



# Gatwick Airport Northern Runway Project

## The Applicant's Response to Actions ISH9: Mitigation

### Book 10

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## Table of Contents

1	Introduction	1
2	Action Point 1	5
3	Action Point 2	5
4	Action Point 3	6
5	Action Point 4	8
6	Action Point 5	9
7	Action Point 6	10
8	Action Point 9	10
9	Action Point 11	16
10	Action Point 14	19
11	Action Point 20	20
12	Action Point 21	21
13	Action Point 22	21
14	Action Point 24	21
15	Action Point 25	22
16	Action Point 27	22
17	Action Point 29	25

## 1 Introduction

1.1.1 This document provides the Applicant's response to the actions arising from Issue Specific Hearing (ISH) 9: Mitigation. The actions relevant to the Applicant are as follows:

Action No.	Action	Deadline
1	Provide revised Surface Access Commitments to better reflect the expected mode shares at the time of the first and subsequent Annual Monitoring Reports.	Deadline 8
2	To submit a proposed new requirement capping the overall number of car parking spaces.	Deadline 8
3	To submit new suggested controls including details of a phasing plan re: Thames Water Utilities and sewerage capacity.	Deadline 8
4	To clarify Thames Water position re growth under the future baseline and sewerage capacity.	Deadline 8
5	Provide post Covid analysis showing whether June and not August is still the highest month for combined traffic flow, given main difference between pre and post Covid traffic relates to business and commuter traffic.	Deadline 8
6	The A27 Arundel Bypass will not now be funded. What effect has this for the analysis contained in the Transport Assessment.	Deadline 8

7	JLAs to submit interpretation of how noise contour limits would work with a half dB reduction every 5 years.	Deadline 8
8	JLAs to provide more detail on how a mechanism could work in the requirements to deal with potential exceedances 2 years in advance.	Deadline 8
9	To provide a note that explains how the noise information in the Aviation Policy Framework 2013 'Aviation key facts' and in the Applicant's Supporting Noise and Vibration Technical Notes to the Statements of Common Ground - Tracked Version June 2024 [REP6-066] Appendix E paragraph 2.2.2, regarding reductions in aircraft and engine noise respectively, would be likely to affect the air noise prediction values at the time dual runway operations commence compared with the air noise prediction values for 2019, assuming the same air traffic movements. The response may be expressed as the area of air noise contours at appropriate noise levels or an air noise change for day and night during the conventional periods.	Deadline 8
10	Other IPs, including the JLAs, the CAA, CAGNE and GACC are invited to offer their response to Action Point 9.	Deadline 8
11	Applicant to provide JLAs and CAGNE with the revised written proposals on the timing of the insulation scheme so that the JLAs and CAGNE can submit a response to the examination at D8.	Deadline 8
12	JLAs to provide comment on the impact on additional awakenings and whether they are	Deadline 8

	satisfactorily mitigated by the LAeq, 8 hr 48 dB limit at night.	
13	JLAs to submit proposed requirement for control of Engine Ground Running (EGR) noise.	Deadline 8
14	Provide response to the JLAs comments on the draft s106 agreement in relation to Air Quality monitoring post 2038.	Deadline 8
15	JLAs to provide suggested wording for the requirement on the Housing Fund.	Deadline 8
16	JLAs to provide detail and justification of the funding the JLAs consider would be satisfactory under Schedule 4 of the draft s106 agreement if agreement between the JLAs and the Applicant is not reached by D8.	Deadline 9
17	JLAs to provide draft wording for a requirement to secure the Community Fund.	Deadline 8
18	Submit unilateral undertakings if agreement on the draft s106 agreement is not reached	Deadline 9
19	Charlwood Parish Council to submit wording for the mitigation that it is seeking in relation to the Community Fund.	Deadline 8
20	Submit updated Carbon Action Plan to reflect the suggested amendments associated with R21	Deadline 8
21	Comment on Interested Parties' responses to ExQ2 CC.2.1 regarding the Finch case	Deadline 8

22	Submit an update on discussions with the JLAs regarding the mechanism for securing the tree planting to comply with CBC Policy CH6.	Deadline 8
23	JLAs to provide comments on the Applicant's D7 submissions regarding tree planting	Deadline 8
24	Provide commentary on the status of discussions regarding the Gatwick Greenspace Partnership and Landscape and Ecology Enhancement Fund	Deadline 8
25	Expand on how action is secured in response to complaints of odour impacts within the odour reporting process	Deadline 8
26	JLAs to provide comment on the Applicant's proposed odour reporting process	Deadline 8
27	Provide justification for the figures for the financial contributions in the draft s106 schedules. Additionally, provide further justification for the cost estimates for noise insulation and relocation assistance as discussed at CAH2	Deadline 8
28	Provide a control document signposting document	Deadline 9
29	Provide a response to the JSC comments in [REP6-101] item 4 identifying a range of documents / actions that JSC thought necessary	Deadline 8

1.1.2 The sections below provide the Applicant's response. For actions which require a more detailed response, a reference to the appropriate document is included.

## 2 Action Point 1

**2.1.1 The Examining Authority has asked the Applicant to provide revised Surface Access Commitments to better reflect the expected mode shares at the time of the first and subsequent Annual Monitoring Reports. The following response is provided.**

2.1.2 The Applicant has provided revised **Surface Access Commitments** (Doc Ref. 5.3 v5) to include new interim mode share commitments to be achieved by the first anniversary of the commencement of dual runway operations (set out at paragraph 4.3 of the **SACs**). The proposed interim mode share commitments are as follows:

2.1.2.1. **Commitment 1A** - A minimum of 54% of air passenger journeys to and from the Airport to be made by public transport; and

2.1.2.2. **Commitment 2A** - A minimum of 54% of airport staff journeys to and from the Airport to be made by public transport, shared travel and active modes.

2.1.3 The new Commitments 1A and 2A mirror the framing of Commitments 1 and 2 (set out in paragraph 4.2 of the SACs) but reflect a trajectory towards the air passenger and airport staff mode shares (respectively) set out in those commitments at the time of commencement of dual runway operations.

2.1.4 The Applicant notes that the Annual Monitoring Reports (AMRs) prepared in accordance with Commitment 16 of the SACs will be produced annually from six months prior to the commencement of dual runway operations. If the AMR shows that the mode share commitments (which include the new interim Commitments 1A and 2A) have not been met or may not be met, the Applicant will be required to follow the procedure described in section 6 of the SACs, including the obligation to produce an action plan to correct such actual or potential non-achievement of the mode share commitments as described in further detail in **Appendix C - Response on JLA's EMG Framework Paper** (Doc Ref 10.65).

## 3 Action Point 2

**3.1.1 The Examining Authority has asked the Applicant to submit a proposed new requirement capping the overall number of car parking spaces. The following response is provided.**

3.1.2 Whilst the Applicant considers the controls on parking described in submissions to date (including principally via the obligations in the SACs) to be sufficient, it notes the concerns raised by the ExA and IPs and in an effort to alleviate such concern has proposed a new Requirement in the draft DCO which could be added if necessary and which sets an overall cap on the number of car parking spaces provided by the undertaker within the Order Limits.

3.1.3 The new Requirement is as follows:

***Car parking spaces***

*37. (1) The undertaker shall not provide more than 53,260 car parking spaces within the Order limits unless otherwise agreed in writing by CBC.*

*(2) Upon commencement of the authorised development and by no later than each anniversary of that date, the undertaker must submit an annual report to CBC providing an update on the number of car parking spaces provided by the undertaker within the Order limits.*

3.1.4 The Applicant has explained this new Requirement in further detail in Appendix B of **The Applicant's Response to Rule 17 Letter – Parking** (Doc Ref. 10.64), including the basis for the 53,260 car park spaces which represents the existing parking provision, the number of parking spaces assumed as part of the future baseline and the 1,100 additional spaces to accommodate the NRP growth.

## 4 Action Point 3

**4.1.1 The Examining Authority has asked the Applicant to submit new suggested controls including details of a phasing plan re: Thames Water Utilities and sewerage capacity. The following response is provided.**

4.1.2 The Applicant is continuing negotiations with Thames Water Utilities Limited ('TWUL') regarding the impact of the Project on TWUL's local wastewater network and sewage treatment facilities, as was explained by the Applicant during Agenda Item 3 in ISH9 (see paragraphs 3.1.30 and 3.1.31 of **The Applicant's Written Summary of Oral Submissions ISH9: Mitigation** (Doc Ref. 10.62.2)). As noted during the hearing, the Applicant has included the following new Requirement 36 in Schedule 2 to the **Draft DCO** (Doc Ref. 2.1 v10) submitted at Deadline 8:



*Thames Water phasing plan*

*36—(1) Prior to the commencement of the authorised development, the undertaker must prepare and provide to Thames Water Utilities Limited a passenger throughput phasing plan which will include forecast passenger growth numbers for the period up to commencement of dual runway operations and for the period five years after the commencement of dual runway operations;*

*(2) The details in the phasing plan provided pursuant to sub-paragraph (1) must not materially exceed the forecast annual passenger numbers shown for the equivalent time periods for the airport with the authorised development in Table 9.2-1 of the forecast data book.*

- 4.1.3 Schedule 14 of the **Draft DCO** (Doc Ref. 2.1 v10) has also been updated to include the **Forecast Data Book** [[APP-075](#)] referred to in the text of the requirement as a document to be certified by the Secretary of State after the Order has been made:

<i>1. Document</i>	<i>2. Document Reference</i>
<i>forecast data book</i>	<i>ES Appendix 4.3.1: Forecast Data Book (Doc Ref. 5.3)</i>

- 4.1.4 The wording of the requirement commits GAL to preparing and providing to TWUL a passenger throughput phasing plan prior to commencing the Project. The phasing plan must include forecast passenger growth at the airport prior to the commencement of dual runway operations (anticipated to be approximately five years) and for the subsequent five year period after commencement of dual runway operations. The Applicant considers that this approximate 10-year period is appropriate for the plan to enable a long-term view of anticipated demand, particularly given that this is the period during which most of the passenger growth associated with the Project is forecast to take place in line with the **Forecast Data Book** [[APP-075](#)]. Sub-paragraph (2) stipulates that the phasing plan cannot show a level of passenger growth beyond that which was assessed in the Environmental Statement, specifically as shown in Table 9.2-1 of the **Forecast Data Book** [[APP-075](#)].
- 4.1.5 The Applicant is hopeful that inclusion of this requirement in the Draft DCO will provide TWUL with comfort regarding the anticipated passenger throughput trajectory (and therefore the correlative wastewater flows from the Airport), and certainty regarding their maximum extents (in line with the information provided

as part of the Application), to enable appropriate planning by TWUL of any required wastewater infrastructure upgrades.

- 4.1.6 The wording of the requirement does not impose a "Grampian" condition on the face of the DCO obliging GAL to agree such a plan with TWUL prior to commencing either the Project or dual runway operations, which is the preferred construction for TWUL of any requirement (see **TWUL's response to ExQ2 WE2.2** [[REP7-119](#)]). The Applicant has explained in previous submissions (see for example, section 2.3 of the **Second Change Application Report** [[REP6-072](#)]) that this is not considered to be appropriate or necessary, given that it would introduce unacceptable uncertainty to the delivery of our Project and which has prompted the proposed alternative on airport waste-water treatment works ('On airport WWTW') option under the DCO (via the recent Project Change 4).
- 4.1.7 If TWUL were to accept the wording of the requirement above and to provide confirmation to the examination that they were satisfied this addressed their concerns and avoided any potential impact on their network/processing facilities, then (subject to any challenge from the Examining Authority, or in turn the Secretary of State) the Applicant would be prepared to confirm that it no longer considers the alternative On-airport WWTW to be necessary. However, the intention would be to retain it in the DCO as an "alternative" option, in the event that the Examining Authority (and subsequently the Secretary of State) is minded to agree with TWUL that the imposition of a Grampian condition is necessary, or to hold any residual queries or concerns regarding the revised form of phasing plan wording proposed by GAL, notwithstanding any confirmation provided by TWUL on the same.

## 5 Action Point 4

- 5.1.1 **The Examining Authority has asked the Applicant to clarify Thames Water position re growth under the future baseline and sewerage capacity. The following response is provided.**
- 5.1.2 The Applicant refers the ExA to the response provided to ExQ2 WE.2.2 and WE2.3 [[REP7-093](#)] which summarises the work undertaken by both the Applicant and TWUL to understand and plan for the effects of the growth associated with the Project. It is noted that this records the position in respect of the Project, rather than the future baseline as disaggregated from that. That said, the proposed requirement referred to at Action Point 3 above, as well as the alternative option of the On-airport WWTW, would both also take account of

airport growth in the future baseline, rather than solely that attributable to the Project.

- 5.1.3 The Applicant considers that it is also for TWUL to provide a substantive response to this question, as the relevant sewerage undertaker, so that the Applicant does not inadvertently mischaracterise their position.

## 6 Action Point 5

- 6.1.1 **The Examining Authority has asked the Applicant to provide post Covid analysis showing whether June and not August is still the highest month for combined traffic flow, given main difference between pre and post Covid traffic relates to business and commuter traffic. The following response is provided.**
- 6.1.2 The Applicant has reviewed a selection of count sites to understand whether 2023 June was still the highest month for combined traffic flows. Table 1 shows this comparison for the morning peak, interpeak and evening peak periods.
- 6.1.3 The general pattern of August flows being lower than those in June is still observed, similar to that seen in 2016. Where the table shows slightly higher flows in August than in June in 2023, this is generally in the interpeak or evening peak periods, when total traffic flows are lower than in the morning peak periods and therefore the network is operating with greater spare capacity. These differences are also of a similar order to that which might be expected through typical daily variation in traffic flows.
- 6.1.4 These figures suggest that the use of the June busy day for the post-COVID assessment reported in **Accounting for Covid-19 in Transport Modelling** [[AS-121](#)] is not only consistent with the approach used in the core modelling but also remains a reasonable basis for assessment.

**Table 1: Comparison of observed differences between August and June traffic flows, 2023**

	AM1	AM2	IP	PM	TOTAL
A2011	-3.1%	+1.1%	-0.4%	-0.7%	-2.7%
A23 London Road	-17.0%	-16.0%	-3.0%	-6.0%	-8.0%
A24	-7.0%	-6.0%	+5.0%	+1.0%	0%
A23 Brighton Road	-21.0%	-21.0%	-2.0%	-5.0%	-11.0%
A23 London Road	-3.8%	-8.9%	+0.5%	+0.1%	-3.2%

M23 (J8 to J9)	-5.0%	-4.0%	+3.0%	+4.0%	0%
Negative figures indicate August flows are lower than June flows					

## 7 Action Point 6

- 7.1.1 **The A27 Arundel Bypass will not now be funded. The Examining Authority has asked the Applicant to consider what effect has this for the analysis contained in the Transport Assessment. The following response is provided.**
- 7.1.2 The core modelling used in the Application does not contain the A27 Arundel Bypass scheme, so the recent announcement has no effect on the analysis presented in the **Transport Assessment** [[REP3-058](#)] or in **ES Chapter 12: Traffic and Transport** [[REP3-016](#)].
- 7.1.3 Following discussions with National Highways, the A27 Arundel Bypass was included within the sensitivity testing reported in the **Accounting for Covid-19 in Transport Modelling** [[AS-121](#)]. This showed that the inclusion of the bypass in that post-COVID test led to only localised differences in flows on the network in that area, compared to the core modelling, and did not affect flows in the vicinity or on the approaches to the Airport.

## 8 Action Point 9

- 8.1.1 **The Examining Authority has asked the Applicant to provide a note that explains how the noise information in the Aviation Policy Framework 2013 ‘Aviation key facts’ and in the Applicant’s Supporting Noise and Vibration Technical Notes to the Statements of Common Ground - Tracked Version June 2024 [REP6-066] Appendix E paragraph 2.2.2, regarding reductions in aircraft and engine noise respectively, would be likely to affect the air noise prediction values at the time dual runway operations commence compared with the air noise prediction values for 2019, assuming the same air traffic movements. The response may be expressed as the area of air noise contours at appropriate noise levels or an air noise change for day and night during the conventional periods. The following response is provided.**
- 8.1.2 The Applicant has provided the expected reduction in fleet noise levels from 2019 to 2029 previously, and explains here how this is consistent with these two references.

- 8.1.3 In **The Applicant's Response to Actions ISH8 – Noise** [\[REP6-087\]](#) the Applicant reported the average reduction in Leq 8 hr night from the 2019 to the 2029 baseline for the Updated Central Case as 0.4dB estimated from the rule of thumb relating Leq noise level to contour area.
- 8.1.4 The future baseline noise modelling uses ATM forecasts that account for both fleet transition and baseline ATM growth without the Project. However, because of the Night Flight Restrictions, no baseline growth is forecast in the 8 hour night Leq 8 hour period (see ES Table 14.7.1) with the number of flights constant at about 125 from 2019 to 2029. So, by looking at the reduction in future baseline noise contours for Leq 8 hr night, from 2019 to 2029 we can see the effect of forecast fleet transition alone in terms of the Leq 8 hr 45dB contour area reducing from 159.4 to 147.1 which equates to roughly 0.4dB.
- 8.1.5 The Examining Authority is asking how this level of reduction is reconciled with two statements referred to in ISH9 and in the question, that appear to indicate that next generation aircraft are some 7dB quieter than the current generation aircraft that they replace. The two statements that appear to indicate that next generation aircraft are some 7dB quieter than the current generation aircraft that they replace are discussed below, but there are three main reasons for the level of reduction in air noise levels that is anticipated and why similar levels of reductions will continue.
- Aircraft typically operate for about 20-25 years, so each year only 4-5% of the fleet retire and the benefit of quieter aircraft materialise gradually over many years.
  - During the COVID years aircraft manufacturing stopped and is taking years to recover, which has slowed down fleet transition. This is why the Applicant had to introduce a slower fleet transition case and latterly an updated central case fleet.
  - The noise reductions for future generation aircraft are not generally 7dB, as discussed below when explaining the two references given by the ExA.

**The APF Key Fact Sheet does not indicate in itself that future aircraft noise levels as experienced at a particular location will be 7dB quieter**

- 8.1.6 APF Key Facts, p7 Aircraft Noise stated in full states:

*The UK was instrumental in the agreeing a decision by the Committee on Aviation Environmental Protection (CAEP) within ICAO which requires new types of large civil aircraft, from 2017, to be at least 7dB quieter on average in total,*

*across the three test points, than the current standard. Standards for smaller aircraft will be similarly reduced in 2020.*

- 8.1.7 The ExA asked in ISH9 if the noise assessment and hence noise envelope proposed noise limits account for this including that new aircraft will be 7dB quieter.
- 8.1.8 The summary statement in the APF, is referring to the fact that next generation aircraft are quieter than current generation aircraft. The APF here, in 2013, refers to the international agreement at the Committee on Aviation Environmental Protection (CAEP) to set the next aircraft noise certification standard, so called Chapter 14, 7dB lower than the then current Chapter 4 standard. As noted in this paragraph in the APF, the 7dB quieter margin is '*in total, across the three test points*'. Unlike noise measurement during certification for cars, lorries or even railway trains which measure noise levels and margins at a single location, when new aircraft are certificated they are measured at three locations; Lateral, Flyover and Approach (see the diagram on p140 of **ES Appendix 14.9.9 Report on Engagement on the Noise Envelope** [[AS-023](#)]). These three Estimated Perceived Noise (EPN) levels measured are summed to give the cumulative total EPN which sets the limit. The 7dB reduction referred to in the APF as the margin by which the then new Chapter 14 standard is below the then current Chapter 4 standard, is the margin in this summed total, not at any single measurement point, and which would on average be about 1/3 of this, ie about 2.3dB. Hence for a person hearing an aircraft at a single location the newer Chapter 14 standard reduces the allowable noise level experienced on the ground at any one location by about 2.3dB, not 7dB.
- 8.1.9 The ExA asked if this new standard has been accounted for in the noise modelling used for the noise assessment and in setting the noise envelope limits. The reduction in noise levels required by this international standard affects aircraft manufacturers aircraft designs so that they must reduce noise and helps to ensure that, in line with the first strand of the ICAO Balanced Approach, noise levels at source trend downwards, and hence aircraft fleets transition to be quieter. The Applicant has studied fleet transition at Gatwick in detail and produced forecasts of the fleet (see **Supporting Noise and Vibration Technical Notes to the Statements of Common Ground - Tracked Version June 2024** [[REP6-066](#)] Appendix F for full tables of fleets modelled for the Central Case and Slower Transition Fleets and **ES Addendum - Updated Central Case Aircraft Fleet Report** [[REP4-004](#)] Annex 1 for the Updated Central Case fleet, based on the best information available from airlines and aircraft manufacturers). These fleet forecasts were supplied to the Environmental Research and Consulting

Department (ERCD) of the CAA for noise modelling in their ANCON noise model. The fleet forecasts use up to 38 different types of aircraft so that the noise model accounts for the relative contribution of each aircraft type and hence models the differences in noise as the fleet transitions as well as grows.

- 8.1.10 As explained in ISH9 and SoCGs, ERCD has access to the Gatwick Noise and Track Keeping system and uses a large volume of measured noise data to calibrate their noise model. ERCD is engaged by the Department of Transport to ensure it understands aircraft noise developments internationally, including advising the DfT and attending CAEP committee meetings (as noted in the APF Key Facts quote above) that collate such information. ERCD has a detailed understanding of noise levels that are expected from aircraft that are currently not operating (so cannot be measured) but are forecast to in the lifetime of the Project. There are few of these aircraft types, primarily the Boeing 737 10MAX, Boeing 779MAX, and Airbus 319 NEO. The arrivals and departure noise emission levels for these relative to the ANCON surrogates (for which there is monitored noise data) are provide in Table 2.1.1 in **ES Appendix 14.9.2 Air Noise Modelling** [\[APP-172\]](#). To be clear, in the first case the surrogate (Boeing 738 MAX) is a next generation aircraft meeting the Chapter 14 requirement referred to in the APF referenced above. The latter two ANCON surrogates are current generation aircraft (Boeing 773 G and Airbus 319 C) and the noise emission levels in the ANCON model for the future aircraft types are when averaged (not totalled) across the arrivals and departures levels 3.2dB quieter than their current generation surrogates, consistent broadly with the statement in the APF.
- 8.1.11 The Chapter 14 category can be divided into 3 sub-categories, High, Base and Minus covering a cumulative (ie total over the three measurement locations) of 6dB (ie about 2 dB as measured at any single location). The current (2019-2023) fleet at Gatwick is split across this range of ICAO noise certification standards as follows:
- Chapter 3 & Below - 1%
  - Chapter 4 – 49%
  - Chapter 14 High - 10%
  - Chapter 14 – 15%
  - Chapter 14 - 25%
- 8.1.12 Further, it is worth noting that the allowable noise levels under the ICAO Chapter classification increase with aircraft weight. So, there are a wide range of noise levels from the aircraft operating at the airport. As the older, usually noisier

aircraft are retired at a rate of about 5% per year, they are replaced by significantly quieter aircraft which gradually reduces the fleet average aircraft noise level, but after several years it is the already quieter aircraft that are being replaced and the margin between them and the newer aircraft will be smaller unless new aircraft with still lower noise levels emerge. New aircraft that will come into service say 20 years or more from now have not been designed and their noise performance is not known. This is why airports cannot commit to Leq noise levels reducing into the 2040s.

**Supporting Noise and Vibration Technical Notes to the Statements of Common Ground - Tracked Version June 2024 [REP6-066] Appendix E**

- 8.1.13 Appendix E relates to ground engine running (EGR). Paragraph 2.2.2, is quoted in full below for reference. It summarises the basis of the EGR noise modelling referring to **ES Appendix 14.9.3: Ground Noise Modelling [APP-173]** for further details.

*2.2.2 The levels are based on measurements of engine testing for a 1998 Boeing 777 'current generation' aircraft that were collected as part of the 2019 survey (detailed in section 2.3 of ES Appendix 14.9.3) which is considered to be very much worst-case. The noise output during engine testing of this aircraft was noted to be very similar to that of the Boeing 747 aircraft, a similar aged aircraft type that has not been in regular service at Gatwick Airport since 2019. It should be noted that more modern variants of the B777 would be likely to be slightly quieter as this is the general trend for aircraft engine modernisation. No measurements were obtained during the survey for EGR tests on next generation aircraft but, given it is the main engines that are the dominant noise source for both EGR tests and taxiing, similar differences could be expected between EGR noise and taxiing noise. The 2019 survey results indicate that, for taxiing aircraft, the sound power level of next generation category E aircraft is 5 dB lower than the current generation equivalent. It also shows that for taxiing aircraft the more common (Category C) aircraft are 7-9dB quieter than the larger Category E. The smaller Category C aircraft being more common will make up the majority of EGRs, so the single predicted level for the larger current generation aircraft will arise for only a minority of EGRs, with the majority being around 7-9dB quieter. This makes the assessment very cautious, and increasingly so for future years as next generation aircraft become increasingly common and older types are retired.*

- 8.1.14 The relevant sentence refers to the difference between the larger and smaller categories of aircraft in general, and says nothing about current or next



generation aircraft: *It also shows that for taxiing aircraft the more common (Category C) aircraft are 7-9dB quieter than the larger Category E.* The full noise data showing this difference is shown in Table 3.1.1 of **ES Appendix 14.9.3: Ground Noise Modelling** [\[APP-173\]](#).

- 8.1.15 This sentence gives a comparison between current and next generation aircraft ‘*The 2019 survey results indicate that, for taxiing aircraft, the sound power level of next generation category E aircraft is 5 dB lower than the current generation equivalent.*’ The full noise data showing this difference of about 5dB for the larger aircraft is also shown in Table 3.1.1 of **ES Appendix 14.9.3: Ground Noise Modelling** [\[APP-173\]](#). Also in that table is the data for the more common smaller category of aircraft, which shows a difference of 3.3dB between current and next generation aircraft. The ground noise modelling uses the same fleet forecasts as the air noise modelling and thus also accounts for the fleet transitioning over time to quieter aircraft types.
- 8.1.16 The ExA’s question notes these noise levels during testing are engine noise rather than entire aircraft noise in flight. For aircraft in flight, i.e. for air noise, total noise from a departing aircraft is dominated by engine noise. Thus this 3-5dB difference for engine testing noise is broadly consistent with the difference in air noise for departing aircraft.
- 8.1.17 On arrival engine noise is not so dominant, aerodynamic noise is also significant, and so next generation aircraft are not as much quieter than current generation aircraft as they are on departure. The two examples of future next generation aircraft given in Table 2.2.1 in **ES Appendix 14.9.2: Air Noise Modelling** [\[APP-172\]](#) are on average 4.3dB quieter on departure but only 2.2dB quieter on arrival, compared to the current generation aircraft they replace. So, when discussing the difference between current and next generation aircraft noise from aircraft in flight in general it does depend on whether the receptor location of interest is more affected by departure or arrivals noise, and if asked to generalise an average difference of between the two of 3dB can be used.

### **Summary**

- 8.1.18 In summary, the air noise modelling takes full account of the fleet transitioning to quieter aircraft based on fleet forecasts produced using the best available information on airline fleets and procurement strategies relevant to Gatwick Airport, modelled using a noise model comprising of up to 38 different types of aircraft, each with noise emissions levels either calibrated by measurement at Gatwick, or for the few future aircraft types based on the best available knowledge of future aircraft design and noise emissions provided by ERCD who

are advisors to DfT on aircraft noise. The two references given by the ExA have been explained and the noise modelling is consistent with them.

## 9 Action Point 11

- 9.1.1 **The Examining Authority has asked the Applicant to provide JLAs and CAGNE with the revised written proposals on the timing of the insulation scheme so that the JLAs and CAGNE can submit a response to the examination at D8. The following response is provided.**
- 9.1.2 The **Noise Insulation Scheme** (Doc Ref. 5.3 v3) has been revised for Deadline 8 following further stakeholder feedback, including Figure 1 (appended to the NIS). The following text was provided to the JLAs and CAGNE on Friday 2 August 2024 to assist them in commenting on the discussions at ISH9, and comprises extracts of the revised NIS that relate to the timing discussed at the hearing.
- 9.1.3 **Noise Insulation Scheme Implementation Programme Update: 2 August 2024**
- 9.1.4 The Inner Zone will be based on the predicted Leq 16 hr 63dB daytime and Leq 8 hr night 55dB summer air noise contours for 2032. The inner zone would be formed on the larger of these, the Leq 8 hr night 55dB, which fully encloses the Leq 16 hr 63dB daytime contour. These noise levels have been assessed as the levels where noise effects to health and quality of life to residents would become significant if noise insulation was not provided. We propose that people living in these areas should be able to apply for a full package of noise insulation (see the table below for details).
- 9.1.5 For ground noise, the same qualifying noise levels would apply and the majority of properties qualifying would qualify due to air noise. There are approximately 20 additional properties that qualify due to predicted levels of ground noise outside the Air Noise Inner zone, as shown on Figure 1, appended to the **Noise Insulation Scheme** (Doc Ref. 5.3 v3).
- 9.1.6 For the new Outer Zone, we intend that the daytime Leq 16 hour 54 dB contour be used as the outer boundary. This goes significantly further than existing or emerging Government policy proposes. The Outer Zone will be comprised of three sub-zones (depicted on Figure 1 to the **Noise Insulation Scheme** (Doc Ref. 5.3 v3)):
- Outer Zone 1 Leq 16 hr 60 to 63 dB

- Outer Zone 2 Leq 16 hr 57 to 60 dB
- Outer Zone 3 Leq 16 hr 54 to 57 dB

- 9.1.7 GAL will launch the Inner Zone and Outer Zone 1 schemes within 6 months following the commencement of Work Nos. 1 – 7 (as defined in the DCO). Within 3 months of launch all properties within the geographic area that qualify will be contacted with details of the scheme and invited to apply. Where any household requires assistance in understanding what is on offer, GAL will make further contact with the householder to explain the offer by telephone or in person, making use of translators if necessary. Householders who have not applied will be contacted again within 6 months of them first being contacted.
- 9.1.8 Within not more than one year following the commencement of any of Work Nos. 1 – 7 comprised in the Project (as defined in the Draft DCO) GAL will contact all properties within the geographic area that qualify for the Outer Zone 2 scheme and invite them to apply. Within not more than two years following the commencement of any of Work Nos. 1 – 7 comprised in the Project (as defined in the Draft DCO) GAL will contact all properties within the geographic area that qualify for the Outer Zone 3 scheme and invite them to apply. Again, where any household requires assistance in understanding what is on offer, GAL will make further contact with the householder to explain the offer by telephone or in person, making use of translators if necessary. GAL will also again contact any householders who have not applied within 6 months of them first being contacted.
- 9.1.9 GAL will also advertise the opening of the Inner Zone and Outer Zone schemes on their website and through the local press.
- 9.1.10 The Inner Zone and Outer Zone 1 schemes will be launched at the commencement of works to build the Project (as described above), and GAL will complete both schemes for all homeowners who have applied within 2 years of launch, prior to opening of the Northern Runway, assuming reasonable access etc. For properties who apply after 2 years from the date of the schemes being launched GAL will carry out works to the properties as soon as is reasonably practicable.
- 9.1.11 The scheme will remain open after the runway opens and would be limited to one application per property. Applications must be made to GAL at the postal or email address provided and will require completion of an eligibility form. A phone number will also be provided for queries on the scheme to be discussed.



- Outer Zone 3 Leq 16 hr 54 to 57 dB £4,500

- 9.1.16 Only works to reduce noise in noise sensitive rooms (bedrooms, studies, living rooms and dining rooms) will be paid for. The acoustic insulation works are intended to improve acoustic insulation to noise sensitive rooms, not to otherwise improve the property. Any homeowner wishing to request additional acoustic treatments may do so at the same unit rates, paying any excess over the stated amount (as with the current NIS). The scheme will not replace acoustic insulation installed under the previous NIS unless its acoustic performance has significantly reduced below the level expected.
- 9.1.17 The limits on the funding amounts are exclusive of VAT, and will be reviewed every three years or as necessary (by reference to cost inflation) to ensure the scheme continues to deliver the intended degree of sound insulation.
- 9.1.18 In all cases the contractor will make an appointment to visit the home and discuss and agree the work to be undertaken with the property owner. The contractor will provide a quotation for the works, for GAL and the property owner to agree before planning installation. In the Outer Zone it is expected that the majority of installations will proceed without further surveys. In the Inner Zone, where homeowners request further treatments such as to upstairs bedroom ceilings, GAL may require a survey to be undertaken to confirm what is appropriate (as referred to at paragraph 4.3.9).
- 9.1.19 The Outer Zone 2 and 3 schemes will be rolled out starting with the higher noise band as follows:
- All properties within the Outer Zone 2, Leq, 16 hr 57-60dB band that have applied for the Outer Scheme within 2 years of its launch will have the noise mitigation measures installed within 2 year of routine use of the northern runway commencing, assuming reasonable access etc.
  - All properties within the Outer Zone 3, Leq, 16 hr 54-57dB band that have applied for the Outer Scheme within 2 year of its launch will have the noise mitigation measures installed within 3 years of routine use of the northern runway commencing, assuming reasonable access etc.

## 10 Action Point 14

- 10.1.1 **The Examining Authority has asked the Applicant to provide a response to the JLAs comments on the draft s106 agreement in relation to Air Quality monitoring post 2038. The following response is provided.**

- 10.1.2 The Applicant is in direct discussions with the JLAs about their comments on the draft s106 agreement in relation to Air Quality monitoring post 2038.
- 10.1.3 Item 12 under Schedule 1, Air Quality in the **Draft Section 106 Agreement [REP6-063]** details the conditions for obligations under schedule 1, air quality monitoring to cease.
- 10.1.4 The monitoring is proposed to cease in 2038 assuming there has been at least two years of compliance with the relevant objectives. **ES Chapter 13: Air Quality [REP3-018]** predicted no exceedances of the objectives in any year around the airport with concentrations being well below the objectives in 2038.
- 10.1.5 The Applicant considers that two consecutive years of monitoring showing no breaches of the relevant air quality standard is appropriate as current monitored concentrations demonstrate that concentrations within the vicinity of the airport are below the current air quality objectives for NO<sub>2</sub>, PM<sub>10</sub> and PM<sub>2.5</sub>. The existing concentrations are already below the future legal target for PM<sub>2.5</sub> due to be achieved by 2040 and WHO interim guideline for NO<sub>2</sub> (20µg/m<sup>3</sup>).
- 10.1.6 Monitored concentrations at the LGW3 monitoring station at Gatwick have been below the updated PM<sub>2.5</sub> legal standard of 10 µg/m<sup>3</sup> to be met by 2040 over the past 5 years (location shown on the Figure 1 in Appendix 1 of the **Draft Section 106 Agreement [REP6-063]**). Furthermore, within Horley Gardens the maximum annual average NO<sub>2</sub> concentration for 2023 was 20 µg/m<sup>3</sup>, half of the air quality objective of 40 µg/m<sup>3</sup>, meeting the more stringent WHO global interim NO<sub>2</sub> guideline value of 20 µg/m<sup>3</sup> (not currently part of UK legislation or policy).
- 10.1.7 The current concentrations are considered an indicator that there is a very low risk of exceeding the UK air quality objectives and demonstrate that breaches of the air quality standard are unlikely.
- 10.1.8 Nonetheless, the Applicant is continuing discussions with the JLAs to address any residual concerns.

## 11 Action Point 20

- 11.1.1 **The Examining Authority has asked the Applicant to submit updated Carbon Action Plan to reflect the suggested amendments associated with R21. The following response is provided.**
- 11.1.2 The Applicant has updated the **Carbon Action Plan** (Doc Ref. 5.3 v2) at Deadline 8.

## 12 Action Point 21

- 12.1.1 **The Examining Authority has asked the Applicant to comment on Interested Parties' responses to ExQ2 CC.2.1 regarding the Finch case. The following response is provided.**
- 12.1.2 The Applicant has provided a response to IPs' comments on the Finch case at Appendix D of **The Applicant's Response to Deadline 7 Submissions** (Doc Ref. 10.65).

## 13 Action Point 22

- 13.1.1 **The Examining Authority has asked the Applicant to submit an update on discussions with the JLAs regarding the mechanism for securing the tree planting to comply with CBC Policy CH6. The following response is provided.**
- 13.1.2 The Applicant has provided a new DCO Requirement in the Draft DCO (Doc Ref. 2.1 v10) which requires the Applicant to demonstrate compliance with CBC Policy CH6.

## 14 Action Point 24

- 14.1.1 **The Examining Authority has asked the Applicant to provide commentary on the status of discussions regarding the Gatwick Greenspace Partnership and Landscape and Ecology Enhancement Fund. The following response is provided.**
- 14.1.2 The Applicant considers that the proposed contribution to the Gatwick Greenspace Partnership is appropriate..
- 14.1.3 Appendix 2 to the **Draft DCO s106 Agreement Explanatory Memorandum [REP7-075]** provides detailed information about the scope and functioning of the Gatwick Greenspace Partnership.

Specifically, the spatial extent of the Gatwick Greenspace Partnership covers Horsham, Crawley, Horley, Reigate and Dorking. The JLAs have not provided the Applicant with details of any geographical areas which are not covered by the partnership boundary which they consider should be or provided justification for such. Neither have the JLAs provided any details of the locations of off-site planting that they believe are necessary to justify a separate fund for use by the JLAs.

## 15 Action Point 25

- 15.1.1 **The Examining Authority has asked the Applicant to expand on how action is secured in response to complaints of odour impacts within the odour reporting process. The following response is provided.**
- 15.1.2 The Odour Reporting Process Technical Note [[REP7-094](#)] has been updated to an **Odour Monitoring and Management Plan** (Doc Ref. 10.57 v2) which has been submitted to the examination and secures action in response to complaints. A DCO Requirement has been added to the **Draft DCO** (Doc Ref. 2.1 v10)

## 16 Action Point 27

- 16.1.1 **The Examining Authority has asked the Applicant to provide justification for the figures for the financial contributions in the draft s106 schedules. Additionally, provide further justification for the cost estimates for noise insulation and relocation assistance as discussed at CAH2. The following response is provided.**
- 16.1.2 Should agreement be reached with the JLAs on the DCO s106 Agreement, the Applicant will submit a final s106 Agreement Explanatory Memorandum at Deadline 9. The updated s106 Agreement Explanatory Memorandum will include justification for the final values of the financial contributions secured by the DCO s106 Agreement. If agreement cannot be reached, the Applicant will submit detailed justifications for the values at Deadline 9.
- 16.1.3 The table below provides the initial summary justification for the current values.

### **Justification for funds in the s106 Agreement**

<b>Contribution</b>	<b>Value</b>	<b>Justification</b>
Schedule 1, para 5 RBBC Air Quality Monitoring Contribution	£70,000 annually	Cost of the scope of works included in para 5.2 of Schedule 1.
Schedule 1, para 6	Payment of any invoice	Based on the value of replacing the monitoring equipment.



RBBC Monitoring equipment repair and replacement		
Schedule 1, para 7 Ultrafine Particles Contribution	£30,000	A contribution based on the equipment costs expected for 1 year of UFP monitoring.
Schedule 3, para 5 Off-Airport Parking Support Contribution	£49,500 annually	Cost of an officer.
Schedule 3, para 8 Transport Mitigation Fund	£10 million	As a contingency fund set aside to address unforeseen/unintended impacts of the Scheme, it is not possible to justify the quantum by reference to a specific 'mitigation' need in the same way as for other contributions listed in this table (as the 'need' is by definition, unknown/uncertain). Instead, the figure has been put forward to ensure a significant sum is available to draw down from in those specific, unforeseen circumstances.
Schedule 4, para 2 London Gatwick Community Fund	Mechanism based on passenger numbers	Detail is set out in Appendix 1 to the <b>Draft s106 Agreement Explanatory</b>

		<b>Memorandum</b> [ <a href="#">REP7-075</a> ]
Schedule 5, para 2 ESBS Fund	£14 million	The cost of delivering significant activities across the region to support delivery of the objectives set out in the ESBS.
Schedule 6, para 2 Gatwick Greenspace Partnership Contribution	£35,000 plus matching local authority contributions up to £15,000	Existing contribution scaled for the Project.
Schedule 7, para 2 Hardship Fund	£25,000 per year until DRO, then increases to £50,000	Available funds for a minimum of 5 households until dual runway operations then a minimum of 10 households.

### **Noise insulation Scheme and Home Relocation Assistance**

16.1.4 The following summarise the build up of the budgets:

#### **Noise Insulation Scheme Budget**

16.1.5 Residential NIS Inner Zone

- 400 properties
- cost per home vary from £5k to £26k (plus VAT)
- £26k covers a large house (5 bed) with ceiling upgrades

16.1.6 Residential NIS Outer Zone

- Total 3,500 homes:
- Leq 54-57    2,700 @ £4,500
- Leq 57-60    700 @ £6,500
- Leq 60-63    100 @ £10,500

**Home Relocation Assistance Scheme (HRAS)**

- Liability calculated based on a £40,000 contribution towards costs of moving home, estate agent fees, and Stamp Duty Land Tax for qualifying properties.

**17 Action Point 29**

**17.1.1 The Examining Authority has asked the Applicant to provide a response to the JSC comments in [REP6-101] item 4 identifying a range of documents / actions that JSC thought necessary. The following response is provided.**

17.1.2 The Applicant reviewed the comments made by the Joint Surrey Councils at Deadline 6 and has provided its response where the submission raises a new matter and/or where the Applicant considers such a response may be helpful to the ExA.

17.1.3 The Applicant provided specific responses to the comments made by the Joint Surrey Councils at Point 4 on the oCTMP at Section 7 of **The Applicant's Response to Deadline 6 Submissions** [[REP7-095](#)].

17.1.4 The Joint Surrey Councils also raised comments in response to ExQ1 that have previously been responded to by the Applicant. For the avoidance of doubt, the Applicant has responded in the table below.

Ref	Joint Surrey Councils comment	Applicant's Response
NV1.1.	<p>The Applicant has not demonstrated that it 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>The bund will be subject to detailed design and which point the exact height to deliver the best noise attenuation will be confirmed.</p>
NV1.2	<p>5.3 Appendix 5.3.2 Code of Construction Practice - Version 4 - Tracked [REP7-023] further amends to CoCP to address the need to construct the bund so as to minimise time over which the noise bund will have a gap in para 5.9.15: In addition, the provision of the new acoustic wall and the replacement bund will be undertaken in a sequence</p>	<p>The Councils request no engine ground running in the western end of the airfield where there is no bund/barrier in place. Engine testing happens near the centre of the airfield most commonly but the Applicant cannot commit to no testing in the western end in case of emergency.</p>

	<p>to ensure that the new acoustic wall is provided in the location where there is not an existing bund first, then the existing bund in so far as not retained will be removed and the remainder</p> <p>of the new acoustic wall and revised elements of the bund will subsequently be provided. There will be no delay in the works sequence, and the delivery of the acoustic wall and retained bund in their entirety will be provided as soon as is reasonably practicable.</p>	
<p>TT1.4, p169</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>A further response on the implications of additional Airport-related traffic is contained in response to ExQ2 TT.2.10 and the associated Appendix A <a href="#">[REP7-092]</a>. Although some parties have requested a test of the implication of the mode share commitments in the <b>ES Appendix 5.4.1 Surface Access Commitment</b> <a href="#">[REP6-030]</a> not being achieved, the Applicant remains confident that it can achieve those commitments. In any event the commitments are secured through Requirement 20 in the <b>draft DCO</b> <a href="#">[REP7-005]</a>. The 10% sensitivity test therefore suggests that an increase in Airport-related traffic of this magnitude on a busy June day, for whatever reason, is</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.

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.

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.

The challenge put forward by GAL is whether the mitigation proposed is sufficient. The modelling results have been presented to suggest that the mitigation

unlikely to alter the overall conclusions reached in the **Transport Assessment** [[REP3-058](#)] and **ES Chapter 12: Traffic and Transport** [[REP3-016](#)].

A response to "circumstances beyond GAL's control" has been provided in response to ExQ2 TT.2.8 [[REP7-092](#)]

	<p>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>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>	<p>A response on monitoring car travel and the use of CAA data is contained in response to ExQ1 TT.1.6 <a href="#">[REP3-104]</a> and ExQ2 TT.2.9 <a href="#">[REP7-092]</a></p>
TT1.9, p172	<p>We await updates of tables being submitted to the examination.</p>	<p>Updated tables were provided in the second version of <b>Response to Rule 17 Letter - Car Parking</b> <a href="#">[REP6-067]</a></p>
TT1.12, p174	<p>This raises the question - when will the airport have recovered? Does this indicate that the current ASAS is unrealistic?</p>	<p>Paragraphs 8.1.1 and 8.1.2 of the <b>Transport Assessment</b> <a href="#">[REP3-058]</a> sets out that the overall demand for air travel is expected to recover in the medium-term, through to the</p>

		mid-2020s. The current ASAS for the Airport was published in October 2022 and considers the airport in recovery.
TT1.13, p176	SCC acknowledge that some results have been shared but await others.	Information was issued to SCC on 28th May and a further meeting was held on 24th July 2024.
TT1.14, p177	SCC acknowledge these results and seek confirmation that this would mean that the SAC have failed. No response to this failure has been given. 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>The outcomes of the post-Covid testing do not show that the SAC have failed. Although those tests indicate mode shares very slightly below the target figures, the tests did not alter the assumptions about interventions to be made under the SACs, including parking and forecourt charges. In practice, the Applicant will be able to vary those charges, and the nature of other measures, to respond to and influence prevailing travel behaviour conditions in order to achieve the mode share commitments.</p> <p>A response to "circumstances beyond GAL's control" has been provided in response to ExQ2 TT.2.8 <a href="#">[REP7-092]</a></p>
TT1.23, p181	A meeting was held to discuss Active Travel infrastructure on the 9 <sup>th</sup> May. However, SCC's position remains unchanged in that SCC remains concerned about the inadequacy of the	In a meeting on 24th July between the Applicant and SCC, the Applicant reaffirmed its position on the scheme's active travel proposals. The Applicant considers that the active travel infrastructure provisions included in the current DCO



proposed Active Travel infrastructure as GAL have not amended the proposals following feedback/requests for improvements. In particular, these relate to

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 end of The Crescent through Car Park B west of the railway;
4. Non-improvement of the Active Travel route across the railway line south of the A23.

application submission (and which are summarised in Appendix A of **The Applicant's Response to Actions from Issue Specific Hearing 4: Surface Transport** [[REP1-065](#)]) are sufficient to achieve the mode share targets set out in the SACs and that no further mitigation is considered to be required.

Further details in relation to the proposals at each of the numbered locations raised by SCC are summarised below with reference to previous responses provided where appropriate:

1. With regards to SCC's comments on the inadequacy of the proposed Active Travel infrastructure as set out in SCC's Local Impact Report [[REP1-097](#)], a detailed response was set out in **The Applicant's Response to Local Impact Reports** [[REP3-078](#)], reference no. TT6. Additional detail in relation to justification of the widths of active travel provision on the bridges on the route to Longbridge Roundabout was subsequently provided in **The Applicant's Response to Deadline 4 Submissions** [[REP5-072](#)] reference no. TT6.

		<p>2. A response was set out in <b>The Applicant's Response to ExQ1 – Traffic and Transport</b> [<a href="#">REP3-104</a>], reference no. TT.1.27 with further detail provided in <b>The Applicant's Response to ExQ2 – Traffic and Transport</b> [<a href="#">REP7-092</a>], reference no. TT.2.11.</p> <p>3. A response was set out in <b>The Applicant's Response to Deadline 2 Submissions</b> [<a href="#">REP3-106</a>] reference Action Points 10 and 11 (Bullet 2 in the response).</p> <p>4. A response in relation to improvements of bridge crossings of the London to Brighton rail line was set out in <b>The Applicant's Response to Local Impact Reports</b> [<a href="#">REP3-078</a>], reference no. TT6. (Point 3 in the response). A response to requests to consider broader improvements of cycle infrastructure south of A23/M23 Spur between Balcombe Road and South Terminal / the rail line via GAL's South Terminal forecourt road network was shared in the meeting on 9th May and 24th July with the details summarised below:</p> <ul style="list-style-type: none"><li>• GAL's forecourt road network is used by a substantial proportion of drivers who may not be familiar with the road network (e.g. tourists) and the</li></ul>
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		<p>South Terminal forecourt road network contains a substantial number of accesses to/from car parks (including for rental cars). These characteristics are considered to lead to a higher than normal risk of collisions between motor vehicles and cyclists (e.g. potential collisions in the vicinity of junctions as a result of driver distraction associated with an increased focus on wayfinding).</p> <ul style="list-style-type: none"><li>• The preliminary design proposals include provisions for improved active travel connectivity between southeast Horley and South Terminal for pedestrian users via the new pedestrian link between Balcombe Road and Ring Road South. The risk of collisions between motor vehicles and pedestrians on the forecourt road network is considered to be lower than for cyclist users (with cyclist users typically travelling at substantially higher speeds).</li><li>• A relatively low volume of active travel users are forecast to travel between Horley east of the rail line and the airport as set out in <b>Transport Assessment</b> Diagram 14.2.3 [<a href="#">REP3-058</a>].</li><li>• Pedestrian travel distance between southeast Horley east of the rail line (commencing at a point</li></ul>
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		<p>200m north of the M23 Spur bridge over Balcombe Road) and the airport via the proposed new pedestrian link off Balcombe Road is approx. 1.7km for South Terminal and approx. 2.9km for North Terminal roundabout or alternatively 1.7km plus use of the inter terminal shuttle. This is considered to be suitable for commuters travelling by foot.</p> <ul style="list-style-type: none"> <li>• Cyclist travel distance between southeast Horley east of the rail line and the airport via Victoria Road Rail Bridge, NCR21 and the grade separated crossings of A23 London Road is approx. 3.2km for South Terminal and approx. 4.0km for North Terminal Roundabout. This is considered to be suitable for commuters travelling by bike.</li> <li>• No further mitigation at this location (beyond the pedestrian link between Balcombe Road and Ring Road South proposed as part of the current DCO application submission) is considered to be required to achieve the target mode share commitments set out in the SAC.</li> </ul>
TT1.30, p182	The Accounting for Covid-19 in Transport Modelling [AS-121] report shows that the SAC had not been met. It did	As the Applicant has already noted the post-Covid tests took account of current (observed) mode shares based on

	<p>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? This question is at the heart of ensuring that the DCO contains the necessary mitigation to meet any non-compliance with the SAC.</p>	<p>available information.</p> <p>The outcomes of the post-Covid testing do not show that the SAC have failed. Although those tests indicate mode shares very slightly below the target figures, the tests did not alter the assumptions about interventions to be made under the SACs, including parking and forecourt charges. In practice, the Applicant will be able to vary those charges, and the nature of other measures, to respond to and influence prevailing travel behaviour conditions in order to achieve the mode share commitments.</p>
TT1.35, p184	<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>	<p>A response clarifying the envisaged involvement of the Secretary of State is in response to ExQ2 TT.2.6 [<a href="#">REP7-092</a>]</p>
TT1.36, p185	<p>SCC notes the improvements proposed.</p> <p>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 9<sup>th</sup> May. However, SCC's position remains unchanged in that SCC remains concerned</p>	<p>Please see response above to TT1.23, p181</p>

	<p>about the inadequacy of the proposed Active Travel infrastructure as GAL</p> <p>have not amended the proposals following feedback/requests for improvements. In particular, these relate to</p> <ol style="list-style-type: none"> <li>1. The inadequacy of sections of the AT route via Longbridge Roundabout;</li> <li>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;</li> <li>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;</li> <li>4. Non-improvement of the AT route across the railway line south of the A23</li> </ol>	
TT1.38, p187	We await updates of tables being submitted to the examination.	Updated tables were provided in the second version of <b>Response to Rule 17 Letter - Car Parking</b> [ <a href="#">REP6-067</a> ].
TT1.40, p188	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.	A response clarifying the envisaged involvement of the Secretary of State is in response to ExQ2 TT.2.6 [ <a href="#">REP7-092</a> ]

