

TRANSPORT FOR LONDON

GATWICK AIRPORT NORTHERN RUNWAY DCO WRITTEN REPRESENTATION

11 MARCH 2024

1. Executive Summary

- 1.1 The Mayor of London is committed to making London net zero by 2030 and reducing air pollution. He believes that the aviation sector needs to play a part in this and not undermine efforts to achieve this goal. He agrees with the view of the Climate Change Committee which has been clear that, if we are to ensure the UK meets its net zero target, there should be no expansion of UK airport capacity until the Government has a strategy in place for reducing overall emissions from the sector.
- 1.2 He continues to have strong concerns about the environmental impacts associated with this development, particularly with regard to carbon, as well as air pollution and noise, as a result of the increase in aircraft movements and road traffic generated. These issues have not fundamentally been addressed and, therefore, the Mayor continues to oppose the proposed development.
- 1.3 Underpinned by a forecast increase in carbon emissions of up to 21% from flights in 2038 compared to without the proposed development, the Northern Runway will lead to significant levels of emissions and runs counter to efforts to decarbonise in the face of the climate change emergency. Compared to 2019 levels and even with the optimistic assumption of a high uptake of sustainable aviation fuel (noting there is no real plan for how or whether that ambition can be achieved), the development is forecast to result in only a 27% reduction in carbon emissions compared to 2019, significantly short of the Government's Jet Zero target of 50%.
- 1.4 The aspirations to increase public transport mode share are not matched by the committed interventions to achieve this. We call for an increase in the quantum and scope of the sustainable transport fund to help secure important rail interventions, alongside support for coach, bus and active travel. Moreover, it is of great concern that under the proposed development, the Applicant forecasts highway trips on the airport's busiest days to increase by over a third compared to its baseline (2016). This is completely inconsistent with sustainable development, as is the corresponding increase of 7,700 car parking spaces. If the Applicant is to be credible in seeking to demonstrate it is tackling emissions, there must be no increase in car trips compared to today – which would translate to a sustainable mode share target of at least 65%.

2. Introduction

- 2.1 This written representation is submitted by Transport for London (TfL) on behalf of the Mayor of London in relation to the Development Consent Order (DCO) application pertaining to the London Gatwick Airport Northern Runway project. The Mayor of London recognises the economic and connectivity benefits that airports, including Gatwick, bring to London. Nevertheless, he is also clear of the need for the aviation sector to fully acknowledge and address its environmental and health impacts.

2.2 Gatwick Airport is an integral part of the London airport system, as the city's second busiest airport and with a significant proportion (42%) of its passengers with their origin or destination in London. The Mayor and TfL have a particular interest in this application with regard to its wider environmental implications, namely noise, carbon and air quality – including within the London area – as well as the impacts on surface access and implications for its associated emissions. This is in line with London Plan Policy T8 on aviation which seeks that London's airports fully address the environmental impacts of any proposed development and that they should increase the proportion of passenger and staff trips by sustainable modes.

3. Carbon

- 3.1 Aviation constituted 7% of total UK emissions in 2018 and the sector needs to make very significant emissions reductions if it is to contribute to achieving binding climate change targets and play its part in tackling the climate emergency. The proposed development entails an increase in air traffic movements (ATMs) of 36% compared to 2018, with carbon emissions reaching 17% above 2018 levels. A further 1 MtCO₂e is forecast to be emitted in 2038 compared to the future baseline of the same year, with the project contributing 21% increased emissions above the baseline.
- 3.2 The Government's Jet Zero policy entails a 50% aviation emissions reduction by 2050 compared to 2019 levels. Yet the forecasts for the development indicate a 27% reduction by 2050 compared to 2019 levels. The proposals need to demonstrate how they are compatible with UK climate change targets. Moreover, the increase in emissions takes a large proportion of the UK carbon budget for 'international aviation and shipping'. The sixth carbon budget (2033-2037) allocates it 37 MtCO₂e per year – of which, the Northern runway (in 2038) will account for 2.8% – 1.038 MtCO₂e. Given Gatwick is forecast to be responsible for 4.545 MtCO₂e even without the proposed development, we question the acceptability of Gatwick seeking to increase these emissions by a further 23% (over the future do minimum scenario). This is likewise a higher proportion of emissions than 2018 and as such relies on others to cut their emissions in order for Gatwick to increase its share of carbon. This development also needs to be considered in the context of growth at other London and UK airports, placing further strain on the carbon budget.
- 3.3 The Applicant is also placing a heavy reliance on sustainable aviation fuel (SAF) to reduce emissions for both the baseline and expansion scenarios. In the Environmental Statement, the calculations for greenhouse gas emissions from flights are based upon the Jet Zero 'high ambition SAF' scenario. However, should the high ambition SAF scenario not be met, emissions from aircraft will be significantly higher, putting the forecast 27% reduction out of reach. The Applicant must begin work on a credible SAF strategy which can drive the transition for airlines, taking into account the increased costs of SAF compared to conventional fuel. Given the reliance worldwide on SAF and the limited feedstocks, with no plants currently operational in the UK, for these emissions figures to be achievable Gatwick must consider a strategy in detail at the earliest opportunity. Without this, even the insufficient 27% reduction in emissions is unlikely to be realised.
- 3.4 More broadly, the Applicant should set out concrete plans for reducing the emissions of aircraft, including detailed measures to increase use of SAF and encourage newer, lower emission aircraft. Plans should also include achieving level 4+ of the Airport Carbon Accreditation (ACA) scheme.
- 3.5 Carbon emissions from surface access likewise remain important, given the increase in passengers travelling to and from the airport. All levers available to the Applicant should

be exercised to increase the proportion of those travelling to their airport by sustainable modes.

4. Surface access

- 4.1 There needs to be much greater ambition from the Applicant when it comes to securing sustainable mode shift. If the environmental impacts are to be addressed, the Applicant must go beyond the proposed target of 55% sustainable mode share for passengers and staff compared to the currently observed 45% for passengers and 31% for staff – with the latter also including car sharing. Gatwick is able to count on exceptional rail access, with fast and frequent connections to London and a wide range of destinations through its recently upgraded station, and this should be reflected in its level of ambition.
- 4.2 Nonetheless, it is important that the Applicant does not seek to rely wholly on schemes already delivered to support background growth and demand from the airport broadly in line with today. The proposed development is forecast to result in an additional 20,000 rail journeys by 2032, yet current capacity forecasts – which only assume modest growth in airport demand – envisage that capacity on the Brighton Main Line will be exhausted in the 2030s. As well as creating challenges for the operational railway, worsening levels of crowding risk discouraging sustainable mode shift. We also note that the Applicant has, in a number of instances, used 2016 as its baseline for its surface access analysis. This risks overstating the mode shift that might be secured in conjunction with the proposed development by including the benefits of major rail enhancements which were delivered in the period 2016-2019, notably the Thameslink upgrade. Indeed, it is deeply disappointing that the passenger and staff highway mode share is forecast by the Applicant to remain almost unchanged between 2029 and 2047.
- 4.3 But it is a particular concern that the 55% target for passengers travelling by sustainable modes still allows for a very substantial increase in highway trips. Compared to 79,000 passenger highway trips per “busy summer day” in the 2016 baseline data provided by the Applicant, an increase of over a third in highway trips with the proposed development is forecast by 2047 – to 107,000 highway trips on an equivalent day. If the Applicant is seeking to expand then it should be committing to no increase in highway trips. Based on these numbers, that would entail a sustainable mode share target of at least 65%.
- 4.4 Similarly, it is incompatible with sustainable development for the Applicant to be seeking an additional 7,700 parking spaces compared to today, 10% of total current on- and off-site parking. This runs completely counter to the sustainability of the proposed development and the need to minimise its associated emissions.
- 4.5 Aspirations for mode shift need to be matched by sufficient commitment on the levers to be used to increase the proportion of sustainable trips to the airport and prevent an increase in car journeys. This includes clarity on the use of demand-side measures, including car parking and forecourt drop-off charges, to change travel behaviour. At the same time, it is essential that there is a committed plan for measures to encourage sustainable trips. It is disappointing that the extent of interventions on the highway network is not matched by similarly comprehensive efforts to support rail and other sustainable modes.
- 4.6 Core to rectifying this would be extending the scope and quantum of the Applicant’s existing sustainable transport fund, to allow it to support interventions beyond the immediate locality of the airport. In particular, it could help unlock rail schemes which are currently yet to be fully defined and which could include: the Croydon Area Remodelling Scheme (CARS) – providing much needed rail capacity on the Brighton Main Line; a direct

service from Gatwick to Kent via Redhill; a third train per hour on the North Downs line towards Guildford; and earlier morning trains on additional corridors to match early shifts and flights. Indeed, a portion of the fund should be ringfenced to give priority to rail interventions to ensure they are afforded sufficient emphasis. The expanded fund could also be used to kickstart new coach services to locations away from the Brighton Main Line, including those in Southeast and Southwest London, which the Applicant has been investigating. Such interventions would be alongside measures to improve local bus services, cycling and walking access to the airport.

- 4.7 Funding specifically set aside to improve the customer experience for public transport users should also be considered, addressing, for example, pinch points in the airport station and signage at key interchanges. More thought needs to be given to the smaller measures which could address such issues and help improve the public transport experience – so further encouraging mode shift. There would be merit in a revamped Gatwick Airport Transport Forum – with stakeholder buy-in at a sufficiently strategic level – as the group to drive the sustainable mode shift agenda and agree disbursement of the transport funds.
- 4.8 More granular mode shift targets, for example by geographical area or by mode, would be an option for enhancing the transparency of the mode share objectives. If there remains uncertainty as to how quickly the Applicant can achieve stretching sustainable mode share targets, a further approach would be to set formal limits on growth in airport passenger throughput if certain mode share thresholds are not met. It should be noted that such limits and thresholds need to be sufficiently meaningful and stringent if such a mechanism is to have credibility.
- 4.9 We also note the emphasis on electric vehicles (EVs) to drive down the emissions from surface access. Notwithstanding the issues surrounding EV particulate emissions from brake and tyre wear, if this growth in EVs is expected, the Applicant should also set out its strategy for EV charging and ensuring adequate charging infrastructure, including implications for the grid – recognising these have long lead times to address.
- 4.10 Concerns remain about the modelling of capacity on rail services. There needs to be a fuller understanding of the impact on the Brighton Main Line corridor of baseline growth, including Gatwick demand, in addition to the proposed development – and the ability of this to be accommodated. This includes at times of perturbation in airport or railway operations – on a line which Network Rail has flagged struggles with the demands put upon it. There are questions about some of the uncommitted services the Applicant has assumed in its modelling, whether it has taken adequate account of luggage and of the notable seasonality of Gatwick’s demand and how that will evolve as the airport grows and what appears to be an absence of freight services in its assumptions on track capacity. There are also questions as to increased traffic flows via the newly opened Elizabeth line and the cumulative impacts associated with the Luton Airport Expansion DCO which also relies on Thameslink. Taken together, the Applicant has not adequately demonstrated that there will be no significant increase in rail crowding as a result of the proposed development.
- 4.11 This is further complicated by the aggregation of passenger demand across each hour in the modelling which does not take sufficient account of the mix of fast and slow services operating on the Brighton Main Line, including the Gatwick Express. The reality is that uneven loadings across services creates substantial crowding, at the airport and further along the line. Aside from the additional doubts that this casts on the conclusion of the modelling, this does suggest that, at the very least, service pattern options which might allow a better distribution of demand between services should be considered.

- 4.12 We also remain concerned that the highway model only includes a small proportion of South London in the 'detailed modelling area.' The rest of London is modelled as part of the 'Fully Modelled Area', but with fixed speeds, as taken from the South East Regional Transport Model (SERTM). Given the significant number of projected highway trips between Gatwick and London – including the areas not covered by the 'Detailed Modelled Area' – it is likely that the full impacts across wider areas of London have not been assessed. The demand calculation of highway trips to and from London for both baseline and project scenarios would be needed to provide suitable assurance. We also note that further sensitivity testing could be required, to assess further impacts across London and provide confidence that the proposed mitigations will withstand demand.
- 4.13 Moreover, additional work is needed to understand the impacts of the expansion on the wider strategic road network, in the context of the cancellation of the proposed M25 smart motorway between J10 and J16, which had been included in the modelling. In the event of increased congestion, work needs to be undertaken to understand the impact traffic seeking alternative routes could have within London. There is a risk of increased congestion, which also impacts bus and coach services and exacerbates air pollution.

5. Air quality

- 5.1 Air pollution and its impact on human health remains a key concern for Londoners. The Applicant must demonstrate how it is addressing air quality, including emissions from aircraft take offs and landings as well as from airside operations and increased highway traffic. Ensuring passenger and staff trips are by sustainable modes is a critical element of this.
- 5.2 The Applicant's assessment is mostly focused on the locality of the airport and has not sought to understand the potential air pollution impacts within Greater London. London remains a key origin/destination for Gatwick Airport passengers and the large volumes of traffic moving to and from the airport could lead to reduced levels of air quality, particularly closer to key traffic corridors, such as the A23. Our concern is that increased traffic levels to and from the airport could increase the health impacts of air pollution for local communities. The Mayor has taken the difficult decisions required to substantially reduce air pollution in London; the proposed development appears to seek to bank those improvements and so undermine the steps London has taken to improve air quality.

6. Noise

- 6.1 We would expect the Applicant to fully assess and address the noise impacts of the proposed development, notwithstanding that the impacts are generally outside London. There will be increased noise exposure for local communities as a result of the increase in the number of flights. It is positive that the Applicant has highlighted properties exceeding noise limit values from both construction and the additional flights, but it should also be cognisant of the more stringent World Health Organization (WHO) Europe guidelines, which reflect the latest scientific evidence on the serious health impacts. For aircraft noise, it recommends 45 dB L_{den} for average noise exposure and 40 dB L_{night} for average night noise exposure as the limits above which there are adverse health effects.
- 6.2 The greatest noise impacts appear to relate to the night-time period. Given the particularly negative health impacts associated with sleep disturbance from aircraft noise, the Applicant needs, in particular, to set out its commitment to limit night-time movements. As noted in the Environmental Statement chapter 14, there is a significant population – around 19,000 people – for whom night time noise will exceed the WHO recommended levels.

- 6.3 Assessment of a suite of noise metrics to better understand the impacts is critical and we welcome the Applicant's efforts in this regard. Nevertheless, the average noise metric used by the Applicant is not suitable given that this risks underplaying the impact of peak noise events.
- 6.4 Air noise insulation is a part of the mitigation strategy; the Applicant should consider whether the proposed thresholds are sufficient to include all those experiencing substantial noise exposure – and ensure that they are able to support those residents who are unable to fund their share of insulation when only eligible for a contribution from the Applicant.

7. Conclusion

- 7.1 We trust that the Examining Authority finds this representation useful in setting out the Mayor of London's concerns and that it will consider the points raised for further investigation during the DCO examination process.