

## Draft GATCOM Relevant Representation 24/10/2023

As the airport's statutory independent consultative body, The Gatwick Airport Consultative Committee (GATCOM) welcomes the opportunity to register as an interested party and make its relevant representation on Gatwick Airport Limited's (GAL's) proposals to bring the existing Northern Runway into routine use alongside the main runway.

GATCOM consists of members from local authorities, business, airlines and environment and community groups. This inevitably results in many differing views. In the pre-application consultations GATCOM neither supported nor opposed GAL's vision for growth, nor attempted to document every view expressed by individual members, but instead highlighted areas where members reached a common view or understanding and made representations which encouraged steps to minimise adverse impacts, mitigate their effects and secure appropriate infrastructure. Where views are from a minority of members this is noted.

Many GATCOM members are expected to submit relevant representations on behalf of their own particular organisation.

The Committee understands GAL's desire to make best use of its existing runways. The Committee also recognises the importance of the airport as a significant asset that contributes to the regional and local economy but is also firmly of the view that any proposals for growth need to be achieved responsibly, sustainably, and with a focus on the well-being of communities around the airport and with mitigation to address the negative impacts of the airport's operations. GATCOM appreciates that there will always be a need to strike a balance between the important priorities of economic development and the local community's well-being.

In this relevant representation GATCOM has reviewed issues previously highlighted and tried to ascertain whether GAL have addressed those issues in the proposals submitted to the Planning Inspectorate. It is acknowledged that GAL have addressed within their proposals many of the issues previously raised, but GATCOM continues to have some concerns that are detailed below and included in the attached issues tracker, which lists the views previously expressed by GATCOM and, includes both a GAL response and the related PINS reference.

### Surface Access

Many of the proposed mitigation measures are to be delivered after the Northern Runway opens. GATCOM is concerned that communities may suffer the negative impacts of growth before the mitigation measures, such as highways improvements works and improvements to walking and cycling infrastructure, are delivered. In respect of promoting active travel, many GATCOM members believe more could be done to bring forward active travel improvements as part of the Northern Runway project.

GATCOM thinks that the mode share targets are considered to be ambitious and there appears to be insufficient evidence to demonstrate how the target mode share percentages for staff and passengers can be met. The behavioural choices

by passengers and airport staff are still uncertain following the COVID-19 pandemic and industrial action on the railways. GATCOM believes that the predictability of mode share needs further examination to test the modelling and assessment of the impacts of airport expansion in a range of scenarios, which should reflect the recent trends and latest forecasts in use of and shift to public transport and sustainable surface access modes. Specifically, the consequences for local communities of lower mode share transfer to sustainable sources should be further examined and additional mitigations proposed if appropriate.

GATCOM has mixed views about the level of car parking provision. Of key importance to GATCOM is the need to ensure there is sufficient car parking provision to accommodate those who need to travel by car to the airport where there are no suitable alternative sustainable transport modes (active travel, bus, coach or rail) and that the airport is incentivised to take all reasonable steps to encourage and facilitate sustainable transport modes.

There continues to be a need to address the problem of approaching traffic from the surrounding road network in Surrey, West Sussex, East Sussex and Kent. Pre-pandemic, the local road network, including country lanes, was already being commonly used to access the airport with traffic volumes exacerbated when there is disruption and congestion on the M25 and M23.

As part of GATCOM's response to the draft Airport Master Plan the A22, A264, A24 and the possibility of a Crawley western link road were highlighted as potential routes needing improvement where financial contributions to local authorities towards improvements may be needed. Most GATCOM members feel strongly that local road improvements need to manage the increased traffic levels should be funded by GAL or Central Government and not a burden on the local Council Tax.

We are aware that GAL has discussed the possibilities of direct rail services to Kent with Network Rail but that such services would not be considered to come forward as part of the assessment, which is disappointing. GATCOM does welcome that GAL has identified enhancements to the regional coach network to target areas that currently have a low public transport mode share but generate significant numbers of trips to and from the airport. These areas include: Sevenoaks and the Medway Towns, East Grinstead and Uckfield, Tunbridge Wells, Horsham and Worthing, Bexley and outer east London.

### Noise

GATCOM questions why GAL is not committed to limiting the simultaneous use of the northern runway for the full 8 hour night period 23:00 – 0700. Whilst the airline representatives view the period 06:00 to 07:00 as important to maintain the resilience and efficiency of route networks, GATCOM reiterates the comments made in its response to previous consultations that there should be no increase in ATMs on the main runway from 2018 levels during the night period 23.00 – 07.00 as well as giving a commitment to not to operate the Northern Runway during the night period 23.00 – 07.00 except when the main runway is non-operational. Airline representatives do not support this view but

some GATCOM members are seeking further reductions in night noise. However, GATCOM does understand this is an issue for the secretary of state as Gatwick is a designated airport.

**GACC are suggesting the following wording be added here:**

*GATCOM notes that no commitments have been made in respect of future levels of night flights and is not persuaded that the requirements of the Airports National Policy Statement (ANPS) have been satisfied in this respect.*

**The Secretariat suggests** the first half of the sentence could be added but the second half in relation to ANPS should not be included. This is therefore **subject to discussion at GATCOM** with advice from the GATCOM technical advisor.

**Airlines** have suggested the whole paragraph above titled 'Noise' be deleted. However, this is a point previously agreed and included in the GATCOM pre submission consultation responses to GAL so it would not be appropriate to remove.

#### Noise Envelope

GATCOM acknowledges that some members continue to express serious concerns about GAL's engagement mechanism for the Noise Envelope and that it did not follow the process set out in CAP1129.

**GACC are suggesting the following wording be added here:**

*As a result, GATCOM is not persuaded that stakeholder views have been sufficiently fully reflected in the noise envelope proposals including in respect of metrics, limits and policy compliance. GATCOM would therefore like to see further engagement on this key issue and new proposals brought forward.*

**GATCOM to debate if this is agreed or could it be added as a minority view?**

However given the advice of the Planning Inspectorate to the GATCOM Secretariat that "The statutory consultation required under the Planning Act 2008 (PA2008) is not set out in guidance such as CAP 1129, however if a developer is applying this guidance to its noise assessment, it is best practice to follow that guidance unless another appropriate method is applied", the appropriateness of GAL's chosen engagement mechanism will be a matter for the Planning Inspectorate to consider.

GATCOM is pleased that GAL have stated they will consider introducing a Noise Envelope even if the DCO does not proceed and that it would form part of the next Noise Action Plan and therefore be subject to review by GATCOM via NaTMAG.

GATCOM's environment and amenity group representative are however disappointed that would not happen until after the next Noise Action Plan is

reviewed in 2029 and would call for this to be implemented immediately should the DCO not proceed.

**Airlines** have requested that the above sentence be deleted. We have amended it to attribute it to a specific member. **GATCOM to discuss and decide if it should remain**

Clarity is needed regarding regulation of a Noise Envelope and the assignment of a responsible party for such regulation. Several Local Authorities members wish to have a regulatory role in the Noise Envelope that would involve reviewing and approving submissions and would allow action to be taken in the event of a breach.

**Airlines** have requested that the above paragraph be deleted. We have amended it to attribute it to a several local authorities. **GATCOM to discuss and decide if it should remain.**

GATCOM previously highlighted the need for the frequency of overflight to also be taken into account in the Noise Envelope. It is the frequency of overflight that is of greatest concern to local communities affected by aircraft noise. We appreciate that GAL has included a series of secondary noise metrics that consider frequency of overflight, but some GATCOM members consider that these need to form part of the quantified noise envelope itself, not merely be reported.

### Climate Change and Emissions

GATCOM does have concerns about the significant increase in greenhouse gas emissions and impacts on climate change and understanding how airport expansion can be achieved in the light of national and international carbon reduction targets.

GATCOM does appreciate that GAL are undertaking significant works to reduce airport emissions and as part of the Airport Carbon Accreditation process will be publishing a stakeholder plan for reducing the wider scope 3 emissions. GATCOM continues to wish to see a carbon reduction trajectory set for airport emissions and a process by which progress can be monitored and remedial action taken in the event that reduction targets are not being met.

## GATCOM DCO Proposals Issues Table

Ref	GATCOM views previously submitted	GAL Response	GATCOM comment	PINS Doc Ref
1	<b>GATCOM is concerned that many of the proposed mitigation measures are to be delivered after the Northern Runway opens. GATCOM is concerned that communities will suffer the negative impacts of that growth for many years before the mitigation measures, such as the surface access schemes, are delivered. This is not acceptable given the significant impact &amp; nuisance communities will suffer during the period of the project's construction. Everything that can be done to reduce &amp; minimise the negative impacts of airport growth should be a priority.</b>	Noted. To address GATCOMs concern, GAL produced a comprehensive Mitigation Route Map setting out the commitment & the phase of implementation to address all impacts associated with the Project.	<b>GATCOM acknowledges the mitigation route map but remains concerned that many of the proposed mitigations measured are to be delivered after the Northern Runway opens</b>	<a href="#"><u>APP-078</u></a>
2	<b>It is also important for GAL to develop a communication plan to keep affected communities informed of what to expect &amp; how local issues/problems that arise during the construction can be discussed &amp; addressed.</b>	GAL has produced a Code of Construction Practice. Section 4.12 sets out our approach to community engagement during the construction phase.	<b>Noted The Code of Construction Practice (CoCP) only provides outline information on the Engagement Plan. Detailed information should be provided by GAL at this stage in the form of an outline Engagement Plan</b>	<a href="#"><u>APP-082</u></a>

### 3 Climate

<b>Addressing the climate impacts &amp; measures to achieve low carbon growth must be a priority for GAL</b>	GAL has produced various documents including a carbon action plan; a climate change resilience assessment; & produced an assessment of Greenhouse Gas Emissions. The Environmental Statement provides an assessment of the impact of the Project on climate change (Chapter 15) & on Greenhouse Gases (Chapter 16).	<b>GATCOM still has concerns about the significant increase in greenhouse gas emissions and impacts on climate change and understanding how airport expansion can be justified in the light of national and international carbon reduction targets.</b>	<a href="#">APP-091</a> ; <a href="#">APP-187</a> ; <a href="#">APP-191</a> – <a href="#">194</a> ; <a href="#">APP-040</a> & <a href="#">APP-041</a> .
<b>4 GATCOM wishes to see a reduction trajectory set &amp; a process by which progress can be independently monitored &amp; remedial action taken in the event that reduction targets are not being met.</b>	The Carbon Action Plan sets out the actions to achieve net zero for GHG emissions under GALs control (scope 1 & 2) by 2030. It also sets out GALs commitment to advancing the Govts Jet Zero Strategy. Monitoring, governance & review is set out in section 4.4.	<b>GATCOM does appreciate that GAL are undertaking significant works to reduce airport emissions and as part of the Airport Carbon Accreditation process will be publishing a stakeholder plan for reducing the wider scope 3 emissions.</b>	<a href="#">APP-091</a>
<b>5 GATCOM also requests that the commitments given in the action plan be included in the new section 106 agreement.</b>	The Carbon Action Plan is secured by Requirement 21 in Schedule 2 of the DCO.	<b>Noted</b>	<a href="#">APP-006</a>

## 6 Surface Access

**The Committee has on-going concerns about the significant congestion (pre-pandemic) on the motorway & strategic road network in the area & on local roads as well as the capacity constraints on the Brighton Main Line to accommodate Gatwick's growth plans.**

A planning assessment of surface access & impacts on the transport networks can be found in section 8.4 of the Planning Statement. The Environmental Statement provides an impact assessment on traffic & transport. A full Transport Assessment with modelling & assessment on the highway network & on the rail network in terms of crowding has also been provided. It concludes that the highway improvement works would provide adequate capacity to cater for background growth & airport-related growth with the Project, providing an overall improvement to local highway network performance when compared to future baseline. They will also deliver key pedestrian & cyclist connections & infrastructure. The assessment has also shown that the growth in passenger & employee numbers as the result of the Project

**There continues to be a need to address the problem of approaching traffic from the surrounding road network in Surrey, West Sussex, East Sussex and Kent. Pre-pandemic, the local road network, including country lanes, was already being commonly used to access the airport with traffic volumes exacerbated when there is disruption and congestion on the M25 and M23.**

[APP-245;](#)  
[APP-37;](#)  
[APP-258.](#)  
[APP-260,](#)  
[APP-263](#)

can be accommodated on the public transport networks, with limited changes to crowding on rail services, increases in patronage on bus & coach services & sufficient capacity at Gatwick Airport station.

**7 Any increase in parking should be fully justified in the context of a sustainable surface access strategy.**

Car parking assumptions are provided in Chapter 12 of the ES. Commitments in relation to car parking can be found in the Surface Access Commitments document (section 5). The Surface Access Commitments document also provide details of the proposed increases in sustainable mode share & the commitments GAL is proposing for wider funding to support public transport & active travel

**GATCOM has mixed views about the level of car parking provision. Of key importance to GATCOM is the need to ensure there is sufficient car parking provision to accommodate those who need to travel by car to the airport where there are no suitable alternative sustainable transport modes (active travel, bus, coach or rail).**

[APP-037](#);  
[APP-090](#)



<p><b>8</b> There are Network Rail &amp; National Highways schemes included in the future baseline assessments that are not fully-funded or going through the relevant statutory planning process. The schemes include the Croydon Area Remodelling Scheme (CARS), a strategic rail improvement, &amp; the Lower Thames Crossing (LTC), a strategic highway improvement. Should these schemes not come to fruition, they may impact travel behaviours &amp; adversely affect the achievement of GAL's proposed mode share targets. GATCOM therefore questions whether transport network changes that are not currently fully-funded or going through the statutory planning process, should be removed from the future baseline assessments.</p>	<p>Our approach to cumulative effects &amp; inter-relationships with other projects is contained in chapter 20 of the ES</p>	<p>Noted</p>	<p><a href="#">APP-045</a>, <a href="#">APP-258</a>, <a href="#">APP-260</a></p>
<p><b>9</b> More information is also needed on how the Gatwick Mode Choice Model has been developed. It is difficult to understand &amp; the suggested changes in mode choice by passengers &amp; staff. Based on the information available the suggested mode share targets are considered to be ambitious because although Gatwick has been relatively successful in targets for sustainable transport mode share by passengers, this has not been the case for airport staff. In addition, the behavioural choices by passengers &amp; airport workers are also uncertain following the COVID-19 pandemic, with many people still reluctant to use public transport &amp; the continuation of remote/virtual working &amp; the reduced number of business trips. The predictability of mode share</p>	<p>see Transport Assessment. The development of the mode choice model, &amp; other model components, is in accordance with DfT guidance &amp; has been scrutinised by National Highways, Network Rail &amp; both West Sussex &amp; Surrey County Councils.</p>	<p><b>GATCOM still thinks that the mode share targets are considered to be ambitious and there appears to be insufficient evidence and mitigation to demonstrate how the target mode share percentages for staff and passengers can be met. The behavioural choices by passengers and airport staff are still uncertain following the COVID-19 pandemic and industrial action on the railways . GATCOM believes that the predictability of mode share needs further examination to test the modelling and assessment of the</b></p>	<p><a href="#">APP-258</a></p>

needs further examination to further test the modelling & assessment of the impacts of airport expansion in a range of scenarios, which should include a lower expectation of shift to public transport in line with recent trends.

impacts of airport expansion in a range of scenarios, which should reflect the recent trends and latest forecasts in the use of and shift to public transport.

10 **there is a need to also address the ever-growing problem of approaching traffic from the surrounding road network in Surrey, West Sussex, East Sussex & Kent. Pre - pandemic, the local road network, including country lanes, was already being commonly used to access the airport with traffic volumes exacerbated when there is disruption & congestion on the M25 & M23. Account also needs to be taken of the site-specific impacts of emerging large development sites in the area; these include Gatwick Green, & Horley Business Park. Due to their proximity, these strategic sites will have a cumulative impact on the transport network. As part of GATCOM's response to the draft Airport Master Plan the A22, A264, A24 & the possibility of a Crawley western link road were highlighted as potential routes needing improvement where possible financial contributions to local authorities towards improvements may be needed.**

The Transport Assessment & modelling includes the whole of the local network as well as the Strategic Road Network. This Transport Assessment is provided at Section 7.4 of the DCO & it's associated appendices include information on modelling & junction assessments. The Transport Assessment provides information on a Cumulative Development scenario, which includes the Gatwick Green & Horley Business Park developments. (It is noted that neither Gatwick Green nor Horley

**GATCOM feel strongly that local road improvements needed to manage the increased traffic levels should be funded by GAL or Central Government and not a burden on the local Council Tax.**

[APP-037](#),  
[APP-153](#),  
[APP-258](#),  
[APP-260](#)

Business Park have put forward significant highway improvements for their development sites)

**11 GATCOM also continues to believe that more focus needs to be given to improving the east – west links to the airport particularly to bring forward initiatives to serve passengers & staff accessing the airport from areas in Kent by rail & coach. For example, there is a need for GAL to actively support the need to reinstate the rail service to Tonbridge via Redhill & Edenbridge, with a possible link to the existing service between Gatwick & Reading. This would help widen the economic benefits of the airport to Kent.**

The Transport Assessment provides information on journeys from all parts of Gatwick's catchment, including Kent. The Surface Access Commitments includes specific measures to encourage public transport mode share for journeys from Kent & East Sussex.

**We are aware that GAL has discussed the possibilities of direct rail services to Kent with Network Rail but that such services would not be considered to come forward as part of the assessment, which is disappointing. GATCOM does welcome that GAL has identified enhancements to the regional coach network to target areas that currently have a low public transport mode share but generate significant numbers of trips to and from the airport. These areas include: Sevenoaks and the Medway Towns, East Grinstead and Uckfield, Tunbridge Wells, Horsham and Worthing, Bexley and outer east London.**

[APP-258](#),  
[APP-260](#)

## 12 Air Noise

**GATCOM questions however why GAL is not committed to limiting the use of the northern runway for the full 8 hour night period 23:00 – 07:00. Whilst the airline representatives view the period 06:00 to 07:00 as important to maintain the resilience & efficiency of route networks, GATCOM reiterates the comments made in its response to the draft Airport Master Plan requesting that there be no increase in ATMs on the main runway from 2018 levels during the night period 23.00 – 07.00 as well as giving a commitment to not to operate the Northern Runway during the night period 23.00 – 07.00 except when the main runway is non-operational.**

DCO Schedule 2, Requirement 19 sets out the operational use of the Northern runway. It states the Northern runway will not be routinely used between the hours 23:00 - 06:00. As part of the Noise Envelope (Appendix 14.9.7 Section 5) GAL has included an Leq 8 hour (2300-0700) night 45 dB contour area.

**GATCOM reiterates the comments made in its response to previous consultations that there should be no increase in ATMs on the main runway from 2018 levels during the night period 23.00 – 07.00 as well as giving a commitment to not to operate the Northern Runway during the night period 23.00 – 07.00 except when the main runway is non-operational.**

[APP-006](#);  
[APP-177](#)

**13 Whilst it is appreciated that GAL is consulting widely on the proposal as part of the DCO process, it is important that a noise envelope design team is established following the close of the consultation. The envelope design team should consider the feedback received & input to a revised envelope design in light of consultation responses with a view to seeking further engagement on the revised envelope design. GAL should undertake the CAP1129 process & report back to GATCOM regularly on progress with a view to it being implemented irrespective of the outcome of the DCO process.**

An extensive engagement exercise was carried out in relation to the noise envelope through the Noise Envelope Group - this included 12 meetings structured around consultation responses & themes from CAP1129 - & reported in the Noise Envelope Group Output Report & the Report on Engagement on the Noise Envelope.

**GATCOM acknowledges that some community groups continue to express serious concerns about GAL's engagement mechanism for the Noise Envelope and that in their view it did not follow the process set out in CAP1129. However given the advice of the Planning Inspectorate to the GATCOM Secretariat that "The statutory consultation required under the Planning Act 2008 (PA2008) is not set out in guidance such as CAP 1129, however if a developer is applying this guidance to its noise assessment, it is best practice to follow that guidance unless another**

[APP-178](#);  
[APP-179](#)

appropriate method is applied”, the appropriateness of GAL’s chosen engagement mechanism will be a matter for the Planning Inspectorate to consider.

14 As part of this process, GATCOM also requests that GAL, in liaison with the local authorities & Gatwick’s Noise Management Board, develops a process through which the operational aspects, such as how compliance with the limits is monitored & enforced, so that this may be included in the new section 106 agreement. GATCOM believes that the monitoring & enforcement should lie within the Section 106 agreement’s monitoring processes in addition to GAL’s own internal performance monitoring.

DCO Requirements 15 & 16 relate to the noise envelope & set out the process for review & approval. ES Appendix 14.9.7: The Noise Envelope includes detail on the independent compliance monitoring process.

GATCOM is pleased that GAL have stated that they will consider to introducing a Noise Envelope even if the DCO does not proceed and that it will form part of the Noise Action Plan and therefore be subject to review by GATCOM via NaTMAG. Some GATCOM members are however disappointed that would not happen until after the current Noise Action Plan is reviewed in 2029 and would call for this to be implemented sooner. ☐

[APP-006](#);  
[APP-177](#)

Clarification is required on regulation. The CAA have been defined in the Draft DCO as the ‘independent air noise reviewer’ to scrutinise and verify annual monitoring and forecasting reports. There may need to be a role for the local authorities (with environmental health responsibilities) to review noise envelope reporting, to take action against limit breaches, and to review any

aspects of the noise envelope.

<p><b>15 GATCOM highlights the need for the frequency of overflight to also be taken into account in the noise envelope design. It is the frequency of overflight that is of greatest concern to local communities affected by aircraft noise. GAL’s consultation material advises that noise impacts of the Project would largely be the result of increases in noise due to the increased number of flights on the northern runway, rather than new noise impacts over areas previously unaffected. Whilst GATCOM is aware of difficulties in applying noise frequency metrics, GAL should note that at the Heathrow Terminal 5 Public Inquiry the Inspector highlighted that an annual movement limit was needed in addition to a contour cap, as the Leq index on its own was, in his view, insensitive to the number of ATMs. This is why the Heathrow Terminal 5 planning agreement limits the number of air transport movements (ATMs) to 480,000 each year. GATCOM therefore asks that GAL consider the scope of including as part of the noise envelope a frequency metric. This is in addition to any other matters that appear appropriate to the design team for the formulation of the noise envelope.</b></p>	<p>GAL has included a movement limit as Requirement 19 of Sch 2 of the DCO. As a result of feedback received through the Noise Envelope engagement process GAL has included a series of secondary noise metrics that consider frequency of overflight.</p>	<p><b>Noted</b></p>	<p><a href="#">APP-006</a>; <a href="#">APP-177</a></p>
---	--	---------------------	---

16	<p><b>GATCOM requests that GAL report on the outcome of the consultation responses &amp; its engagement with airlines on this particular proposal &amp; the administration of a revised system to the Gatwick Noise Management Board so that the final detail of the proposal can be discussed &amp; agreed with all stakeholders before its introduction.</b></p>	<p>An extensive engagement exercise was carried out in relation to the noise envelope through the Noise Envelope Group which is reported in the Noise Envelope Group Output Report &amp; the Report on Engagement on the Noise Envelope.</p>	Noted	<p><a href="#">APP-178</a>; <a href="#">APP-179</a></p>
17	<p><b>Given the expected increase in the number of flights at the airport, it is questioned whether GAL should look to go even further with the enhanced scheme through the use of the N above contours to determine the boundary of the new scheme. The N above contours would better reflect the number of noise events households experience.</b></p>	<p>GAL has included a movement limit as Requirement 19 of Sch 2 of the DCO. As a result of feedback received through the Noise Envelope engagement process GAL has included a series of secondary noise metrics that consider frequency of overflight.</p>	Noted	<p><a href="#">APP-006</a>; <a href="#">APP-177</a></p>
18	<p><b>Ground Noise</b></p> <p><b>It is noted that GAL proposes to introduce a variety of measures to mitigate the effects of airport ground noise, including the construction of a new noise bund at the western end of the Northern Runway. It is essential that the level of ground noise is robustly monitored &amp; additional measures put in place if ground noise levels are likely to exceed assessed maximum levels.</b></p>	<p>Chapter 14 of the ES provides an assessment of ground noise. A ground noise modelling report was also produced</p>	Noted	<p><a href="#">APP-039</a>; <a href="#">APP-173</a></p>
19	<p><b>GATCOM requests that the new Section 106 agreement continues to include an obligation on the number of ground run engine tests that may be undertaken within any rolling six-month period with triggers to</b></p>	Noted	<p><b>GATCOM would still like to see this included in a revised Section 106 agreement.</b></p>	

require alternative means of managing or mitigating any material impact, including the consideration of a ground run pen.

## 20 Air Quality

**GATCOM requests that GAL continues its commitment to actively monitor air quality in partnership with the local authorities & to put in place a new action plan, funding & reporting arrangements, to also include the active monitoring of ultrafine particles on & in the vicinity of the airport. GATCOM also requests that such a commitment is included in the new section 106 agreement.**

Section 5.5 of the Planning Statement details GAL's approach to mitigation including the inter-relationship between DCO Requirements & the S106. Air quality monitoring will continue to be provided for in the s106 Agreement

**Noted**

[APP-245](#)

## 21 Economic benefits

**GATCOM is aware that other organisations have commissioned their own economic research into GAL's assumptions on the economic benefits of & the need for the Northern Runway project, or the need for certain elements of the project, to assist with their own responses to the consultation. It is important that GAL gives full consideration to & takes account of the outcomes of those studies submitted as part of other organisations' responses in advance preparing the DCO application submission.**

Economic Benefits & Needs are both covered in the DCO submission. A Needs document forms part of the DCO submission & includes a National Economic Impact Assessment.

Gatwick undertook two separate economic assessments using different methodologies & the outcomes of those studies are aligned, arriving at broadly the same range of economic benefits.

**Noted**

[APP-250](#)  
&  
[APP-251](#)



22	<p><b>The Outline Employment, Skills &amp; Business Strategy introduces some promising actions including construction training programmes, business engagement &amp; intelligence sharing, &amp; capacity building for SMEs, together with support &amp; obligations via GAL's procurement. However, the document is very light on detail, with most actions missing any clear commitments. GATCOM therefore expects the Implementation Plan to provide greater detail on initiatives, targets, objectives &amp; implementation processes, which may not be covered in this outline strategy.</b></p>	<p>The outline ESBS was updated to take account of feedback in the final strategy document for the DCO submission. An implementation plan will now be developed in consultation with the local authorities &amp; other local stakeholders &amp; partners. This will cover the additional detail &amp; governance arrangements &amp; will need to be updated periodically post consent.</p>	Noted	<a href="#">APP-198</a>
23	<p><b>Highways</b></p> <p><b>It is noted that GAL's preferred new solutions have been developed in consultation with National Highways. However, whilst acknowledging that GAL has had some engagement with the local authorities (&amp; their consultants) on highway proposals, some GATCOM members are concerned about the lack of engagement with the local highway authorities on technical matters, prior to the launch of the further consultation. It is vital that GAL proactively seeks meaningful engagement with the local authorities so that they have the opportunity to contribute to the evolving designs to ensure traffic flows in the surrounding areas are not adversely affected &amp; are considered holistically &amp; alongside other planned development &amp; highway/traffic management/active travel schemes planned for surrounding areas.</b></p>	<p>West Sussex County Council &amp; Surrey County Council have been directly engaged on the technical design of highway improvements &amp; have provided input to the design development with particular emphasis on changes to their networks</p>	<p><b>Noted but GATCOM is aware that Local Authorities still have concerns about the level of engagement and sharing of data.</b></p>	<a href="#">APP-020</a> , <a href="#">APP-074</a> , <a href="#">APP-258</a>

- |    |  |   |  |   |
|----|--|---|--|---|
| 24 | <p><b>In respect of promoting active travel, many GATCOM members believe more could be done to bring forward active travel improvements as part of the Northern Runway project. GAL is therefore asked to revisit the proposed active travel initiatives &amp; schemes with the aim of building into the highway improvement schemes the provision of walkways &amp;/or cycleways to enable passengers staying in local hotels &amp; staff from local areas to have the option to cycle or walk to the airport terminals. New connections, &amp; significant improvements to existing routes, need to be planned &amp; designed from the outset with the highway improvements.</b></p> | <p>The proposed highway improvements include extensive active travel improvements, including enhanced crossing facilities &amp; new footways, cycleways &amp; shared use paths. These have been discussed with local authorities to provide input in to the design development</p>            | <p><b>In respect of promoting active travel, many GATCOM members believe more could be done to bring forward active travel improvements as part of the Northern Runway project.</b></p>  | <p><a href="#"><u>APP-020,</u></a><br/> <a href="#"><u>APP-030,</u></a><br/> <a href="#"><u>APP-258</u></a></p> |
| 25 | <p><b>GATCOM also reiterates the need for the highway improvements to be delivered at the right time as the airport grows so that they are constructed &amp; implemented in advance of the Northern Runway becoming operational. It is noted that the full traffic modelling is still to be concluded to determine the timing of delivery of improvements. However, it is important that schemes are delivered in good time to accommodate future growth.</b></p>  | <p>Transport modelling has been concluded &amp; is included in the Transport Assessment &amp; Traffic &amp; Transportation chapter of the Environmental Assessment. The timing of highway improvements takes account of the future growth in background traffic as well as airport growth</p> | <p><b>GATCOM remains concerned that communities may suffer the negative impacts of growth before the mitigation measures, such as highways improvements works and improvements to walking and cycling infrastructure, are delivered.</b></p> | <p><a href="#"><u>APP-037,</u></a><br/> <a href="#"><u>APP-258,</u></a><br/> <a href="#"><u>APP-260</u></a></p> |

26	<p><b>In respect of the traffic modelling, the Committee wish to be assured that the scope of the modelling will take into account the potential impact on areas of special interest close to the airport, for example the Ashdown Forest, with the outcome of the modelling providing a basis for a joined-up approach to future sustainable transport across a wide area. It is important therefore that the outcomes of the full modelling are shared with the local authorities at the earliest possible time to enable them to engage more meaningfully with GAL on the evolving scheme design &amp; the update to the Airport Surface Access Strategy (ASAS).</b></p>	<p>The Transport Assessment sets out the extent of modelling &amp; the area covered, which includes Ashdown Forest &amp; other sites of special interest. The transport modelling provides input to the Environmental Assessment, which presents analysis on air quality, noise, carbon &amp; habitats amongst other topics. The Surface Access Commitments, provided with the DCO sets out GAL's approach to promoting sustainable travel.</p>	<b>Noted</b>	<p><a href="#">APP-090</a>,  <a href="#">APP-258</a>,  <a href="#">APP-260</a></p>
27	<p><b>GATCOM would like to see the updated ASAS include details of how targets are to be monitored &amp; the timescale for delivery, with triggers for delivery as the airport grows.</b></p>	<p>The Surface Access Commitments document includes proposals for regular monitoring of mode shares &amp; other transport data relevant to our sustainable travel targets.</p>	<b>Noted</b>	<p><a href="#">APP-090</a></p>
28	<p><b>As the updated ASAS is developed &amp; traffic modelling concluded, GATCOM requests that GAL share details with the Committee in advance of the draft ASAS being confirmed &amp; submitted as part of the DCO application.</b></p>	<p>GAL has submitted a Surface Access Commitments document with the DCO; this will set the parameters for the updated ASAS, which will be developed following any consent. The current ASAS covers the period to 2030 &amp; this will be</p>	<b>Noted</b>	<p><a href="#">APP-090</a></p>

superseded should requirements set out in the Surface Access Commitments be triggered.

- 29 **GATCOM's previous response commented on the proposed 18,500 extra car parking spaces which suggested that there will be a proportionate increase in passengers using private vehicles to access the airport. The Committee also highlighted that any increase in parking needed to be fully justified in the context of a sustainable surface access strategy. GATCOM is therefore pleased that GAL has re-examined the forecast car parking provision in light of the emerging updated ASAS & feedback to the consultation. It is noted that GAL has identified a reduced minimum number of spaces required - 12,025 spaces - taking into account other initiatives supporting sustainable travel & greater optimisation of the proportion of spaces used with increased occupancy rates to over 85%.**
- It should be noted that the number of spaces quoted is not a nett increase of 12,025 spaces as there is a need to replace spaces lost during construction
- See below**
- [APP-030](#)
- 30 **There are a mix of views about the revised level of car parking provision. Of key importance is the need to ensure there is sufficient car parking provision to accommodate those who need to travel by car to the airport where there are no suitable alternative sustainable transport modes (active travel, bus, coach or rail).**
- The revised car parking proposals take account of the mode shares presented in the Transport Assessment
- GATCOM continues to have mixed views about the level of car parking provision. Of key importance to GATCOM is the need to ensure there is sufficient car parking provision to accommodate those who need to travel by car to the airport where there are no suitable alternative sustainable transport modes (active travel, bus, coach or**
- [APP-258, APP-260](#)

rail). Also see response to point 9 above.

- |   |   |                     |                                       |
|---|---|---------------------|---------------------------------------|
| <p><b>31 GATCOM’s Passenger Advisory Group is aware of the current increase in demand &amp; for car park bookings &amp; acknowledges that the current demand &amp; may not be representative of future travel behaviours. As it is not yet known what is driving passengers’ behaviour of transport mode choices, which has changed since the pandemic, it is important that GAL continues to work with the rail, coach &amp; bus operators to gain a better understanding of travel behaviours &amp; how they will look in the future. This must be taken into consideration as part of the update to the ASAS &amp; final Parking Strategy.</b></p> | <p>GAL routinely engages with transport providers &amp; is in regular contact as part of the day-to-day activities of the Surface Access Team. This includes quarterly meetings with the Transport Forum Steering Group, which comprises representatives of local authorities, transport providers &amp; other groups</p> | <p><b>Noted</b></p> | <p><a href="#"><u>APP-090</u></a></p> |
| <p><b>32 GATCOM also requests that, in the context of a comprehensive approach to developing a sustainable transport strategy that there is a mechanism put in place through the DCO process to ensure that GAL only provides parking when it is needed, &amp; for this to be actively monitored.</b></p>   | <p>Our approach to parking is consistent with our Section 106 obligations to provide sufficient capacity for all airport-related growth but to only provide parking where &amp; when it is needed. This is reflected in our approach to monitoring included in the Surface Access Commitments document</p>                | <p><b>Noted</b></p> | <p><a href="#"><u>APP-090</u></a></p> |

**33 Noise**

**GATCOM’s original response asked GAL to undertake further engagement on the evolving noise envelope design & to set up a noise envelope design team, as suggested in the CAA’s CAP1129. It also requested that GAL, in liaison with the local authorities & Gatwick’s Noise Management Board, develops a process through which the operational aspects, such as how compliance with the limits is monitored & enforced, so that this may be included in the new section 106 agreement.**

An extensive engagement exercise was carried out in relation to the noise envelope & reported in the Noise Envelope Group Output Report & the Report on Engagement on the Noise Envelope

**Noted and aware the Noise Envelope will be part of the Noise Action Plan**

[APP-178;](#)  
[APP-179](#)

**34 GATCOM acknowledges that some community groups continue to express serious concerns about GAL’s further engagement mechanism in that it does not follow the full process set out in CAP1129 & that there was no discussion to agree the terms of reference of engagement or appointment of its Chair.**

Noted

**GATCOM acknowledges that some community groups continue to express serious concerns about GAL’s engagement mechanism for the Noise Envelope and that it did not follow the full process set out in CAP1129. However given the advice of the Planning Inspectorate to the GATCOM Secretariat that “The statutory consultation required under the Planning Act 2008 (PA2008) is not set out in guidance such as CAP 1129, however if a developer is applying this guidance to its noise assessment, it is best practice to follow that guidance unless another appropriate method is applied”, the appropriateness of GAL’s chosen engagement mechanism will be a matter for the Planning Inspectorate to consider**

[APP-178;](#)  
[APP-179](#)

**35 Carbon**

**The Committee is supportive of GAL’s commitment to low-carbon growth. GATCOM again advocates the need to ensure GAL’s draft Carbon Action Plan is subject to further discussion & engagement with the local authorities in identifying & setting out measures to reduce emissions over which GAL has direct control.**

Carbon & climate change issues were presented to the local authorities in Topic Working Group meetings during 2023

**Noted**

[APP-223](#)

**36 There is also a need for GAL to work in partnership with other organisations to help influence & drive forward reductions in Scope 3 emissions (includes those emissions from flights taking off & surface access trips to/from the airport).**

Agreed. As part of the ACI Airport Carbon Accreditation process (level 4) GAL will be publishing a stakeholder plan for reducing scope 3 emissions.

**GATCOM does appreciate that GAL are undertaking significant works to reduce airport emissions and as part of the Airport Carbon Accreditation process will be publishing a stakeholder plan for reducing the wider scope 3 emissions.**

**37 It is noted that GAL is in the process of developing a Carbon Action Plan to explain how the airport will reach net zero for Scope 1 & 2 emissions before 2040 & which will also describe how GAL intends to influence reducing emissions from construction, surface access & aviation. So that GATCOM can have a greater understanding of GAL’s approach to managing carbon, it requests that GAL reports to GATCOM on the implications of the Government’s Jet Zero policy, once published, on the airport’s current operation as well as on**

A presentation was provided to GATCOM by Mark Edwards from GAL on Gatwicks journey to net zero on 26th Jan 2023

**Noted**

the carbon assessments for the Northern Runway project prior to the DCO application being submitted.

**38 Employment**

**It is hoped that the GAL's commitments made as part of this Strategy will be backed up by legal obligations in the new Section 106 agreement reflecting priorities identified by local authorities, businesses, colleges & HE providers.**

Section 5.5 of the Planning Statement details GAL's approach to mitigation including the inter-relationship between DCO Requirements & the S106. Adoption of an employment, skills & business strategy will be proposed in the new s106.

**Noted**

[APP-245](#)

**39 General Comment**

**There is on-going concern across GATCOM's membership about the need for GAL to release further information as it becomes available particularly in respect of the outcomes of the full transport modelling, ASAS & sub-strategies such as Rail, Bus & Coach, Active Travel & Parking; Carbon Action Plan; Employment Skills & Business Strategy; Construction Programme; & Biodiversity Net Gain, which needs to be addressed by GAL.**

All of the DCO Application material is now available on the PINS website

**Noted**



DRAFT