

CAGNE Surface Access Transport Update – Response to D4 Submissions
Sterling Transport Consultancy Limited
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CAGNE has reviewed the D4 submissions made by the applicant and IPs in relation to transport matters. CAGNE remains disappointed that the applicant has not addressed basic matters in respect of the transport evidence presented despite responding in detail to the CAGNE D3 submission regarding whether the scheme as currently constituted is a new runway or not. Our review of the D4 submissions (please see the table below) made by the applicant offer little by way of update / revision in transport matters.

We retain the concerns outlined in our previous submissions at RR WR and D1-3. The traffic modelling remains not fully documented, is not approved by the Highway Authorities and the applicant is still heavily reliant on third parties to deliver its SAC commitments. This places doubt in CAGNE's that the proposed surface access strategy and outcomes are deliverable.

CAGNE has noted the IPs responses in relation to transport at D4 which concur with our previous submissions. These responses have emphasized lack of progress made by the applicant in addressing matters of substance. The matters which remain unagreed raise the concern that the follow on environmental impact analysis that takes transport related assessments as core information remain based on incomplete or incorrect information.

We are deeply concerned that the applicant and IPs seemingly have no agreement on the level or effect of car parking provision resulting from the proposed development even at this late stage in the examination process. If this base information is not agreed it is difficult to understand how an informed measurement of the applicant's transport proposals and assessment of the SAC can be made. We also note that National Highways (REP 4) have raised at D4 detailed concerns about the achievability of the applicant's proposed mode share target for surface access. Whilst National Highways are rightly seeking to understand the traffic impact on their network, CAGNE reiterates its view that the applicant has not actually made a concerted effort to minimise to reduce traffic levels to minimum with the current mode share aspirations quoted.

We welcome the commitment by the applicant to assess in detail the transport implications of the revised approach to waste management.

In terms of the mechanisms to deliver the applicant's transport related mitigation, the weaknesses of the SAC as set out in our D3 submission remain. IPs have expressed notable concerns about the SAC and the TMF approach to determining what mitigation schemes are funded and when. Network Rail see the TMF as being of too low a value (£10m) and with too much uncertainty to deliver the rail interventions required to support the airport's rail aspirations. This places a fundamental question mark in our view over the applicant's ability to claim that the rail interventions are deliverable as a central plank of their surface access aspirations. We remain convinced that a section 106 agreement based approach is not the most effective way to secure the applicant's transport obligations.

CAGNE WR Issue	Applicant Response (if any) D4		CAGNE based on D4 material
<p>Failure to apply relevant guidance documents</p>	<p>No specific comment in response to IP Submissions. Applicant has responded to CAGNEs D3 submission but not in respect of transport matters.</p> <p>No further information supplied at D4</p>	<p>No further comment from relevant IPs</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 in their RR and WR.</p>
<p>Traffic Modelling Scope</p>	<p>Applicant maintains that the modelling work is considered adequate and in keeping with guidance as set out in the responses above.</p> <p>No further information supplied at D4</p>	<p>Legal Partnership Authorities REPS 4-059 to 4-073</p> <p>The Highway Authority remains concerned that the commitments in the SACs are vague and lack specific detail as to what measures are to be implemented.</p> <p>The Authorities would like to see a list of sensitivity tests undertaken and who they have been shared with. We do not believe that we have seen any despite requests.</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>All three highway authorities remain concerned about the strategic 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 JL:A authorities raise concerns that traffic modelling sensitivity tests have not been carried out. From CAGNE’s viewpoint there has been no exposure of the specification of any proposed sensitivity tests which makes any comment on their desirability difficult. However, as a general principle given the uncertainties in transport analysis (as reflected in DfT Tag Unit M4 “Forecasting and Uncertainty” https://assets.publishing.service.gov.uk/media/65a6bdbf64060200143cb7b0/tag-unit-m4-forecasting-and-uncertainty.pdf) it is our view that sensitivity test on a range of demand and traffic growth scenarios are essential.</p>

		<p>Concerns raised over the quantum of parking assessed and the non-inclusion of off airport parking and residential street parking in the traffic analysis.</p> <p>Kent CC</p> <p>Request for sensitivity test of coach passenger levels as part of the public transport mode share.</p>	
Traffic Modelling Uncertainty log	<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>No further information supplied at D4</p>	No further comment by IPs	<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>
Traffic Model Validation Incomplete	<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</p>	<p>Kent CC Rep 4-055</p> <p>Kent CC have made a further request for the LMVR report to be supplied.</p>	<p>No change in CAGNE view</p> <p>CAGNE repeats that the vital LMVR for the strategic transport model has not been exposed to examination. This prevents an informed view being on the veracity of the model deployed by GAL.</p>

	<p>Transport Assessment Annex B - Strategic Transport Modelling Report [APP260].</p> <p>No further information supplied at D4</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 sensitivity test still springs from the unverified base model – no LMVR etc as noted above.</p>
<p>Scope of local traffic modelling</p>	<p>The modelling work is considered adequate and in keeping with guidance as set out in the responses above.</p> <p>No further information supplied at D4</p>	<p>National Highways</p> <p>National Highways has raised a number of concerns in relation to mode shares that are presented by the Applicant as part of its Surface Access Commitments document. National Highways has reviewed the updated Surface Access Commitments [TR020005/REP3/029] submitted at Deadline 3 and has outlined its continued concerns in respect to securing a realistic and achievable mode share that protects the Strategic Road Network as part of Appendix A to National Highways</p>	<p>No change in CAGNE view</p> <p>CAGNE has recorded in its RR and WR and D3 reps the view that the coverage of local traffic modelling is inadequate.</p> <p>CAGNE concurs with National Highways that that the traffic effects of the application have not been thoroughly tested and that mode shares assessed have no sound basis for analysis.</p>

		comments on submissions made at Deadline 3.	
(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 further information supplied at D4	Specific comments recorded elsewhere in this submission	No change in CAGNE view All three highway authorities share concern about traffic model with its scope and assumptions not agreed by any of the three key highway authorities. CAGNE agrees with these positions and awaits further detail including exposing to the examination the LVMR for the strategic model. CAGNE is conducting a detailed review of AS1-121 which details new assumptions etc .
Non-incinerating waste disposal plant, freight movements	The applicant has conceded that the effect of the change in waste management arrangements do need to be included in the ES.	No comment from IPs	No change in CAGNE view – CAGNE welcomes that the GLA will provide an analysis for the ES of the revised waste management approach CAGNE has highlighted the limitations of the freight analysis in respect of the r scheme.
Rail capacity	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.	Network Rail Rep 4-080 The additional passenger demand driven by Gatwick's expansion will also place further pressure on the reliability of the overall system.	No change in CAGNE view The applicant does not address the points made by CAGNE. 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. 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 funding and delivery challenges highlighted by CAGNE.

	<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>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>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 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.</p>
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<p>Airport has no or limited influence on the rail timetable</p>	<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>	<p>Network Rail Rep 4-080</p> <p>Still requires reliability testing of timetable options.</p>	<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.</p>
<p>Lack of east-west rail connectivity and the fixed hours of operations</p>	<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 comment from IPs</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> <p>The comments above about GAL’s level of commitment to rail service delivery, above, is repeated.</p>
<p>Market forces will dictate service delivery for bus and coach</p>	<p>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</p>		<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>

	financial support in relation to these services, or others which result in an equivalent level of public transport accessibility.		<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>
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<p>Sustainable transport mitigations are limited in scope and local in nature</p>	<p>The Local Authorities require certainty that the Surface Access Commitments will be delivered by the Applicant. Achieving this will require an appropriate balance to be struck by the Applicant in providing sufficient on-airport passenger parking to meet the needs of those who choose or need to travel to the airport by private vehicle, whilst ensuring that there is not over-provision of passenger parking such that access by sustainable transport modes is discouraged..</p>	<p>.</p> <p>Legal Partnership Authorities REPS 4-059 to 4-073</p> <p>The STF is just one mechanism by which the Applicant proposes to achieve compliance with and ensure adequate funding for the Surface Access Commitments (SACs). The Applicant has explained to the JLAs that it has been included in the s.106 agreement as an assurance that the SACs will be delivered. Whilst these assurances are welcomed, the JLAs consider that how the SACs may be funded (such as through the STF) would best be included within the SACs document itself, rather than the s106 agreement. The key point is that the airport operator will be expected to meet its SACs irrespective of the level of funding to be provided and how this is to be secured.</p> <p>Surrey CC</p> <p>SCC's comments on the inadequacy of the proposed Active Travel infrastructure are set out in SCC's Local Impact Report [REP1-097]. In particular, SCC has raised concern that the proposed off carriageway active travel improvements from Longbridge Roundabout to South Terminal via North Terminal is not the most direct route between Horley and the airport. SCC has repeatedly requested that the route north from the proposed A23/North Terminal signalised crossing through Riverside Garden Park is improved</p> <p>Network Rail Rep 4-080</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 to ensure the (self selected by GAL) targets are met.</p> <p>CAGNE agrees with the majority of transport IPs that the SAC is inadequate to secure the volume and type of sustainable access required to mitigate the project impacts. CAGNE further concurs that the TMF is insufficient in scope to guarantee delivery of the necessary transport interventions.</p> <p>Transport related IPs have repeatedly raised concern over the quantum and deliverability of sustainable travel measures.</p>
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<p>Applicant's flawed transport analysis has material implications for other parts of the ES, including air quality and noise</p>	<p>The modelling work is considered adequate and in keeping with guidance as set out in the responses above.</p>	<p>Kent CC Rep 4-055 Kent CC have made a further request for the LMVR report to be supplied.</p> <p>Legal Partnership Authorities REPS 4-059 to 4-073</p> <p>Given that GAL has said that growth will mean more people will drive as public transport is not viable for all – this approach seems problematic, which without Environmentally Managed Growth, could go relatively unchecked.</p>	<p>No change in CAGNE view</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>