

Interested Party Reference number: 20045900

Gatwick Airport Northern Runway Project – Development Consent Order (DCO)

Written Representations for Deadline 26th March

Comments on any further information/ submissions received by Deadline 1.

Gatwick Area Conservation Campaign (GACC)
26th March 2024

Dear Examining Authority

Please find our further written submissions for the 26th March deadline..

Yours faithfully,

Peter Barclay

Chair, Gatwick Area Conservation Campaign

Questions relating to Document 10.9.2 - The Applicant's Response to Actions - ISH 1: The Case for the Proposed Development

In 10.9.2 the Applicant notes that resurfacing is proposed to involve removal of 100mm of the existing carriageway on the emergency runway, and then replacement of this with “*a new asphalt later of approximately 150-250mm*” (paragraph 4.1.10). This appears to be more of an ‘overlay’ than a resurfacing operation, such as would be used to strengthen a pavement to be able to cope with heavier operating aircraft. However, the indicative cross-section shows a pavement with 50mm asphalt surf, then 50mm asphalt bin over 280mm asphalt base course. Therefore, the new layer appears to include surfacing as well as base course. GACC would suggest that this is not resurfacing but ‘*new construction*’ of a new, stronger, runway pavement. The Applicant also notes that the pavement was last resurfaced in 2022 at Gatwick. **Can the Applicant please advise the thickness of runway removed and thickness of runway replaced during the resurfacing in 2022, and the extent to which the proposed pavement removal and overlay is intended to strengthen the emergency runway pavement?**

In 10.9.2 in response to Action Point 6 the Applicant notes (in Table 6.1) that 81% of Gatwick’s passengers are in London and the South East. **Please can the Applicant confirm the comparative distribution of passengers for the project and without project cases in 2038 and 2047, both with and without Heathrow Airport expansion? Please can the Applicant confirm whether passengers overnighting in hotel and guesthouse accommodation around the airport are counted as having travelled from there, or from their home postcode.**

In 10.9.2 in response to Action Point 7 GAL notes that (paragraph 7.1.3) that, “*In the first years after the Project’s opening, there would be some air traffic absorbed from other airports – in particular, from Heathrow and Stansted.*” This continues in paragraph 7.1.4 to note that, “*Adopting a comprehensive London system approach to fare modelling ensures*

that estimates incorporate the potential displacement of air traffic from other London airports within the estimated airfares, and consequently, the stated benefits.” Can the Applicant set out the extent of this displacement from other airports, and can the economic benefits attached to this be broken down for clarity.

In 10.9.2 in response to Action Point 11 the Applicant provides Table 10.1, which sets out the predicted busy day numbers through to 2038, but data for 2047 has not been shared. **As the Project is predicted to increase passenger numbers up until 2047, can these be provided for 2047 too, both with and without the project, so that the increase over the whole project period is clearly set out.**

In addition in paragraph 10.1.3 it is stated that, “*The majority of the baseline busy day passenger growth is within the shoulder periods of the day.*” **Please can this be justified in terms of need and demand forecasting and in comparison to the Gatwick Airport 2015 second runway expansion plan.**

Questions relating to Written Summary of Oral Submissions from Issue Specific Hearing 4: Surface Transport

In 10.8.5, paragraph 3.2.6 the Applicant notes that there is higher car dependency in June than August. However, it is not clear if this is a relative (%) or absolute (number). **Please can the data be provided to set out why June is a worse case than August for a) road traffic and b) rail traffic, so the worse case for both the road and rail network has been modelled.**

In 10.8.5, paragraph 4.2.3, the ExA asked for clarification about the model being based on timetable date or actual performance, and the Applicant confirmed that the model is based on timetable data. **Does that mean that the modelling of train services and capacity assumes perfect operation and that typical actual performance, which will include a reduction in capacity due to unreliability, has not been represented? Is that considered by the Applicant to be a realistic scenario?**

In 10.8.5, paragraph 4.2.6, the Applicant notes that the redevelopment of Gatwick Airport station has helped reduce delays to trains accessing the platforms. Therefore it would be reasonable to assume that inadequate station capacity could result in an increase in train delays. At ISH4, Network Rail confirmed that Gatwick Station redevelopment had been designed to accommodate forecast demand to 2036 and did not account for additional demand arising from the Northern Runway plan. **If it is the case that Gatwick Station has not been designed to accommodate the demand that will arise from the Gatwick Northern Runway Project, will that therefore mean that there will be congestion on the platforms which could cause delays to trains accessing the platforms, and knock on impacts at other stations?**

In 10.8.5 paragraph 5.1.10, the car parking balance between on-airport and off-airport is insufficiently clear nor specific. The Applicant refers to “striking the right balance” but does not offer any fuller explanation. **How has the balance between on-airport and off-airport parking been examined, how was it defined and how will it be delivered?**

In 10.8.5, paragraph 6.1.5.3, the response to the point made by Chris Hyde of the Surrey Climate Commission is that “it would be unrealistic to assume no additional journeys would be made by road”. In 6.1.5.4 the Applicant refers to a no car growth scenario as being “unachievable in practice”. This implies that the Applicant has no control over the modes used to access the airport, which is plainly not the case. The Applicant does have measures available which could limit the number of cars accessing the airport, should it choose to use them. Rather than being “unrealistic to assume no additional journeys would be made by road”, we would argue that it is a matter of choice by the Applicant. **What measures has the Applicant considered to prevent any increase in car use as a result of the project, and have those measures been assessed?**

In 10.8.5, paragraphs 4.1.3 and 4.2.8, the Applicant confirmed that it is meeting with Network Rail on 14 March 2024 to discuss rail station and passenger modelling. **Will the record of this meeting be shared with other interested parties?**

Questions relating to The Applicant’s Response to Actions from Issue Specific Hearing 4: Surface Transport

In 10.9.5, paragraph 2.2.7.3 the Applicant justifies its use of a future baseline to assess the worst environmental impact. However, compared to the current environmental impact – not just for surface transport but for other aspects too – this is not as great an impact as that future ‘with project’ case compared to today. The change that will be experienced in terms of both future growth without the project and additional growth with the project is the impact that will be experienced by both people and the environment. The Applicant refers to this as an “artificial scenario” (which is the term that the Applicant uses in paragraph 2.2.8) but the actual impact that will be experienced by people, and the full environmental impact will be this – which would seem entirely reasonable to be described as the worse case. Impacts which could be experienced if the project was to go ahead. **Can the Applicant please set out this worse case clearly for all of the topics of the Environmental Statement, not least for: surface transport, air pollution, noise, climate change, noise and biodiversity impacts.**

In 10.9.5, paragraph 3.3.1 with reference to on-street parking (fly parking), the Applicant acknowledges that it is “*not possible to accurately assess the number of airport-related vehicles parking in these locations*”. This is an uncertainty in the level of sustainable mode share that could be realistically achieved.

The Applicant notes (paragraph 3.2.1) that the extent of informal parking that “*is not quantified, and cannot be accurately measured*” is rental of driveways. Likewise the extent of illegal off-airport parking operating at any time is not included. GACC does not accept that no attempt at measuring these three types of parking could be made and requests some assessment of the scale of this be included, and made available for public scrutiny and comment. There are many different ways in which data could be collected, qualitatively and quantitatively. In addition, it would seem plausible that some data on at least fly-parking and illegal off-airport parking sites might be held by some local authorities.

The overall extent of off-airport parking should be estimated as part of this application, as opposed to being deliberately under-estimated, as is the case currently. This should be assessed in Horley, Crawley, villages within a radius of Gatwick where this is known to take place and around train stations with a direct link to the airport.

Has the Applicant carried out sensitivity tests of the scale of these three different types of off-airport parking that could (and already do) occur and, consequently, the impact this would have on the achievement of mode share targets, the extent of the highway network that would be affected and the levels of traffic that would arise? If not, can this please be completed and shared based on available data.

In 10.9.5, paragraph 4.1.3, in response to a question from the ExA at ISH4, the Applicant answered that Table 45 of APP-260 was incorrect. The implication was that this was already known to be incorrect. **Is the Applicant aware of any other inaccurate tables or other data in the documentation?**

Questions and Comments related Questions to Document 10.5 - The Car Parking Strategy

The Car Parking Strategy is self-contradictory. In section 2 (paragraph 2.3.6) it implies that the Applicant's role in ensuring off-airport parking enforcement and management is sufficiently well planned and resourced is not required as its strategy aims to ensure there is "*enough car parking at the airport to meet demand and deter off-airport parking.*" However, in section 4 the same strategy states (paragraph 4.5.2) that, "*the use of [on-airport] parking charges is part of the suite of measures to influence travel choice and achieve the committed mode shares.*" Indeed, the extent that parking constraints support a modal shift from car transport to/from the airport to bus, coach, rail and active transport then it will act as a constraint, so a far more active role in parking policy is requested.

Given that the strategy's stated aim is to be part of the way mode share is to be delivered then the on-airport parking extent and charging will also actively drive off-airport parking. This should be acknowledged by the Applicant, and an off-airport parking strategy be developed to show what the overall way parking is to be constrained off-airport for airport passengers and workers, as well as on-airport and forecourt charges.

The Surface Access Strategy and Car Parking Strategy should be updated such that the parking strategy, modal shift and achievement of Surface Access Commitments, planned capital investment in transport infrastructure (e.g. increase in road capacity, allocation of road space to buses and active travel, rail investment) and incentives to shift transport (e.g. increased workplace parking levy, subsidised rail and bus fares for passengers and workers) are actively seen as connected, not separate strategies.

The Applicant has assumed no change in the quantum and locations of authorised off-airport parking. The total modelling however, should include the total of authorised, and unauthorised sites, inclusive of driveway and street parking. All of this off-airport parking should be modelled, and the strategy should have policies and plans, resources and enforcement mechanisms such that all of it is sufficiently constrained. **The Applicant should**

set out how it envisages that fly-parking is to be constrained where it is an issue now, and where achievement of the SAC make it likely to become an issue in the future.

The Applicant's Car Parking Strategy excludes data on specific car parking charges. In paragraph 3.1.2 it is noted that "GAL uses variable parking charges to optimise the occupancy of spaces", and in paragraph 4.5.5 it is noted that "GAL is not committing to implement a specific level of charge". The level of parking charges and the availability of free parking are important influences on car use by airport staff, passengers and other visitors, and therefore a significant factor in the achievement of mode share targets. Car use will also be influenced by the proximity of car parking spaces to on-airport work locations and other destinations. The absence of any specific data on the level of car parking charges is a significant gap in the Car Parking Strategy. **Can the Applicant describe the existing level of car parking charges or, if variable, the range and how it is applied for staff and passengers, how this changed between pre-covid and post-covid, the extent of free parking for staff and airport visitors, and pre-covid and post-covid changes in the location of parking for staff and visitors relative to on-airport work and other destinations, and any planned future changes.**

The Car Parking Strategy (reference 10.5) appears to be primarily an on-airport parking strategy. Although it notes four different types of airport related parking (paragraph 1.1.2) it deems that 'all off-airport parking provision are matters for local planning authorities ...' so limits GAL's commitment to on-airport parking and providing financial support for off-airport parking. However, as the car parking strategy is completely silent on what constitutes sufficient "policy, parking standards, enforcement and management" for off-airport parking (as noted in paragraph 1.1.2) it appears to be only half a car parking strategy. Whilst the Applicant has direct control over on-airport parking it should accept responsibility of the extent to that its current operations, future operations, and proposed project have an impact on off-airport parking, and that the extent of finance and/or other resources provided by the Applicant, will deem the extent to which off-airport parking is controlled. This must go beyond plan policies (see paragraphs 2.3.2-4) and enforcement (2.3.5).

Comments on the Document 10.2, the Relevant Representations Report

On page 36 the Applicant notes that, "*It is considered that a longer design life for the airfield works would not be realistic given it is likely there will be further significant changes to the airport and its operations in that timescale. Assessment of climate change allowances over a longer design life is therefore considered disproportionate as the aviation industry has changed considerably during the past 40 years and this rate of change is anticipated to continue ...*" This argument could be put by any airport, based on aspirations for future developments (as yet neither stated nor submitted). No clear basis for this position is provided. **Can the Applicant set out why it appears this applies uniquely to Gatwick rather than at other airports, and why a future planning application that is neither drafted nor submitted that might limit the design life of the runway in future (or not, if it does not occur) should be given weight for this DCO application?**

Questions and Comments related to 10.10 Technical Note on the Future Baseline and 10.6 Needs Case Technical Appendix

The technical note (10.10) sets out and then summarises the forecast outputs in terms of growth rates of future demand and throughput (Table 1.4). The characteristics of recent growth are characterised and explored further in the Technical Appendix (10.6). This seems little more than a 'predict and provide' model of unconstrained growth. Apart from increase in plane size the greatest increase in load seems to be due to peak spreading. **Can the Applicant please explain and quantify how the demand for peak spreading at Gatwick Airport in future is predicted to be affected by a possible expansion of Heathrow Airport, and to what extent are the overall trends in the London aviation market shaped by available slots (even if at less desirable times)?**

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