

**Gatwick Northern Runway  
TR020005  
Cover Letter Deadline 4**

May 2024

Our ref: 20044834

Your ref: TR020005

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Via E-Mail to:

15 May 2024

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Dear Mr Gleeson,

## **GATWICK NORTHERN RUNWAY PROJECT – DEADLINE 4 SUBMISSION**

Please find attached National Highways' Deadline 4 submission.

The following documents are provided:

1. Response to comments on any further information/submissions received by Deadline 3
2. Comments on Responses to the Examining Authorities Written Questions
3. Post-Hearing submission, including written summaries of oral submissions to the Hearings held during week commencing 29 April 2024
4. Mark-up of the Outline Construction Traffic Management Plan without prejudice to the following matters:
  - National Highways outstanding concerns in regard to construction traffic modelling
  - National Highways acceptance of the position of the South Terminal Compound

In addition to the above documents that have been submitted at Deadline 4, National Highways has provided the following additional updates and clarifications below.

### **Land Rights Interest Update**

National Highways continues to work with the Applicant to ensure that all land rights relating to National Highways interests are correct. National Highways has submitted an updated list of outstanding items to the Applicant to review and address.

National Highways will continue to work proactively with the Applicant to resolve these matters through the course of the examination.

## Actions arising from Issue Specific Hearing 6

National Highways has reviewed its position in respect of the Scheme's Green House Gas (GHG) assessment, based on the Applicants response to SoCG 2.11.3.1, and Action 2 arising from Issue Specific Hearing 6.

National Highways retains a concern that the GHG assessment does not address the impact of the scheme in its entirety. The applicant is required to thoroughly consider the potential effects on the Strategic Road Network (SRN) and surrounding roads likely to be affected by the proposed developments. This is necessary to provide a comprehensive understanding of the project's environmental impacts. While the applicant has provided clarity on the assessment methodology, National Highways is not yet satisfied itself that the overall significance of effects is correctly reported in the Environmental Statement due to concerns on the baseline carbon assessment. National Highways request that the Applicant provides a Whole Life Carbon Assessment that covers the works impacting the SRN and all surrounding roads affected by the scheme (collectively known as the Affected Road Network). It would also be beneficial to include:

- Evidence that Whole Life Carbon has been considered for both the airport and the surrounding impacted and enabling infrastructure. This should include how carbon was considered during options appraisal and also how areas such as Well to Tank Emissions are considered.
- Evidence demonstrating how the transport modelling conducted by the Transport Team is integrated into the Climate Chapter - and that this is up to date i.e. in alignment with the latest Emission Factor Toolkit. This will help in understanding how the network has been considered.
- Evidence that the assessment aligns with the most relevant policies during the examination—including updates to the National Networks Policy Statement (NNPS) and relevant Aviation NPS. The methodology used should comply with the latest versions of the Design Manual for Roads and Bridges (DMRB) LA 114, the Institute of Environmental Management & Assessment (IEMA) guidance, and PAS 2080:2023, as outlined in the NNPS.

This information will allow National Highways to adequately determine the contextualisation and significance against budgets and thus confirm the overall significance of effects in relation to the SRN. National Highways will continue to engage with the Applicant on this matter and will provide a further update in the next issue of the Statement of Common Ground due to be submitted into the Examination at Deadline 5.

## Update on Surface Access Works Related Matters included in National Highways Written Representation

As part of National Highways Written Representation submitted at Deadline 1

**[TR020005/REP1/088]**, National Highways identified a number of additional matters which were outlined under the following headings:

- Eastbound Connector Road Merge from South Terminal Roundabout
- M23 Spur Westbound Diverge
- Segregated Left Turn Lane at M23 Junction 9
- Provision of Emergency Areas (EA)/ Place of Relative Safety (PRS) on the M23 Spur

Whilst introduced into the examination at Deadline 1, having previously discussed these matters with the Applicant, and subsequently included in a technical note which was shared with the Applicant on the 2<sup>nd</sup> February prior to the commencement of the examination. National Highways can confirm that the Applicant has issued a response to this technical note on the 10<sup>th</sup> May. However, the short timeframe between receipt of this information and submission of Deadline 4 material does not allow National Highways the opportunity to undertake the necessary review. National Highways will therefore endeavour to provide an update on our Written Representation matters in light of this new material by Deadline 5.

### Concerns Raised by the Wilky Group / Gatwick Green at Issue Specific Hearing 7

During Issue Specific Hearing 7, the Wilky Group / Gatwick Green made representations relating engagement with the Applicant and National Highways in respect to its current landholding. National Highways can confirm that it has written to the Applicant on this matter which outlined the following principles:

National Highways is satisfied with the principle of alternative access proposals being taken forward, subject to satisfactory agreement being in place regarding the rights for National Highways to access and maintain its infrastructure. Furthermore, we will require appropriate obligations on the Wilky Group to maintain serviceable access to ensure unimpeded 24/7 access for National Highways.

The surface access works propose to remove the hard shoulder and thereby convert the M23 eastbound spur to a three lane All-Purpose Trunk Road. National Highways therefore needs to be satisfied that all existing roadside infrastructure to remain can be safely accessed and maintained. At present the Applicant has not provided a full account of infrastructure to be maintained and therefore cannot guarantee the viability of all infrastructure being safely accessed via either Peeks Brook Lane or Balcombe Road using the powers provided in the order.

Therefore, while National Highways is keen to work with the Applicant to minimise the impacts of land required, National Highways is unable to agree to changes to land required until safe and non-disruptive maintenance access has been demonstrated for all assets in the area affected by the Northern Runway works.

National Highways remains committed to working with the Applicant to resolve these matters in parallel with the Examination process.

Yours Sincerely,



Peter Fisher  
Head of 3<sup>rd</sup> Party Infrastructure