

County Hall
Chichester
West Sussex
PO19 1RQ



Website: www.gatcom.org.uk

3 February 2015

Dear Sir/Madam,

AIRPORTS COMMISSION CONSULTATION ON A GATWICK AIRPORT SECOND RUNWAY

GATCOM welcomes the opportunity to comment on the consultation on the Commission's assessment of Gatwick's second runway proposal.

Although GATCOM is not able to reach a consensus on whether or not there should be an additional runway at Gatwick due to the diverse and conflicting views of its membership, there are a number of areas/issues where the Committee has reached a common view. GATCOM's agreed position in respect of the provision of an additional runway at Gatwick was set out in its response to the Commission dated 27 September 2013 (copy attached for ease of reference). That position remains unchanged particularly in respect of paragraphs (1), (4) and (6) and we ask that the Commission again takes those particular points into account in its final report to the Government.

In respect of the current consultation on the Commission's assessment of Gatwick's business case for a second runway, GATCOM's comments are given below:

Local community pledges and commitments to minimise the impacts of a new runway

As part of its submission and business case for a second runway at Gatwick, Gatwick Airport Limited (GAL) has put forward a package of local community pledges and other commitments to minimise and mitigate the impacts of a second runway. GATCOM is fully supportive of GAL's pledges and commitments as they provide some reassurance to those most affected by the construction and use of a second runway that they will be compensated in some way as a result of some of the impacts they will encounter or will have other measures put in place to minimise and/or mitigate those impacts. However, mechanisms would need to be put in place to ensure the pledges and commitments are honoured.

The importance of GAL's pledge in respect of a Business Engagement Charter to help local landowners and businesses affected by a new runway should not be underestimated. The business community around Gatwick has some concern about the impact on their businesses and there is uncertainty for the future particularly in respect of the availability of alternative business sites in the vicinity and maintaining stability in rental rates as businesses may be

BY EMAIL

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offered alternative sites by the airport which may have rental rates that do not reflect the current circumstances.

Both the Commission and the Government have important roles to play in ensuring that GAL's pledges and the associated commitments are delivered. GATCOM asks that, should the Commission in its final report recommend that a second runway should be built at Gatwick, it should also recommend that the Government should ensure, through the planning process, that the pledges and commitments are made legally binding on the current and future owners of the airport, and that appropriate monitoring arrangements are in place to make sure they are delivered at the right time and prior to the opening of a new runway.

Flight paths

It is important that any plans to further expand Gatwick are developed in such a way which prevents as far as possible deterioration in the local environment around the airport.

GATCOM acknowledges the positive approach by the industry to address aviation noise, and has welcomed the work of Sustainable Aviation, especially in producing its Noise Road Map¹, and the progress reporting it undertakes in delivering its environmental targets.

The recent airspace change consultations and trials undertaken by NATS and GAL have caused much concern and anxiety across a wide range of communities. The impacts of changes to flight paths as a result of any new runway at Gatwick must therefore be fully assessed, in consultation with local communities, and the impacts recognised with recommendations for compensation and mitigation.

It must be recognised that aircraft noise tends to be more annoying in rural areas than in urban areas as the background (ambient) noise level tends to be lower and there is an expectation of peace and quiet in rural areas, albeit that fewer people are likely to be affected. GATCOM therefore would like to see included in the Commission's report to the Government recommendations and guidance on noise exposure levels to support the strategic overview given in the Government's Noise Policy Statement for England which currently lacks the detailed guidance needed on which planning decisions can be based.

The improvements in navigational accuracy with the implementation of RNAV1 means that what was a relatively wide swathe of aircraft trajectories will increasingly be narrowed. This results in fewer people being overflown but an increasing number of overflights for a specific number of people, causing significant disturbance and distress. New routings therefore need to be carefully positioned to avoid the most sensitive areas and targeted land use management policies applied to prevent encroachment under the flight paths and to ensure appropriate standards of noise insulation. GATCOM is concerned however that the impact of concentrating flight paths in this way has not been fully assessed nor have possible mitigation/compensation measures been consulted upon by the Government. GATCOM therefore urges the Commission to raise this issue in its report to the Government. It is vitally important that the way in which the Government's policy of minimising the number of people impacted by aircraft overflight and noise is fully understood and measures put in place to fully compensate those suffering significant disturbance as a result of changes for loss of property value.

Respite could be very valuable for some communities affected by aircraft overflight and noise. However, it should be balanced with the effects of frequency of flights and thus disturbance. GATCOM generally supports the concept of respite provided that it does not involve diverting flight paths over areas which are at present peaceful. It must also be recognised that implementation of respite could mean significant negative impacts for some people and in such cases some mitigation measures may be needed, assuming there are sufficiently strong benefits overall to justify the change.

¹ <http://www.sustainableaviation.co.uk/wp-content/uploads/SA-Noise-Roadmap-Publication-version1.pdf>

Surface access

Effective, efficient, high quality and resilient surface transport to Gatwick benefits not just passengers but also the local population and is an integral part of the sustainable growth of the airport. GATCOM is aware that there are concerns about the reliance on a single motorway and a single rail connection to an expanded Gatwick. The assessments made by both GAL and the Commission on the surface access improvements necessary are noted but GATCOM remains anxious about the capacity constraints of both the motorway and rail connections over the longer term as the growth of passenger throughput at Gatwick reaches the upper end of its intended capacity and the implications of this in terms of resilience. GATCOM has made its views known to Network Rail as part of its consultation on the draft Sussex Area Route Study about the need for further investment on the Brighton Mainline over the longer term. A copy of GATCOM's response is attached for the Commission's consideration.

Rail

GATCOM notes that the assessments and modelling carried out by both the GAL and the Commission conclude that sufficient rail capacity is expected to be available to accommodate passengers using a two runway airport. However, the assessments have been based on forecast rail traffic in 2030 which is prior to a new runway operating at near full capacity. So growth beyond 2040 has not been provided for and this needs to be addressed.

The Thameslink programme which is due to be completed in 2018 will improve capacity by increasing the number of carriages on trains which together with improvements to junctions and other bottlenecks on the rail network will remove some capacity constraints on the Brighton Mainline. GATCOM welcomes these planned improvements but notes that a number of the improvements whilst within the rail industry's future plans do not yet have committed funding. The analysis also suggests that up to the 2040s additional investment is likely to be required to increase capacity due to background growth.

It is important therefore that all the appropriate organisations and bodies involved in assessing and funding schemes are also fully committed to the investment needed and can secure the delivery of the necessary improvements at the right time, including the acceleration of funding for improvements in Network Rail's Control Period 6.

GATCOM recognises the concerns of some interested parties about the resilience of the Brighton Mainline being the single rail link to the airport. Most of the assessment work has for that reason concentrated on the issues associated with the Brighton Mainline but GATCOM feels that there should be further consideration of the needs and/or potential of the Arun Valley and North Downs lines which could add resilience to the network when there are closures or problems on the main line. As mentioned in GATCOM's response to Network Rail's draft Sussex Area Route Study the further consideration of a short new rail link, the Arundel Chord, would be beneficial for adding resilience on the line as well as providing new journey opportunities for passenger movements between the Arun Valley and the South Coast.

Links to the North Downs line are also worthy of greater examination particularly in respect of identifying better east/west rail connectivity between Gatwick and areas to the west of the airport and Kent to the east.

GATCOM very much supports the current proposed improvements to Gatwick's station concourse. However, there is a need to ensure that as part of any second runway proposal, plans are included to transform the station into a world class full transport interchange between all modes of transport to benefit not only the growth of Gatwick but the region as a whole.

Motorways

The reliance on the M23 as a single strategic highway link to the airport is also of concern to GATCOM. Consideration should be given to enhancing other strategic road links such as the A24 which could provide an alternative in the event of accidents on the M23 which could lead to its closure. In addition to this, consideration needs to be given to providing a further motorway spur from the M23 to help ease potential congestion and to improve resilience.

Local roads

GAL has proposed the establishment of a £10 million Local Highway Fund to help fund local highway improvements across the wider area around Gatwick. GATCOM questions whether the size of this fund is appropriate to deal with the impact on local roads given the fact that once shared amongst local authorities immediately surrounding the airport it would fund very limited improvements. The Commission is therefore asked to consider whether the amount of the fund is sufficient.

Coach and bus routes

The important role that coach and bus services and their routes have in providing passengers and airport staff public transport choices needs to be fully recognised and embraced in a package of measures if a new runway is provided at Gatwick. GAL's strategy for local bus services and the associated facilities must therefore feature in the Commission's recommendations.

Housing need

GATCOM notes that the Commission's work reaches a different view on housing need to that of GAL. The Commission's work is less detailed than that by GAL and does not look at the potential effects of changing employment and commuting patterns.

GATCOM is concerned that the Commission has made sweeping statements about the potential delivery of new homes and has suggested that the additional housing demand generated by the expansion of the airport could be divided evenly between the local authorities in the area. It also implies that the delivery of these additional homes would not be difficult. GATCOM feels these comments are not helpful and do not reflect local circumstances or the requirements and operation of the planning regimes. GATCOM is aware that the assumptions made are of concern to many of the local authorities around Gatwick who themselves will be questioning the conclusions reached on the likely housing numbers and their deliverability.

If it is decided that a new runway is to be provided at Gatwick, it will be vitally important that the local authorities work with the Government, the LEP and others to secure the necessary infrastructure to support the new housing which the Commission appears to have underestimated given existing infrastructure constraints such as the strategic and local road network, sewage treatment capacity, health and education facilities.

GATCOM therefore urges the Commission, and the Government, to revisit the range and scale of the forecasts with a view to reconciling the differences as the Government, local authorities and other partners could not use the Commission's current assumptions/forecasts as the basis for future planning.

Other Supporting Infrastructure contributions

GATCOM believes there is a need for an appropriate mechanism to secure contributions and supporting infrastructure delivery. As highlighted in the "Housing Need" section above, the Commission appears to have underestimated the supporting infrastructure that would be required across the wider area to accommodate the growth associated with a new runway at Gatwick Airport. All the relevant partners need to be engaged in the development of the plans to deliver the necessary supporting infrastructure. GATCOM therefore urges the Commission to consider this and make appropriate recommendations to the Government to ensure that the supporting infrastructure needs across the wider area are recognised and robust monitoring arrangements put in place to ensure timely delivery. It may also be necessary to identify the need to provide this infrastructure in the relevant National Policy Statement.

Air Quality

GATCOM is concerned that the assessment of air quality undertaken by the Airports Commission is quite limited and involves emissions forecasting rather than dispersion modelling. The lack of dispersion modelling in the report makes it impossible for external stakeholders to assess compliance with EU limit values, to examine the changes in temporal and spatial pollution concentrations compared to the base case, and to examine the source of pollution i.e. aircraft vs. road traffic and how these change with time. Whilst it is noted that the Commission has

acknowledged that it needs to undertake such modelling at a later date, no indication has been given as to when this work is to be undertaken.

Flood Risk

GATCOM asks that if further flood modelling work identifies any additional mitigation measures required to address surface water flooding and fluvial flooding downstream, then it is important that funding is identified and agreed at an early stage so that these can be delivered at the appropriate time.

Phasing of construction work

GATCOM acknowledges the concerns of key stakeholders about GAL's proposed phasing of the runway and terminal construction works. It is noted that GAL has since publicly stated that it would now bring into operation the use of the new third terminal at the same time as the opening of the second runway. GATCOM supports this proposed re-phasing of the work.

Pre-funding of new facilities

GATCOM is aware that the whole issue of how the construction of new runway capacity and its associated infrastructure works should be paid for is being considered by the Airports Commission and the CAA. It is noted that the CAA is considering the potential of pre-funding which is of concern to GATCOM's airline representatives because of the potential impact on incumbent airlines of having to pay for new facilities prior to them being delivered that new airlines (their competitors) will benefit from once the new capacity is operational. GATCOM has sympathy with their concerns and therefore urges the Commission to take into account ways in which the costs to airlines can be adjusted and applied to ensure that a fair and equitable charging regime can be put in place.

Implications of new runway capacity elsewhere

GATCOM has already highlighted to the Commission the need to consider the implications for Gatwick should it be decided that that expansion should take place elsewhere (see paragraph (6) in our response to the Commission dated 27 September 2013). It appears that the Commission has not yet assessed the long term impacts (economic/social/competition/environmental) of new runway elsewhere across the airports system in respect of all short-listed options. GATCOM notes that this is a matter that the Commission stated would be addressed as part of the Appraisal Framework. GATCOM therefore requests that this work is undertaken by the Commission prior to making its recommendations to the Government.

GATCOM trusts its comments will be taken into account.

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County Hall
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27 September 2013

Dear Sir/Madam,

CONSIDERATION OF LONG TERM OPTIONS IN RESPECT OF GATWICK AIRPORT

I refer to the Airports Commission's publication of the long term proposals that have been submitted for new runways and airports to strengthen the UK and London's air connections with the world. GATCOM welcomes the opportunity to comment on the long term proposals in respect of Gatwick Airport.

GATCOM (the Gatwick Airport Consultative Committee) is the statutory advisory body for Gatwick Airport and comprises representatives from local authorities, the aviation industry, passengers, business, environmental interests and other users of the airport. We provide a forum for informed discussion leading to the provision of advice to the Government, Gatwick Airport Limited and other organisations on a range of matters concerning the operation and future development of Gatwick.

GATCOM fully supports the efforts of Gatwick Airport under its current ownership to position itself as "London's airport of choice" by delivering a good overall passenger experience, tailored to the needs of the individual passenger, through initiatives such as security assistance lanes and support for passengers with reduced mobility. However as the airport grows and passenger numbers increase GATCOM is keen to ensure that such growth and future expansion does not diminish or have a detrimental impact on the quality of the passenger experience. The Committee also strives to ensure that the impact of Gatwick's growth on local communities and the environment is contained, minimised and mitigated.

An important element of ensuring the sustainable growth of Gatwick and maintaining a good passenger experience is in the provision of good surface transport links between London and the South Coast as well as to other parts of the country. Effective, efficient and resilient transport infrastructure, particularly rail, benefits not just passengers and staff but also the regional economy and the wider local community as well as helping to manage the airport's overall environmental impact.

Gatwick Airport Limited has kept GATCOM fully informed of its submissions to the Airports Commission and the work it has undertaken on developing options for an additional runway at Gatwick. Although GATCOM is not able to reach a consensus on whether or not there should be an additional runway at Gatwick due to the diverse and conflicting views of its membership, there are a number of areas/issues where the Committee has reached a common view.

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GATCOM has highlighted to GAL the need for it to take into consideration all the benefits as well as disbenefits resulting from an additional runway at Gatwick and the impacts of growth on the region's supporting infrastructure including (but not restricted to) surface transport, housing, hospitals, schools and labour markets. There is also a need for the potential environmental and urbanising impact of a second runway on the immediate and surrounding area (sub region) and evidence provided on how such impacts will be mitigated. All these points must be further considered and explored.

GATCOM acknowledges the fact that the Airports Commission has not yet formed a view on its assessment of the need for additional runway capacity in the UK. However in the event that the Airports Commission is of the view that there is a need for additional runway capacity in the South East GATCOM has agreed the following points which it asks the Airports Commission to take into account:

- (1) GATCOM recognises the important role of Gatwick Airport in maintaining a vibrant and growing economy for the Gatwick region and that it is one of the region's major economic generators, a position that needs to be protected and supported;
- (2) GATCOM recognises the need for Gatwick Airport Limited to contribute to the work of the Airports Commission in examining options for future airport capacity in the UK;
- (3) GATCOM maintains its previous view that the 1979 legal agreement preventing the construction of a second runway at Gatwick before 2019 should be upheld but recognises that the timescales involved mean that it is unlikely to be a constraint on the time when a second operational runway could be constructed;
- (4) While some members of GATCOM see potential national and regional economic benefits of an additional runway at Gatwick, there are other members who do not, and some members have not formed a judgment and will not do so at this time. GATCOM therefore advocates caution in taking forward any development proposals without:
 - (a) ensuring that the environmental impacts are capable of being contained, minimised and mitigated; and
 - (b) the necessary resources being in place at the appropriate time to provide the proper level of all the necessary infrastructure needed to support the development;
- (5) In the event of the Airports Commission deciding to take forward the option of additional runway capacity at Gatwick to Phase 2 of its work, GATCOM advocates a further and fully inclusive stakeholder consultation on how the environmental and infrastructure impacts would be capable of being contained and minimised in relation to the runway development and the necessary supporting infrastructure. GATCOM has a role in that process and would welcome the opportunity to participate in any consultations in relation to the options being considered for Gatwick Airport.
- (6) If the Airports Commission decides that no additional runway capacity is needed at Gatwick and that expansion should take place elsewhere in the South East, GATCOM recognises the potential impacts of such a decision on Gatwick's operations and on the region's economy and this needs to be acknowledged by the Commission in its deliberations and final report to the Government.

I trust GATCOM's views will be taken into account.

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12 January 2015

Dear Sir/Madam

SUSSEX AREA ROUTE STUDY – CONSULTATION DRAFT

I refer to Network Rail's consultation on the draft Sussex Route Study. GATCOM welcomes the opportunity to comment the proposals for the future of the network insofar as they relate to Gatwick Airport.

GATCOM represents a broad range of interests at Gatwick from local authorities and communities, airlines and business groups, to passengers and environmental and amenities groups. One of our key aims is to ensure that the future growth and development of Gatwick Airport have particular regard to the impact this has on the surrounding local communities, the environment and local economy. The way in which passengers, staff and users access the airport is therefore a key issue for the Committee.

Effective, efficient, high quality and resilient surface transport to Gatwick benefits not just air passengers and airport staff but also the local population and is an integral part of the sustainable growth of the airport. The Thameslink programme which is due to be completed in 2018 will improve capacity by increasing the number of carriages on trains which together with improvements to junctions and other bottlenecks on the rail network will remove some capacity constraints on the Brighton Main Line. GATCOM welcomes these planned improvements but notes that a number of the improvements whilst within the rail industry's future plans do not yet have committed funding. The analysis also suggests that by the 2040s additional investment is likely to be required to increase capacity due to background growth.

GATCOM acknowledges the difficult task Network Rail faces in striking a balance between all the aspirations of the different stakeholders and the need to make best use of the available capacity on the rail network in the South East and to identify priorities for investment. Overall GATCOM generally supports the proposals outlined in the draft Route Study but wishes to submit the following comments for consideration:

Future Rail Capacity

GATCOM welcomes the detailed analysis that has been undertaken on the forecast demand and capacity gap for peak services into London, and the potential opportunities

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to improve infrastructure to cater for this demand. It is noted that without further interventions beyond those already committed (including the Thameslink programme capacity enhancements), widespread standing in the busiest morning peak is predicted on services from Haywards Heath to London by 2023 and from Hove and Lewes to London by 2043.

With the full package of proposed interventions, it is noted that this widespread peak standing is predicated to be reduced to morning peak services north of Croydon by 2023 and north of Gatwick Airport by 2043. This is of great concern to GATCOM in view of the expected growth in passenger numbers at Gatwick over the next few years and particularly if it is decided that there should be a second runway constructed at Gatwick which will result in significantly more passengers and airport staff using the rail network to access the airport.

GATCOM acknowledges that the package is aimed at enhancing capacity, enabling six additional train paths to be provided in the morning peak, and addresses performance issues on this complex stretch of the network. However whilst GATCOM welcomes the proposals there is concern about the potential for continued overcrowding issues on services north of Gatwick in the morning peak which coincides with the airport's peak arrivals period and the implications of this for future service patterns particularly for those stations north of Gatwick. In addition to this, crowding on board trains will not incentivise air passengers to use the train to access the airport which will not assist Gatwick Airport Limited in achieving its surface access target of 60 per cent of air passengers using public transport to and from the airport.

As the peak morning capacity constraints look set to continue, GATCOM is concerned about the impact this will have on ensuring the resilience of the Brighton Main Line and the potential to recover from incidents and major disruption. Most of the assessment work appears to have concentrated on the issues associated with the Brighton Mainline and services into Central London. GATCOM would also like to see more detailed consideration of infrastructure and rail service improvements on other parts of the network. GATCOM believes there should be further consideration of the needs and/or potential of the Arun Valley and North Downs lines which could add resilience to the network when there are closures or problems on the Main Line as well as improved connections to areas east and west of Gatwick via the North Downs Line.

GATCOM would also like to see opportunities to invest in the rail infrastructure on other routes to improve the journey times and capacity of rail services for orbital routes from Gatwick Airport on the North Downs Line to and from Guildford and Reading and towards Kent, looked at in detail. As part of this, GATCOM would also like to see a direct train service between Kent and Gatwick using the Redhill-Tonbridge Line.

Resilience of the Brighton Main Line and the Arundel Chord

Resilience of the Brighton Main Line is of key concern particularly as it is the only rail line serving Gatwick Airport. GATCOM believes that more investment is needed to ensure greater resilience on the line and diversionary routes identified for times of significant disruption. GATCOM therefore welcomes the consideration that has been given to the potential of the Arundel Chord scheme which could provide a much needed diversionary route for the Brighton Main Line via the Arun Valley Line to reduce the impact of delays for passengers between Three Bridges and Brighton during periods of extreme disruption.

However it is disappointing to note the low cost-benefit score for this scheme, mainly due to the limit on the number of trains that can be handled in the West Coastway facing platforms at Brighton. Greater recognition needs to be given to the potential benefits including the additional 1 train path that could be created via the Arun Valley Line in the off peak. GATCOM believes this should be given further detailed consideration as to how investment of this nature could enable other rail infrastructure improvements in the region to improve journey times between Gatwick and the main towns along the West Coastway and Arun Valley lines.

Gatwick Station and Second Runway

GATCOM acknowledges that Network Rail has taken into account the potential provision of a second runway at Gatwick Airport, and the implications of this in terms of additional demand along the Brighton Main Line. It is noted that modelling undertaken by Gatwick Airport Limited concerning the additional patronage expected from provision of a second runway anticipates an additional 800 passengers during the morning peak hour. GATCOM is concerned that the Study notes this additional patronage but that it is viewed as marginal relative to the level of background demand on the route as a whole, although the predicted growth will be significant for the station itself. GATCOM is anxious to ensure that the major improvements to the Gatwick Station concourse currently being planned are comprehensive and will provide scope for further development as a world class international multi-modal interchange to meet the future needs of an expanded airport. The potential for Gatwick's passengers having to stand on services during the peak is however of great concern and needs to be addressed.

Investment Priorities

The outputs for CP6 have yet to be set and it is noted that investment is reliant on the Government's and the Regulator's assessment of priorities. It is vitally important that Network Rail in its final document emphasises in a more rigorous manner the need for the Government to ensure that priority is given to securing the improvements on the Brighton Main Line particularly as it is the only rail link serving Gatwick Airport. GATCOM notes that this is an issue which the Airports Commission has raised in its appraisal of the Gatwick Airport Second Runway business case and sustainability assessment in which it emphasised that without a package of improvements, capacity constraints on the Brighton Main Line may present a serious challenge for airport expansion by 2030.

Cross-boundary analysis

GATCOM welcomes the Cross-Boundary analysis undertaken on routes between Gatwick Airport, Guildford and Reading via the North Downs Line, and for the West Coastway route between Brighton, Southampton and the West Country.

GATCOM supports the previous First Great Western franchise commitment to extend two North Downs Line services in each hour so they operate to Gatwick Airport which should be enabled by the planned provision of additional platform capacity at Redhill. The investigation of potential journey time benefits savings from conversion of the line to AC electrification alongside the electrification of the Great Western Mainline and introducing a third service each hour is welcomed, as is investigation of potential direct links to Oxford. However, there is concern about the suggestion of changing stopping patterns of existing services by reducing station stops. GATCOM is anxious to ensure that connectivity between local stations and Gatwick are retained, particularly north of Gatwick, as they provide essential links for air passengers as well as airport staff and in some cases links to other routes.

Maintenance Access and Early morning/late night services

GATCOM acknowledges the challenge of balancing the increasing demand for services to be provided around the clock, against the need to ensure that access is available to the network for maintenance to ensure the provision of a safe and reliable rail network. Access to the rail network at off-peak times is a key issue for securing services to/from Gatwick to match flight schedules in the early morning/ late night. Access at early morning/last thing at night is not only important for air passengers, but also for staff working shift patterns at the airport. GATCOM would encourage Network Rail to consider strategic investments in new technology which could enable shared maintenance and train running access to the network late at night or early in the morning. Currently double track sections south of Three Bridges and along the Arun Valley Line restrict the potential to run additional later evening or early morning services due to the requirements for maintenance possessions of both running lines.

GATCOM trusts its comments will be taken into account.

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