

Appendix 1

Summary of key points to be included in our Relevant Representation response to Gatwick's Northern Runway Proposal Development Consent Order.

Topic Area	Key issues for consideration
Surface transport	<p data-bbox="770 437 887 464"><u>General</u></p> <ul data-bbox="819 491 2027 847" style="list-style-type: none"><li data-bbox="819 491 2027 555">• If approved, the need for timely delivery of supporting infrastructure i.e. in advance of the northern runway being full operation<li data-bbox="819 576 2027 639">• The Mode Share Commitments, set out in the Surface Access Commitments, are not considered to be sufficiently ambitious, especially for passenger travel.<li data-bbox="819 660 2027 724">• That there is insufficient mitigation proposed to encourage substantial modal shift towards sustainable travel<li data-bbox="819 745 2027 847">• Focus of mitigation has been upon provision of service rather than implementing measures, within GAL's control, to increase the attractiveness of alternative modes of travel, ie bus priority measures to deliver journey time savings. <p data-bbox="770 868 904 895"><u>Highways</u></p> <ul data-bbox="819 922 2027 1177" style="list-style-type: none"><li data-bbox="819 922 2027 1054">• Need to address the approaching traffic from the surrounding road network, including routes in East Sussex such as the A22 and A264, which feed into the A23/M23 corridor. Consideration of the impacts of airport growth on the strategic road network (eg M25) as well as ESCC's highway network beyond the immediate environment of the airport.<li data-bbox="819 1075 2027 1177">• Would like to see measures that reduce traffic through sensitive locations near and through Ashdown Forest Special Area of Conservation (SAC) / Special Protection Area (SPA) and along the A22. <p data-bbox="770 1198 831 1225"><u>Rail</u></p> <ul data-bbox="819 1252 2027 1313" style="list-style-type: none"><li data-bbox="819 1252 2027 1313">• Need to ensure that the rail infrastructure and service provision has been considered by GAL and Network Rail to ensure that the potential increase in

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	<p data-bbox="869 264 2027 325">demand and capacity from passengers that will arise should the NRP go ahead can be accommodated.</p> <p data-bbox="775 347 990 376"><u>Public Transport</u></p> <p data-bbox="775 402 1422 430"><i>Bus/Coach service between Gatwick and Uckfield</i></p> <ul data-bbox="819 459 2027 1104" style="list-style-type: none"> <li data-bbox="819 459 2027 558">• The proposed new coach route to/from the airport to Uckfield would only have a 2 hourly frequency off-peak, though hourly peak time. We strongly advocate for an hourly service at all operational times. <li data-bbox="819 580 1966 641">• Unclear as to why the Uckfield route is categorised as a ‘coach’ route. This should be provided as a bus service, permitting local travel between bus stops. <li data-bbox="819 663 1989 798">• Consideration should be given to extending the proposed Uckfield – Gatwick service to Heathfield. It is important to integrate this with the existing ESCC funded bus service between Heathfield and Uckfield (which ESCC proposes to increase from 2 hourly to hourly). <li data-bbox="819 820 1960 954">• There needs to be an integrated approach to public transport provision as there is an ESCC funded local bus service running parallel to the proposed coach route for the greater part of the route, between Uckfield and East Grinstead (this is currently the 2 hourly Monday to Friday daytime only route 261). <li data-bbox="819 976 2027 1104">• Recommend extending the 261 route beyond East Grinstead so as to provide a direct service between Uckfield and Gatwick Airport. We wish to see the operational hours of the service extended to include early mornings, evenings and weekends. This would need funding <p data-bbox="775 1126 1173 1155"><i>Crowborough – Gatwick service</i></p> <ul data-bbox="819 1184 2027 1343" style="list-style-type: none"> <li data-bbox="819 1184 2027 1343">• Scope for a Gatwick – Crowborough service. Suggest a separate ‘new’ route due to its geographical location and the limitations of the road network. There would be scope for a Crowborough – Gatwick route to run via Forest Row and East Grinstead thereby, in combination with an Uckfield – Forest Row – East Grinstead – Gatwick service, doubling the frequency between Forest Row and Gatwick.

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	<p data-bbox="775 264 1189 296"><i>Demand Responsive Transport</i></p> <ul data-bbox="819 320 2022 762" style="list-style-type: none"> <li data-bbox="819 320 1861 352">• Any new services with Demand Responsive Transport (DRT) in mind should: <li data-bbox="819 371 1939 435">• be wholly integrated with conventional public transport (ie. integrated ticketing and service design); <li data-bbox="819 459 2022 523">• complement existing bus services, ie. only runs at times/to places when conventional bus services are not available; and <li data-bbox="819 547 1966 643">• Where feasible, feed into conventional services (ie first mile/last mile principles). This does require high levels of integration, service reliability, public information, waiting facilities and ticketing. <li data-bbox="819 667 2000 762">• In the context of Gatwick, we would see DRT in East Sussex potentially feeding the proposed Uckfield/Crowborough bus/coach links using the above principles, rather than running all the way to/from the Airport. <p data-bbox="775 783 853 815"><i>Other</i></p> <ul data-bbox="819 839 2022 1058" style="list-style-type: none"> <li data-bbox="819 839 1951 903">• Metrobus should be engaged with, as they run bus services in the Forest Row, East Grinstead, Crawley and Gatwick areas. <li data-bbox="819 927 2022 1058">• There is a need for a process whereby GAL liaises with the rail, coach and bus operators to get a better understanding of travel behaviour and how this may look in the future. This need to be taken into consideration when GAL develops their Airport Surface Access Strategy (ASAS). <p data-bbox="775 1078 1099 1110"><u>Electric Vehicle Charging</u></p> <ul data-bbox="819 1134 1977 1230" style="list-style-type: none"> <li data-bbox="819 1134 1977 1230">• Ensure that EV charging in airport car parks that meets anticipated demand, and work with both third-party parking providers and local authorities (as suggested) to boost charging facilities in the area around the airport. <p data-bbox="775 1254 1032 1286"><u>Transport modelling</u></p> <ul data-bbox="819 1310 2022 1369" style="list-style-type: none"> <li data-bbox="819 1310 2022 1369">• There is a concern over the impacts of the NRP on additional car journeys to the airport via Ashdown Forest which is an area of European Ecological Importance, Special Area of

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	<p>Conservation, and a Site of Special Scientific Interest (SSSI). As a consequence, there is a need for GAL to consider these impacts in respect of air quality - nitrogen deposition issues.as part of the modelling work being undertaken.</p> <p><u>Assessment methodology</u></p> <ul style="list-style-type: none"> • The Traffic & Transport Chapter of the Environment Statement has been undertaken in accordance with rescinded and replaced guidance from IEMA, Guidelines for Environmental Impact Assessment of Road Traffic (1993). This was replaced in July 2023 by Environmental Assessment of Traffic and Movement. The ES should be reviewed against the latest guidance and amended as necessary. • Since emerging from the pandemic more representative transport data continues to become available and therefore this data should be used to validate that the proposed approach is robust and takes accounts of changes since the 2016 base and any travel changes due to Covid 19. The applicant should also review the latest Department for Transport (DfT) TAG Unit M4, Forecasting and Uncertainty, and ensure the modelling takes account of the latest DfT advice.
Economy	<ul style="list-style-type: none"> • There is a need for the applicant to fully set out the economic impacts of the Northern Runway proposal • There is a need to further understand the employment and skills offer arising from the Northern Runway proposal. We would expect substantial number of jobs and apprenticeships ring-fenced for East Sussex workforce; and that the airport work with local training providers and colleges in East Sussex to ensure that training, pathways and careers opportunities are offered. • GAL should seek to ensure that subcontractors deliver social value in employment and skills (i.e. subcontractors also to offer recruitment offers, apprenticeships and upskilling of staff) • Sub-contractors should work to the CITB national skills academy for construction framework benchmarks, and the same in relation to non-construction procurement

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	<ul style="list-style-type: none"> • The Employment Skills and Business Strategy should include specific mention of links to Careers Hubs working with schools across Surrey, West Sussex and East Sussex. • In non-construction, the option should include upskilling existing workforce which includes residents of East Sussex • There is a need to ensure that SMEs and subcontractors include social value measures in their provision that echo those of GAL's ESBS and that work is undertaken with LA Careers Hubs to engage with schools around the careers agenda. • GAL should develop an Inward Investment Service and Strategy, and that the development and delivery of initiatives led by the Sussex Chamber of Commerce and other partners should develop (not just promote) international trade opportunities with destinations aligned to LGW's route network • GAL should continue and enhance sponsoring of events and funding of community related projects in local communities affected by the Airport • GAL should ensure that there is better and sustained promotion at the airport of East Sussex to support the visitor economy.
Noise	<ul style="list-style-type: none"> • Due to the effects of overflight and noise disturbance on people's health and wellbeing, it is very important for us to gain an accurate understanding of how many more flights would be passing over East Sussex and which locations would be the most affected. • There is a need for assurances as to the accuracy and reliability of the estimated overflight mapping, and we wish to ensure East Sussex is included as part of this. • Air noise relates to noise from aircraft in the air, or departing or arriving on a runway, generally assessed to a height up to 7,000 feet above ground level. It is understood that some aircraft (Gatwick related air traffic) do pass over parts of East Sussex below 7,000 feet and therefore request such areas are part of the air noise modelling work. • The Terms of Reference for the noise envelope review should be clearly defined and include a requirement for engagement and consultation with key stakeholders as part of the review process.

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	<ul style="list-style-type: none"> • Night flights will need to be restricted / capped, and the Northern Runway should not operate, between the hours of 23:00 and 06:00. We need assurances that there are not dispensations that GAL can routinely operate within this restricted night time period, notwithstanding use of aircraft at night for emergencies. • The report states that flight paths above 7000 feet would not be affected by the project. Crowborough is 794 feet above sea level – has this been considered? • What is the impact of noise on Ashdown Forest, being this is a noise sensitive area.
Climate change	<ul style="list-style-type: none"> • There is a question of whether Gatwick expansion is compatible with the Government's legal commitments on climate change – the Government's own advisory body (the Climate Change Committee) has expressed caution. • It is important to understand the level of greenhouse gases arising from additional operations (relating to aircraft movements and ancillary operations) and how these would be mitigated. The same applies to Climate Change mitigation, and In-Combination Climate Change Impacts. • The negative impacts of emissions and climate change arising from aircraft flights and the ancillary operations and traffic movements associated with air travel (at Gatwick) needs careful consideration. We need reassurances that the forecasts and values used by GAL in the preliminary economic impact assessment have been assessed appropriately. • Concern that there is an over reliance placed on new and emerging technology (aircraft and fuels) to reduce carbon emissions such as placing an unwarranted level of confidence in the introduction of Sustainable Aviation Fuels (SAF) being introduced in a timely manner to contribute towards reducing aviation generated emissions
Air quality and carbon	<ul style="list-style-type: none"> • GAL need to work with key stakeholders on the Carbon Action Plan to consider ways to reduce carbon emissions that are in and outside of their control, such as those arising from aircraft at take-off, and from vehicles undertaking surface access trip to/from the airport.

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	<ul style="list-style-type: none"> • GAL need to keep stakeholder informed on the development of the process to address reducing emissions from construction, surface access and aviation • The need for further clarification on what Gatwick Airport considered to be 'minor adverse significant effects' in relation to air quality impacts on Ashdown Forest. • Further clarity needed on the baseline information that has been used to assess air quality and that this is not the worst case. • Further clarity needed on the air quality assessment scenarios; how air quality will be monitored, evaluated and reported to local authorities, as well as the robustness of the air quality model that has been used. • Further clarity required on whether the embodied carbon from construction has been considered in the assessment.
Environment	<ul style="list-style-type: none"> • Clarification required on how the proposal aligns with dark skies policy.
Nature	<ul style="list-style-type: none"> • The wider biodiversity net gain impacts on environmental designated areas in the county such as the Ashdown Forest need to be considered
Health	<ul style="list-style-type: none"> • Noise and vibration impacts on health and well-being of local communities needs further consideration and appropriate mitigation measures need to be identified. There is a need to consider vulnerable groups within this, that may be more affected by the impacts of noise (and vibrations). • A Health Impact Assessment should outline population health impacts for East Sussex and appropriate mitigations proposed and provided to protect population health and any impact on local services and infrastructure

Other comments:

- Want to be party to legal agreement to secure required and appropriate mitigation should the Northern Runway Proposal be approved
- Want assurances that should a second runway option come forward in the future, that the use of the northern runway for departures ceases to operate.