



**Gatwick Northern Runway Project DCO (Project Reference: TR020005)**

**Deadline 7 Submission (15 July 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 7 from the above Joint Surrey Councils (JSCs) on a number of Deadline 6 submissions:
  - Comments on GAL Deadline 6 Submissions
  - Comments on any other submissions received by Deadline 6
2. The Joint Local Authorities have provided collective comment on a range of submissions. These have been submitted by Crawley Borough Council on behalf of the authorities.
3. The Legal Partnership Authorities' have provided responses to ExA WQ2 and comments on DCO documents. These have been submitted by West Sussex County Council on behalf of the Legal Partnership.

**Response to GAL submissions at Deadline 6**

**Response to Rule 17 Letter – Car parking – version 2 [REP6-068]**

4. The JSCs have a number of comments and queries.

Ref	Issue	JSC comments
Notes for Table 1	Regarding the table footnotes, there are a number of factors to consider that make comparisons between the data in this table hard:	<ul style="list-style-type: none"> <li>• Footnote 10 states that <i>all daily values correspond to a peak August busy day to reflect the maximum estimated parking accumulation, which is used to determine required capacity consistent for parking demand.</i></li> <li>• The mode share data presented represents annual average values.</li> </ul> <p>The mode share presented in the table is not the mode share that will have driven the volume of parking demand presented. The JSCs request that mode share for August is also presented.</p>

Table 2	Comparison of Future Baseline and Proposed Development on airport employee parking.	<p>The JSCs are concerned that should the approx. 3,100 extra employees in the NRP scenario not be sufficiently incentivised to use public transport or active travel, it would lead to considerable unauthorised on street parking on our network and affecting our community.</p> <p>This is not suggesting that more parking spaces are created, but shows the challenge of meeting SAC 2 and SAC 4.</p>
Further notes for Table 2	Annual estimates of airport employee parking demand and capacity for the future baseline and Proposed Development.	<p>It is stated that the values correspond to a peak August day. We have stated above that the mode share information presented corresponds to annual average values.</p> <p>Furthermore, see our response to para 3.1.6 below.</p>
3.1.6	The Applicant will also support temporary reductions in the number of staff spaces available in the peak summer period should additional passenger capacity be required to avoid pressure on off-airport capacity and support sustainable mode share targets. It should be noted that in all cases the annual number of parking spaces shown assumes all car parks are open and available. Should there be less than the predicted demand for spaces some car parks will be withheld, except where it would reduce the parking product choice offered to passengers.	<p>The JSCs are particularly concerned that during the airport's busiest months for passengers (and therefore staff) that the staff car park will be made available for passengers to use. There is considerable likelihood that this would result in staff parking on-street and affecting local residents.</p> <p>As such, we request that the staff car park is made available to staff only. We are also concerned about how opening up more spaces for passengers to park will help mode share targets.</p>
3.1.12	The Applicant is working proactively to minimise the potential for less sustainable forms of car parking, such as off-airport unauthorised parking, whilst maintaining its commitment to encouraging those that can shift to more sustainable modes do so. It does so by planning in advance of any adjustment that is necessary and using the flexibility it has within the operation of existing car parks, such as switching some spaces from self-park to block-park, to maximise efficiency before any changes take place. This dynamic process doesn't easily lend itself to simple control.	The JSCs are not looking for any other control of parking other than ensuring that no more spaces than are necessary and capped at 1,100 through the DCO process.

<p>Table A1 Action Point 6 (bullet 1)</p>	<p>The authorities queried - The modelling shows there is no need for the extra spaces and, in terms of GAL saying that an additional 1,100 spaces are required, confirmation of how the need will be triggered is awaited. GAL <i>Response:</i> <i>The point raised in Surrey County Council's LIR and reiterated here relates to the estimated daily demand for the Future Baseline and Proposed Development in 2047 being almost the same, suggesting no further parking capacity is necessary for dual runway operation. The additional spaces are required both in the short term to supplement parking capacity during construction, when several existing car parks will be unavailable and in the longer term when peak parking demand is more sustained due to peak spreading as well as to accommodate an additional 13 million passengers. An increase in the capacity of North Terminal Long Stay is required to provide sufficient capacity both during and post-construction, when existing sites are either temporarily or permanently unavailable. This includes re-provision for other parking products, which need to be relocated due to construction that require the intensification (through decking) of existing long stay spaces.</i></p>	<p>The JSCs have reviewed the SAC 8A and subject to the following amendment (in bold) being added, are content with this commitment.</p> <p><i>.....and provide sufficient but no more additional on-Airport public car parking spaces than necessary <b>(and not exceed 1,100 spaces)</b></i></p>
<p>Table A1 Action Point 6 (bullet 4)</p>	<p>The Applicant has confirmed that it no longer assumes the addition of the 820 spaces proposed at the Hilton Hotel in its future car parking estimates.</p>	<p>We seek clarification as to what has happened to these car parking spaces in the transport modelling.</p>

GAL Note on habitat wide loss and replacement [REP6-071]

5. The figures showing locations of habitats are useful. The document still does not address the issue that woodland and pond loss is not being mitigated for adequately.
6. We note from ExQ2 (LV.2.3) that the Applicant has been asked to consider providing more detailed visualisations/photomontages for certain sensitive viewpoints. We further note that the Applicant has provided rendered photomontages (showing the baseline view, Year 1 and Year 10) within REP6-071, focussed on viewpoints affected by vegetation loss along the

A23/M23 corridor. We welcome these more detailed photomontages, although we note that some do not show existing/proposed airport buildings and infrastructure where these would be present within the view. Given the ExA's request and our previous requests for more detailed photomontages, we consider it would be reasonable and proportionate, for completeness and robustness in the assessment of the Project, for the applicant to supplement these rendered photomontages with additional equivalent ones covering key close/middle-range viewpoints where adverse effects have been identified. These should include Viewpoint 8 (PRoW 362a North of A23 & South Terminal), Viewpoint 18 (North Terminal Roundabout Sussex Border Path) and Viewpoint 22b (A23 footway looking North-West).

7. The document acknowledges that if DMRB LD117 buffer requirements (no climax trees/woodland within 9m of the highway) are adhered to, replacement woodland planting along the A23 corridor would not attain equivalent visual screening value to the current vegetation. Ultimately, National Highways has discretion over adherence to these standards within its land, but the Project is currently adopting a worst-case scenario with regard to the buffer. The note further acknowledges that 'Due to the complexity of the surface access improvements works and the constrained footprint of this development adjacent to Riverside Garden Park and Gatwick Airport, the implementation of advance planting is not viable in this context' (Para 4.3.9). As such, this reinforces the views previously expressed by JSCs regarding the long-term harm to visual and landscape receptors due to the time between removal of the existing A23 corridor vegetation and the maturation of replacement planting.
8. With regard to the Interaction of the Habitat Area Balance Calculation and the AIA (Section 4 of the note), we note this includes discussion of tree number balance and planting density, but there is an absence of discussion around canopy cover balance and associated ecosystem services. Due to the significant net loss of woodland along the A23 corridor, there will be a consequent net loss of canopy cover which will detrimentally affect attributes such as rainwater interception, solar shading and biodiversity value.
9. Para 4.1.3 states that the AIA data has been updated following the more detailed planting plans for the Museum Field Environmental Mitigation Area and that this shows, for the DCO Order Limits, the change in tree numbers is +5,631, ie an increase in tree numbers.
10. It is quite difficult to understand whether the Applicant is actually truly balancing tree losses with replacements. As the note explains, numerical tree planting figures are not necessarily helpful when set against density of planting. Planting too dense will result in trees dying and others not establishing well.

#### The Applicant's Response to Actions ISH 8 Ecology (REP6-088) and Biodiversity Net Gain Statement Version 4 [REP6-051]

11. The Examining Authority has asked the Applicant to provide BNG calculation for all land within the order limits. At present the Applicant has responded with this statement:  
*The order limit metric shows that the total baseline units of the order limits is circa 1,029 units with a post development score of 1,100 units – i.e. a gain of circa 70 units. This equates to a net gain around 7%.*

12. We request that the supporting documents are provided for the BNG calculation for all land within the order limits. Supporting documents required for us to review include:
  - BNG report (including habitat condition scoring);
  - UK Hab baseline figures and post development figures;
  - BNG metric (excel)
  
13. Section 2.1.3 of REP6-088 states *‘a BNG Metric for the order limits has been provided at Deadline 6 (ES Appendix 9.9.2 (Doc Ref 5.3)). This **does not** account for strategic significance **nor any delays in planting** due to the mechanism...’ This contradicts Section 2.6 of the update BNG report (REP6-051) which states *‘The BNG metric **includes** a Strategic Significance multiplier for both the baseline and post development habitat creation/enhancement. The Metric submitted at Deadline 6 has therefore been updated to include this multiplier’*. In addition, section 2.71 *‘In order to account for both advance planting (ie that occurring in advance of development impacts) and any delay in habitat creation between impacts occurring and planting taking place, the BNG metric submitted at Deadline 6 has also **been updated to including the advance/delay multiplier’** (our emphasis).**
  
14. We also request clarification regarding the *‘GIS system mechanism’*. It is not understood what it meant by this.
  
15. **BNG Additionality-** At present, it is unclear how the habitat enhancement / compensation proposed for protected species mitigation has been included in the BNG metric. Guidance states that habitat creation / enhancement for protected species can count towards no net loss (0%) in the BNG metric. To demonstrate BNG additionality, usually, two metrics would be submitted, one metric including all habitat proposals for protected species mitigation and a second metric with all other habitat proposals. Clear separation and clarity is required for the habitat creation / enhancement for protected species mitigation and the habitat proposals which are for BNG / enhancement.

#### North and South Terminal Roundabouts BAU Improvement Scheme Plans (REP6-012)

16. Although the North and South Terminal Roundabouts are beyond Surrey’s boundary, the JSCs would support pedestrian and cycle crossings on the design layouts to enable safe active travel around the airport. However, these would be most beneficial/should be provided as part of a wider active travel network rather than standalone features.

#### Surface Access Commitments Version 3 – tracked (REP6-031)

17. The JLAs include at Deadline 7 a tracked update of this document.

#### The Applicant’s Written Summary of Oral Submissions – ISH 8 Surface Access Commitments (REP6-078)

18. The JLAs include at Deadline 7 a tracked update of this document.

#### The Applicant’s Written Summary of Oral Submissions – ISH 8 Car Parking (REP6-079)

19. The JSCs have a number of comments.

Ref	Issue	JSC Comments
2.1.3	<p>The Applicant also highlighted that the SACs submitted at Deadline 3 included a new provision (Commitment 8A) requiring the Applicant to consult the Transport Forum Steering Group ('TFSG') and assess need for additional parking over and above that required to replace what is lost through the construction. The Applicant also committed in the Draft Section 106 Agreement to provide a contribution for the provision of parking controls in the surrounding area as part of a package of measures that sit within this fundamental commitment. These examples illustrate the advantages of a flexible toolkit approach to achieving mode share commitments.</p>	<p>The JSCs have nothing against the flexible tool approach. However, even this approach lacks controls and certainty should the SAC not be met. EMG provides that assurance.</p> <p>The local authorities continue to highlight to the Applicant that the parking contribution proposed within the S106 is insufficient.</p>
2.1.9	<p><b>Post-hearing note:</b> Ultimately, GAL considers the risk lies with it as to the extent any supply of car parking was showing the potential effect of compromising its adherence to the mode share commitments then GAL would need to exercise its dynamic pricing to deter parking demand, meaning GAL would suffer commercially by having 'over-provided' in that context. However, the alternative, whereby GAL was constrained and "under-supplied" parking may lead to greater impacts off-airport by consequence, even in circumstances where the mode share commitments were being achieved. It is considered, in this context, that the risk of 'under-supply' would be more problematic/impactful than any 'over-provision'].</p>	<p>The implication of this is that public transport interventions would not be forthcoming and would restrict demand by these modes. In that scenario GAL would only meet the SAC commitments if these charging measures priced passengers away from the airport. This seems a highly unlikely scenario. It is more likely that with EMG, GAL would do all it could to achieve compliance and maintain its chance to grow.</p> <p>Fundamentally, EMG is a backstop. GAL has full control to use its toolbox and policies as it sees fit. GAL would still be able to grow if it slightly missed the SAC (within 5% of 55%) but not if it breached the target by more than that amount.</p>
3.1.10	<p>The response by TFL in Deadline 4 Submission - Comments on responses to ExQ1 provides indicative figures for parking spaces provided by third parties at Heathrow, which when added to those of the airport operator shows a similar level of overall provision to Gatwick when combining both on-airport and off-airport capacity at both airports. The capacity <b>indicated in shows</b> 64,000 spaces currently provided at and near Heathrow, combining those operated by</p>	<p>We note that the source is missing as highlighted in bold.</p>

	the airport and by third parties. This compares to 63,600 spaces at Gatwick as recorded in the 2019 Gatwick Parking Survey.	
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**GAL response to Actions ISH8 – Surface Access Commitments [REP6-084]**

20. The JLAs include at Deadline 7 a tracked update of this document.

**The Historical Development of Gatwick Airport including a Review of the Extent of Past Ground Disturbance [REP6-070]**

21. The local authorities have long been requesting such a document. The information on past ground disturbance within Surrey is very useful to inform the need for future archaeological works.

**Draft S106 [REP6-064]**

22. A brief response to the draft dDCO Section 106 Agreement and Explanatory Memorandum submitted at Deadline 6 has been produced on behalf of the JLAs. Negotiations continue.
23. There are a number of Surrey specific points that we wish to raise. We note that SCC is not included as a member of the ESBS Steering Group in appendix 6 and ask that this is amended so that SCC is included to represent Surrey.
24. Queries remain with the Applicant in relation to the operation of both the London Gatwick Community Fund and the Hardship Fund.
25. Formerly Schedule 6(3) – Replacement Open Space (ROS) Maintenance Contribution, the JSC’s accept that this is an ongoing discussion and that alternative arrangements for maintenance of the ROS are being looked at with the intent that the Applicant will now maintain the space. However, while funding arrangements are no longer necessary the JSC’s would like to see confirmation that the ROS on Land West of Church Meadows, will be maintained, in perpetuity, by GAL within a formal agreement.
26. If it is not deemed to be appropriate to include this within the S106, then the Applicant is asked to confirm where this commitment will be formally set out and when this alternative agreement will be available.
27. The JSC’s are aware that there has been some discussion regarding the potential use of the Outline Landscape and Ecology Management Plan (oLEMP) to set this arrangement out and that further detail on this matter may be included within the Applicant’s response to ExAQ2 CA.2.9, which will be submitted at Deadline 7.

**GAL Second Change Application Report [REP6-072]**

- 28. The JSCs provided a response to the Applicant as part of its Project Change 4 Consultation on the 11<sup>th</sup> June 2024 for its proposed provision of an on-airport Wastewater Treatment Works (WWTW). It is noted that this consultation response has been attached in full within the report Appendices [REP6-077] pages 92-95 and provides the overarching position of the JSCs to the proposed project change. This is therefore not repeated in this submission.
- 29. Should the JSC’s feel that further comment is necessary, these will be submitted at Deadline 8 in response to ExA letter issued 11 July 2024 (PD-023).

**Response to other submissions at Deadline 6**

Govia Thameslink Railway Comments on any further information/submissions received by D5. (REP6-126)

Ref		JSC Comments
Para 1	Brighton Mainline will be full by the time the Gatwick Northern Runway is completed and the additional Airport passengers cannot be accommodated without unacceptable standing, and therefore it is critical that capacity is increased, to accommodate the increased passengers, and prevent the train service from collapsing due to running too many trains for the track capacity.	<p>The JSCs are concerned that the rail operator (and separately Network Rail) has repeatedly reported that there will not be capacity on the existing rail network to efficiently accommodate the forecast level of demand required for GAL to meet its SAC.</p> <p>We will follow this discussion and maintain concerns until this stakeholder confirms that growth could be accommodated.</p>

**National Highways – comments on any further submissions received by Deadline 5 (REP6-114)**

- 30. Para 5.6.2 – South Terminal Compound access from Balcombe Road – as a reminder, the JSCs note that this access will be restricted to the public. However, we remain concerned that construction workers can still access from Balcombe Road with associated impact on SCC’s Local Road Network. As per our concerns set out previously, the JSCs request that all access is from the South Terminal Roundabout, with Balcombe Road access restricted to active travel for local construction employees only.

**National Highways – Post- hearing submissions, including oral submissions to ISH8 (REP6-115)**

Ref	Issue	JSC Comments
2.12	National Highways confirmed in its deadline 5 cover letter [REP5-105] that it had received some technical information from the Applicant in response to matters raised in	SCC notes that compliance with the relevant design standards for highways in this instance relates to the Strategic Road Network. SCC is liaising with GAL in relation to the



	<p>National Highways Written Representation [REP1-088] on compliance with the relevant design standards for highways, notably the Design Manual for Roads and Bridges and the Project Control Framework. National Highways in the deadline 5 cover letter stated that it would update the Examining Authority on its position regarding design at ISH8. By way of update, National Highways is generally satisfied with the information provided however further work is required to ensure compliance with the relevant design standards.</p>	<p>highway infrastructure proposed on Surrey's Local Road Network.</p>
<p>2.16.2</p>	<p>National Highways noted at ISH4 that the Transport Assessment assumes the inclusion of a signalisation scheme (Business as Usual signalisation scheme), however, the Business as Usual signalisation scheme isn't secured in the dDCO.</p> <p>While National Highways has some residual modelling concerns (for example National Highways has not yet received all of the requested VISSIM modelling as set out in section 2.20.1.8 of the Statement of Common Ground between Gatwick Airport Limited and National Highways Limited) National Highways and the Applicant have agreed wording to secure the Business as Usual signalisation scheme.</p>	<p>SCC requests sight of the requested VISSIM modelling, otherwise notes National Highways and the Applicant have agreed wording to secure the Business as Usual signalisation scheme</p>