Appendix 5.4.1: Surface Access Commitments (SAC) [APP-090] document para 5.2.1 , however, we were not engaged with this trial taking place, and as a result there was no promotion from ESCC, which we believe resulted in modest passenger numbers.</p>

<p>S1</p>	<p>Paragraph 1.1.7 of the Employment, Business and Skills Strategy (ESBS) states its activation would be set out within an Implementation Plan which “would describe, in detail, how GAL will collaborate with partners to deliver the ESBS. The Implementation Plan would be developed pursuant to the agreement of ESBS mitigations. The ESBS Implementation Plan will be secured via the Section 106 agreement”. We would suggest this is made a condition of the DCO should it receive consent from the Secretary of State. It is imperative that ESCC has access to the Implementation Plan to be able to determine whether the proposals will have a negative, neutral or positive impact. The ESBS currently lacks detail and does not, for example, mention initiatives tailored for local needs.</p> <p>ESCC notes from paragraph 5.3.26 of the ESBS that GAL is</p>	<p>There are no significant adverse impacts on skills or business identified in the ES Chapter 17: Socio-Economic [APP-042]. As such there are no impacts that require mitigation. Section 17.8 of the ES Chapter lists the ESBS as enhancement activity and paragraph 17.13.5 reads: “moderate beneficial significant labour market effects have been identified during the operation of the Project from 2032 to 2047 at the LSA and FEMA levels. These effects would be subject to further enhancement measures as part of the ESBS. No significant adverse effects have been identified in terms of socio-economic effects.”</p> <p>Paragraph 1.1.7 of the ESBS should read “activities” rather than “mitigations”.</p> <p>In the context of the above response, it is appropriate for the ESBS to remain secured as a s106 obligation rather than a DCO Requirement.</p> <p>A draft Implementation Plan has been shared with ESCC and the Applicant is continuing to work with ESCC and other local authorities to develop the draft, including tailoring delivery to local needs and including specific measures such as work with Careers Hubs. A copy has been submitted at Deadline 3 (Draft Section 106 Agreement Annex: ESBS Implementation Plan (Doc Ref. 10.11)).</p> <p>The governance of the ESBS includes a proposed multi-agency Steering Group that will approve the Implementation Plan and oversee its delivery.</p>	<p>We would continue to suggest that the creation of an ESBS Implementation Plan with shared governance - under section 106 - remains a condition of the DCO to ensure that the impact of the development is substantially positive.</p> <p>Whilst we have not been involved in the creation of the Draft Implementation Plan for the ESBS we would wish to be engaged in any further development activity to consolidate and approve this plan.</p> <p>There are some key omissions e.g. no mention of Independent Training Providers as yet in the partnership table and although there is mention of procurement opportunities, this does not include mention of employment and skills targets within GAL’s own procurement exercises and very little detail as yet regarding specific activities being supported. It is still very strongly focused on construction related employment – and doesn’t give consideration to the wider job creation potential of the additional runway – e.g. impact on employment in the wider visitor economy. It focuses on the existing</p>
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<p>currently working with “the Coast to Capital LEP Careers Hub to ensure young people in [GAL’s] region have access to employer insight and understand the potential opportunities open to them”. ESCC is pleased to note GAL’s work with the Careers Hub and requests confirmation as to how that work will continue and be secured in the Implementation Plan. ESCC is interested in how the ESBS will be governed and considers it would be helpful if the Implementation Plan provided was governed by a multi-agency board.</p> <p>Commitment required to the setting up of a multi-agency board for the ESBS. This is to ensure East Sussex’s needs and requirements are taken into consideration when developing business, skills and employment opportunities, so that these benefit neighbouring authorities in addition to adjoining authorities. Suggest this is made a condition of the DCO. This will need to take</p>		<p>labour/employment geographies and doesn’t explore whether there is scope for appealing to labour from a wider geography/new area where employment is needed, – or working with other transport providers in order to enable other labour to reach work at the Airport.</p> <p>It is not possible for us to approve a draft plan that lacks detail and in which we have not been involved. More detail is needed before we would be able to do so.</p> <p>ESCC Employment and Skills Team would wish to sit on the multi-agency Steering Group to shape, approve and implement the delivery of this plan, and would ask that future meetings are set well ahead, give sufficient time for input and responses from local authority partners, and enable hybrid or online participation.</p>
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	<p>into account the East Sussex Economic Strategy currently being developed.</p>		
<p>S2</p>	<p>Promoting tourism is mentioned in the ESBS. ESCC would encourage GAL to ensure there is a sustained promotion of East Sussex at the airport to support the visitor economy. ESCC require continued discussions with GAL to see how this can be achieved, and for any requirements to be included in the ESBS Implementation Plan.</p>	<p>One of the six themes of the ESBS is regional promotion, including tourism. The Applicant is continuing to meet with East Sussex and other local authorities to agree how to deliver the theme. More detail has been provided in the Draft Section 106 Agreement Annex: ESBS Implementation Plan (Doc Ref. 10.11) submitted at Deadline 3.</p>	<p>We would welcome Gatwick adopting the Local Visitor Economy Strategy for Growth and working in collaboration with Experience Sussex to deliver this, rather than developing a separate strategy.</p> <p>[REP3-103] Deadline 3 Submission - 10.16 The Applicant's Response to the ExA's Written Questions (ExQ1) - Socio-Economic Effects (SE1.10) - We would urge Gatwick to work closely with the LVEP on data capture to ensure a standard baseline approach to be adopted regionally and informed by the national Visit England/VisitBritain approach. This is likely to be a combination of different data sets to include:</p> <ul style="list-style-type: none"> - Air DNA - Lighthouse - Visit Britain/Visit England are working to build and improve data for LVEPs -and looking at central purchasing data such as mobile/ credit cards - ONS now provide some limited data sets

			<p>Whilst the Gatwick Gateway Partnership is recognised as one useful vehicle for brokering a shared approach to tourism promotion, ESCC would also wish to see active participation in the East Sussex, Brighton & Hove and West Sussex Local Visitor Economy Partnership.</p>
<p>C1</p>	<p>Under the IEMA GHG Assessment methodology used in the Environment Statement (ES), GAL is required to update the carbon assessment and assess all material emissions over the whole life of the proposed Scheme. If an exclusion is undertaken, this must be evidenced and be <1% of total emissions, and where all such exclusions total a maximum of 5%.</p>	<p>This issue is connected to the question of Well-to-tank emissions included in the referenced impacts below and the two issues are responded to together here.</p> <p>Within Section 2.11.2.1 of the Statement of Common Ground between Gatwick Airport Limited and East Sussex County Council [REP1-039] it is noted that the assessment has sought to develop a methodology to allow for the assessment of impact, and doing this within the context of the contextualisation exercise that forms part of the assessment.</p> <p>The assessment does not seek either to develop a Corporate Reporting Account for Gatwick Airport Ltd (which is informed by the GHG Corporate Protocol Standard) nor a Whole Life Carbon Appraisal for the Project for a full 120 years study period.</p> <p>It is not disputed that Well-to-tank emissions arise in the supply chain for fuels, and methodologies for estimating these (as an uplift to direct emissions) are well established.</p>	<p>The Legal Partnership Authorities note from the most recent National Networks NPS that whole-life cycle carbon assessments are not inconsistent with national budgets and the UK's carbon budgets as the Networks NPS now expects whole-life carbon assessments to take place.</p> <p>As noted in the Applicant's reply to support this request, they will now include Well To Tank (WTT) emissions for Construction, ABAGO, and Surface Access.</p> <p>In addition, the Applicant notes in its reply that it predicts that 30% of aviation fuel is refined in the UK, which could be material. Therefore, in line with the whole-life carbon assessment requirements, these emissions are within the boundary's scope and should be assessed.</p>

		<p>However, the approach adopted is based on the assessment process which contextualises emissions against a) the UK carbon budget and b) the Jet Zero Strategy.</p> <p>The RICS Guidance on Whole Life Carbon assessment currently in force dates from 2017. The revised guidance will come into force in July 2024. In neither of these is the assessment of User emissions (within Module B8) a mandatory item for inclusion. As such the assessment exercise within ES Chapter 16: Greenhouse Gases [APP-041] (as required by ANPS) captures a larger scope of emissions than is mandatorily required by RICS Whole Life Carbon assessment guidance by including surface access emissions from passengers, and by including emissions from aircraft.</p> <p>With regards to Well-to-tank considerations – this requires some care regarding the inclusion of WTT emissions arising from different sources when considered in the context of the assessment contextualisation within a UK framework.</p> <p>The context for Jet Fuel usage is specifically challenging due to the proportion of this fuel that is imported from outside the UK (approximately 70% in recent years – see https://www.gov.uk/government/statistics/petroleum-chapter-3-digest-of-united-kingdom-energy-statistics-dukes) and as a result WTT emissions</p>	<p>The Legal Partnership Authorities consider that the Applicant's approach to this issue will have a key bearing on the assessment of the result's significance due to the 5% carbon budget IEMA threshold that the Applicant is using.</p>
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		<p>would predominantly fall outside the scope of the UK carbon budgets and the Net Zero legislation. Additionally, the aviation strategy set out in Jet Zero does not include WTT within the main emissions calculation methodology. For these reasons WTT has been excluded from the aviation impact assessment. For consistency across the assessment methodology it was also removed from other aspects of the GHG assessment. However, it is acknowledged that the inclusion of WTT for Construction, ABAGO, and Surface Access would be useful for contextualisation against the UK Carbon Budgets. The WTT emissions for these will be calculated and provided at Deadline 4.</p>	
C2	<p>Excluding WTT is non-compliant with the globally recognised GHG Protocol Corporate Accounting Standard, the UK Government's carbon accounting methodology and the IEMA GHG Assessment methodology used in the ES. Under the IEMA GHG Assessment methodology used in the ES, the Applicant must update the assessment to evidence that exclusions are <1% of total emissions and</p>	<p>See response to C1 above.</p>	<p>Please see response above with regard to WTT emissions and whole life carbon assessment.</p>
C3	<p>Excluding WTT is non-compliant with the globally recognised GHG Protocol Corporate Accounting</p>	<p>See response to C1 above</p>	<p>Please see response above with regard to WTT emissions and whole life carbon assessment.</p>

	<p>Standard, the UK Government's carbon accounting methodology and the IEMA GHG Assessment methodology used in the ES.</p> <p>Under the IEMA GHG Assessment methodology used in the ES, the Applicant must update the assessment to evidence that exclusions are <1% of total emissions and where all such exclusions total a maximum of 5%.</p>		
C4	<p>GAL needs to update the transport assessment in compliance with the RICS methodology quoted in the ES to ensure shipping transport emissions are accounted for. This can then be used to inform appropriate transport efficiency mitigation measures as part of the ES Appendix 5.4.2: Carbon Action Plan [APP-091].</p>	<p>Please see the response to C1 above.</p> <p>At this stage the likely geographic source location for materials is not known. The assessment of GHG has assumed UK sourcing of materials with an average transport distance based on RICS guidance, considering an appropriate estimate of those materials sourced locally and those sourced nationally.</p> <p>With regards to quantification of impacts from construction of infrastructure – the majority of emissions are large quantities of bulk materials (aggregate, concrete etc) which will predominantly be sourced locally. While it might be expected some small portion (by mass) may be sourced outside the UK this is likely to be minor in comparison to the large quantities of bulk materials. Any underestimation would, therefore, be small and</p>	<p>On the basis that every effort will be made to source the materials from within the UK, the approach that has been taken is deemed to be acceptable.</p>

		<p>unlikely to be material to the conclusions of the assessment.</p> <p>The quantification of impacts from construction of buildings is based on typical embodied carbon metrics per m2 of floor area, within which a proportion of local, national, and international sourcing is already included.</p> <p>Assumptions used within the construction assessment are set out in ES Appendix 16.9.1: Assessment of Construction Greenhouse Gas Emissions [APP-191].</p>	
C5	<p>One of PAS2080:2023's foundational principles is that the earlier you implement it during the design process, the more likely it is that carbon can be reduced in the design. Hence, in alignment with this principle, GAL should implement PAS 2080:2023 with immediate effect within the design process to maximise carbon-saving opportunities.</p>	<p>Part of the commitment in the CAP is that the Applicant commits to being PAS 2080: 2023 certified as the asset owner. This means that the design stages will be covered by the approach set out in PAS 2080.</p> <p>In response to these comments, the Applicant has submitted the Construction Carbon Management Strategy (Doc Ref. 10.18) at Deadline 3 which sets out the work already undertaken and that planned to embed its approach to low carbon in construction into all relevant actions.</p>	<p>We acknowledge the submission of the PAS 2080: 2023 plan satisfies these requirements.</p>
C6	<p>GAL should provide passive provision of charging infrastructure within the Airport to support the anticipated uptake of electric vehicles.</p>	<p>The ES Appendix 5.4.1: Surface Access Commitments (SAC) [APP-090] set out how the Applicant's commitments to sustainable travel are binding under the DCO. Achieving the modes shares set out will significantly reduce surface transport emissions. Furthermore, the Applicant has invested or pledged over £1m to Metrobus in</p>	<p>The response does not address the previous comment (also covered in T8 below). Electric vehicle adoption is increasing and set to increase further under national targets.</p>

		<p>hydrogen buses for the local network serving the airport and has introduced an electric vehicle charging forecourt on airport. We are continuing to invest in charging infrastructure for passengers and staff within a wider strategy for EVs on the campus as part of our Decade of Change programme independent of the DCO. Decarbonisation of all surface transport is a matter for Government policy and the Applicant cannot mandate that all surface access journeys are by zero emission vehicles ahead of meeting those policy targets.</p>	<p>There will be demand from airport passengers to have access to facilities to enable their cars to be parked and fully charged upon their arrival from a return trip.</p> <p>It is, currently unclear how this demand will be served (Chargers in the car parks, Valet parking, Fast chargers etc.). Please can this be clarified.</p> <p>Consideration should be given to:</p> <ol style="list-style-type: none">1. Dynamic tariffs that support charging at off peak times, to lower congestion and to encourage use when the cost of energy grid carbon intensity is lowest2. Areas that support public charging exclusively (non-airport vehicles)3. Pre-bookable chargers4. Commercial charging for vehicles associated with the airport should have designated zones.5. Automated allocation of a specific charger on arrival (at busy times) . This will prevent the reserving of chargepoints by users for friends colleagues, improve fair use.6. Options that limit a charge to a specific percentage e.g. 80% times to support higher throughput.
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			Note: East Sussex is developing an Electric Vehicle Charging Strategy.
C7	If concluded technically and financially viable in the cost-benefit study, ESCC expect that GAL will implement BREEAM Excellent certification (for water and energy credits) into the scheme.	Sustainability accreditation schemes are one way of achieving sustainable outcomes in construction. Different schemes are available for different types of assets and covering different sustainability issues. GAL will consider whether the use of sustainability accreditation schemes will result in sustainability outcomes that may otherwise not be achieved.	It is appreciated that there are numerous accreditation schemes, but it would be useful to know which types of schemes are being considered if the BREEAM Excellent scheme cannot be committed to.
C8	GAL should explore options to support offsetting through planting local vegetation by funding the Local Nature Recovery Strategy to help offset the scheme's emissions and enhance biodiversity/ecosystem health and nature recovery	<p>At Gatwick today, through its Airport Carbon Accreditation Level 4+, the Applicant buys offsets covering residual Scope 1 and 2 GHG emissions (as well as business travel). In order for the Applicant to maintain its ACA certification, any offsets – removal and/or reduction – must be bought from schemes accredited by the ACA.</p> <p>ACA is the only global, airport-specific carbon standard which relies on internationally recognised methodologies. It provides airports with a common framework for active carbon management with measurable goalposts. The programme is site-specific allowing flexibility to take account of national or local legal requirements, whilst ensuring that the methodology used is always robust</p> <p>Details of Level 4+ available on the ACA website: https://www.airportcarbonaccreditation.org/about/7-</p>	Noted – no further comment.

		<p>levels-of-accreditation/ With a view to achieving Net Zero for Scope 1 and 2 GHG emissions by 2030 (under both its existing Decade of Change commitments, and the equivalent under the Carbon Action Plan as part of the Project), the Applicant is in the process of transitioning from use of carbon reduction offsets to carbon removal offsets instead (as the use of carbon removal offsets would not meet the definition of Net Zero). For 2023, GAL purchased 25% removal offsets and 75% reduction offsets.</p> <p>Furthermore, the Applicant is investigating the development of a local removal project, independent of the Project. Any such project will need to be accredited by the ACA.</p>	
A1	<p>ES Appendix 5.3.2: Construction Traffic Management Plan (CTMP) [APP-085] and Construction Workforce Travel Plan (CWTP) – An outline CTMP and an outline CWTP have been provided with the application. This is welcomed to mitigate adverse air quality effects associated with both construction traffic and construction work traffic, but additional information is required</p>	<p>This matter has not been raised in the Statement of Common Ground between Gatwick Airport Limited and East Sussex County Council [REP1-039], Written Representations by East Sussex County Council [REP1-188] or East Sussex County Council Deadline 2 Submission - Updated Principal Areas of Disagreement Summary Statement [REP2-043].</p> <p>The Applicant requests clarification on the additional information requested by East Sussex County Council</p>	<p>Noted. No further comment.</p>
A2	<p>Air Quality Action Plan (AQAP) - A combined operational air</p>	<p>This matter is included at 2.2.4.2 of the Statement of Common Ground between Gatwick Airport</p>	<p>No further comment, noting that an AQAP has been provided.</p>

	<p>quality management plan has not been prepared to draw together the Carbon Action Plan and Surface Access Commitments documents and to specifically focus on local air quality. Air Quality Action Plan (AQAP) - A combined operational air quality management plan has not been prepared to draw together the ES Appendix 5.4.2: Carbon Action Plan [APP-091] and ES Appendix 5.4.1: Surface Access Commitments [APP-090] documents and to specifically focus on local air quality. An AQAP is required to collate all the proposed air quality mitigation measures together, identify any further opportunities to maximise air quality benefits and avoid any unintended consequences.</p>	<p>Limited and East Sussex County Council [REP1-039].</p> <p>The Applicant has provided a draft air quality action plan (AQAP) at Appendix 5 of Deadline 2 Submission – 10.11 Draft Section 106 Agreement [REP2-004].</p>	
A3	<p>Aviation emissions are expected to be considered within the GAL AQAP. A wide range of mitigation measures for aviation sources are anticipated to be included e.g. Fixed Electrical Ground Power Supplies (FEGP) for new</p>	<p>This matter is included at 2.2.4.2 of the Statement of Common Ground between Gatwick Airport Limited and East Sussex County Council [REP1-039]. The Draft Outline AQAP which was shared with Local Authorities for comment on 26th March considers aviation mitigation measures and ultrafine particulate monitoring.</p>	<p>No further comment, noting that an AQAP has been provided.</p>

	Aircraft Stands, low emission vehicle standards. Discussions are also proposed on the inclusion of ultrafine particulate monitoring.		
T1	<p>Increasing opportunities to travel to the airport by bus/coach will reduce the number of car journeys and provide travel choices, thereby reducing carbon emissions and helping to meet decarbonisation and climate change targets.</p> <p>Upgrade and extend the current 261 bus route beyond East Grinstead providing a direct service between Uckfield and Gatwick Airport. Re-route the 261 bus service between Wych Cross and Forest Row, via Coleman's Hatch, so that it operates directly between Forest Row and Coleman's Hatch. Extend the operational hours of the 261 service to include early mornings, evenings and weekends. This will require a funding contribution from Gatwick Airport.</p>	<p>The bus and coach matters are included at Rows 2.20.4.8 to 2.20.4.12 of the Statement of Common Ground between Gatwick Airport Limited and East Sussex County Council [REP1-039]. The Applicant can confirm that a Sustainable Transport Fund will be available as set out in Commitment 13 of the Surface Access Commitments (SAC) [APP-090] and secured in the draft DCO S106 Agreement [REP2-004] (paragraph 4 of Schedule 3). The Applicant is committed to the mode shares set out in the SAC, and the Applicant will provide reasonable financial support in relation to the services identified from the strategic modelling work, or others which result in an equivalent level of public transport accessibility. Funding for bus and coach services is set out in the draft Section 106 Agreement [REP2-004] (paragraph 5 of Schedule 3).</p>	<p>For Gatwick the only commitment related to bus/coach access from East Sussex is a 2 hourly bus service from and to Uckfield via Forest Row and East Grinstead, enhanced to hourly at peak times.</p> <p>A 2 hourly service will not be adequately attractive to encourage modal shift and would substantially compromise service users journey planning arrangements. The service will need to hourly, running on 7 days a week, with ongoing funding from the applicant to be effective. This future service provision will need to be planned in consultation with ESCC, given that it provides funding support for the current 261 route (Uckfield-Forest Row-East Grinstead).</p> <p>ESCC is open to switching its funding for the 261 service and contributing towards the cost a replacement enhanced 261 service to/from Gatwick, subject to the Gatwick service also being able to</p>

<p>Introduce a Gatwick – Crowborough service. If Crowborough was to be linked directly to Gatwick, we recommend that this would best be delivered by providing a separate new route due to its geographical location and the limitations of the road network. ESCC considers that there would be scope for a Crowborough – Gatwick route to run via Forest Row and East Grinstead thereby, in combination with an Uckfield – Forest Row – East Grinstead – Gatwick service, doubling the frequency between Forest Row and Gatwick.</p> <p>ESCC request that bus service provision includes a direct link to Heathfield by extending the Uckfield – Gatwick service. This could integrate with the existing ESCC funded bus service between Heathfield and Uckfield. Improvements should be sought and secured through current and future iterations of Gatwick’s Airport Surface Access Strategy (ASAS) which is a document</p>		<p>provide from the needs of passengers currently using the 261.</p> <p>Diagram 11.3.1 in the TA purports to show passenger use by coach to access by Gatwick from various areas. It shows low to medium levels of use (from 5-10 users per day to 10-50 users per day) from Eastbourne and surrounding areas of South Wealden. This needs clarification as there are no passenger coach services from these areas to Gatwick. In fact there are no passenger coach services from any part of East Sussex to Gatwick.</p> <p>In light of information provided in the TA, to address the potential for passengers (and the employee catchments additionally shown in Diagram 11.3.2) then Gatwick should build on their commitment to funding a Gatwick-Uckfield bus/coach service and extend it to Eastbourne via Hailsham and Polegate.</p> <p>Discussions are ongoing regarding the most appropriate approach to securing transport mitigation measures.</p>
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	<p>produced as part of the Gatwick Forum Steering Group which includes East Sussex County Council along with other local transport authority representatives, rail and bus operators, and business representatives.</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. This will be important as airport passenger numbers increase, and public transport opportunities and demand increases.</p>		
T2	<p>Whilst the applicant has stated that 'Agreement has been reached with Natural England on the method used for the HRA assessment and Natural</p>	<p>The extent of the strategic traffic model includes Ashdown Forest, which is an agreed matter at Row 2.20.2.1 of the Statement of Common Ground between Gatwick Airport Limited and East Sussex County Council [REP1-039]. This matter is also</p>	<p>Comment noted and ESCC welcome further updates being provided through the SoCG.</p>

	<p>England's Relevant Representations detail that no further information is required with regard to the HRA assessment' (ES Appendix 9.9.1 Habitats Regulation Assessment Parts 1 and 2 [APP-134 & APP-135].). Regardless of the agreement with Natural England, we wish for an accurate assessment of the current and anticipated impacts needs to be established in order to understand what the impacts would be, regardless of whether or not they are significant. This is because we continue to have concerns over the fundamentals of the traffic data used for us to check that these conclusions are acceptable.</p>	<p>included at Row 2.20.4.7 for traffic impact, and Rows 2.2.3.2 and 2.2.3.3 for air quality in the Statement of Common Ground between Gatwick Airport Limited and East Sussex County Council [REP1-039]. The Applicant will continue to engage with ESCC on this matter and provide further updates to the SoCG in due course.</p>	
T3	<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.</p> <p>Any identified pressure(s) on the rail network should be mitigated accordingly,</p>	<p>A comprehensive assessment of the rail network has been undertaken as set out in Chapter 9 of the Transport Assessment [AS-079] and ES Chapter 12: Traffic and Transport [AS-076]. The rail network within the public transport model covers much of south and east England. The study area for the rail network is described in paragraphs 12.4.16 to 12.4.20 of ES Chapter 12: Traffic and Transport [AS-076] and focuses on the lines where the Project is likely to have the greatest impact. This approach</p>	<p>Network Rail is undertaking rail industry approved modelling (MOIRA demand assignment model) to establish the baseline growth rate of Brighton Main Line railway demand and provide data to evidence their position that the impact of the NRP on the railway network is material (contrary to Gatwick's conclusion).</p>

<p>including through improved infrastructure and services (where possible and in liaison with Network Rail and the train operator (Southern – GTR).</p> <p>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. This must be considered alongside wider demands for rail travel.</p> <p>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.</p>	<p>is in keeping with guidance and regulations set out in paragraph 12.4.11 of ES Chapter 12: Traffic and Transport [AS-076] to ensure that the emphasis is on explaining the significant environmental effects which are likely to be associated with the development and that the ES is proportionate. Discussions with Network Rail with regard to future demand and capacity are ongoing and it should be noted that the Applicant’s commitment to rail access has already resulted in considerable investment in railway infrastructure in recent years benefiting airport and non-airport rail users. Further funding would be available through the Sustainable Transport Fund, which the Transport Forum Steering Group is consulted on, including East Sussex County Council along with other local transport authority representatives, rail and bus operators, and business representatives. The Sustainable Transport Fund is secured in the draft Section 106 Agreement [REP2-004] (paragraph 4 of Schedule 3) and would be available to fund initiatives aimed at increasing the use of sustainable transport modes and in support of delivering the commitments in ES Appendix 5.4.1: Surface Access Commitments [APP-090]. Rail matters are included at Rows 2.20.3.1 and 2.20.3.2 of the Statement of Common Ground between Gatwick Airport Limited and East Sussex County Council [REP1-039].</p>	<p>We would support Network Rail should they determine a need for Gatwick to make a contribution to the railway via a ring-fenced rail mitigation fund as per their PADSS [REP2-058].</p> <p>Network Rail's view is that:</p> <p>(a) the applicant should provide a reasonable and proportionate contribution to mitigate the effects of airport-driven rail demand growth. Network Rail and GTR are best placed to advise on the mitigation</p> <p>(b) the absence of such a commitment is in conflict with Aviation Policy Framework which notes that <i>“The general position for existing airports is 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”</i> (p.75, para. 5.12).</p> <p>(c) A reasonable and proportionate contribution to mitigate the effects of airport-driven rail demand growth whether additional rail services and</p>
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	<p>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 the rail network, and consideration will subsequently need to be given as to how the impacts could be mitigated.</p>		<p>infrastructure are required to support the additional rail capacity arising from the NRP.</p> <p>Network Rail needs certainty that funding will be available and expects this to be secured via a ring-fenced rail-specific fund, or similar, to deliver the necessary interventions at the point they are required.”</p>
T4	<p>GAL needs to mitigate the impacts of additional rail passenger demand arising from the use of the northern runway through investment in the rail network. Network Rail are best placed to advise on the type of mitigation that would be appropriate. It is important that Network Rail's individual assessment of the impact of the proposed NRP on rail demand is undertaken and appropriate mitigation is introduced ahead of the commencement of any operational use of the NRP should it receive consent.</p>	<p>The assessment for the Project contained in Chapter 9 of the Transport Assessment [AS-079] and ES Chapter 12: Traffic and Transport [AS-076] shows that there would be no significant adverse impact on rail services which require mitigation. ESCC support for Network Rail's proposal to undertake independent modelling work is noted. Rail matters are included at Rows 2.20.3.1 and 2.20.3.2 of the Statement of Common Ground between Gatwick Airport Limited and East Sussex County Council [REP1-039].</p>	<p>ESCC understand that Network Rail are undertaking independent modelling to assess whether additional rail services and infrastructure are required to support the additional rail capacity arising from the NRP. Therefore, ESCC will provide further comments in relation to this, once this evidence is available.</p>

<p>T5</p>	<p>GAL needs to mitigate the impacts of the approaching traffic from the surrounding road network, including 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.</p>	<p>This matter is included at Rows 2.20.4.6 of the Statement of Common Ground between Gatwick Airport Limited and East Sussex County Council [REP1-039]. The transport modelling covers a large area which includes all roads in neighbouring Districts, as indicated in Diagram 5.3.3 of the ES Chapter 12: Transport Assessment [AS-076]. The assessment identified where traffic flow changes might occur across the modelled area as a result of the Project and the magnitude of impacts was also considered to understand the scale of impact at junctions and links within the model. This process is outlined in Chapters 5 and 12 of the Transport Assessment [AS-079] and in section 6.12 of Annex B – Strategic Transport Modelling Report of the Transport Assessment [APP-260]. The assessment results are presented in Section 12.8 of Annex B of the Transport Assessment [APP-260]. No further mitigation has been identified as being necessary in addition to the surface access improvement works which form part of the Project</p>	<p>The future year baseline has not been addressed. The JLAs do not agree that the future year, baseline without the project of 67mppa, is a reasonable forecast. Whilst this is being worked through with the Applicant and consultants (York Aviation), this has impacts on the assessment of the transport impacts of the project.</p> <p>ESCC supports WSCC's updated position on transport assessments on the surrounding road network to the airport, including:</p> <ul style="list-style-type: none"> • Junction capacity of North Terminal Signalised Junction – seeking a more detailed narrative around queue lengths for the North Terminal Signalised Junction, and that the applicant undertakes a LINSIG assessment for this junction. • VISSIM –seeking further information in relation to the VISSIM model including a summary of the demand matrix changes that have been applied to the model. We note that GAL have agreed to this request and are providing further info.
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			<ul style="list-style-type: none"> • Displaced traffic from the Strategic Road Network (SRN) to local road network –further information requested such as Select Link Analysis from the strategic model to better understand the potential for SRN traffic displacing onto the local road network. We note that some information in relation to this has been provided and is currently being reviewed. • The overall forecast future year impact has not been agreed as the above queries still need to be addressed.
T6	<p>A combined local transport authority approach whereby growth of the airport is only permitted when surface access commitments / targets have been met will be sought as part of Deadline 2 submission.</p> <p>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,</p>	<p>The Applicant’s mode share commitments within the ES Appendix 5.4.1: Surface Access Commitments (SAC) [APP-090] represent the position the Applicant is committing to achieve, based on modelling of mode choice and transport network operation with the Project in place. The SAC also includes a section on our further aspirations, which includes more ambitious mode share targets which the Applicant will be working towards, the Applicant has set the committed mode shares and the timescales within which they are to be achieved explicitly to ensure that the core surface access outcomes set out in ES Chapter 12: Traffic and Transport [AS-076] and in the Transport Assessment [AS-079] are delivered. The SAC sets out the monitoring strategy which is in keeping with the existing process for monitoring ASAS targets</p>	<p>Crawley Borough Council will be submitting a document on behalf of the JLAs at Deadline 4 on 15 May which will introduce into the Examination an outline of an Environmentally Managed Growth Framework (‘The Framework’). The Framework will set environmental thresholds to sustainably manage the growth of the airport. The Authorities are Crawley Borough Council, Horsham District Council, Mid Sussex District Council, Mole Valley District Council, Reigate and Banstead Borough Council, Tandridge District Council, East</p>

	<p>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.</p>	<p>and the development of Action Plans in consultation with the Transport Forum Steering Group.</p>	<p>Sussex County Council, Surrey County Council and West Sussex County Council. ESCC supports and endorses the submission of this document by CBC.</p>
<p>T7</p>	<p>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.</p> <p>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>The Applicant's mode share commitments within the ES Appendix 5.4.1: Surface Access Commitments (SAC) [APP-090] represent the position the Applicant is committing to achieve and includes a monitoring strategy. The Applicant has not proposed a specific mode share target for journeys to or from Kent, but the additional coach services to and from the County which are included in the SACs reflect the potential to shift journeys onto public transport from that area and are part of the measures that underpin the mode share commitments we are making. The SAC contains commitments to monitoring progress and, if necessary, taking additional actions to ensure that the mode share commitments are achieved. Sensitivity testing for a situation in which the mode share commitments are not achieved is therefore not necessary.</p>	<p>ESCC supports KCC's updated position following the Applicant's answers to the Examining Authority's written questions TT.1.13 and TT.1.35: <i>in confirming that their requested mode share sensitivity tests have not been carried out, and that their concerns would be covered by the monitoring and reporting procedures outlined in the updated Surface Access Commitments [REP3-028].</i></p> <p>The submission from National Highways on this point in their D3 Submissions '<u>Comments on further information/submissions received by Deadline 2'</u> (REP3-140) and have commented on KCC's PADSS Tracker is also noted, which states the following:</p> <p><i>"National Highways notes the representations made by Kent</i></p>

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.

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>T8</p>	<p>GAL must ensure that EV charging in airport car parks meets anticipated demand, using scenarios for EV adoption from the Government's 2023 Transport Decarbonisation Plan.</p> <p>Issues for GAL to consider:</p> <ul style="list-style-type: none"> - Dynamic tariffs that support charging at off peak times, to lower congestion and to encourage use when the cost of energy grid carbon intensity is lowest - Areas that support public charging exclusively (non-airport vehicles) - Pre-bookable chargers - Commercial charging for vehicles associated with the airport should have designated zones. - Automated allocation of a specific charger on arrival (at busy times). This will prevent the reserving of charge points by users for friends colleagues, improve fair use. - Options that limit a charge to a specific percentage e.g. 80% times to support higher throughput. 	<p>This matter is included at Row 2.20.5.4 of the Statement of Common Ground between Gatwick Airport Limited and East Sussex County Council [REP1-039].</p> <p>The Applicant will keep the provision of EV charging infrastructure in airport car parks under review to ensure continued compliance with relevant Government policy</p>	<p>No further comment.</p>
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<p>H1</p>	<p>A Health Impact Assessment (HIA) should outline population health impacts for East Sussex. Appropriate mitigation should be proposed and provided to protect population health and any impact on local services and infrastructure. While there is not a statutory duty on the applicant to do so. In the case of this project - given the size, duration of construction, proximity to communities and far reaching disruption as well as ongoing operational increase in activity on completion - we would strongly recommend an HIA be carried out for East Sussex and each affected local authority area. This would ensure that the local health impacts for each area can be clearly identified and communicated. Without independent HIA's it is not possible to understand the health impacts on each of the populations. The health impacts will vary greatly across the authority areas, and so it is important that this is made clear and presented</p>	<p>The Applicant's position that ES Chapter 18: Health and Wellbeing [APP-043] is a full Health Impact Assessment is detailed further in the Deadline 1 Submission 10.9.4, the Applicant's Response to Actions from Issue Specific Hearing 3: Socio-economics, Action Point 6 [REP1-064] ES Chapter 18: Health and Wellbeing [APP-043] signposts to and sets out appropriate mitigation to protect population health and any impact on local services and infrastructure. See for example Section 18.7 and Table 18.7.1 of ES Chapter 18: Health and Wellbeing [APP- 043].</p> <p>The UK Health Security Agency (UKHSA) and the Department of Health and Social Care Office for Health Improvement and Disparities (OHID) are the national statutory stakeholders for public health, and were previously collectively Public Health England. UKHSA and OHID in their combined relevant representation [RR- 4687] of October 2023 confirm that: "Following our review of the submitted documentation we are satisfied that the proposed development should not result in any significant adverse impact on public health".</p> <p>These Government organisations have a particular role and technical expertise in relation to health inequalities and they are satisfied with the current assessment</p>	<p>ESCC remain concerned over the health impacts of the NRP on East Sussex communities. In order to give this matter the consideration it warrants, we respectfully request that we submit our views on this issue at the next Deadline (5).</p>
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<p>transparently rather than integrated within an existing environmental statement chapter.</p> <p>Note: GAL have stated that their Environmental Statement Chapter 18: Health and Wellbeing (Doc Ref. 5.1) sets out the study areas in Section 18.4, paragraph 18.4.8 (pdf page 25/214). East Sussex is part of the 'Six Authorities Area'. These are local level effects that are summarised at paragraph 18.11.9 (pdf page 178/214), with measures to reduce adverse impacts and increase beneficial effects discussed in the respective sections of section 18.8 that deal with each of these determinants of health.</p>		
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<p>H2</p>	<p>The noise and vibration impacts on health and well-being of local communities need further consideration and appropriate mitigation measures need to be identified. There is a need to consider vulnerable groups within this, that may be more affected by the impacts of noise (and vibrations).</p>	<p>ES Chapter 14: Noise and Vibration [APP-039] sets out the primary analysis of noise on local communities and discussion of appropriate mitigation.</p> <p>ES Chapter 18: Health and Wellbeing [APP-043] section 18.8 sets out the assessment of Health and Wellbeing Effects from Changes in Noise Exposure. Specific regard is given to vulnerable groups, which are listed at paragraph 18.8.107. Table 18.7.1: includes specific mitigation measures to support uptake of the ES Appendix 14.9.10: Noise Insulation Scheme [APP-180]. for local vulnerable groups. These are set out in ES Appendix 14.9.10, paragraph 4.1.15.</p> <p>ES Chapter 18: Health and Wellbeing [APP-043] concludes, paragraph 18.8.223 “Overall, the minor adverse noise scores reflect that, whilst any increase in aviation (both air noise and ground noise) and surface access noise may be considered detrimental to some degree for public health, ie not negligible, the change due to the Project is not significant for population health in EIA Regulation terms.”</p> <p>It is noted that the UKHSA conclude [RR-4687]: “Following our review of the submitted documentation we are satisfied that the proposed development should not result in any significant adverse impact on public health”.</p>	<p>Departures along the 08SFD and 26WIZ routes that overfly Wealden District will experience an increase in aircraft movements as a result of the proposed expansion. Aircraft noise contours for the worst-case 2032 scenario [APP-064] do not stretch as far as Wealden so it is outside the Lowest Observed Adverse Effect Level. Consequently, although aircraft noise is audible in Wealden District, it is not of sufficient magnitude to result in adverse effects on health and quality of life.</p> <p>However, we remain concerned over the impact this will have on local communities, notably after 23:00 and before 06:00. Gatwick has confirmed that it is their ‘intention’ that these night flight restrictions will take place.</p>
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		ES Chapter 14: Noise and Vibration [APP-039] includes an assessment of vibration from construction work (paragraphs 14.9.64 and 14.9.65) and confirmation of the very limited potential for operational vibration impacts (Table 14.3.1).	
D1	Concern that the increase in night flights will impact on dark skies and be in conflict with policy outlined in local protected landscape strategies e.g. High Weald, South Downs National Park.	This issue has been previously addressed at Row 2.14.3.1 of the Statement of Common Ground between Gatwick Airport Limited and East Sussex County Council [REP1-039].	This matter is under discussion in the current version of the Statement of Common Ground (SOCG) and will be further considered ahead of the next Deadline 5 submission when the SOCG will be updated.

	<p>Whilst Gatwick Airport's assessment deems there to be minor adverse effects (see excerpt below) any effect should be appropriately mitigated as this could have an impact on the protected landscapes below.</p> <p>The increase in overflights at up to 7,000 feet, compared to the future baseline scenario in 2032, is estimated to be up to approximately 20% during daytime and up to 10% during night time, which is considered to result in minor adverse effects (see Table 8.8.1)</p>		
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