

<p>Principal Areas of Disagreement Summary Statement PADSS from Network Rail</p>	<p>Version Number: 32.0 Submitted at: 21/06/2024</p>
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Contents

1. Land implications	3
1.1. Land implications.....	3
1.2. Asset protection	3
2. Transport assessment: overall conclusion that no mitigation for rail system required	3
2.1. Lack of mitigative funding for rail.....	3
3. Transport assessment: technical modelling approach, assumptions, comprehensiveness and conclusions	86
3.1. Model supply assumptions.....	86
3.2. Technical model clarification and alignment.....	97
3.3. Gatwick Airport station capacity is a concern with future passenger levels.....	138
3.4. Wider network capacity issues that are unacknowledged and/or assessed	169
4. Transport Assessment: Sustainable Access Commitments queries and issues.....	1811
4.1. Mode share target for rail.....	1811
4.2. Mode share opportunities.....	1811
1. Land implications	2
1.1. Land implications.....	2
1.2. Asset protection	2
2. Transport assessment: overall conclusion that no mitigation for rail system required.....	2
2.1. Lack of mitigative funding for rail.....	2
3. Transport assessment: technical modelling approach, assumptions, comprehensiveness and conclusions	4

3.1. Unfunded model assumptions	4
3.2. Technical model clarification and alignment	5
3.3. Rail network performance challenge	6
3.4. Gatwick Airport station capacity is a concern with future passenger levels	7
3.5. Brighton Main Line freight services unaccounted for in Transport Assessment	8
3.6. Wider network capacity issues that are unacknowledged and/or assessed	9
4. Transport Assessment: Sustainable Access Commitments queries and issues	9
4.1. Mode share target for rail	9
4.2. Mode share opportunities	10
4.3. Clarity of mode share commitments	10

This Principal Areas of Disagreement Summary Statement (PADSS) has been prepared following the format set out in the Planning Inspectorate's letter of 8 September 2023.

The first version of this PADSS was submitted to the Examining Authority on 15 March 2024 as an annex to Network Rail's written representation. A second version was submitted to the Examining Authority on 6 June 2024. Since then, Network Rail has undertaken further analysis and modelling work to further clarify and refine its position in respect of the proposals. The table below sets out in track changes Network Rail's updated final position based on the engagement with Gatwick Airport Limited (GAL) and our understanding of the measures now proposed within the Surface Access Commitments.

~~Where issues and concerns have been deleted this is either because that issue or matter has been resolved and/or this is no longer a principal issue that Network Rail intends to pursue during the Examination.~~

~~Pending further discussions, it remains the case that Network Rail is not in a position to reach a view on the likelihood of the stated concerns being addressed during the Examination. However, this PADSS is intended to be a 'live' document so will be updated in due course to include this information.~~

Principal Issue in Question	Concern held	What needs to change/be amended/be included in order to satisfactorily address the concern	Likelihood of concern being addressed during Examination
1. Land implications			
1.1. Land implications	<p>The DCO includes the proposed compulsory acquisition of land and rights belonging to Network Rail. These rights include the permanent acquisition of land, the temporary occupation of land and the acquisition of rights benefitting Network Rail, including rights of access.</p> <p>Work is ongoing to review the impact of these proposed acquisition, but these access rights should be maintained so that Network Rail can effectively and safely access and maintain the railway.</p>	<p>Technical Clearance underway within Network Rail to clarify impact and acceptability of the land acquisition proposals.</p> <p>Network Rail expects all rights that it relies on to be retained.</p>	<p><u>Concern addressed.</u></p> <p><u>The terms of a Framework Agreement and inclusion of protective provisions in favour of Network Rail in the Order, have been agreed between the applicant and Network Rail.</u></p>
1.2. Asset protection	<p>The DCO includes the carrying out of works which are on or in close proximity to the railway. Network Rail's Southern Region Asset Protection and Optimisation team (ASPRO) must be engaged to support the safe delivery of works in a way which does not unduly place risk on the railway. In addition an ASPRO "Structures Agreement" will be required in respect of the proposed widening of the Airport Way bridge.</p>	<p>Gatwick Airport to engage with NR Southern Region ASPRO and agree any relevant Asset Protection agreements, including the Structures Agreement.</p>	<p><u>Concern addressed.</u></p> <p><u>The terms of the agreed protective provisions (referred to above) include a commitment to enter into an Asset Protection Agreement..</u></p>
2. Transport assessment: overall conclusion that no mitigation for rail system required			
2.1. Lack of mitigative funding for rail	<p><u>The Aviation Policy Framework notes that "The general position for existing airports is that developers should pay the costs of upgrading or enhancing road, rail or other transport networks or</u></p>	<p><u>With this policy in mind, Network Rail's position has been that Gatwick should provide a reasonable and proportionate</u></p>	<p><u>Gatwick hasve proposed several mitigation measures which address the principles of the</u></p>

services where there is a need to cope with additional passengers travelling to and from expanded or growing airports” (p.75, para. 5.12).

From a railway network perspective, the overall level of capacity provided in the December 2019 timetable plus lengthening limited services is the limit for the foreseeable future without further capacity upgrades, such as the Brighton Main Line Upgrade Programme. Rail industry forecasts – which only account for modest growth at Gatwick – indicate that the capacity limit on the Brighton Main Line will be exhausted in the 2030s – a similar timescale to this proposal being delivered. In particular, we are forecasting increased passenger standing on services from Gatwick in the morning peak and to Gatwick in the evening. Shoulder peak services are also forecast to experience standing. Without additional infrastructure capacity, accommodating growth over and above industry forecasts will require careful review of the allocation of services and distribution of passenger capacity.

Additional passengers associated with the Northern Runway Project would therefore be adding to the future crowding such that many of the additional passengers are likely to have to stand.

contribution to the rail network to mitigate the effects of airport-driven growth for which Network Rail and the wider rail industry, on behalf of the taxpayer, are not currently funded to provide.

Acknowledgement from Gatwick that the Northern Runway Project is a major change event for the railway and that business as usual arrangements are unsuitable.

We do not agree that there will be sufficient capacity on the rail network in the early 2030s to accommodate Gatwick’s growth whilst also meet current and future passenger expectations.

Gatwick’s Northern Runway Proposal will add additional demand onto already busy services and so we expect Gatwick to recognise their impact and contribution to a shared challenge.

Gatwick are yet to identify and propose appropriate mechanisms which could fund investment in rail, including infrastructure or train

concern. These are summarised below:

- Rail Enhancement Fund (Surface Access Commitment 14A¹, para (2))
- Transport Mitigation Fund (Surface Access Commitment 14)
- Sustainable Transport Fund (Surface Access Commitment 13)
- Rail Monitoring and Enhancement Plan (Surface Access Commitment 14B)²
- Further defined measures, in addition to the Rail Enhancement Fund (Surface Access Commitment 14A, para(1)) GAL must:
 - a. Fund the provision of additional wayfinding measures at Gatwick railway station;
 - b. Commission a station gateline capacity review at Gatwick railway station;
 - c. Fund the delivery of recommended measures of the gateline capacity review (proportionate to the impacts of the Project);

¹ Network Rail has agreed updated drafting to Surface Access Commitment 14A and understands this will be submitted at Deadline 9.

² Network Rail has agreed the wording of this with the applicant, and understands that a revised version of the Surface Access Commitments, incorporating 14B will be submitted at Deadline 9.

	<p>The Gatwick Northern Runway DCO does not include any mitigative funding to manage the impact of the proposed increase in passengers on the railway network.</p> <p>Gatwick have proposed a Transport Mitigation Fund which is, Network Rail understand, intended to support surface transport measures, as and when such investment is required to accommodate unexpected impacts resulting from an increase in airport passenger numbers. Network Rail have provided a separate response at Deadline 4 to the Transport Mitigation Fund explaining its unsuitability for mitigating rail-specific impacts.</p> <p>Network Rail also note the proposed Sustainable Transport Fund – This is an existing fund which is secured via the current section 106 agreement. It is funded as a levy on the number of available air passenger car parking spaces and the number of staff parking permits issued each year. This is not considered an appropriate mechanism to fund rail-specific mitigation either.</p> <p>The absence of specific mitigations or a future fund which could deliver investment in rail is important as Gatwick’s Holistic Strategic Transport (GHOST) Model predicts that, with the Northern Runway, the number of combined staff and passenger two-way rail trips to/from the Airport relative to 2016 (the base year for the model) will increase by 66% to 2029, 96% to 2032, and 119% to 2047. In absolute terms, this represents an increase from just under 50,000 daily rail trips in 2016 to around 96,000 in 2032. According to ORR station usage data, in the</p>	<p>service subsidy, to support the provision of sufficient capacity to serve the additional airport passengers anticipated in the future.</p> <p>Gatwick have not set out any funded proposals for mitigations to manage the impact of the additional airport demand, similar to the commitments Gatwick have made for the road network. There are a range of mitigation measures which could increase capacity of the Brighton Main Line and mitigate the impact of the proposals on the wider network, which we have set out in an attachment. We wish to discuss these with the applicant. Network Rail’s view is that the Transport Mitigation Fund is not an appropriate mechanism for securing this investment (see NR’s comments on responses to ExQ1 at Deadline 4). Network Rail’s view is that a separate ringfenced Rail Mitigation Fund would be the most appropriate and streamlined approach. This would enable the introduction of appropriate governance arrangement for these funds and the integration of appropriate rail industry representation.</p>	<p>d. <u>engage constructively and in good faith with Network Rail on timetable consultations in order to meet passenger demand requirements;</u></p> <p>e. <u>participate in planning and consultation of network upgrades to improve performance and reliability on the Brighton Main Line near Gatwick;</u></p> <p>f. <u>to fund the costs of NR undertaking an analysis of the benefits of signalling upgrades to secure earlier/later services; and</u></p> <p>g. <u>constructively engage with the station operator to identify and agree measures to be carried out within Gatwick railway station to enhance the customer experience at Gatwick railway station and optimise platform capacity and use and fund the delivery of such measures.</u></p> <p>Network Rail consider that these measures are the best achievable measures in the circumstances to resolve Network Rail’s concerns due to the:</p>
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year from April 2022 to March 2023, 16.5 million people passed through Gatwick station, equivalent to over 45,000 people each day. With ongoing demand recovery, by late 2023 the station had exceeded the passenger demand levels observed in 2016. Overall growth at Gatwick is forecast to more than double the number of rail passengers to the Airport by 2032 compared to today, of which around 40% are associated with the Northern Runway Project. The Northern Runway Project can be seen to add in the region of 20,000 additional rail trips every day, which Network Rail reflects is a material increase and that accommodating this demand will require a range of interventions.

At a strategic level, the overall level of capacity provided in the December 2019 timetable is the limit for the foreseeable future without further capacity upgrades, such as the Brighton Main Line Upgrade Programme. Rail industry forecasts – which only account for modest growth at Gatwick – indicate that the capacity limit on the Brighton Main Line will be exhausted in the 2030s – a similar timescale to this proposal. In particular, we are forecasting increased passenger standing on services from Gatwick in the morning peak and to Gatwick in the evening. Shoulder peak services are also forecast to experience standing. Additional passengers associated with the Northern Runway Project will be adding to the future crowding such that all additional passengers are likely to have to stand. We are working with GTR to finalise our analysis and will provide further representations in due course. Without additional infrastructure capacity, accommodating growth

- Complexity in aligning industry models with the Transport Assessment findings of the applicant due to fundamental differences in design and purpose.
- The overall uncertainty involved in forecasting future passenger demand, and
- Complexity in isolating the NRP Northern Runway Proposal impact from the wider network position.

On this basis, NR confirms its concerns in this regard have been addressed. On this basis, NR confirms that it does not object to the proposals on the grounds that no funding for mitigation has been provided.

~~over and above industry forecasts will require careful review of the allocation of services and distribution of passenger capacity.~~

~~The DCO inherently assumes the overall railway system will provide the rail capacity required by the Airport, including a return to December 2019 levels of capacity. This does not take account of the unprecedented financial constraints that the rail industry is operating within, which has resulted in recent capacity reduction. This includes reductions in the number of passenger trains leased by GTR. It is important to note that there is no public funding currently allocated or planned for the train service or infrastructure mitigations that Gatwick's expansion might require, and Gatwick have not identified mechanisms to fund any future shortfall. This is also out of alignment with the Aviation Policy Framework which notes that "The general position for existing airports is that developers should pay the costs of upgrading or enhancing road, rail or other transport networks or services where there is a need to cope with additional passengers travelling to and from expanded or growing airports" (p.75, para. 5.12).~~

~~Overall, our position is that Gatwick should provide a reasonable and proportionate contribution to the rail network to mitigate the effects of airport-driven growth for which Network Rail and the wider rail industry on behalf of the taxpayer are not currently funded to provide.~~

3. Transport assessment: technical modelling approach, assumptions, comprehensiveness and conclusions

<p>3.1. <i>Unfunded mModel supply assumptions</i></p>	<p><u>Gatwick’s transport assessment provides details of the passenger services which are assumed to be operating at the time of the runway opening.</u></p> <p><u>Network Rail have reviewed this to understand differences from the services which operate today, and those which could credibly operate in the future – subject to operational funding and rolling stock being secured.</u></p> <p><u>The following services are uplifts compared to today, but are credible as there is nominally infrastructure capacity for them:</u></p> <p><u>Gatwick’s transport modelling assumes that the rail industry will deliver the following schemes in time for the opening of Gatwick’s Northern Runway:</u></p> <ul style="list-style-type: none"> <u>a) 24 tph Thameslink services (also as per table 9.2.1). 9.4.16 of the Transport Assessment incorrectly states that 24 tph has been delivered – this requires Traffic Management which has not yet been delivered;</u> <u>b)a) _____ North Downs 3 tph service pattern;</u> <u>e)b) _____ Restoration of 4 tph Gatwick Express peak and off peak;</u> <u>d)c) _____ Reinstatement of peak hour services (as per the December 2019 timetable);</u> <u>d) Additional off peak fast services between Thameslink / London Bridge and Gatwick (Table 9.2.1) – these cannot be accommodated without a major change to</u> 	<p><u>It has not been possible to fully reconcile capacity supply assumptions used by Gatwick in the transport assessment with industry planning assumptions.</u></p> <p><u>In lieu of full alignment and agreement, initiatives which will support review of train service capacity in the future, and to engage constructively in future timetable consultations are required.</u></p> <p><u>For 3.1a, confirmation of the materiality of the 24tph Thameslink service assumption to the overall analysis.</u></p> <p><u>For 3.1b-d, clarification from Gatwick Airport on the materiality of these outcomes to the overall Transport Assessment if they are not in place.</u></p> <p><u>For 3.1b-d, proposals for mechanisms for Gatwick to fund/ part-fund the implementation of these services, should the industry not have implemented them by the timescales required by the NRP.</u></p>	<p><u>Whilst we have been unable to fully reconcile and agree modelling outputs due to modelling complexity and uncertainty, Gatwick have proposed several specific measures which will assist with understanding service supply requirements in the future and have been secured in the Surface Access Commitments as follows:</u></p> <ul style="list-style-type: none"> <u>• Rail Monitoring and Enhancement Plan (Surface Access Commitment 14B), and</u> <u>• GAL to engage constructively on timetable consultations (Surface Access Commitment 14A, (1)).</u> <p><u>It is also noted that the Rail Enhancement Fund, Transport Mitigation Fund and Sustainable Transport Fund (secured in the Surface Access Commitments) could support the delivery of measures in the future.</u></p> <p><u>On this basis, NR confirms its concerns in respect of these matters have been</u></p>
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	<p>service specification or increased infrastructure capacity.</p> <p><u>Network Rail note the table 9.2.1 in the Transport Assessment includes an uplift in the off peak fast Thameslink services in the core scenario, which is not supported as an assumption as there is not sufficient infrastructure capacity. However, it is noted that Network Rail's capacity concerns on London Bridge services are primarily peak time, so this is unlikely to materially change the findings.</u></p> <p>For points a-d, these model input assumptions are uncommitted and unfunded, but nonetheless credible. Point e is not compatible with the capacity available on the current infrastructure.</p>	<p>For 3.1e, Network Rail have received supplemental advice from Gatwick and are reviewing the implications alongside observed capacity data.</p>	<p>addressed. does not object to the proposals on the grounds of the model supply assumptions.</p>
<p>3.2. Technical model clarification and alignment</p>	<p><u>Network Rail have worked with Gatwick to review the Transport Assessment, and to compare the findings with industry demand forecasts.</u></p> <p><u>Collectively, we have identified material differences between the outputs presented in the Transport Assessment and industry forecasts, covering fundamental differences in both demand, supply, and distribution assumptions which interface with one another.</u></p> <p><u>Network Rail remain concerned with some of the Transport Assessment outputs:</u> <u>A large volume of information has been provided relating to forecast train loading data across services which would be affected by the Northern Runway Project. Network Rail are working to review</u></p>	<p><u>Full reconciliation of the models and subsequent outputs is impractical in the time due to fundamentally different model purposes, assumptions, and mechanics. Comprehensive passenger surveys would need to be commissioned to iron out some assumptions, for example.</u></p> <p><u>As these issues have not been fully resolved, Network Rail require that there are mechanisms to close this gap in understanding in the future.</u></p> <p>It is noted that Network Rail are in live discussions with Gatwick Airport Ltd to explore these issues.</p>	<p><u>Whilst we have been unable to fully reconcile and agree modelling outputs due to modelling complexity and uncertainty, Gatwick have proposed a number of initiatives which will support the resolution of this issue in the future, including:</u></p> <ul style="list-style-type: none"> <u>Rail Monitoring and Enhancement Plan (Surface Access Commitment 14B).</u> <p><u>Furthermore, Network Rail are preparing a Demand Forecasting Technical Note for the Brighton Main Line, and will work with Gatwick in line with existing</u></p>

~~these in detail with Gatwick Airport Ltd and to compare to observed and industry forecasts.~~

~~At this stage, 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" (Transport Assessment, page 73).~~

~~In summary, Network Rail's concerns relate to the following areas:~~

i. ~~The aggregation of passenger demand by hour and service group does not reflect the significant variation that results in uneven passenger loads across each of the Brighton Main Line service groups. Network Rail are reviewing observed loading data provided by GTR to understand the materiality of this concern as there is a risk t~~The Transport Assessment modelled outputs artificially smoothen out demand; when looked at one a service-by-service basis passenger crowding and standing is more acute.-

ii. ~~The Network Rail have been unable to fully reconcile~~ assumptions relating to assumed train capacities, including train lengths, formation and seated and standing densities. ~~Furthermore, NR remain of the view that T~~the requirements for airport passengers, particularly those with luggage, have a material impact on passenger experience and will reduce effective available

~~Ongoing liaison between Network Rail and Gatwick Airport Ltd is required to come to an agreement on factors such as these.~~

~~It is possible that initiatives or investments in services and infrastructure could be required to satisfy these concerns — Gatwick Airport Ltd should propose mechanisms for this to be implemented if required.~~

collaborative relationships, such as through the Transport Forum and Transport Forum Steering Group to come to a common understanding on route forecasts.

It is also noted that the Rail Enhancement Fund, Transport Mitigation Fund and Sustainable Transport Fund (secured in the Surface Access Commitments) could support the delivery of measures in the future.

On this basis, NR considers that there is an appropriate mechanism to address the unresolved issues in the future and does not object to the proposals confirms its concerns in respect of these matters have been addressed on technical modelling grounds.

capacity. ~~Network Rail are reviewing the provided data to understand the materiality of this concern.~~

~~iii.~~ iii. The modelling of the Gatwick Express and the impact of fare differentials on the overall distribution of capacity may smoothen out demand.

~~iii.iv.~~ iii.iv. ~~Alignment with r~~Rail industry forecasts and observed passenger loading data and subsequent conclusions. Our draft analysis is indicate forecasting high levels of passenger standing on services from Gatwick in the morning peak and to Gatwick in the evening, ~~before Gatwick's growth is considered.~~ Shoulder peak services are also forecast to experience standing.

~~iv.v.~~ iv.v. ~~Conclusion from Gatwick that future crowding levels are acceptable. We~~Network Rail note that it is an industry standard to aim for passengers at peak times to not have to stand for more than 20 minutes, and no standing at off peak times.

~~v.vi.~~ v.vi. It is unclear how much of the additional demand is allocated to the slow line services via Redhill ~~this area is under review.~~

~~vi.~~ vi. ~~Our review has also highlighted a fundamental difference in the baseline growth expectations for Gatwick Airport demand between those presented by GAL in the Transport Assessment and the growth rate which is provided for rail planning purposes by the Department for Transport. In short, Gatwick's~~

	<p>Business As Usual scenario has a much higher growth rate than the rail industry's baseline (based on our funder's assumptions). This means the impact of Gatwick's BAU growth is not currently accounted for in our analysis, creating a large gap between current forecasts and the NRP proposals. Network Rail are working to refine these assumptions and assess the impact of a more substantial BAU growth rate.</p> <p>—</p> <p>vii. Network Rail reserves the right to add items to this list as our analytical assurance activity continues.</p>		
<p>3.3. Rail network performance challenge</p>	<p>Maintaining good train service performance is an ongoing challenge on the Brighton Main Line. The high volume of trains, passengers, and mix of service groups including freight sharing the same infrastructure means small disruptions on the network can cascade and magnify, leading to cancellations and more significant network disruption.</p> <p>Gatwick's Transport Assessment does not recognise this ongoing challenge to maintain and improve performance across the Brighton Main Line and is instead proposing more trains and passengers on a system which is at or will soon be at its functional capacity*.</p> <p>It is in both Gatwick's and the rail industry's best interests to ensure a reliable rail service can operate otherwise existing performance challenges on the Brighton Main Line could significantly dent passenger experience and diminish Gatwick's</p>	<p>Network Rail has provided an indicative range of initiatives in the attached appendix which could improve rail network performance for Brighton Main Line and Gatwick Airport rail passengers. Network Rail expects Gatwick to contribute to, or fully fund, initiatives such as (but not limited to) those identified.</p>	

	<p>attractiveness for passengers. This could also threaten the achievement of the Airport's modal shift targets.</p> <p>Our concern is that Gatwick has not acknowledged how the Northern Runway Proposal will add to the interlinked capacity and performance challenge. Gatwick has also not proposed any initiatives to mitigate the impact of the Airport's growth on railway system performance.</p> <p>Similarly, the additional pressure placed on the rail network from Gatwick's expansion will mean engineering access for maintenance, renewals and enhancements will become increasingly difficult to accommodate and the pressure on alternative routes when passengers are diverted will also increase.</p> <p>*The train service operating in the December 2019 timetable was the most intensive possible on the existing infrastructure, without unacceptably compromising overall system performance. At peak times there were no more paths available, and the off-peak periods were used as a 'buffer' time to recover from delays which accumulate in the peak. Effectively, the December 2019 timetable was the 'cap' to the service volume which could be accommodated peak and off peak, without infrastructure enhancements.</p>		
<p>3.4.3.3. Gatwick Airport station capacity is a</p>	<p>The Gatwick Station Project has substantially increased passenger capacity and has transformed the journey from train to plane and given</p>	<p><u>Network Rail expect Gatwick to propose mechanisms to assess, fund and resolve forecast capacity</u></p>	<p><u>Concern resolved.</u></p> <p><u>Gatwick have proposed a range of initiatives to manage station issues</u></p>

<p>concern with future passenger levels</p>	<p>passengers travelling between Brighton and London easier, faster, more reliable journeys.</p> <p>The Gatwick Station Project delivers additional capacity but explicitly did not account for the impact of the Northern Runway Project. The evidence provided in the Transport Assessment indicates a particular issue with congestion at two of the ticket barriers (gate lines) due to the extra passengers arising due to the scheme, which requires further investigation and potential mitigative measures.</p> <p>Network Rail have undertaken a high level quality assurance exercise of Gatwick's station capacity modelling. This has included comparing gateline throughput to observed data, as well as understanding the current spread of passengers across the gatelines.</p> <p>Network Rail's conclusion is that the station modelling is sufficiently robust in its distribution of passenger across the northern and southern overbridges and gatelines — modelled distribution is in line with observed distribution from April 2024.</p> <p>The model assumes a slightly faster throughput of the gatelines compared to observed, but this is partially offset by observed data indicating instances of greater use of the southern gateline compared to the modelled analysis.</p> <p>As the modelling does broadly reflect the current operational situation, Network Rail are confident that there will be congestion at the arrival gatelines in the</p>	<p><u>issues at the station, in line with the Aviation Policy Framework.</u></p> <p>Network Rail have identified mitigation measures which would reduce congestion at the arrival ticket gates in the future. These are attached.</p>	<p><u>resulting from the project (which are secured in the Surface Access Commitments), specifically:</u></p> <ul style="list-style-type: none"> - <u>Fund the provision of additional wayfinding measures at Gatwick railway station,</u> - <u>Commission a station gateline capacity review at Gatwick railway station,</u> - <u>Fund the delivery of recommended measures of the review (within reasons agreed between the parties),</u> - <u>GAL to identify, seek agreement and fund measures to enhance the customer experience at Gatwick railway station.</u>
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	<p>future as passenger demand rises, and the Northern Runway Proposal will add to this congestion.</p> <p>Consequently, we do not agree with Gatwick's conclusion that "the Project does not require any additional mitigation works to Gatwick Airport station" (Transport Assessment, p. 83).</p>		
<p><i>3.5. Brighton Main Line freight services unaccounted for in Transport Assessment</i></p>	<p>We are concerned that Gatwick's Transport Assessment makes no mention of rail freight services. This is an issue because many rail freight services interact with Gatwick passenger services each day. This affects network performance and capacity and means that capacity is not necessarily available in the off peak to accommodate additional passenger services to serve Gatwick demands.</p> <p>Network Rail is also committed to deliver freight growth across the Region. Existing and potential future freight train usage of the network is another reason as to why the off-peak service assumptions provided in table 9.2.1 may not be deliverable as assumed.</p> <p>Allocation of limited network capacity will also become increasingly difficult into the future, with competing demands from the network.</p> <p>There is also an opportunity to deliver goods by rail to reduce road network implications which may also require freight terminal interventions such as at Crawley New Yard or in the immediate Gatwick station area. Gatwick has not acknowledged this opportunity at this stage.</p>	<p>Removal of the off-peak service uplift assumed in the modelling in table 9.2.1, and acknowledgement of freight services using the network in the off-peak.</p> <p>Consideration of the opportunities for delivery of materials by rail during construction.</p> <p>Identification of any required mitigative works to Crawley New Yard or in the immediate Gatwick station area and how these would be funded.</p>	

<p>3.6.3.4. <u>Wide</u> r network capacity issues that are unacknowledged and/or assessed</p>	<p>There are system-wide considerations that Network Rail must have due regard to as different proposals will interface with one another. Although these are outside the scope of Gatwick’s own DCO, the implications could be severe as pressures increase across the route from multiple directions. Concerns for the rail industry are<u>include</u>:</p> <ul style="list-style-type: none"> - <u>Maintaining good train service performance is an ongoing challenge on the Brighton Main Line, driven by high levels of infrastructure utilisation from several sources. The Northern Runway Proposal will increase rail passenger demand and therefore add to the overall issue.</u> - <u>The airport’s expansion will also mean engineering access for maintenance, renewals and enhancements will become increasingly difficult to accommodate. The pressure on alternative routes when passengers are diverted will also increase.</u> - <u>The current application for expansion at Luton Airport, which is served by the same Thameslink services that would be serving Gatwick. Increases in demand at both ends of the route clearly places further pressure on the overall service.</u> - <u>The Brighton Main Line is also a busy freight corridor, and the airport’s expansion proposals could conflict with Network Rail’s commitments to increase freight traffic on the network due to only limited capacity being available.</u> - Integration with the Elizabeth Line at Farringdon - with demand increases from Gatwick and Luton as well as general shift 	<p>Due to the uncertainty in these applications <u>and their cumulative or conflicting impacts with other network users</u>, it is unlikely not possible for <u>Gatwick can to satisfy address</u> these concerns.</p>	<p><u>Planning for future network requirements is the responsibility of Network Rail and train operators, and competing track access issues are managed by the ORR should these arise in the future.</u></p> <p><u>Gatwick has proposed steps which will assist with managing competing network access issues of relevance to the Airport, in particular committing to engage constructively on timetable consultations and to participate in planning and consultation of network upgrades to improve performance and these are secured in the Surface Access Commitments.</u></p> <p><u>The proposed Rail Enhancement Fund (Surface Access Commitment 14A(2)) also offers a mechanism to deliver improvements to address issues such as performance, with the Transport Mitigation Fund (Surface Access Commitment 14) a further backstop to assist with managing unforeseen challenges.</u></p> <p><u>Gatwick has also proposed a Rail Monitoring and Enhancement Plan (Surface Access Commitment</u></p>
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	<p>towards Farringdon from other London Terminal stations could result in wider system limitations and the need for interventions here.</p>		<p><u>14B) which secures monitoring of the rail network and sets trigger points for any proposed interventions and the process by which such identified intervention will be agreed between the NR and Gatwick.</u></p> <p><u>On this basis, NR confirms it is satisfied that Gatwick has proposed appropriate measures that are within its control to address the uncertainty regarding cumulative or conflicting impacts with other network users as a result of the Project have been appropriately secured.</u></p>
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4. Transport Assessment: Sustainable Access Commitments queries and issues			
<p>4.1. Mode share target for rail</p>	<p>Currently, Gatwick’s Sustainable Access Commitments (SACs) are stated as a combined ‘public transport’ target, differentiated by staff and air passenger trips.</p> <p>While this reflects the separate trip characteristics/modal choices made by passengers and staff, it makes it ambiguous what the rail industry mode share target is. The lack of a rail specific target means accountability in its achievement could be undermined and a A specific target would focus <u>rail</u> industry partners on a simple goal.</p> <p><u>This is a policy issue for the Examining Authority and relevant Local Authorities to consider, rather than an area which Network Rail requires resolution.</u></p>	<p><u>Not applicable, Network Rail is an infrastructure provider and so will work with Gatwick to achieve their modal shift targets however they are presented.</u></p> <p>Details from Gatwick on how it intends to monitor and manage rail mode shares and details on the opportunities that will exist for the airport to invest in initiatives which could increase rail demand and mode share — particularly for initiatives which would require subsidy.</p> <p>Having a clear rail mode share target that Gatwick is accountable for achieving.</p>	<p><u>Concern resolved.</u></p> <p><u>Network Rail is represented on the Transport Forum and Transport Forum Steering Group, where rail mode shares are monitored and managed.</u></p> <p><u>Furthermore, one stated use of the Rail Enhancement Fund proposed by Gatwick is to support achievement of the mode share commitments.</u></p> <p><u>Finally, Gatwick’s Surface Access Commitments includes higher mode share ambitions, indicating a positive direction for rail.</u></p>
<p>4.2. Mode share opportunities</p>	<p>Gatwick does not take a proactive approach to increasing rail mode share.</p> <p>The largest mode share uplift <u>for rail demand</u> is between 2016 and 2029 – which is a result of the completion of major schemes such as Thameslink and the Elizabeth Line, which have already been delivered. No further rail enhancements are identified in Section 7.3 of the Transport Assessment, or the updated version of ES Appendix 5.4.1: Surface Access Commitments. It is therefore unsurprising that mode share for rail only marginally improves between 2029 and 2047.</p>	<p>Identification of, and funding for, rail initiatives that would support Gatwick in achieving its public transport modal shift targets.</p> <p>Further discussion on the mode share opportunities for rail.</p>	<p><u>Concern resolved.</u></p> <p><u>Gatwick already has the Sustainable Transport Fund, supported by the Transport Forum and Transport Forum Steering Group. In the past, these have secured investment in initiatives which sought to support an increase in rail mode share.</u></p>

	<p>Network Rail points to the Aviation Policy Framework which notes that “all proposals for airport development must be accompanied by clear surface access proposals which demonstrate how the airport will ensure easy and reliable access for passengers, increase the use of public transport by passengers to access the airport, and minimise congestion and other local impacts” (p.75, para 5.11).</p> <p>As no rail interventions are identified by Gatwick, and the rail mode share uplifts are linked to schemes that have already been delivered, the increase in rail trips appears to be in line with the overall increase in passenger numbers rather than a concerted effort to encourage the use of rail.</p> <p>Furthermore, increasing highway capacity will make achieving public transport mode share commitments more challenging.</p>		<p><u>Gatwick has also proposed further bespoke initiatives in response to this issue, in particular the Rail Enhancement Fund which can be used to fund initiatives which increase rail mode share and funding analysis into the benefits / costs of earlier / later services.</u></p>
<p>4.3. Clarity of mode share commitments</p>	<p>The Transport Assessment is not clear as to the actions that Gatwick are proactively taking to drive mode shift, only that the Sustainable Access Commitments and mode shift targets are an output of the model specification. Objective 4 of the Transport Assessment reads “Objective 4: Deliver a new standard in sustainable surface access in support of Gatwick’s Decade of Change” (p.4, para. 50). This objective should be supported by clear initiatives to support monitoring and evaluation.</p>	<p>Gatwick have identified a list of the push and pull interventions to ensure the mode shift targets are achievable and thus achieved in the Statement of Common Ground.</p>	<p>Concern clarified; no interventions are proposed to increase modal share of rail.</p>