

CAGNE Surface Access Transport Update
Sterling Transport Consultancy Limited
15th May 2024

CAGNE WR Issue	Applicant Response (if any) D3		CAGNE based on D3 material
Failure to apply relevant guidance documents	No specific comment in response to IP RR's.	<p>Refer to detailed comments below</p> <p>Also the applicant's revised ES Chapter 12: Traffic and Transport (REP 3-016) offers no change in substance only a clerical exercise in revising cross-referencing.</p>	<p>No change in CAGNE view</p> <p>The applicant is still failing to apply the requirements of key policies in the surface access space.</p> <p>The WR makes clear that the scheme transport impacts are used to generate a series of further assessments relating to environmental matters. The failure to apply the relevant policy framework to these assessments must place in doubt their validity.</p> <p>The statutory bodies responsible for transport matters in the application are noted to have raised concerns in relation to the application of policy by GAL.</p>
Traffic Modelling Scope	The modelling work is considered adequate and in keeping with guidance as set out in the responses above.	<p>National Highways (REP3-137 et seq)</p> <p>Now pursuing additional construction traffic VISSIM modelling.</p> <p>Assumptions still not agreed</p>	<p>No change in CAGNE view</p> <p>CAGNE commented that the scope of the local traffic modelling is too limited in nature to be useful in terms of assessing community level impacts.</p>

		<p>Definitive list of NH schemes submitted</p> <p>NH comment that no clear link between airport usage (mppa) and traffic levels is demonstrated... <i>"However National Highways notes that any increase in mppa does not directly correlate to a corresponding increase in road user traffic on the Strategic Road Network, or indeed detrimental impacts on network performance"</i></p> <p>ESCC / JLA (Rep 3-118)</p> <p>See note below on validation. Also query re inclusion / or not of the 2500 robotic car parking spaces.</p> <p>WSSC (rep 3-150) Further information is needed to satisfy stakeholders correct levels of mitigation have been put in place through the lengthy construction phase, including traffic management.</p> <p>Concerns remain that the level of growth assumed by the Applicant is too high, these concerns are supported by the assessment made by York Aviation (see Chapter 6 and Appendix F of the Joint West Sussex</p>	<p>All three highway authorities remain concerned about traffic model with its scope and assumptions not agreed by any of the three authorities. This is despite the applicant claiming 'comprehensive scoping and engagement took place leading to the development of the TA'</p> <p>The NH comment on the link (or lack of between generated mppa and traffic volumes) shows the flawed nature of the approach taken.</p>
--	--	--	---

		<p>LIR). This could be resulting in an over forecast of the demand and therefore over provision of car parking and highway elements of the infrastructure. The Applicant should provide realistic forecasts for airport capacity and resultant demand</p> <p>Surrey County Council (rep 3-146 and 147)</p> <p>Still in the process of undertaking a detailed review of the Project's wider impacts on the local highway network.</p>	
Traffic Modelling Uncertainty log	The modelling that has been undertaken is in accordance with guidance provided in the DfT's Transport Appraisal Guidance and is explained in the Transport Assessment [AS-079] and detailed information is provided in Transport Assessment Annex B - Strategic Transport Modelling Report [APP260].	See comment on lack of exposure of the LVMR and other modelling documents below made by ESCC / JLA (rep 3-118) in particular.	<p>No change in CAGNE view</p> <p>The CAGNE position remains that the uncertainty log and the scenarios for low and high traffic growth which evolve from it are not truly reflective of how uncertainty should be dealt with in DfT TAG Unit M4.</p> <p>It is noted that further work has now been completed by GAL (AS-121) that deals with the matter of covid-19 effects. This analysis has removed certain schemes from the</p>

			<p>'committed' list of schemes included in the traffic model.</p> <p>The sensitivity test (AS-121) shows less rail use and concern over mode</p>
Traffic Validation Incomplete	<p>Model</p> <p>The modelling that has been undertaken is in accordance with guidance provided in the DfT's Transport Appraisal Guidance and is explained in the Transport Assessment [AS-079] and detailed information is provided in Transport Assessment Annex B - Strategic Transport Modelling Report [APP260].</p> <p>Sensitivity testing results (AS-121)</p> <p>7.6.1 The reference case demand shows that highway demand would be 14% lower by 2047 than forecast in the DCO Application at a 24-hour level. Reference case rail demand is projected to be 15% lower by 2047 at a 24-hour level than forecast in the DCO Application.</p>	<p>ESCC / JLA (Rep 3-118)</p> <p>As set out within the LIR the Highway Authority would still wish to see any modelling reports produced including the <u>Local Model Validation Report</u>, Forecasting Report and the model files for the various scenarios, to be able to fully appraise the modelling.</p> <p>WSSC</p> <p>No explicit comments</p>	<p>No change in CAGNE view</p> <p>CAGNE notes that the LMVR for the strategic transport model has not been exposed to examination.</p> <p>It is noted that following parameters / values have been updated in the covid sensitivity test AS-121)</p> <ul style="list-style-type: none"> • Road Traffic Forecasts 2018 (RTF) has been updated with National Road Traffic Projections (NRTP) 2022 • National Trip End Model (NTEM) 7.2 has been updated to the latest version 8.0 • TAG Databook has been updated from version 1.17 to 1.21 <p>The revised FY DM models now conveniently show less background traffic than previously but with certain previously 'committed' schemes removed from the modelling (e.g. Lower Thames crossing) removed.</p> <p>The worker data has been revised in the covid test but with employee</p>

			<p>numbers below previous estimates; again this reduces traffic impacts in the FY DM scenarios. The jobs analysis seeks to claim that numbers of jobs FY DM to DS is a negligible change due to the application. This emphasises the impact of the additional jobs / parking consented by non-DCO means.</p> <p>The sensitivity test still springs from the unverified base model – no LMVR etc as noted above.</p>
Scope of local traffic modelling	The modelling work is considered adequate and in keeping with guidance as set out in the responses above.	<p>National Highways (REP3-137 et seq)</p> <p>Additional VISSIM modelling of construction traffic requested – with scope to be agreed.</p>	<p>No change in CAGNE view</p> <p>CAGNE has recorded in its RR and WR the view that the coverage of local traffic modelling is inadequate.</p>
(Traffic) Growth Factors to 2029,2032 and 2047	The modelling that has been undertaken is in accordance with guidance provided in the DfT's Transport Appraisal Guidance and is explained in the Transport Assessment [AS-079] and detailed information is provided in Transport Assessment Annex B - Strategic Transport Modelling Report [APP260].	No comment from the IPs. As noted above the ESCC / JLA have again asked for the supporting documents to the traffic analysis be released to the Examination.	<p>No change in CAGNE view</p> <p>All three highway authorities share concern about traffic model with its scope and assumptions not agreed by any of the three key highway authorities.</p> <p>CAGNE agrees with these positions and awaits further detail including exposing to the examination the LVMR for the strategic model.</p> <p>CAGNE is conducting a detailed review of AS1-121 which details new assumptions etc .</p>

<p>Non-incinerating waste disposal plant, freight movements</p>	<p>Increases in freight movements have been considered as set out in Chapter 16 of the Transport Assessment [AS079] and these movements are included in the strategic modelling work. Overall, the strategic modelling shows that the additional traffic demand associated with the Project, taking into account the highway improvement works which form part of the Project, can be accommodated on the wider highway network and no significant effects are identified.</p>		<p>No change in CAGNE view</p> <p>CAGNE has highlighted the limitations of the freight analysis in respect of the revised scheme scope.</p> <p>The TfSE / ESCC position appears to suggest that use of public transport by airport users and staff has a positive effect on freight movements generated by the scheme. This is not demonstrated by the GAL analysis other than in the most general of terms.</p>
<p>Rail capacity</p>	<p>The Project includes surface access improvements, as summarised in Section 2.2 of the Transport Assessment [AS-079]. These improvements include new and improved layouts for the South Terminal, North Terminal and Longbridge roundabouts, as well as enhancements to the A23 London Road and M23 Gatwick Spur.</p> <p>A comprehensive assessment has been undertaken for rail capacity and this is set out in Chapter 9 of Transport Assessment [AS-079] and the full set of rail data, including off-peak loading information, is included in Environmental Statement - Appendix 12.9.2 Rail Passenger Flows [APP-154]</p> <p>Rail assessments have been undertaken for two peak periods, Network and Project peak, as described in paragraph 9.3.21 of the Transport Assessment [AS-079]. The Project peak reflects the hour with the highest increase in rail passengers as the result of the Project, which tends to be outside the network peak.</p>	<p>Network Rail (REP 3-142)</p> <p>Raise concerns relating to "assumed train capacities, including train lengths, formation and seated and standing densities. The requirements for airport passengers, particularly those with luggage, have a material impact on passenger experience and reduce effective available capacity."</p>	<p>No change in CAGNE view</p> <p>The applicant does not address the points made by CAGNE.</p> <p>The responses made by the sector participants reflect the CAGNE concerns in respect of capacity, contractual certainty and funding. The applicant has delegated responsibility for delivery of these vital mode shift outcomes to third parties with no financial or other mechanism to guarantee delivery.</p> <p>The question of passenger capacity and constraints on the BML is understood to be under examination by Network Rail. Whilst this may identify issues with rail operations it does not address the</p>

	<p>The assessment shows that the Project would increase the number of rail passengers across the day and across the assessment years, but no significant increase in crowding on rail services is expected as a result of the Project. Where standing is expected, spare standing capacity would remain available. The rail crowding assessment indicates that no mitigation is required.</p>		<p>funding and delivery challenges highlighted by CAGNE.</p> <p>The lack of commitment by GAL to consider serving by rail locations other than on the BML is clear as are the challenges the relevant stakeholders identify.</p> <p>The attempt by GAL to focus on off peak travel is flawed in CAGNE's view. Whilst marginal gains in capacity may be possible off peak this does not address peak time issues. The GAL view that scheme related peak hour rail travel is likely to be marginal in operational capacity terms is unsubstantiated.</p> <p>The transport authorities identify the concern made by CAGNE that rail access outwith the BML is not possible at times of airport demand to use rail to meet both passenger and staff travel requirements.</p> <p>This therefore places in doubt whether the rail service proposition advanced is sustainable and capable of delivering the mode share anticipated.</p> <p>As indicated by National Highways a failure to secure and then meet the GAL claimed mode share has further and unassessed consequences for</p>
--	---	--	---

			the highway network. CAGNE's view is that this exposes analysis in other areas, notably noise and air quality to a high degree of circumspection in respect of surface access.
Airport has no or limited influence on the rail timetable	<p>No comment – applicant solely comments on the BML issues as set out above.</p> <p>A comprehensive assessment has been undertaken for rail capacity and this is set out in Chapter 9 of Transport Assessment [AS-079] and the full set of rail data, including off-peak loading information, is included in Environmental Statement - Appendix 12.9.2 Rail Passenger Flows [APP-154]</p>		CAGNE notes that the local authorities have significant concerns about the deliverability of the proposed rail service changes. This reflects the CAGNE stated concerns in our RR and WR. Network Rail have only provided their views in respect of rail infrastructure and potential timetable options. The reasonable and proportionate contribution does not guarantee that the trains GAL expect will be operational it only seeking funding for the infrastructure capability to operate the level of capacity suggested. Ultimately, it remains CAGNE's view that only the Secretary of State can guarantee the services whether through contractual commitment or by way of requirement in the DCO.
Lack of east-west rail connectivity and the fixed hours of operations	<p>No comment – applicant solely comments on the BML as set out above.</p> <p>A comprehensive assessment has been undertaken for rail capacity and this is set out in Chapter 9 of Transport Assessment [AS-079] and the full set of rail data, including off-peak loading information, is included in Environmental Statement - Appendix 12.9.2 Rail Passenger Flows [APP-154]</p>		<p>No change in CAGNE view</p> <p>CAGNE provided a detailed assessment of this limitation in REP1-139. The concern has not been addressed by GAL but has been commented by the relevant IPs.</p>

			The comments above about GAL's level of commitment to rail service delivery, above, is repeated.
Market forces will dictate service delivery for bus and coach	ES Appendix 5.4.1: Surface Access Commitments [APP-090] sets out the bus and coach improvements identified and included in the modelling work, and GAL is committed to provide reasonable financial support in relation to these services, or others which result in an equivalent level of public transport accessibility.		<p>No change in CAGNE view</p> <p>The local transport authorities have notable concerns that the bus and coach offer is at best reactive to events.</p> <p>Each has requested that bus improvements are in place prior to the development becoming operational through a clear DCO requirement.</p> <p>In the alternative, the Councils have suggested a sustainable travel fund is established to guarantee the proposed level of bus service. CAGNE believes that the bus and coach service offer is not sufficiently developed in scope or commitment to ensure that the proposed mode share targets are achieved.</p>
Sustainable transport mitigations are limited in scope and local in nature	Active travel routes benefiting from the surface access improvement works (as set out in Section 2.2 of the Transport Assessment [AS-079]) include those between Longbridge roundabout, North Terminal and South Terminal; southern Horley and the Airport; and between Balcombe Road and South Terminal. They also offer further benefits for active travel users on and around Longbridge roundabout and those travelling between Longbridge roundabout and Riverside Garden Park.	<p>ESCC / JLA</p> <p>Suggest surface access commitments should be a DCO requirement.</p> <p>Further active and sustainable travel mitigation is also considered necessary to maximise the level of trips to and from the airport via sustainable modes.</p>	<p>No change in CAGNE view</p> <p>CAGNE has highlighted the local and limited nature of the proposed sustainable travel mitigations.</p> <p>The real issue in surface access terms is the mechanism to deliver surface access by non-car modes. At present inadequate security exists</p>

	<p>The proposed facilities selected for active travel routes have been based on expected demand levels and guidance in the DfT's Local Transport Note 1/20 has been applied to determine the appropriate widths provided for cyclists.</p>	<p>We wish to support the comments made by West Sussex and Surrey County Councils in their Deadline 3 response on 'National Highways annotated commentary on the Surface Access Commitments [REP2-056]' and the comments contained therein, notably Table 1 which relates to reflections on the Surface Access Commitments document [APP-090] and comments on National Highways comments and proposed amendments</p> <p>WSSC (rep 3-150) Further active and sustainable travel mitigation is also considered necessary to maximise the level of trips to and from the airport via sustainable modes.</p> <p>There is considered to be a lack of detail and robustness to the SACs and lack of clarity or suitable control should the SACs not be met. The Highway Authority is advocating an alternative approach similar to that adopted by Luton Airport to control growth against meeting surface access modal splits. The specific concerns, relating to the SACs, are set out in the Joint West Sussex LIR.</p>	<p>to ensure the (self selected by GAL) targets are met.</p>
<p>Applicant's flawed transport analysis has</p>	<p>The modelling work is considered adequate and in keeping with guidance as set out in the responses above.</p>	<p>Comments made in detail by relevant statutory IPs on each</p>	<p>No change in CAGNE view</p>

<p>material implications for other parts of the ES, including air quality and noise</p>		<p>affected discipline. From these it is clear that the IPs do not agree to the applicant's approach in affected areas of the analysis.</p>	<p>CAGNE has made clear in its RR and WR the crossover between assessments and the need for an accurate analysis of the surface transport impacts of the development.</p> <p>GAL seek to reassure the ExA that the analysis presented is robust yet fails to expose to the examination critical information such as the LMVR for the strategic traffic analysis. It is therefore unclear how the applicant can confidently claim that the assessments in other area of analysis are based on a robust foundation of transport evidence.</p>
---	--	---	---

Analysis

CAGNE has, within its WR and subsequently, submitted its view on the scope and outcomes from the surface access analysis conducted by the applicant. Our review of the Deadline 3 submissions has re-confirmed our concerns. The applicant still has not exposed to examination its full suite of traffic modelling documents, does not demonstrate agreement to the analysis by the highway and transport authorities, and continues to rely unduly on third parties for much of its public transport related mitigation. We note with concern that National Highways has now concluded (**REP3-137 et seq**) that it cannot verify the link between predicted airport passenger numbers, the level of development traffic generated and the modelled traffic impacts anticipated on their network. This uncertainty raises concerns about the validity of the transport analysis conducted by GAL and the follow on potential implications for local communities who will be exposed to the adverse consequence of inadequate or poorly targeted airport transport provision.

CAGNE has reviewed the latest version of the GAL surface access commitments (SAC) document (Environmental Statement Appendix 5.4.1: Surface Access Commitments – Tracked Version. **REP 3-029**).

CAGNE has concern about the proposed movement to moving annual averages (MAA) for measuring mode share as set out in Paragraph 4.1.3. An annual average will understandably damp out seasonal variation but fails to react quickly to emerging trends that many require prompt attention by GAL. CAGNE notes the mode share targets recorded in Paragraph 4.2.1 but considers these to lack ambition (i.e. The sustainable travel and public transport mode shares

should be higher in our view) and do not recognise for the sustainable travel mode share the geography within which the airport is located. We would expect higher sustainable travel mode shares for staff travel within the 8km distance and indeed substantially higher sustainable travel mode shares in closer proximity to the airport where sustainable travel should be the first choice for staff access.

The lack of detail for the proposed new and improved bus routes set out in the SAC give no confidence that the interventions would play a substantive role in reducing car travel to the airport. Critically, commitments 5 and 6 of the SAC appear to be commitments to negotiate with providers only not commitments to deliver. We are unclear how commitment 7 would operate given the need to translate the global mode share targets to one specific bus route in a wider network. Given the stance of Network Rail and Southern Railways in their respective WRs we are concerned that the SAC has no commitment relating to investment in rail services. CAGNE noted in its WR the lack of control that GAL has over rail services without financial contribution and contractual commitment.

In terms of the parking commitments (Nos 8 to 11) CAGNE sees no incentive for GAL to reduce the level of staff parking to reflect the transport outcomes sought and changing work habits. We concur that the level of staffing parking should be capped but the commitment should be expanded to prevent a transfer of staff parking spaces to public parking. The commitment covering the setting of parking charges in our view is simplistic and fails to consider the wider context within which surface access and its funding operate. We would wish to see the applicant demonstrate commitment to link parking charge levels directly to the need to increase non-car based access to the airport.

CAGNE notes the commitment 12 to reduce single occupancy car trips but without a defined target the commitment is meaningless in terms of informing the GAL actions to secure this. This lack of certainty also creates uncertainty in the analysis of non-transport effects in the ES.

The sustainable travel fund committed to through commitment 13 has no mechanism to encourage a reduction in parking capacity in response to successful operation of the sustainable travel approach by GAL. We would encourage the development of such a mechanism that also maintains the level of funding.

The monitoring component of the SAC has the weakness that it does not seek further setting of stretched targets if the DCO approved outcomes are secured.