



**Horsham
District
Council**



GATWICK AIRPORT NORTHERN RUNWAY PROJECT

Planning Inspectorate's Reference: TR020005

Legal Partnership Authorities

Comments on The Applicant's Response To The ExA's Written Questions (ExQ1)

Response to [\[REP3-104\]](#) | Traffic and Transport

DEADLINE 4: 15 May 2024

Crawley Borough Council (GATW-AFP107)

Horsham District Council (20044739)

Mid Sussex District Council (20044737)

West Sussex County Council (20044715)

Reigate and Banstead Borough Council (20044474)

Surrey County Council (20044665)

East Sussex County Council (20044514)

Tandridge District Council (GATW-S57419)

Legal Partnership Authorities' Comments on the Applicant's Responses To The ExA's Written Questions (ExQ1)

Response to [\[REP3-104\]](#) | Traffic and Transport

The Legal Partnership Authorities are comprised of the following host and neighbouring Authorities who are jointly represented by Michael Bedford KC and Sharpe Pritchard LLP for the purposes of the Examination:

- Crawley Borough Council
- Horsham District Council
- Mid Sussex District Council
- West Sussex County Council
- Reigate and Banstead Borough Council
- Surrey County Council
- East Sussex County Council; and
- Tandridge District Council.

In these submissions, the Legal Partnership Authorities may be referred to as the "*Legal Partnership Authorities*", the "*Authorities*", the "*Joint Local Authorities*" ("*JLAs*") or the "*Councils*". Please note that Mole Valley District Council are also part of the Legal Partnership Authorities for some parts of the Examination (namely, those aspects relating to legal agreements entered into between the Applicant and any of the Legal Partnership Authorities).

Introduction

1. The Legal Partnership Authorities have now had the opportunity to review the Applicant's responses to ExQ1 in conjunction with their specialist consultants and legal advisors.
2. The Applicant provided their response to ExQ1 in the form of 19 separate written submissions to the examination together with annexes. For the ExA's ease of review, the Legal Partnership Authorities set out their comments on the Applicants responses in the final column of the table below.
3. Where the Legal Partnership Authorities have decided not to comment on one of the Applicant's responses, this question has been deleted from the table below.
4. For the avoidance of doubt, where the Legal Partnership Authorities have decided not to comment on one of the Applicant's responses this should not be taken to indicate that the Legal Partnership Authorities agree with the response.

ExQ1	Question to:	Question and Applicant’s Answer	Legal Partnership Response
TT.1.2	The Applicant	<p>Sustainable Transport Fund</p> <p>Paragraph 8.4.22 of the Planning Statement [APP-245] describes several measures to reduce the potential for impacts on traffic and transport. Reference is made to a Sustainable Transport Fund, established under the existing Gatwick s106 agreement and to a new contingent transport fund.</p> <p>Would the Sustainable Transport Fund continue to operate in the future? Explain what the contingent transport fund is, what funding it would have and how it would be secured through the dDCO?</p> <hr/> <p>The Sustainable Transport Fund (“STF”) would continue to operate in the future and is secured under the draft DCO s106 agreement [REP2-004] at paragraph 4 of Schedule 3. The STF is mode neutral and has been used in the past to support active travel improvements, bus services and rail infrastructure in support of our sustainable transport objectives.</p> <p>The contingent fund is the new Transport Mitigation Fund (“TMF”) described in the Surface Access Commitments [APP-090] (Commitment 14) and secured under the draft s106 agreement [REP2-004] at paragraph 10 of Schedule 3. The TMF is to support any further interventions identified as necessary to mitigate an</p>	<p>The Joint Local Authorities (JLAs) are of the opinion that a s106 obligation is not necessarily the most appropriate and enforceable means of providing the Sustainable Transport Fund (STF). The STF is just one mechanism by which the Applicant proposes to achieve compliance with and ensure adequate funding for the Surface Access Commitments (SACs). The Applicant has explained to the JLAs that it has been included in the s.106 agreement as an assurance that the SACs will be delivered. Whilst these assurances are welcomed, the JLAs consider that how the SACs may be funded (such as through the STF) would best be included within the SACs document itself, rather than the s106 agreement. The key point is that the airport operator will be expected to meet its SACs irrespective of the level of funding to be provided and how this is to be secured. The JLAs have proposed to the Applicant that this measure be included within an updated SACs document and that discussion is under way.</p> <p>The JLAs accept the principle of having a TMF as a truly unforeseen circumstances mitigation fund. The Authorities have provided comments on the draft s.106 agreement and have some concerns with current proposals as to how the TMF will operate practically. These can be summarised as follows:</p> <ul style="list-style-type: none"> - The JLAs do not agree that only GAL should be able to make a recommendation as to whether an application to the fund should be considered.

ExQ1	Question to:	Question and Applicant’s Answer	Legal Partnership Response
		<p>unforeseen or unintended impact. Further detail in respect of the Transport Mitigation Fund is provided in response to TT.1.29 below.</p>	<ul style="list-style-type: none"> - The determination of any proposal should take place within 6 months, rather than 1 year in order to ensure mitigation is in place in a timely fashion. <p>The JLAs also consider that some matters do not constitute unforeseen circumstances’ and therefore need to be part of a separate contribution in order to mitigate the impacts of the development.</p>
TT.1.3	The Applicant	<p>Gatwick Parking Provision – Comparison with Other South East Airports</p> <p>How does Gatwick compare with other south east airports in terms of car parking provision both on site and authorised off site when looked at ratio for each mppa. Provide a table showing this comparison.</p> <p>UK airports do not routinely provide information on authorised off-airport car parks as these are matters for local planning and are generally, though not exclusively, operated by third parties. Publication of information for the capacity of on-airport parking provided by the airport operator is not required under existing Government guidance in relation to an Airport Surface Access Strategy though most airports provide summary information on staff and passenger parking capacity. The following table (Table 1) is drawn from available, published information and provides a ratio for number of spaces per million passengers per annum (spaces/mppa)</p>	<p>The Applicant has confirmed through [REP3-106] that reference to ‘on-site’ car parking (40,600) spaces in the Table accompanying this answer refers only to GAL-operated car parks within the airport boundary. As such, the figure excludes 4,694 authorised on-airport spaces that are not operated by GAL. The Authorities’ wider concerns regarding the implications of this are set out in the West Sussex Deadline 4 submission.</p>

ExQ1	Question to:	Question and Applicant's Answer				Legal Partnership Response
		<p>for London Gatwick, London Luton and London Stansted airports. Data for London Heathrow is not directly available as published information in connection with development proposals is provided for passenger and staff spaces combined.</p>				
		<p>Airport</p>	<p>mppa</p>	<p>On-site car pax parking spaces</p>	<p>No. of spaces per mppa</p>	
		<p>Gatwick (2019)</p>	<p>47</p>	<p>40,600</p>	<p>863</p>	
		<p>Gatwick (Future Baseline)</p>	<p>67</p>	<p>46,350</p>	<p>692</p>	
		<p>Gatwick (With Project)</p>	<p>80</p>	<p>47,450</p>	<p>593</p>	
		<p>Luton Airport (2019)*</p>	<p>18</p>	<p>10,550</p>	<p>586</p>	

ExQ1	Question to:	Question and Applicant's Answer				Legal Partnership Response
		Luton Airport (With Project)*	32	16,000	500	
		Stansted Airport (2019)	28	26,800	957	
<p>Table 1 Car parking figures for London Gatwick, London Luton and London Stansted airports</p> <p>* Taken from London Luton Airport Expansion Transport Assessment Appendix H (TR020001/APP/7.02)</p> <p>It should be noted that the parking capacity provided is related to car mode share, passenger mix, airline and destination mix (short haul/long haul), location, pricing and other factors meaning a direct comparison is misleading. However, in all cases it would be expected that the ratio of spaces/mppa gradually declines over time as mode share changes and airports succeed in promoting more sustainable travel modes. Further information on London Gatwick's on-airport car parking is provided in the Car Parking Strategy [REP1-051] document submitted at Deadline 1.</p>						

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TT.1.4	The Applicant	<p>Zero Traffic Growth Option for the Proposed Development</p> <p>Numerous RRs have mentioned that growth at Heathrow would be on the basis that there would be no associated traffic growth. Explain why you have not adopted this approach at Gatwick.</p> <hr/> <p>Paragraph 6.1.5 of Written Summary of ISH4 Oral Submissions from ISH4 Surface Transport [REP1_059] provides a post-hearing note on the response to the queries on no car traffic growth, which is reiterated below.</p> <p>The Applicant already achieves a very high mode share by rail where passengers and staff have access to rail services, in particular for journeys to and from London. However, there are other areas within the catchment of the Airport that are currently less well served by public transport and the Applicant is committing to significant investment in public transport to provide an alternative, sustainable mode of access for journeys to and from those areas, aiming to reduce car and taxi mode shares.</p> <p>Nevertheless, in the process of developing the Surface Access Commitments [APP-090], the analysis based on the transport models showed that it would be unrealistic to assume that no additional journeys would be made by road. Detailed modelling, shared with stakeholders through the DCO Application and wider</p>	<p>The Legal Partnership Authorities wish to understand what is driving the statement that <i>'it would be unrealistic to assume that no additional journeys would be made by road'</i>.</p> <p>Is it an unwillingness to increase parking / forecourt access charges or that buses seem incapable of solving public transport demand or the rail provision is deemed at capacity? SCC are concerned that this renders the existing targets challenging and the aspirations as meaningless.</p> <p>The assessment only shows that there would not be significant adverse environmental effects or operational effects related to congestion if the SAC are met. We have not seen the impacts if the SAC are not met. Furthermore, our LIR highlights locations where further mitigation is required but has not been proposed.</p>

ExQ1	Question to:	Question and Applicant's Answer	Legal Partnership Response
		<p>engagement, highlights the measures required to achieve the Applicant's mode share commitments and indicates that it would not be possible to achieve higher levels of public transport mode share across the whole passenger catchment area.</p> <p>The Applicant notes that it currently achieves a higher public transport mode share than Heathrow and the Surface Access Commitments [APP-090] go further than the public transport mode shares which were "expected" for Heathrow in the Airports National Policy Statement (paragraph 3.51).</p> <p>The assessment shows that with the Project (including the associated surface transport interventions and the proposed highway works) there would not be significant adverse environmental effects or operational effects related to congestion, and it is therefore not necessary to achieve a "no more traffic" position in order to mitigate the effects of the Project.</p>	
Transport Assessment			
TT.1.6	The Applicant	Paragraph 6.2.10 addresses passenger mode share. How are remote off airport parking passengers considered in the mode share	

ExQ1	Question to:	Question and Applicant's Answer	Legal Partnership Response
		<p>(authorised off airport parking, park (on street or public car park) and bus, taxi or walk). Is there any data on these passengers?</p> <p>Remote off airport parking passengers are considered in the mode share based on the available information contained with the CAA data. This records up to three sequential mode stages in relation to the journey to the airport with the last mode recorded being generally used as the main mode of access.</p> <p>Within the Private Car mode category, this identifies private parking provided off airport which is considered as authorised off airport parking. There is no distinction in the classification to identify those that may park off site in public car parks or on street and use buses, taxis or walk into the airport. In the 2016 CAA data, where car is listed as mode 1 and followed by a public transport mode or other, this amounts to 4.4% of overall travel which is 3% Car to Rail/Tube, 1% Car to Bus/Coach and less than 0.5% Car to Taxi. In all instances it was assumed that these combinations related to drop off at facilities such as stations or bus stops remote from the Airport and that the final leg represented the majority of the journey. In the transport modelling, the final leg is normally used as the main mode of transport on arrival at the Airport, so trips recorded like this would be considered as rail/tube, bus/coach or taxi accordingly. This is the conventional approach in working with the CAA data used at other airports in the UK. No other data was identified that covered off</p>	<p>The Legal Partnership Authorities query what the question in the CAA survey asks for main mode of transport.</p> <p>Whilst 4.4% is relatively small overall, the correct allocation of these people to modes is vital to ensure that the SAC targets are robustly met. Note that the dual mode journey could equally be a long drive to Three Bridges station to avoid the forecourt charge. The Authorities require further information in this regard.</p>

ExQ1	Question to:	Question and Applicant's Answer	Legal Partnership Response
		<p>airport use of public or on street parking, nor to distinguish the length of variable mode journeys to identify whether the final mode was the dominant mode used.</p>	
TT.1.9	The Applicant	<p>Paragraph 6.7.11 states that there are currently approximately 46,700 car parking spaces 'on-airport' and a further 21,200 authorised spaces 'off-airport'.</p> <p>Does off airport parking including on street? If not have any surveys/ analysis been undertaken to ascertain off-site parking including on street and other not specifically authorised parking places (eg, private parking areas such as drives and forecourts managed via web applications). Can any analysis be submitted so the ExA can understand the scale and extent of this parking provision?</p> <p>The authorised off-airport spaces referred to are in dedicated authorised off-street car parking facilities, operated by third parties expressly for the purpose of providing airport-related parking. Users of these sites are transferred by bus to the Airport terminals by the car park operator.</p> <p>On-street parking is not specifically or solely available for airport parking and is controlled only by traffic regulation orders and other planning restrictions. The Applicant engages with local planning and highway authorities, town councils and parish councils on a regular</p>	<p>The Applicant has confirmed through REP3-106 that its reference to 'on-site' car parking spaces refers only to GAL-operated car parks within the airport boundary. Where spaces not operated by GAL are located on-airport (i.e. within the Crawley Local Plan airport boundary) the applicant is incorrectly counting these as 'off-airport'. This approach means that 4,694 authorised on-airport spaces (not operated by GAL) are being excluded from the Applicant's calculations. The Authorities wider concerns regarding the implications of this are set out in the West Sussex Deadline 4 submission.</p> <p>SCC is concerned that the wording of the CAA survey means that parking in a residential road near a Gatwick bound bus stop or rail station is not necessarily picked up. SCC is concerned that this practice does happen and these unsustainable journeys, where the majority of the journey is made by car, are potentially missing from the data.</p>

ExQ1	Question to:	Question and Applicant’s Answer	Legal Partnership Response
		<p>basis with respect to off-airport parking activity and has conducted parking beat surveys in the past to ascertain the locations and extent to which on-street parking associated with the Airport occurs. It is noted that it is not possible to determine with certainty if a car parked on-street has carried airport passengers, airport staff or is there for non-airport reasons. On-street parking and use of private driveways and other premises for informal parking “rental” offered by local residents is not found to be significant in the amount of airport parking activity relative to on-airport and off-airport authorised parking sites or control of unauthorised sites that are subject to planning enforcement activity.</p> <p>Further information is available in the Car Parking Strategy [REP1-051] document submitted at Deadline 1.</p>	
TT.1.10	The Applicant	<p>Paragraph 6.10.7 sets out the car parking assumptions in the future baseline. With respect to these assumptions, explain the following:</p> <ul style="list-style-type: none"> a) How are on airport car parking spaces controlled to these limits? b) How would the Applicant control occupancy of off-site airport parking to 87.5% of capacity? <p>There is no mention of other offsite parking including on street and other not specifically authorised parking places (eg, private parking</p>	<p>The Local Authorities disagree with the Applicant’s response, as the current S106 agreement between GAL/CBC/WSCC does provide control, as it requires the airport operator to provide “sufficient but no more parking than necessary to achieve a combined on and off airport supply that is proportionate to that is proportionate to 48% of non-transfer passengers choosing to use public transport for their journeys to and from the airport by end of 2024”</p> <p>However, the nature of this control would (if not complied with) necessarily be via legal recourse, highlighting a reason why the authorities are seeking</p>

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		<p>areas such as drives and forecourts managed via web applications). What assumptions have been made about this parking supply?</p> <p>a) There is no control/limit on parking spaces imposed on the Applicant under any planning permission or agreement. On-airport car parking capacity is reported each year to Crawley Borough Council, in accordance with the Applicant’s 2022 Section 106 agreement. This provides information on the type of parking being provided (mix of self park and block park) and locations. Surveys of cars parked provide a level of occupancy at the time of survey, noting that this will be very variable over time. Block parking, which allows for more cars to be parked per hectare than self-park, is used more during peak seasons in response to passenger demand and customer preferences for different products.</p> <p>The Applicant uses pricing to ensure car parks are used efficiently and in balance with its surface access strategy and goals for sustainable travel. The Applicant operates several different parking products, retaining some capacity in each for passengers to park on the day (“roll-up”) without booking in advance (“pre-book”). Peak parking capacity, being the maximum amount of capacity that the Applicant is able to release for pre-book and roll-up customers, occurs during the summer peak period. The future baseline sets out the</p>	<p>greater control (via Environmentally Managed Growth) through the planning process to ensure that the SACs are met moving forward.</p> <p>The Local Authorities reiterate previously stated concerns regarding the Applicant’s omission of existing on-airport spaces where these are not operated by GAL.</p>

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		<p>expected peak capacity that could be available for both self-park and block-park spaces based on the parking products available.</p> <p>b) The Applicant monitors the demand for parking capacity to inform pricing and availability, noting the extent to which each parking product is pre-booked over the summer peak period. The Applicant does not “control” occupancy to 87.5% occupancy, this is the level of efficiency that it believes it is reasonable to operate on a regular basis by monitoring bookings and varying pricing. This level of occupancy is considered the practical maximum level that can be reliably achieved whilst still retaining some flexibility for roll-up demand and operational requirements. Through annual monitoring and working closely with local planning authorities this approach has worked successfully as the airport has grown and has not prevented sustained increases in public transport mode share during that time. This has not required any controls or limits for on-airport parking outside of permitted development rights.</p> <p>The Applicant does not control occupancy of off-airport capacity, nor does the DCO seek to do so. Data indicates that off-airport providers have typically operated up to this level of occupancy so this figure was used to reflect this capacity in the transport models, ensuring those passengers</p>	

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		<p>that travel by car were allocated to each available authorised car park according to its practical capacity. Requests for additional capacity would require planning permission.</p> <p>In relation to on-street and on-driveway parking, please refer to the response to question TT.1.10.</p> <p>Further information is available in the Car Parking Strategy [REP1-051] document submitted at Deadline 1.</p>	
TT.1.12	The Applicant	<p>Paragraph 7.3.9 addresses staff parking. Is it correct that staff parking charges will only be used if modal targets are not being met? What incentives are proposed for staff using public transport and active travel modes and how would these be secured?</p> <p>The Applicant already charges on-airport businesses for access to staff parking (to cover maintenance and other costs). However, these charges are not necessarily passed on to individual staff members so may not drive a change in behaviour. Direct charging is one of a number of measures that may be used to help drive the change in behaviour required to meet mode share targets but other measures will and are being used as well. Measures such as discounted travel by public transport, car share schemes, incentives for active travel including “Ride to Work” schemes are all supported</p>	<p>The present level of staff travel by public transport is lower than the existing ASAS target and the proposed SAC target. The Legal partnership Authorities wish to understand what measures will be applied in the immediate term to address this.</p> <p>The response from the Applicant is noted, with their view being that various measures to encourage staff to travel via sustainable and active means will be implemented to meet the targets within the SACs.</p> <p>The Applicant states that placing constraints on specific measures to be introduced would be counterproductive. It should be noted though that within the strategic model a charge of £5 for access to staff parking for single occupancy vehicles has been assumed and is therefore ingrained in the overall approach and has clearly influenced the modelled results.</p>

ExQ1	Question to:	Question and Applicant's Answer	Legal Partnership Response
		<p>under the current Airport Surface Access Strategy and accompanying Action Plan.</p> <p>The Applicant has a commitment to promoting sustainable modes and invests through the Sustainable Transport Fund to improve public transport services and provide incentives (such as discounted bus, coach and rail travel). This will continue as part of the Project, secured through the s106 Agreement (see response to question TT.1.2 above). In addition, the SACs (secured through Requirement 20 to the draft DCO) provide the sustainable outcomes against which the combination of measures for staff travel is secured in the DCO ensuring the Applicant, in consultation with stakeholders, can be flexible on the most appropriate blend of measures to use to meet the mode share targets. Placing constraints now on which measures are used in the future would be counterproductive as the approach should be adaptable to the cohort of staff and travel choices available at the time the DCO requirements are triggered.</p>	<p>The Highway Authority remains concerned that the commitments in the SACs are vague and lack specific detail as to what measures are to be implemented.</p>
TT.1.13	The Applicant	<p>Paragraphs 8.1.12 and 8.1.13 outline the assessments supporting the Preliminary Environmental Information Report (PEIR) and those contained in the TA. The PEIR assessment was based on more robust modelling and the scenario in the TA reflects "a more reasonable and likely scenario." Have any other sensitivity tests been undertaken to ensure the scenario presented in the TA is robust?</p>	<p>The Authorities would like to see a list of sensitivity tests undertaken and who they have been shared with. We do not believe that we have seen any despite requests.</p>

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		<p>The paragraphs identified acknowledge a small change in approach relating to the treatment of seasonality. As set out in paragraph 8.1.12 of Transport Assessment [AS-079] the modelling for PEIR was "unrealistically onerous". The move to using June as the basis for the assessment creates a more reasonable and likely scenario. This was discussed at ISH4 and considerations related to this seasonality point are set out in Appendix B of The Applicant's Response to Actions - ISHs 2-5 [REP2-005].</p> <p>During the development of model forecasts, and through discussions with key stakeholders including National Highways and SCC and WSCC, some sensitivity analysis was undertaken to help understand specific topics in more detail and to help build confidence in the forecasting process, assumptions and outputs. As an example, through discussions with National Highways, a test which explored a 10% increase in airport traffic was undertaken to understand the sensitivity of the model in terms of performance of the network, particularly at M23 Junction 9, and the resilience of the proposed highway works to traffic flows greater than those forecast through the core modelling process.</p> <p>The Applicant has also undertaken sensitivity testing for post-Covid travel behaviour, following guidance issued by the DfT in an updated version of TAG Unit M4. These sensitivity tests for the strategic model are reported in Accounting for Covid-19 in Transport</p>	<p>Sensitivity tests for the future years 2032 and 2047 are presented in Post-Covid VISSIM Sensitivity Tests for 2032 and 2047, however the title states years 2023 and 2047. This error should be corrected to prevent confusion.</p> <p>The comments made previously in November 2023 by SCC that remain are:</p> <ol style="list-style-type: none"> 1) Network should be extended to cover the junctions along the A23 and A217 as previously requested by SCC; and 2) Junction specific results should be provided. <p>The above information will help to understand how the proposals will mitigate increases in traffic flows through Longbridge Roundabout and beyond.</p>

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		<p>Modelling [AS-121]. Post-Covid sensitivity tests have also been undertaken using the VISSIM model, to address requests from National Highways, which are reported in Post-Covid VISSIM Sensitivity Tests for 2032 and 2047 (Doc Ref. 10.19) which is being submitted at Deadline 3</p>	
TT.1.14	The Applicant	<p>Paragraph 9.1.1 explains that Chapter 9 of the TA provides an assessment of the rail network in terms of crowding in the future baseline and with Project scenarios.</p> <p>Is all the modelling undertaken based on timetabled services? Has any account been taken of cancellations and actual performance against timetabled services?</p> <hr/> <p>All of the rail modelling is based on timetabled services or where new services are proposed and not within the timetable, the anticipated hourly frequency, following TAG Guidance in Unit M3.2 Public Transport Assignment. No account has been taken of cancellations and actual performance against timetabled services on the basis the timetable reflects the operators' anticipated operating plans. We are continuing to discuss rail crowding analysis and assumptions with Network Rail and are seeking engagement with GTR and will update the ExA accordingly within the SoCG due at Deadline 5.</p>	<p>The Authorities refer to Network Rail statements in [REP1-090] that the rail timetable is not at pre-Covid levels and that there is no funding ear-marked to return to this level of rail provision.</p> <p>The Covid test showed the impact of this reduced rail provision, resulting in missed SAC targets.</p> <p>The Authorities would like it confirmed that the post-Covid rail timetable, unless changed, would be the default timetable and that failing to meet the SAC target as a result of this level of service rather than the pre-Covid level of service, is not considered to be a matter outside of GAL's control.</p>

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TT.1.15	The Applicant	<p>Chapters 9 and 10 of the TA address Rail and Station modelling. Given the concerns about the rail and station capacity modelling detailed in the WR from Network Rail [REP1-090] and Govia Thameslink Railway [REP1-185], provide a timeline for response/ resolution to these concerns to be submitted into the Examination.</p>	<p>The Authorities await the submission at Deadline 5.</p>
		<p>The Applicant is continuing to engage with NR and GTR to discuss matters relating to the rail crowding assessment and station capacity modelling. A meeting was held on 11th April between all parties to discuss the station modelling and rail crowding assessment. Network Rail is undertaking additional technical work and the parties will continue to have a series of engagement sessions around station capacity and rail crowding during April and May. This ongoing dialogue and active engagement from all parties is working towards the update of the SoCG for Deadline 5.</p>	
TT.1.16	The Applicant	<p>Paragraph 11.3.14 states that the future baseline scenarios in the model reflect measures GAL is proposing to take together with the expected commercial response of the bus and coach industry to increased demand. How are the improvements listed being secured?</p>	<p>The Authorities understand that these services are to be funded for five years. Should that fail to be commercially operable, what is GAL's proposal? If not commercially viable, presumably the mode share target will be missed. GAL's confirmation of its position would be welcomed.</p> <p>A 2 hourly bus service from and to Uckfield via Forest Row and East Grinstead, enhanced to hourly at peak times will not be adequately attractive to encourage modal shift and would substantially compromise service users' journey planning arrangements. The service will need to be</p>
		<p>The measures assumed in the future baseline scenarios in the model are not 'secured' under the Project in that they relate to future baseline assumptions, and so would be delivered in the absence of the Project through the Airport's Surface Access Strategy. The</p>	

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		<p>Applicant has provided further clarification on how the future baseline has been considered in the Transport Assessment and Chapter 12 of the ES in The Applicant’s Response to Actions – ISH4 Surface Transport [REP1-065].</p> <p>The Applicant has submitted a revised Surface Access Commitments (Doc Ref. 5.3 v2) at Deadline 3. The Surface Access Commitments (secured in Requirement 20 of the draft Development Consent Order) sets out the Applicant’s commitments in relation to surface access as part of the Project. The interaction between the Airport Surface Access Strategy and the Surface Access Commitments is set out in section 2 of the Surface Access Commitments (Doc Ref. 5.3v2) and paragraphs 8.4.34 and 8.4.35 of the Planning Statement [APP-245].</p> <p>The Surface Access Commitments include a number of commitments in relation to mode share (Commitments 1-4) and support for bus and coach services (Commitments 5-7), a number of which reflect the improvements listed at paragraph 11.3.16 of the Transport Assessment. Funding for these improvements is secured in Schedule 3 of the draft s106 agreement [REP2-004].</p> <p>The table below (Table 2) sets out the summary position of how each of the improvements listed at paragraph 11.3.16 of the Transport Assessment are expected to be delivered:</p>	<p>hourly, running 7 days a week, with ongoing funding from the Applicant. 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). ESCC is open to switching its funding for 261 and contributing towards the cost a replacement enhanced 261 service to/from Gatwick, subject to the Gatwick service also being able to provide for 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. Nor are there any from any part of East Sussex to Gatwick.</p> <p>In the 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>

ExQ1	Question to:	Question and Applicant's Answer	Legal Partnership Response
		<p>Table 2 Delivery mechanism for improvements (Please refer to the Applicant's submission for this table)</p>	
TT.1.23	The Applicant	<p>Diagram 14.2.3 shows active travel mode trips for the 2016 baseline and 2047 with Project. What do the green/ blue and yellow lines represent?</p> <p>In Diagram 14.2.3 of the Transport Assessment [AS-079] the green/blue and yellow lines are intended to assist with spatially summarising the employee active travel trip numbers. The green/blue line encompasses zones with daily active travel mode trips, which are wholly or predominantly within 5km of the Airport and to the north and east of it. The number in the green/blue box is the number of active travel trips within the area enclosed by the green/blue line. The number in the yellow box is the number of active trips within the area enclosed by the yellow line, which encompasses zones to the south and southeast of the Airport with daily active travel mode trips, that are wholly or predominantly within 5km of the Airport.</p>	<p>SCC Comment – SCC has no specific comments on this question and answer. SCC's comments on the inadequacy of the proposed Active Travel infrastructure are set out in SCC's Local Impact Report [REP1-097].</p>
TT.1.24	The Applicant	<p>Diagram 14.3.1 shows the existing active travel network around Gatwick Airport. The public footpath on the northeast side of the A23 is not a PRow.</p> <p>Should this be shown differently?</p>	<p>SCC Comment – SCC has no specific comments on this question and answer. SCC's comments on the inadequacy of the proposed Active Travel infrastructure are set out in SCC's Local Impact Report [REP1-097].</p>

ExQ1	Question to:	Question and Applicant's Answer	Legal Partnership Response
		<p>Diagram 14.3.2 shows the existing Public Rights of Way network in the vicinity of the airport and does not include the pedestrian route northeast of A23 London Road. The pedestrian route northeast of A23 London Road in Diagram 14.3.1 is a path within Riverside Garden Park which can be utilised by pedestrians.</p>	
TT.1.25	The Applicant	<p>Diagram 14.3.5 shows Gatwick Airport cycling facilities. Part of the key is missing but should this be the same as Diagram 14.3.? Are the yellow walking routes usable by cyclists as in some cases the only connection is to cycle parking?</p> <p>The key to Diagram 14.3.5 should be the same as that for Diagram 14.3.1. This will be corrected in the updated version of the Transport Assessment (Doc Ref. 7.4 v3) being submitted at Deadline 3.</p> <p>The yellow walking routes are not usable by cyclists and are only for pedestrians.</p> <p>Cyclists are currently expected to travel around the airport using the existing road network, with NCR21 being the only existing designated infrastructure for cyclists.</p> <p>One of the key benefits brought about by the proposed Project is the proposed off carriageway active travel improvements for cyclists in and around Gatwick Airport from Longbridge Roundabout to South</p>	<p>SCC is concerned that the proposed off carriageway active travel improvements from Longbridge Roundabout to South Terminal via North Terminal is not the most direct route between Horley and the airport. SCC has repeatedly requested that the route north from the proposed A23/North Terminal signalised crossing through Riverside Garden Park is improved. Similarly, improvement is needed from the southern end of The Crescent along the west side of the railway through the proposed open recreational space to be created within the extent of current Car Park B.</p>

ExQ1	Question to:	Question and Applicant's Answer	Legal Partnership Response
		Terminal via North Terminal which will provide significant safety benefits for cyclists.	
TT.1.27	The Applicant	<p>Riverside Park – Pedestrian Link</p> <p>Explain why a new pedestrian/ cycle link has not been considered from the pedestrian crossing in the new North Terminal signalised junction directly towards the small car park and Riverside and Crescent Way beyond which would seem to provide a much more direct link to central Crawley.</p> <p>The design proposals at this location seek to minimise environmental impacts to Riverside Garden Park. Active travel user access between the signalised junction and the small existing car park accessed from Riverside would be via the existing paths through the middle of Riverside Garden Park. These existing paths would be accessed via the existing connection onto the A23 London Road footway which is to be widened as part of the scheme proposals. Refer to label c14 on Sheet 1 of the 'Surface Access Highways Plans - Active Travel' in Appendix A of The Applicant's Response to Actions from Issue Specific Hearing 4: Surface Transport [REP1-065] for the location of the access point.</p> <p>Retaining the existing paths within the park minimises further tree loss and/or loss of green space. The proposed footway</p>	<p>SCC's comments on the inadequacy of the proposed Active Travel infrastructure are set out in SCC's Local Impact Report [REP1-097]. In particular, SCC has raised concern that the proposed off carriageway active travel improvements from Longbridge Roundabout to South Terminal via North Terminal is not the most direct route between Horley and the airport. SCC has repeatedly requested that the route north from the proposed A23/North Terminal signalised crossing through Riverside Garden Park is improved. Similarly, improvement is needed from the southern end of The Crescent along the west side of the railway through the proposed open recreational space to be created within the extents of the current Car Park B.</p>

ExQ1	Question to:	Question and Applicant’s Answer	Legal Partnership Response
		<p>improvements on the eastern side of A23 London Road would benefit pedestrian users travelling between Horley and the new signal controlled crossing via Longbridge Roundabout. This route would benefit from improved lighting provision and passive surveillance from the A23 London Road. The proposed Replacement Public Open Space at Car Park B and the new pedestrian link between Car Park B and the A23 London Road Eastern footway, labelled as c12 on Sheet 1 of the 'Surface Access Highways Plans - Active Travel', would provide enhanced connectivity to/from the east / south east of Horley.</p> <p>The design proposals do not preclude potential future provision of an upgraded path through the park, noting that not all park users or other stakeholders may support the principle of additional or widened paths across the middle of the park between the existing car park and the new junction. The primary travel routes for cyclists travelling between Horley and the airport are envisaged to be via NCR 21 on the eastern side of Riverside Garden Park or via the proposed new active travel path connection between Longbridge Roundabout, North Terminal Roundabout and South Terminal on the western side of A23 London Road.</p>	
ES Chapter 12 Transport			
TT.1.30	The Applicant	Paragraph 12.5.3 of ES Chapter 12 [APP-073] states that “Strategic multi-modal modelling has been undertaken which informs mode	SCC Comment - When is the airport expecting to have recovered and what confidence can we have that behaviour will return to previous norms?

ExQ1	Question to:	Question and Applicant’s Answer	Legal Partnership Response
		<p>shares and the resulting traffic flows and rail loadings used in this assessment.” How do these mode shares compare with actual mode shares from the latest travel survey?</p> <p>The response to TT.1.42 sets out the latest mode share data for staff and passengers. The mode shares from the strategic multi-modal model are set out in detail in Transport Assessment Annex B Strategic Transport Modelling Report [APP-260]. Table 72 shows the annual average passenger mode shares for the 2016 baseline and future baseline years and Table 135 show the mode share information for the with Project scenarios. Table 74 shows the staff mode shares for the 2016 baseline and future baseline years and Table 137 shows the staff mode shares for the with Project scenarios.</p> <p>Because the staff surveys show that the Airport is still in recovery post-pandemic, they are not a suitable direct comparator to the forecast mode shares in the strategic modelling, which takes into account a range of sustainable interventions in the future baseline (paragraphs 12.6.52 to 12.6.76 of ES Chapter 12 [AS-076]) and with Project (paragraphs 12.8.6 of 12.8.9 of ES Chapter 12 [AS-076]).</p> <p>The future baseline mode shares shown in Tables 72 and 74 of Transport Assessment Annex B: Strategic Transport Modelling Report [APP-260] are therefore the most appropriate basis for</p>	<p>If the traffic model was built now, against current mode shares, what would be required to meet SAC targets?</p> <p>The Authorities would welcome the Applicant's view on these questions.</p>

ExQ1	Question to:	Question and Applicant's Answer	Legal Partnership Response
		comparison with the mode shares for the with Project mode scenarios.	
TT.1.31	<p>The Applicant Network Rail</p> <p>Train Operating Companies</p>	<p>Paragraph 12.5.15 states that it is assumed that air passengers place their luggage in overhead luggage racks. Is it realistic on trains serving an airport that all luggage will fit in overhead racks or luggage storage areas and not on the floor. Has this assumption been checked against actual surveys?</p> <p>Paragraph 12.5.15 of ES Chapter 12: Traffic and Transport [AS-076] states that <i>"It is assumed that all seats are available for passenger use, and that air passengers place their luggage in overhead luggage racks, under the seats, in the luggage compartments provided throughout the train, or on the floor, but not on the seats."</i> The assumption is therefore not limited to luggage being in overhead racks or storage areas and does include the potential for luggage to be placed on the floor.</p> <p>Further information around the assumptions relating to luggage and its potential implications with regard to the rail crowding analysis has been presented in The Applicant's Response to Actions - ISHs 2-5 [REP2-005] in Appendix C. Paragraphs 4.1.1 and 4.1.2 of that Appendix reiterate the approach noted above, stating that <i>"The seated and standing train capacities used in the assessments of rail passenger modelling are taken from DfT's Green Book (2019). It is</i></p>	<p>It would be a valuable sensitivity test to understand the impacts of reduced seat and standing capacity due to luggage.</p> <p>The Authorities would welcome the Applicant's view on this point.</p>

ExQ1	Question to:	Question and Applicant's Answer	Legal Partnership Response
		<p><i>not clear from this source what specific assumptions are made in the calculation of standing capacity. The working assumption relating to luggage in the assessment of rail crowding is that it is placed in overhead racks, under seats, in luggage compartments or placed on the floor."</i></p> <p>No surveys of how luggage is located in trains have been obtained - the assessment has focused on considering the proportion of available standing space (as defined in the DfT Green Book) that would be occupied by the passenger volumes that are forecast. Clearly if the Green Book standing capacities do not assume any luggage placed where passengers might otherwise stand, the presence of such luggage would reduce the available standing capacity although any reduction is likely to represent a small proportion of available standing capacity.</p>	
TT.1.33	The Applicant	<p>Paragraph 12.6.45 states that "There is also access to the Airport via Povey Cross Bridge which is convenient for staff living around Charlwood and Hookwood, and from the Balcombe Road for residential areas to the east of the Airport". These are not shown as either new or existing pedestrian routes in Figure 12.6.2 [APP-059]. Why not?</p> <p>While the existing Povey Cross Bridge can be used by active travel users as it is signed by a "No vehicles except bicycles being pushed"</p>	<p>SCC Comment – SCC's comments on the inadequacy of the proposed Active Travel infrastructure are set out in SCC's Local Impact Report [REP1-097]. In particular, SCC considers that the scheme has not fully explored how further improvements to the Rights of Way network around the airport could increase opportunities for sustainable travel from surrounding residential areas such as Charlwood, Hookwood and Povey Cross.</p>

ExQ1	Question to:	Question and Applicant’s Answer	Legal Partnership Response
		<p>sign, there is no formal off carriageway provision in the form of a footway, shared-use or segregated route within the Airport and therefore this has not been highlighted on Figure 12.6.2.</p>	
TT.1.34	The Applicant	<p>Can the Applicant provide evidence that the pricing of car parking is effective in managing modal choice at airports?</p> <p>The relationship between parking capacity and pricing in helping to manage mode share is illustrated by the relative change in car parking capacity in the decade from 2010. Over this time capacity increased by 8,000 spaces, a 23% increase and this was accompanied by increases in parking charges. However, air passenger demand increased by approximately 41%, equivalent to a need for 14,200 additional spaces if mode shares had stayed the same. However, as part of a wider Airport Surface Access Strategy, the Applicant promoted the use of public transport, including investment in rail in support of objectives for more sustainable travel. As a result, car mode share (park and fly and kiss and fly) reduced from 48% to 34% over this period. This shows the importance of the Applicant managing changes to on-airport car parking capacity and pricing alongside commitments towards sustainable modes.</p> <p>This relationship between behavioural change and pricing of car parking and forecourt drop off and pick up can be modelled by</p>	<p>SCC Comment – Further to the question above in TT1.30 - Does the present mode share reflect the calibrated model?</p>

ExQ1	Question to:	Question and Applicant's Answer	Legal Partnership Response
		<p>calibrating choice of mode in the transport models to change in travel cost (money and time).</p> <p>Appendix A of Transport Assessment Annex B - Strategic Transport Modelling Report [APP-260] sets out the development of the Airport demand model that is used to predict how mode shares for air passengers may change in the future. It sets out the approach to model development, the source data and calibration of the model. A key attribute considered in the model calibration was airport parking cost and various statistics from the calibration and analysis help to demonstrate the importance of parking cost on travel behaviour. Table 7 of this Appendix shows that for the M_Money attribute, representing monetary costs experienced by passengers on their surface access trip, the t-statistic (indicating the strength of significance of the parameter), is high for all passenger segments, indicating it has a significant role in influencing surface access mode choice decision making at Gatwick. Table 15 provides a comparison of the outturn elasticities of the GapSAM model with previous results from the LASAM model (which covers Heathrow). The 'Parking to parking cost line', shows the strength of response predicted at both Heathrow and Gatwick illustrating that pricing of car parking has a significant influence on car park demand. This is further illustrated for Gatwick in Table 16, which outlines the outturn elasticities relating to a range of surface access transport components. It illustrates that for a 20% increase in car parking cost, car park demand could decrease from 24.1% to 21.9%. It should be noted these tests are simple</p>	

ExQ1	Question to:	Question and Applicant's Answer	Legal Partnership Response
		<p>model sensitivities to check the scale of response, but may differ to the Application scenarios as these will combine a range of surface access measures.</p>	
TT.1.35	The Applicant	<p>Has the Applicant undertaken any sensitivity analysis of failure to meet the modal targets? If not, why not?</p> <p>As noted in the answer to TT.1.13, during the development of model forecasts, and through discussions with key stakeholders including National Highways and SCC and WSCC, some sensitivity analysis has been undertaken to build confidence in the forecasting process, assumptions and outputs. However, the Applicant has set out the mode shares it is committing to achieve in ES Appendix 5.4.1: Surface Access Commitments (Doc Ref. 5.3 v2) together with arrangements for monitoring and reporting progress towards achieving them and a process for addressing a situation in which the targets are not, or are not expected to be, met in a particular year.</p>	<p>SCC Comment – SCC have repeatedly asked to see sensitivity tests to this effect. We remain unsighted of the potential impacts of failure, especially given it could be several years before the targets are met and there is no sanction should they not be met.</p> <p>The Local Authorities remain concerned that the SACs as currently worded allow a substantial amount of time to pass, without meaningful sanction, to ensure that the modal split targets are met by the Applicant. The SACs allow two successive Annual Monitoring Reports to report that the mode share commitments have not been met before the TFSG can even consider or comment upon the action plan to address missing the mode share commitments.</p>
TT.1.36	The Applicant	<p>The new cycle link, along the A23, into the Riverside Park and crossing to the terminal is likely to become a much used route. The degree of change for users is therefore likely to be great but there is no mention of this route being considered in the latest Technical Note [AS-119] assessment of the effects on the users of this path in</p>	<p>SCC Comment – SCC's comments on the inadequacy of the proposed Active Travel infrastructure are set out in SCC's Local Impact Report [REP1-097]. With regard to the provision along the A23, SCC considers that the route would be subject to fear and intimidation as it is next to the A23. SCC also questions the use of the shared use section from</p>

ExQ1	Question to:	Question and Applicant’s Answer	Legal Partnership Response
		<p>terms of Fear and Intimidation. Signpost where this is submitted or provide explanation as to why this has not been done.</p> <p>In keeping with guidance, the emphasis in the ES Chapter 12: Traffic and Transport [AS-076] is to identify and explain significant effects (as set out in paragraph 12.4.11) and this is the same approach undertaken in the Technical Note on the Impact of Latest IEMA Guidance (2023) on the Assessment of Effects Related to Traffic and Transport [AS-119]. As Section 4.2 of the technical note describes, the assessment of fear and intimidation experienced by pedestrians and cyclists is based on determining a 'degree of hazard' (with reference to traffic flows and speeds) and an overall score for the level of fear and intimidation in a particular location. The magnitude of impact arising from the Project is determined by considering the change in the overall score. The magnitude of impact is then considered alongside the sensitivity of relevant receptors in that location to determine the significance of effect resulting from the Project.</p> <p>Table 12 of Technical Note on the Impact of Latest IEMA Guidance (2023) on the Assessment of Effects Related to Traffic and Transport [AS-119] lists the locations where low and medium magnitudes of impact were identified using the criteria set out in the 2023 IEMA guidance. The section of A23 London Road between Longbridge Roundabout and the new signal junction for North</p>	<p>Longbridge Roundabout into Riverside Park for Gatwick Airport users. Instead, SCC has repeatedly requested that the route north from the proposed A23/North Terminal signalised crossing through Riverside Garden Park is improved. Similarly, improvement is needed from the southern end of The Crescent along the west side of the railway through the proposed open recreational space to be created within the extents of the current Car Park B. These routes are more direct between Horley and Gatwick Airport than the proposed route from Longbridge Roundabout south of the A23.</p>

ExQ1	Question to:	Question and Applicant’s Answer	Legal Partnership Response
		<p>Terminal (link 003) is identified in Table 12 as experiencing a medium magnitude impact in the initial construction period (2024-2029). At this time the new shared use cycle track between Longbridge Roundabout and the ramp into Riverside Garden Park, and the continuation of the new pedestrian footway southeastwards to the new signal junction, would not yet be complete.</p> <p>In other assessment years, the analysis indicated that the Project would cause a negligible magnitude of impact in these locations using the 2023 IEMA methodology. It is not therefore identified in Table 12 of the technical note as there would be no significant effect related to fear and intimidation at this location in those other years.</p>	
TT.1.37	The Applicant WSCC	<p>Sussex Border Path</p> <p>Sheet 1 of the Rights of Way and Access Plans [APP-018] shows the existing route of the Sussex Border Path (PRoW 346-2sy). Explain why when the proposed dDCO realignment does not include formal realignment of the elements of the path not coincident with the existing footpaths within the airport site.</p> <p>The existing alignment shown on the plans seems to follow an alignment in part along carriageways which is unlikely to be the practical route for those using the PRoW. Given the formal diversions being asked for within the dDCO this would seem to be an opportunity to formally divert the path within the airport to follow</p>	<p>Clarity needs to be provided to show on the Rights of Way Access Plan that the shared footway/cycle way acting as an alternative to FP346/2sy is actually Highway. At present this isn’t clear.</p> <p>The Authorities would welcome further clarity from the Applicant on this point.</p>

ExQ1	Question to:	Question and Applicant's Answer	Legal Partnership Response
		<p>established pedestrian routes on the site. Should this form part of the PRow diversion within the dDCO?</p> <p>The relevant section of Public Right of Way Footpath 346_2sy is labelled as B2 on Sheet 1 of the Rights of Way and Access Plans [REP1-014]. This section of footpath is currently coincident with various Rights of Way with a highway designation (including Longbridge Way, North Terminal Roundabout, Gatwick Way and Perimeter Road North and the associated footways which form part of the highway). To address this existing issue of overlapping Rights of Way, the footpath is to be stopped up where it is coincident with highways (as is the case elsewhere along the footpaths associated with Sussex Border Path). The Sussex Border Path long distance trail would follow the proposed predominantly shared use path provision that reflects a rationalised version of the current route as stated in Table 4.1.1 of ES Appendix 19.8.1: Public Rights of Way Management Strategy [REP2-009]. The relevant labelled sections of the replacement route on Sheet 1 of the Rights of Way and Access Plans are as follows: c11 (southwestern section), c8 (eastern section), c40, c6, c5, c4, c3 and c2. Waymarking signage would be updated to reflect the revised Sussex Border Path trail route.</p>	
TT.1.38	The Applicant	Car Parking Strategy	

ExQ1	Question to:	Question and Applicant’s Answer	Legal Partnership Response
		<p>Table 2 of the Car Parking Strategy [REP1-051] does not provide an estimated total peak parking accumulation, 2047 (equivalent to line H) for the 2047 future baseline. Provide that estimation and also the comparison with the future baseline parking provision.</p> <p>Using the same methodology as was used to derive the passenger parking requirement shown in Table 2 of the Car Parking Strategy [REP1-051] with the Project, which is explained in the answer to TT.1.39 below, the estimated total peak passenger parking accumulation for the future baseline in 2047 would be 59,650. For completeness we have reproduced Table 3 below to include the 2047 future baseline requirement below.</p> <p>As acknowledged in paragraph 4.6.5 of The Applicant’s Responses to Actions - ISHs 2-5 [REP2-005], planning permission for the 820 parking spaces at the Hilton hotel has lapsed and those spaces no longer form part of the future baseline or with Project scenarios. The 820 spaces have therefore been removed from the future baseline projects in row M.</p> <p>Row N in the revised Table 3 below shows the parking supply that would be required assuming a maximum occupancy of 87.5% of capacity. However, despite removing the Hilton hotel spaces from the calculation, the Applicant is not seeking to increase the number of spaces required for the Project. Rows P and Q have therefore been added to Table 2. Row P shows the proposed additional provision for</p>	<p>SCC Comment – SCC question the need for the additional 1,100 car parking spaces proposed. Is there a risk that by including them they will reduce the ability to meet the mode share targets in the SAC?</p> <p>As per the Local Authorities other comments, we remain concerned that some 4,694 existing on-airport spaces have been omitted from the Applicant’s calculation due to them not being operated by GAL. These spaces still form part of the on-airport provision and are used by passengers travelling to/from the airport. Their exclusion presents a question as to whether the proposed 1,100 addition spaces to be provided through the DCO represent an over-provision.</p> <p>Given that there is no forecast change in park and fly demand in 2047 (as reported in Transport Assessment Annex B – Strategic Transport Modelling Report Table 70 and Table 133), SCC would like to see a phased approach to such development, should these additional spaces be required.</p>

ExQ1	Question to:	Question and Applicant’s Answer	Legal Partnership Response												
		<p>the future baseline and with Project scenarios (other than the known future baseline parking projects in row M). Row Q shows the overall total passenger parking provision in the future baseline and with Project scenarios.</p> <p>Table 3 2047 Car Parking Requirements</p> <table border="1" data-bbox="666 565 1577 1404"> <tbody> <tr> <td data-bbox="666 565 736 708"></td> <td data-bbox="736 565 1577 708"></td> </tr> <tr> <td data-bbox="666 708 736 805">A</td> <td data-bbox="736 708 1577 805">Current on-airport passenger parking provision (2019)</td> </tr> <tr> <td data-bbox="666 805 736 948">B</td> <td data-bbox="736 805 1577 948">Current authorised off-airport passenger parking provision (2019)</td> </tr> <tr> <td data-bbox="666 948 736 1045">C</td> <td data-bbox="736 948 1577 1045">Total passenger parking provision (2019) (A+B)</td> </tr> <tr> <td data-bbox="666 1045 736 1188">D</td> <td data-bbox="736 1045 1577 1188">Peak on-airport passenger parking accumulation (August 2019)</td> </tr> <tr> <td data-bbox="666 1188 736 1404">E</td> <td data-bbox="736 1188 1577 1404">Assumed peak off-airport passenger parking accumulation (August 2019) (87.5% of off-airport provision)</td> </tr> </tbody> </table>			A	Current on-airport passenger parking provision (2019)	B	Current authorised off-airport passenger parking provision (2019)	C	Total passenger parking provision (2019) (A+B)	D	Peak on-airport passenger parking accumulation (August 2019)	E	Assumed peak off-airport passenger parking accumulation (August 2019) (87.5% of off-airport provision)	
A	Current on-airport passenger parking provision (2019)														
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C	Total passenger parking provision (2019) (A+B)														
D	Peak on-airport passenger parking accumulation (August 2019)														
E	Assumed peak off-airport passenger parking accumulation (August 2019) (87.5% of off-airport provision)														

ExQ1	Question to:	Question and Applicant's Answer	Legal Partnership Response	
		F Current peak passenger parking accumulation on and off-airport (August 2019) (D+E)	50,550	50,550
		G Estimated increase factor in number of Park & Fly trips with Project (2019 to 2047)	1.18	1.2
		H Estimated total peak passenger parking accumulation, 2047 (F x G)	59,650	60,810
		I Estimated peak passenger parking accumulation accommodated off-airport (87.5% of off-airport provision)	18,550	18,550
		J Estimated on-airport peak passenger parking accumulation to be accommodated, 2047 (H – I)	41,100	42,260
		K Estimated on-airport passenger parking provision required (allowing for max occupancy of 87.5% of provision) (J / 0.875)	46,970	48,300
		L Additional on-airport passenger parking provision required (over and above current) (K – A)	6,370	7,700
		M Less future baseline projects	5,750	5,750

ExQ1	Question to:	Question and Applicant's Answer	Legal Partnership Response													
		<table border="1"> <tr> <td data-bbox="666 295 736 431">N</td> <td data-bbox="736 295 1577 431">Additional requirement for the future baseline / Project assuming 87.5% peak occupancy (L – M)</td> <td data-bbox="1599 295 1814 431">620</td> <td data-bbox="1814 295 2061 431">1,950</td> </tr> <tr> <td data-bbox="666 431 736 574">P</td> <td data-bbox="736 431 1577 574">Expected additional passenger parking provision (in addition to row M)</td> <td data-bbox="1599 431 1814 574">0</td> <td data-bbox="1814 431 2061 574">1,100</td> </tr> <tr> <td data-bbox="666 574 736 711">Q</td> <td data-bbox="736 574 1577 711">Expected total passenger parking provision for the future baseline / Project (A + M + P)</td> <td data-bbox="1599 574 1814 711">46,350</td> <td data-bbox="1814 574 2061 711">47.450</td> </tr> </table>	N	Additional requirement for the future baseline / Project assuming 87.5% peak occupancy (L – M)	620	1,950	P	Expected additional passenger parking provision (in addition to row M)	0	1,100	Q	Expected total passenger parking provision for the future baseline / Project (A + M + P)	46,350	47.450		
N	Additional requirement for the future baseline / Project assuming 87.5% peak occupancy (L – M)	620	1,950													
P	Expected additional passenger parking provision (in addition to row M)	0	1,100													
Q	Expected total passenger parking provision for the future baseline / Project (A + M + P)	46,350	47.450													
		<p>The revised Table 3 shows that the estimated peak passenger parking accumulation in the 2047 future baseline would be approximately 59,650 vehicles of which 41,100 would be on the airport (row J), assuming 87.5% occupancy of authorised off-airport parking and no change to the capacity of that parking stock. Applying an 87.5% occupancy rate to the on-airport passenger parking accumulation gives an on-airport capacity required of 46,970 spaces (row K). The airport had 40,600 passenger parking spaces in 2019 and the planned future baseline projects (row M, now excluding the Hilton hotel parking) would increase this to 46,350 spaces (row Q). This would result in peak passenger car park occupancy levels of 89%. Although this is slightly above the target operational maximum of 87.5% occupancy, peak parking demand occurs for a relatively short period during the summer months and the Applicant is confident</p>														

ExQ1	Question to:	Question and Applicant’s Answer	Legal Partnership Response
		<p>that it will have the flexibility to manage this additional level of demand.</p> <p>The removal of the 820 Hilton hotel car park spaces from the future baseline parking projects means that in the with Project scenario, the total parking requirement would amount to 48,300 spaces at 87.5% occupancy (row K). The Applicant continues to seek 1,100 additional parking spaces as part of the Project (row P) which would provide a total of 47,450 spaces (row Q). This would result in peak occupancy levels of 89%, which the Applicant considers is manageable for the reasons noted above.</p> <p>The Applicant is aware that the ExA has requested further information about car parking provision and accumulation for each year between 2024 and 2035, through its Rule 17 request issued on 8 April 2024 (item R17a.3 of PD-013). The Applicant will provide a full response to that request at Deadline 4.</p>	
TT.1.39	The Applicant	<p>Car Parking Strategy</p> <p>With reference to Table 2 of the Car Parking Strategy [REP1-051] explain the derivation of the increase factor in Park and Fly trips with the Project. Also provide and explain any similar increase factor for the future baseline projections along with an explanation of any difference between these two factors.</p>	<p>SCC Comment – SCC wonders if, with revised information and aspirations, the factors could be revised as it seems that this estimate has been used since an early stage of model development and not revised since.</p>

ExQ1	Question to:	Question and Applicant’s Answer	Legal Partnership Response
		<p>The estimate of passenger car parking requirement was made at an early stage in the transport modelling process, because parking provision and location is an input to the strategic model and therefore needed to be defined before the full model runs could be undertaken. The Applicant is keen to ensure that there is sufficient parking capacity available to accommodate park and fly trips and avoid any shortage of capacity leading increased parking in surrounding streets or unauthorised locations, or transferring to kiss-and-fly trips instead.</p> <p>The factor was derived from initial estimates of the change in the number of Park & Fly trips between 2019 and 2032 with the Project, which were available at that time from the mode choice model, together with the anticipated growth in passenger throughput between 2032 and 2047. The factor therefore combines a factor of 1.08 for Park & Fly trips between 2019 and 2032 (drawing on information in Table 133 of Transport Assessment Annex B: Strategic Transport Modelling Report [APP-260]) and a factor of 1.11 for growth in passenger throughput between 2032 and 2047 (from 72.3mppa to 80.2mppa), giving an overall factor of 1.2.</p> <p>Using the same methodology for the 2047 future baseline would produce a factor of 1.04 for Park & Fly trips between 2019 and 2032 drawing on information in Table 70 of Transport Assessment Annex B: Strategic Transport Modelling Report [APP-260]) and a factor of 1.13 for growth in passenger throughput between 2032 and</p>	

ExQ1	Question to:	Question and Applicant’s Answer	Legal Partnership Response
		<p>2047 (from 59.4mppa to 67.2mppa), giving an overall factor of 1.18.</p> <p>The differences between the future baseline and with Project factors arise because the rate of passenger growth at the Airport with the Project would be faster between 2019 and 2032 than would be the case in the future baseline. This leads to a greater increase in the number of Park & Fly trips in this period with the Project than without it, although the subsequent rate of growth in passenger throughput would actually be slightly lower (in percentage terms) with the Project than in the future baseline.</p>	
TT.1.40	The Applicant RHAs RPAs	<p>Car Parking Strategy</p> <p>Paragraph 3.5.5 states that authorised parking demand is calculated to a maximum practical occupancy of 87.5%. Could the approval for future increases in parking not be done on an as and when required basis, linked to mode share targets, to ensure the parking supply is managed on actual demand and not long term forecasting? We note that in paragraph 3.1.1 that this approach is already used to identify, plan consult on and implement any additional car parking.</p> <p>As a commercial operator, the Applicant only provides as much on-airport parking capacity as is needed, with due reference to mode shares and demand. As noted in its response to question TT.1.34 above, this has been effective in accommodating passenger growth</p>	<p>SCC Comment – SCC wonder if this is saying that GAL intend to build the car park when convenient from a construction point of view, despite saying as and when necessary and arguably not until after 2032? The implication is that the car park will be built with other construction. It is not likely to be needed before 2032 and would potentially not be used as mode share targets need to be met.</p> <p>The modelling shows that with and without the Project, parking does not change - so are these spaces required?</p> <p>Given that GAL has said that growth will mean more people will drive as public transport is not viable for all – this approach seems problematic, which without Environmentally Managed Growth, could go relatively unchecked. There is no sanction to a missed SAC. The threat of more off-site parking should not be a reason to allow more on site. GAL should</p>

ExQ1	Question to:	Question and Applicant's Answer	Legal Partnership Response
		<p>at the Airport, whilst simultaneously reducing car mode share. This will remain the Applicant's approach in the future, including in delivery of the Project and having regard to the Surface Access Commitments (Doc Ref.5.3 v2), which are a binding requirement under the DCO.</p> <p>Due to the variable nature of peak demand, passenger mix and seasonal mode shares, the lead time for implementing any additional capacity (in the form of decking, multi-storey car parks or even surface parking) and the corresponding impact on existing parking during construction, some element of forecasting is necessary in order to avoid either over-supply or under-supply. The DCO is providing for an increase of 1,100 spaces over the assessment period and GAL would not anticipate the additional spaces to be required until after 2032. However, this will depend on the above variables and an increase in the operational efficiency to ensure capacity is used most effectively. Delivering insufficient capacity would risk an increase in demand for off-airport unauthorised parking, which the Surface Access Commitments seeks to avoid. The mode share commitments mean that any concern that harm may arise from an over provision of parking is protected against by the need for the Applicant to meet the mode share commitments and that there is no need to control parking numbers as well.</p>	<p>invest the money saved in not building an additional 1,100 spaces into public transport accessibility improvements, to provide that impetus for sustainable access to the airport.</p>

ExQ1	Question to:	Question and Applicant’s Answer	Legal Partnership Response															
		<p>a) 2023 staff travel survey information has been submitted at Deadline 2 as part of The Applicant's Response to Actions - ISHs 2-5 [REP2-005] - see Section 4.2 and Appendix D.</p> <p>b) The Transport Assessment [AS-079] referenced latest CAA 2022 passenger mode share information. 2023 CAA data is now available and this shows a slight increase in public transport mode share to 44.1%, compared to private car 37.9% and taxi/minicab/uber at 16.7%. The table below (Table 5) provides both the 2022 and 2023 CAA data for comparison.</p> <p>Table 4 2022 and 2023 CAA data</p> <table border="1" data-bbox="731 836 1475 1416"> <thead> <tr> <th data-bbox="731 836 916 980">Mode</th> <th data-bbox="916 836 1244 980">2022 (as in Transport Assessment)</th> <th data-bbox="1244 836 1475 980">2023</th> </tr> </thead> <tbody> <tr> <td data-bbox="731 980 916 1078">Rail</td> <td data-bbox="916 980 1244 1078">40.6%</td> <td data-bbox="1244 980 1475 1078">38.9%</td> </tr> <tr> <td data-bbox="731 1078 916 1222">Coach / bus</td> <td data-bbox="916 1078 1244 1222">3.2%</td> <td data-bbox="1244 1078 1475 1222">5.2%</td> </tr> <tr> <td data-bbox="731 1222 916 1320">Private car</td> <td data-bbox="916 1222 1244 1320">37.7%</td> <td data-bbox="1244 1222 1475 1320">37.9%</td> </tr> <tr> <td data-bbox="731 1320 916 1416">Taxi</td> <td data-bbox="916 1320 1244 1416">17.0%</td> <td data-bbox="1244 1320 1475 1416">16.7%</td> </tr> </tbody> </table>	Mode	2022 (as in Transport Assessment)	2023	Rail	40.6%	38.9%	Coach / bus	3.2%	5.2%	Private car	37.7%	37.9%	Taxi	17.0%	16.7%	
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ExQ1	Question to:	Question and Applicant's Answer			Legal Partnership Response
		Car rental	1.1%	1.1%	
		Other	0.4%	0.3%	
		Total	100.0%	100.0%	