

CAGNE Surface Access Transport Update – Response to D5 Submissions & ISH8
Sterling Transport Consultancy Limited

26 June 2024

Introduction

1. CAGNE has reviewed the information supplied by the applicant and IPs at D5. In particular the updated Principal Areas of Disagreement Statements made by the statutory transport bodies at D5 provide a clear picture of the failure by the applicant to address concerns identified by CAGNE in its RR, WR and subsequent Deadline 1 to 5 responses.

Fundamental weakness in surface access case

2. In particular, we note the Network Rail stance (**REP 5-107**) which highlights *“the Gatwick Northern Runway DCO does not include any mitigative funding to manage the impact of the proposed increase in passengers on the railway network”*. This view is based on the applicant’s own case which indicates a 119% increase in airport rail use by 2047. In CAGNE’s view the failure by the applicant to explain how the necessary rail improvements are to be delivered, by when and how the applicant will provide the full cost of required mitigation package is a fundamental weakness of the applicant’s surface access case that fails scrutiny even at the most strategic level from the rail infrastructure provider.
3. We highlighted the concern we made at D5 about Network Rail’s D4 observations on the SAC. This is now repeated as a PADSS issue where Network Rail record that *“it ambiguous what the rail industry mode share target is” and “Gatwick does not take a proactive approach to increasing rail mode share. The largest mode share uplift is between 2016 and 2029 – which is a result of the completion of major schemes elsewhere... No further rail enhancements are identified in Section 7.3 of the Transport Assessment or the updated version of ES Appendix 5.4.1: Surface Access Commitments”*. Again CAGNE consider that the view of Network Rail places into doubt the ability of the applicant to deliver the rail related surface access outcomes desired. The Network Rail observations similarly bring into further focus the applicant’s ‘sticking plaster’ approach to mitigation provision.
4. National Highways **REP 5-103** considers that in respect of the SRN that *“the Applicant’s approach to securing its proposed Transport Mitigation Fund is unclear”*. National

Highways have proposed a further draft requirement (No 24) to require completion of certain SRN mitigation works in advance of the intended development exceeding specific level of passenger use. Whilst CAGNE is not in support of enhancing road capacity to cater for airport growth we note the need for usage levels to be constrained until these SRN schemes are in operation. We would seek that that the draft R24 has enhanced wording to require the necessity for these schemes to be reconfirmed prior to construction being allowed to commence.

Applicant's Traffic Modelling Analysis

5. National Highways still have no recorded agreement to the applicant's traffic modelling analysis. Given the late stage of the examination process and the importance of this approval to providing a substantiated information feed to other ES assessment matters is a matter of great concern to CAGNE. On a similar theme to National Rail, National Highways state that the applicant is *"basing their mode split assumptions on incentivisation measures which have not been defined, agreed or secured."* CAGNE fully concur with these concerns made the two major transport infrastructure providers serving the airport. Ultimately, CAGNE believe that the grave concerns of the major infrastructure providers in respect of analysis and delivery provide a clear and persistent element of doubt in the applicant's treatment of surface access matters in the DCO.
6. CAGNE had consistently sought exposure of the transport analysis LMVR to the examination to enable a validated base position to be demonstrated. Kent CC **Rep 5-096** has also made this basic technical request at previous deadlines alongside ourselves. Kent CC further set out that the case for coach and rail services between Kent and the airport have received no detailed analysis. CAGNE would describe the information seen to date in this matter as only "vague aspiration" rather than quantified and reasoned proposition to a level of certainty appropriate to a DCO.
7. East and West Sussex Councils (**REP 5-088 and REP 5-115 respectively**) do not record any agreement to the totality of the applicant's transport analysis. ESCC highlight the failure of the applicant to advance proposals to manage development traffic in the Ashdown Forest SAC / SPA. CAGNE considers that for the statutory local highway authority having to continue to pursue traffic mitigation within such a sensitive and statutorily protected location this late in the examination process is deeply unfortunate. WSCC remain unconvinced that the localised VISSIM traffic modelling is fully reflective of conditions there. CAGNE notes that the applicant has submitted further

information for review. In the meantime, CAGNE reiterates its concern at the late development of appears to be very relevant evidence. We reserve the right to comment on this new modelling and the local highway authority observations thereto. Both councils as the local highway and transport authorities continue to provide commentary on the limitations of the SAC and the detail of the specific basket of proposed SAC interventions. CAGNE commented at D4 on the operation of the SAC and the limitations that attach to the current approach. Given the lack of movement by the applicant in terms of the principles and detail of the SAC, CAGNE is now conducting a review of the TMF and its operation as we believe that the SAC approach deficiencies will require the 'top up' TMF to deployed far before the applicant seeks to suggest. We propose to submit this further commentary at D7.

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