



Gatwick Northern Runway Project DCO (Project Reference: TR020005)

Deadline 6 Submission (26 June 2024)

Joint Surrey Councils – Surrey County Council (Ref. 20044665), Mole Valley Borough Council (Ref: 20044578), Reigate and Banstead Borough Council (Ref. 20044474) and Tandridge District Council (Ref: 20043605)

Overview

1. This document provides a response at Deadline 6 from the above Joint Surrey Councils (JSCs) on a number of Deadline 5 submissions:
 - Comments on GAL Deadline 5 Submissions
 - Comments on any other submissions received by Deadline 5
2. The Joint Local Authorities have provided collective comment on a range of submissions. These have been submitted by Crawley Borough Council (CBC) on behalf of the authorities.
3. The Legal Partnership Authorities’ have provided post-hearing submissions for ISH8, an update on S106 negotiations and comments on dDCO Schedule of Changes. These have been submitted by West Sussex County Council on behalf of the Legal Partnership.

Response to GAL submissions at Deadline 5

GAL response to Deadline 4 Submissions [REP5- 072]

4. The JSCs do not wish to repeat points previously made and have only revisited points where necessary. The Councils also wish to update on a number of points which should be read alongside the Joint Local Authorities Response to the Applicants Deadline 5 Submission, submitted on the JSC’s behalf by CBC at D6:

<u>Ref</u>	<u>Issue</u>	<u>JSC response</u>
DCO.1.4 6, p 49	The Applicant is correct that the JSC’s have previously highlighted and reiterated requests, principally through REP3-135, REP4-054 and REP1-097, to include detailed measures of management and mitigation within the final COCP framework. However, this has still not been actioned and the response within REP5-072 fails to provide justification for this. There remains a clear absence of specific commitments which are necessary	The ExA will be aware that the Applicant has included requirements and obligations within REP5-022 (Annex 9 – Construction Dust Management Strategy) and these are welcomed. However, it remains the view of the JSC’s that the CoCP [REP4-008] should be integrated across noise and vibration impacts and therefore detailed preventative and guiding measures should be included in the CoCP framework as a whole to ensure overarching coverage. This approach would not negate a need for matter specific measures for air quality or noise related aspects but would

	<p>and beneficial in the offsetting of impacts of relevant aspects.</p>	<p>ensure a cohesive approach to Construction as a whole and from the outset.</p> <p>Previous responses in relation to an integrated construction management plan providing suitable commitments included, but are not limited to:</p> <ul style="list-style-type: none"> • Specific measures to identify high risk zones as construction commences; • Material assistance in administering the Section 61 process including funding for a Section 61 officer; • Construction engagement; • Noise management and monitoring proposals; • Online noise and dust reporting which is accessible by the local communities; • Self-service portal for complaint recording and monitoring ; and • The provision of a dedicated Environmental Manager, with suitable acoustic experience, appointed by the airport, to liaise between contractors and Local Authorities.
<p>NV.1.1, p107</p>	<p>Replacement Noise Bund. The Applicant states that there is insufficient space to maintain the bund at the same height in this particular area. The ground noise model, as described in ES Appendix 14.9.3 Ground Noise Modelling [APP-173], was used to study bund design options and their relative performances, as reported. The Applicant considers that the proposed re-provision of the noise bund will provide equivalent attenuation to that which is currently provided and that the 0.5dB difference is negligible and not significant</p>	<p>The Applicant has not demonstrated that is has explored all the available techniques to ensure that the bund remains at the existing height or if the height needs to increase due to the changes to operational configuration. The Applicant comments that APP-173 provides noise modelling information but does not describe noise barrier options that were considered and how the final scheme was derived. The Applicant has identified that further mitigation is not necessary but has not demonstrated this in a transparent fashion that would allow others to come to the same conclusion. The opportunity to consider if and how the development may improve the situation for local residents appears to be overlooked.</p>
<p>NV.1.2, p107</p>	<p>Replacement Noise Bund: Both the removal and replacement of the western noise mitigation bund is comprised in Work No. 18 of the Draft DCO (Doc Ref. 2.1). The location and extent of the western noise mitigation under Work No. 18 is specified on the Works Plan (Sheet 5) (Doc Ref. 4.5) and therefore secured under the Limits of Works in Part 2, paragraph 6 of the Draft DCO (Doc Ref. 2.1).</p>	<p>The locations and alignment of the barrier should be secured through reference to ES Figure 5.2.1g [AS-135] in the Design Principles [REP2-037] for both the western noise bund/wall and noise barriers at the north and south terminal junctions (item N3 in Table 1.11.1 [REP2-037]). Furthermore, it is difficult to understand how the bund only mitigates noise at one property by 3dB. The Applicant should identify any temporary likely significant noise effects at all potentially affected receptors for</p>

	<p>Further design detail on the replacement noise mitigation (e.g. its height) is contained in Design Principle DBF13 of the Design Principles (Doc Ref. 7.3) secured under Requirement 4 of the Draft DCO (Doc Ref. 2.1).</p> <p>The construction programme as referred to in our response provides the estimate that the longest period over which part of the bund will be missing before it is reinstated will be 6 months. The 3dB increase in ground noise modelled for this period at Westfield Place would be temporary and would not constitute a significant effect. The Applicant has in any event undertaken to provide noise insulation to this property ahead of the bund being removed, to mitigate the effect.</p>	<p>the period when there would be no barrier or bund in place. This should be identified through provision of noise modelling results for the 'no mitigation' scenario. The JLAs would also like to see a commitment that no engine ground running is undertaken at the western end of the Juliet runway when there is no bund/ barrier in place.</p>
<p>TT1.4, p169</p>	<p>The Applicant has explored the potential mode share outcomes that might be achieved with the Project through the strategic transport modelling suite, including the likelihood of achieving zero growth in airport-related demand by private car and the scale of interventions that might be required to achieve different outcomes.</p> <p>The Applicant has determined its proposed commitments based on that modelling work, which suggests that an outcome in which no additional journeys would be made by road is not realistic; however, nor is it necessary to mitigate the impacts of the Project.</p> <p>The SAC have been developed to be realistic and proportionate to mitigate the surface transport impacts of the Project. There is no policy requirement to deliver the Project with 'no additional journeys' on the road, and it is misleading to focus on that theoretical proposition.</p>	<p>The Applicant has shared sensitivity test information that reflects a scenario of lower sustainable mode shares than required in the SAC and the consequent impact on the highway network. The results inevitably lead to more vehicles on the SRN and LRN, (approximately 7% more GAL related road traffic in 2032). The analysis presented traffic impacts, there was no associated air quality and noise assessment.</p> <p>The value of the exercise is that it shows the considerable relative influence of the parking and forecourt charges.</p> <p>Whilst we appreciate the extra modelling undertaken, we remain of the view that the impacts of not meeting the SAC are not known. We have stated before that traffic modelling is generally regarded as a means of comparing one forecast of the future with another. It tends not to be used in such an absolute way.</p> <p>Related to this is an implicit assumption by GAL that the future baseline rail table is at pre-Covid levels. SCC seek confirmation that should rail services not return to this level of service (Network Rail state it is theoretically possible but unlikely) then this event was foreseeable and is not a reason for GAL to miss SAC.</p>

		<p>We also recognise that GAL requires flexibility to meet the SAC using a variety of tools at its disposal and the various groups and forums that SCC are members of provide some scrutiny.</p> <p>The challenge put forward by GAL is whether the mitigation proposed is sufficient. The modelling results have been presented to suggest that the mitigation is. We have raised questions on some aspects in terms of highway and sustainable travel and whether it is realistic to assume that rail will deliver as modelled. The JSCs have concerns that if forecourt and parking charges are the only viable means of ensuring the SAC are met, there may come a point at which the 'push' is too strong and undesirable for GAL or results in unofficial parking solutions that may blight our community.</p>
TT1.6, p171	<p>The CAA survey records up to three legs of a surface access journey to the airport, which may be by the same or different modes. Data for both main mode of transport and, at an aggregate level last mode of travel were provided in the publicly available data for 2018 and 2019 but only last mode is published for the 2022 survey, although more detailed data on the use of multiple modes is available from the CAA.</p>	<p>This does not confirm which mode is attributed as 'main' mode for the SAC and actually confirms that last mode is being used more recently. This would imply that those driving to off-site car parks and complete their journey by public transport would be referred to as public transport. This would be misleading. The JSCs seek assurances that main mode is used for the SAC.</p>
TT1.9, p172	<p>The estimate of spaces not held by the airport operator but located within the airport boundary is included in the annual Gatwick Parking Survey used as the basis for modelling as part of the Transport Assessment. All of the car trips to and from these spaces are also included in the model as they have been captured in the extensive data collection supporting the model development.</p>	<p>We await updates of tables being submitted to the examination.</p>
TT1.12, p174	<p>The latest staff surveys show that the airport is still in recovery post-pandemic, and these mode shares are</p>	<p>This raises the question - when will the airport have recovered?</p>

	not a suitable direct comparator to the forecast mode shares in the strategic modelling, which take into account a range of sustainable interventions in the future baseline.	Does this indicate that the current ASAS is unrealistic?
TT1.13, p176	The Applicant is continuing to engage with SCC regarding the sensitivity tests and two meetings were held in May 2024 with further technical information provided to inform the Statement of Common Ground on this issue.	SCC acknowledge that some results have been shared but await others.
TT1.14, p177	The post-Covid testing shows mode shares only being 0.2 to 0.3 percentage points from the committed mode shares. The testing takes into account reduced rail services as well as bus and coach services, sustainable transport mode shares are seen to drop slightly in the with Project sensitivity test as a consequence of the lower total highway demand and reduced congestion. This is considered a reasonable response from the sensitivity test model.	<p>SCC acknowledge these results and seek confirmation that this would mean that the SAC have failed. No response to this failure has been given.</p> <p>SCC acknowledge that rail services are beyond GAL's control. What SCC is seeking is that in reference to SAC Commitment 16 - having regard to any circumstances beyond GAL's control which may be responsible - is that the assumption that services will return to pre-Covid levels is premature and that only service patterns below those currently being operated should be considered as circumstances beyond GAL's control.</p>
TT1.23, p181	<p>Regarding SCC's comments on the inadequacy of the proposed Active Travel infrastructure, set out in SCC's Local Impact Report.</p> <p>It is noted that SCC has no specific comments or questions in relation to the Applicants ExQ1 Response, therefore the ExQ1 reference no. TT.1.23 is considered closed.</p>	<p>A meeting was held to discuss Active Travel infrastructure on the 9th May. However, SCC's position remains unchanged in that SCC remains concerned about the inadequacy of the proposed Active Travel infrastructure as GAL have not amended the proposals following feedback/requests for improvements. In particular, these relate to</p> <ol style="list-style-type: none"> 1. The inadequacy of sections of the Active Travel route via Longbridge Roundabout; 2. Non-improvement of the Active Travel route between Horley and North terminal through Riverside Garden Park between the new A23 signalised crossing and Riverside Garden Park car park; 3. Non-improvement of the Active Travel route between Horley and South Terminal from the

		<p>end of The Crescent through Car Park B west of the railway;</p> <p>4. Non-improvement of the Active Travel route across the railway line south of the A23.</p>
TT1.30, p182	<p>In response to SCC Comment - When is the airport expecting to have recovered and what confidence can we have that behaviour will return to previous norms?</p> <p>If the traffic model was built now, against current mode shares, what would be required to meet SAC targets.</p> <p>Accounting for Covid-19 in Transport Modelling [AS-121] considers post-Covid impacts on mode shares.</p>	<p>The Accounting for Covid-19 in Transport Modelling [AS-121] report shows that the SAC had not been met. It did not propose further measures to meet the SAC and thus the question remains:</p> <p>If the traffic model was built now, against current mode shares, what would be required to meet SAC targets?</p> <p>This question is at the heart of ensuring that the DCO contains the necessary mitigation to meet any non-compliance with the SAC.</p>
TT1.35, p184	<p>The Applicant outlines process in place should the Annual Monitoring Report suggest in GAL's or the TFSG's reasonable opinion that a mode share commitment may not be met (i.e. an anticipatory breach). GAL will, in consultation with the TFSG, prepare an action plan to identify such additional interventions which are considered reasonably necessary to correct such actual or potential non-achievement of the mode share commitments</p> <p>This process ensures that any anticipated breach of the mode share commitments are responded to in good time with the intention of preventing any such breach.</p>	<p>Whilst agreed, it is based on good intention but has no penalty for failure.</p> <p>Failure would mean that the conditions report in the ES were under-reported and impacts unmitigated.</p>
TT1.36, p185	<p>The proposed active travel provision running alongside A23 London Road consists of widened and improved provision when compared to the existing. The route will be lit by updated street lighting along its length. The reduced speed limit on A23 London Road will introduce safety benefits and likely increase the attractiveness of the route for users to</p>	<p>SCC notes the improvements proposed. However, this is not considered a direct/suitable Active Travel route next to the highway and as per TT1.23, while a meeting was held to discuss Active Travel infrastructure on the 9th May. However, SCC's position remains unchanged in that SCC remains concerned about the inadequacy of the proposed Active Travel infrastructure as GAL have not amended the proposals following</p>

	<p>make the route busier, it is considered this route will also benefit from passive surveillance by road users, both of which reduce the potential for fear and intimidation.</p> <p>TT1.23 further comment.</p>	<p>feedback/requests for improvements. In particular, these relate to</p> <ol style="list-style-type: none"> 1. The inadequacy of sections of the AT route via Longbridge Roundabout; 2. Non-improvement of the AT route between Horley and North terminal through Riverside Garden Park between the new A23 signalised crossing and Riverside Garden Park car park; 3. Non-improvement of the AT route between Horley and South Terminal from the end of The Crescent through Car Park B west of the railway; 4. Non-improvement of the AT route across the railway line south of the A23
TT1.38, p187	<p>The inclusion of 1,100 spaces is the residual requirement for summer peak period parking capacity after taking account of the mode share targets set out in the Surface Access Commitments being achieved.</p>	<p>We await updates of tables being submitted to the examination.</p>
TT1.40, p188	<p>The Applicant does not accept that there is no sanction to a missed Surface Access Commitment. The revised SAC submitted at Deadline 3 includes a sanction to submit a mitigation action plan and proposed mitigation measures to the Secretary of State if they cannot be agreed with the Transport Forum Steering Group following two successive Annual Monitoring Reports showing a breach or anticipated breach of the mode share commitments.</p>	<p>SCC question whether this is a sanction when in reality, the submission of a mitigation action plan and proposed mitigation measures to the Secretary of State is an 'action' after two repeated failures to meet the SAC.</p>
LV3, p312	<p>The Applicant states that the design of the surface access improvements has progressed from the outset with the intent to reduce environmental impacts, notably removal of vegetation within the highways corridor and impacts on land within Riverside Garden Park. An explanation is provided on how trees and woodland have informed the Outline Landscape and Ecology Management</p>	<p>The JSC's still have some tree assessment concerns, however the detailed LEMPs will provide opportunities to develop enhanced improvements on the Gatwick Dairy Farm/ Church Meadows and Car Park B sites.</p>

	Plans which includes replacement open space and habitat to the west and east of Riverside Garden Park.	
LV13, p315	The Applicant held a meeting with Reigate and Banstead Borough Council on 14th May 2024 to confirm the nature and scope of the requested illustrative material. Images showing vegetation removal, the new landscape scheme at implementation and the maturing planting are being prepared to the specifications set out by RBBC.	A meeting has been held and new visualisations have been received. These are being reviewed but appear to be more helpful. RBBC will continue to work with the Applicant.
LV14, p318	Replacement Open Space at Gatwick Dairy Farm and Car Park B	Discussions are continuing between the Applicant and RBBC on the ROS. RBBC would be willing to accept the proposed ROS provided the Applicant maintains the two elements. The Applicant has indicated that they could undertake the maintenance of the Gatwick Farm extension to Church Meadows including the new footbridge and Car Park B extension to Riverside Garden Park. Access is still to be agreed.
W2, p323	GAL stated that only one component of the Project will require Ordinary Watercourse Consent (the extension to the culvert to the east of Balcombe Rd on the Haroldslea Stream), however the LLFAs calculate that it will be considerably more elements that will require OWC.	A productive meeting was held with the Lead Local Flood Authority and the Applicant on 7 th June at which it was recognised that a greater number of ordinary watercourse consents will be required than suggested. The LLFAs are now waiting to hear from the Applicant as to whether they wish to include Protective Provisions within the dDCO or alternatively apply for consent as and when it is required (possibly in batches, depending on phasing of the works) with the details being confirmed during the detailed design stage post DCO decision.
TT5, p325	Lane Rental and Permit Scheme - The Applicant has reached out to the highway authority and is seeking to arrange this meeting	This meeting was held on 24 th June and was a productive discussion of how the inclusion of the Permit Scheme and Lane Rental could be of benefit to all parties. This matter is now with the Applicant to consider their position.

SE7, p337	<p>The Community Foundation eligibility criteria generally prohibits grants to statutory organisations. Therefore, these organisations, such as local authorities, including town and parish councils are broadly ineligible because as the Community Foundations only fund non-statutory work and initiatives. Despite this, for a small number of specific initiatives, i.e. where local, parish or town councils are the only organisations delivering certain services and the services are above and beyond the organisation's usual statutory function, funding may be available through the London Gatwick Community Fund, subject to the priorities established within the draft section 106 Agreement. The London Gatwick Community Fund's primary focus is to reach a wide range of local causes and support the voluntary sector. Large refurbishments would potentially limit the number and breadth of causes the Fund can support.</p>	<p>As part of S106 negotiations the JSCs have raised specific queries in relation to the Community Fund, including the value, eligibility and assessment criteria and the mechanics of how the scheme will operate. For example, will there be an application form specific to the Gatwick Community Fund? Will it be evident to applicants that they are applying to the Community Fund?</p>
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GAL Environmental Appraisal of the impact of post-Covid traffic data for the ES [REP5-068]

5. This document provides an environmental appraisal of the implications of the post-Covid 19 traffic data to determine any new or materially different significant environmental effects compared to those reported in the ES. SCC has reviewed the Transport Sections para 2.3.7 to 2.5.1, review of the Post COVID assessment against submitted DCO Application (referred to as the application) impacts.
6. The table below contains SCC's review of the impacts identified in the post-COVID assessment against the reported impacts in the application. The 'Review of Impact' column contains the comparison between the scenarios.
7. To conclude, there is little change in overall impacts reported between the DCO Application and the post-COVID modelling assessment. Whilst there is an overall reduction in non-airport demand in the post-COVID modelling test, airport growth has remained unchanged. The implication is that airport traffic now plays a larger contribution to impacts than compared with the original assessment. As such, previous concerns raised by SCC are applicable and reiterated below:

- SCC has concerns as several locations are operating close to capacity including M23 J6 WB merge (operating just under 100%) and London Road/ Gatwick Road roundabout (operating at 95%) in the post-COVID modelling.
- Where this is the case, highway improvements should focus on accommodating improvements for buses & coaches (e.g. priority measures), active travel movements, taxis and service vehicles rather than private motorists.
- SCC wish to see wider active travel improvements to mitigate the highway impact on pedestrians and cyclists in terms of severance.
- SCC is concerned about the impact on the Local Road Network and that no mitigation is proposed, along with the associated impact on bus journey times with no specific bus priority measures identified for the route. This adds to SCC's concern that this will make GAL's mode share targets/ambitions more difficult to achieve without other interventions.
- SCC are concerned by forecast journey time increases on its network and require GAL propose mitigation accordingly.
- Regarding public transport impacts, specifically crowding on rail services, the overall impact to rail services is reduced slightly in the post-COVID modelling. Having said this, SCC remain concerned that crowding levels could be much worse if third party improvements to services are not delivered and that the level of crowding on services would impact on passenger decisions when choosing mode of travel.
- SCC consider that a contribution to the proposed Network Rail schemes assumed in the baseline should be provided to ensure that they are delivered.

Year	Topic	Review of Impact
2029	Severance	Unchanged impact to severance between the post-COVID modelling and the application.
	Driver delay	In the post-COVID modelling there are no junctions identified with high magnitude of impacts, whilst there were two identified in the application. However, there are two junctions identified with a medium magnitude of impact at Gatwick Interchange / M23 and London Road / Gatwick Road roundabout – medium sensitivity and therefore a moderate adverse effect.
	Pedestrian Cyclist amenity	Unchanged impact to pedestrian and cyclist amenity between the post-COVID modelling and the application.
	Crowding on Rail Services	The post-COVID modelling shows a small reduction in crowding for all services compared to the application. Overall seated loaded factor reduces from 1.4 (in the application) to 1.2 in post-COVID scenario.

2032	Severance	<p>In the post-COVID modelling, eight links have been identified with a >30% change in traffic (compared to nine in the application).</p> <p>Four of the identified junctions are in new locations (compared with the application) with adverse severance effects. Two were attributed to model noise. The other two:</p> <ul style="list-style-type: none"> - Airport Way A23 on/off slip (minor adverse) - North Terminal entry/exit (moderate adverse). <p>This link has no controlled crossing but expected low numbers of pedestrian flows – does have informal crossing with pedestrian refuge</p>
	Driver Delay	<p>The same number of nodes were identified in the modelling results with a medium or high magnitude of impact to driver delay.</p> <p>In the post-COVID modelling, five are newly identified:</p> <ul style="list-style-type: none"> - Cheam Road/ St Nicholas Way - M25 Junction 6 westbound merge - M23 Junction 9 (Gatwick Interchange) (two nodes) - London Road/ Gatwick Road roundabout. <p>SCC note M23 J6 WB merge – operating under 100% and London Road/ Gatwick Road roundabout continues to operate a 95% in the post-COVID modelling.</p> <p>Locations operating above capacity in future baseline.</p>
	Pedestrian and cyclist amenity	<p>Unchanged impact to pedestrian and cyclist amenity between the post-COVID modelling and the application.</p>
	Crowding on Rail Services	<p>Similar to the 2029 review, the post-COVID modelling shows a small reduction in crowding for all services compared to the application.</p> <p>Overall seated loaded factor reduces from 1.4 (in application) to 1.2 in post-COVID scenario.</p>
2047	Severance	<p>Fewer links identified in the post-COVID modelling with changes in traffic >30% than the application. Of those eight links identified in the application (compared with 12 in the DCO), seven have moderate adverse impacts, and two of which of interest to SCC.</p> <ul style="list-style-type: none"> - A217 London Road - North Terminal Entry/Exit
	Driver Delay	<p>There are fewer links identified in the post-COVID modelling with medium to high magnitude of impact compared to the application. 13 junctions are identified in the post-COVID assessment compared with 22 in the DCO.</p> <p>Five of the 13 are new locations.</p>
	Pedestrian and cyclist amenity	<p>There are three links identified with minor adverse impact to pedestrian and cyclist amenity, including:</p> <ul style="list-style-type: none"> - Longbridge Way

		- Perimeter Road North - Staff carpark Y The remaining five locations were assessed to have negligible adverse impact.
	Crowding on Rail Services	The post-COVID modelling shows a reduction in crowding for all services compared to the application.

GAL future baseline sensitivity analysis [REP5-081]

8. This document reflects a continuing lack of alignment between the Applicant and the JLA on matters to do with airport capacity and passenger forecasting and demonstrates the impacts of alternative forecasts submitted to the ExA that were prepared for the JLA by York Aviation.
9. Comments made below relate to a review of the surface access chapter C, pages 80 –100. SCC has reviewed the three Sensitivity Analysis tests against submitted DCO Application impacts. In the first instances SCC would like to see tables showing the numbers of passengers per modes that relate to other information provided. As it stands, it is difficult to draw conclusions based on different scenarios where low growth results in increased in traffic when only plots of ATMs are shown.
10. However, based on the evidence provided there is little change in overall impacts reported between the application and the three sensitivity tests analysis, with York High adding the highest volume of additional vehicles overall, but not presenting any significant change to impacts reported in the application. As such, previous concerns raised by SCC are applicable and reiterated below:
 - SCC has concerns as several locations are operating close to capacity and where this is the case, highway improvements should focus on accommodating improvements for buses & coaches (e.g. priority measures), active travel movements, taxis and service vehicles rather than private motorists.
 - SCC wish to see wider active travel improvements to mitigate the highway impact on pedestrians and cyclists in terms of severance.
 - SCC is concerned about the impact on the Local Road Network and that no mitigation is proposed, along with the associated impact on bus journey times with no specific bus priority measures identified for the route. This adds to SCC's concern that this will make GAL's mode share targets/ambitions more difficult to achieve without other interventions.
 - SCC are concerned by journey time increases on its network and require GAL propose mitigation accordingly.
 - Regarding public transport impacts, specifically crowding on rail services, the three sensitivity tests present very similar crowding levels compared to the DCO Application. York High shows largest increase in seated load factors, but is still only a 0.04 increase. The change in crowding on rail services is not significant to alter conclusions of ES Chapter 12.
 - SCC remain concerned that crowding levels could be much worse if third party improvements to services are not delivered and that the level of crowding on services would impact on passenger decisions when choosing mode of travel.

- SCC consider that a contribution to the proposed Network Rail schemes assumed in the baseline should be provided to ensure that they are delivered.

GAL response to EMG proposition [REP5-074]

11. Detailed comments are provided in the Joint Local Authorities Response, however specific points are reinforced below:

<u>Ref</u>	<u>Question</u>	<u>JSC response</u>
2.1.5	The fundamental question for this examination is whether Gatwick's mitigation approach is acceptable on its merits.	We contend the application has not shown the impact on the surface access networks if the SAC are not meet. Despite best intentions, the SAC requires two annual action plans to remedy failure to meet SAC and then no sanctions. This leaves a considerable period of time when the impact of the airport growth is greater than forecast.
4.1.10	There is nothing in policy to suggest that constraints in growth are necessary to achieve acceptable controls over transport impacts for airport or any other form of development. In this context, it would be disproportionate for there to be a constraint on growth to be related to adherence to such commitments which are enforceable in their own right.	How are these enforceable in their own right? What is not evident is whether, given the market of the airport, that public transport will peak at c50% and thus, the only option is parking charges (which would themselves be part of GAL's business plan) or high access charges. Both of which could have unintended consequences on the LRN and the community.

Updated Outline Construction Traffic Management Plan [REP5-021]

12. As per the title, the JSCs consider that this is an Outline Construction Traffic Management Plan (CTMP) and a more detailed CTMP will need to be developed in conjunction with the highway authorities. Detailed comments on this document have been submitted by Crawley Borough Council on behalf of the joint authorities. However, the Surrey authorities wish to highlight two specific points.
13. Firstly, in relation to the South Terminal Roundabout Contractor Compound. We note that GAL propose that construction workforce privately owned vehicles will still be able to access the site from a secondary entry point at Balcombe Road. SCC are not prepared to accept a construction compound access onto Balcombe Road other than for active travel. All access (construction vehicles, delivery and workforce private vehicles) should be from the purpose-built access off the South Terminal Roundabout, via the SRN. Active local travel can be provided for via a pedestrian/cycle access off Balcombe Road.

14. The second relates to the Longbridge Roundabout Compound. Current access proposals are not satisfactory as they do not prohibit right turning into the site across the A217 immediately northwest of the Longbridge Roundabout. The access should be designed to facilitate left in and left out only, with u-turns being undertaken at the two roundabouts either side of the access.
15. At Appendix A – SCC notes the restricted use access of Povey Cross Road/Charlwood Road/Horley Road/The Street as well as Balcombe Road – we query how this will be controlled? We note the addition of section 6.5 and query whether there should be a corresponding section on the Local Road Network (LRN).
16. We note that paragraph 6.9.4 states a commitment to the incorporation of Lane Rental Schemes, however Lane Rental and Permit Schemes remain a matter that is still under discussion (see ref TT5 above). We suggest that such agreed permits would be via Permit Scheme powers. Ideally this section would make reference to adherence to Permit Scheme powers and permit submission to agree traffic management measures.

Outline Reptile Mitigation Strategy (REP5-067)

17. The JSCs support the comments that have been made by the Sussex authorities.

Draft Development Consent Order – Schedule of Changes version 3 (REP5–004)

18. The JSC's note the introduction of Schedule 12 (Non-Highway Works for which Detailed Design Approval is Required) within the revised REP5 – 006/7 draft Development Consent Order (Version 7).
19. MVDC is particularly interested in the reference to Works No 40(a) (the pedestrian foot bridge over the River Mole) and recognises that the amended dDCO would result in the separation of agreeing the design for the Replacement Open Space (ROS) element, from the footbridge, despite the two being unavoidably linked.
20. Previously (REP4-054) the Council has expressed its wish to be the signing-off authority for the Landscape and Ecology Management Plan (LEMP) for the listed Works No.40 as the Local Planning Authority within which the ROS is located. The dDCO currently proposes (draft clauses 4, 8 & 40), that sign off should be obtained from CBC in consultation with MVDC and RBBC. It is the Council's view that, in the spirit of securing good and cohesive design, the sign off for both the footbridge and the ROS more generally should be undertaken by the same planning authority.
21. That being said, it is recognised that the Applicant's approach to highlighting Works No 40(a) specifically through the introduction of Schedule 12, and separately from the wider proposed LEMP process, does have some merit in terms of ensuring that connecting footbridge can be achieved more swiftly if needed and in advance of the ROS. For this reason, the Council does not object to the inclusion of Schedule 12.

Design and Access Statement Appendix 1- Design Principles Version 4 [REP5-031]

22. Our main comments on the Design Principles are incorporated into the Joint Local Authorities response. We were encouraged to hear at ISH8 that the Applicant is in advanced discussions with the former chair of CABE's Olympic Design Review Panel to set up a Design Review Panel for the Northern Runway with the aim of considering different elements of the project, should the DCO progress. It is therefore even more fundamental that the Design Principles are clearly defined for a future panel to work with.
23. From the JSC perspective one building we have particular concerns with is the very large multideck Car Park Y which could be even larger should the proposed onsite Wastewater Treatment works be included in the DCO. Given the prominence of this building close to the North Terminal and A23 London Road and its height and bulk, we would support the inclusion of Car Park Y as one of the development proposals to be tested by a future design panel.

Response to other submissions at Deadline 5

Network Rail PADSS (REP5-108)

24. The JSCs have reviewed with interest the PADSS between Network Rail and the Applicant as rail is forecast to be the dominant mode of sustainable travel. SCC is concerned therefore that the following points remain unresolved:
 - Gatwick's Northern Runway Proposal will add additional demand onto already busy services.
 - Gatwick have not identified or proposed any appropriate mechanisms which could fund investment in rail or set out any funding mitigations to manage the impact.
 - Network Rail's view is that the Transport Mitigation Fund is not an appropriate mechanism for securing this investment, and that a separate ringfenced Rail Mitigation Fund would be the most appropriate and streamlined approach.
 - Gatwick's modelling assumes that the rail industry will deliver a number of schemes in time for opening on the Northern Runway. Whilst these model input assumptions are uncommitted and unfunded, but nonetheless credible.
 - Network Rail cannot endorse the Airport's conclusion that "no significant increase in crowding on rail services is expected as a result of the Project" and that therefore "no additional mitigation is required."
25. This update from Network Rail shows that there is a considerable hole in GAL's approach to meeting its SAC with regards to rail. Failure to address these concerns is likely to result in increased driving and parking on the local road network which creates problems beyond those highlighted in the Environmental Statement.

National Highway PADSS (REP5-104)

26. The JSCs have reviewed with interest the PADSS between National Highways and the Applicant. We are pleased to see that there is some agreement within the PADSS but urge that that matters are addressed as any failure to resolve these concerns is likely to result in increased driving and parking on the local road network which creates problems beyond those highlighted in the Environmental Statement.