

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

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1. Comment on D6 Submissions

CAGNE has reviewed the D6 submissions made by the applicant and other parties in respect of surface transport. CAGNE remains concerned at the lack of progress recorded in providing certainty over surface access matters and the concerns that IPs continue to record in relation to surface access matters. CAGNE reiterates its overall position that the applicant's approach to proactively managing surface access and the impacts generated is limited in scope and lacking in foresight by promoting an airport heavily reliant on access by private vehicles.

The JLA

The JLA remain committed to seeking Environmentally Managed Growth of the Airport. The JLA record their view on the starting point for the surface access in the DCO regime should be that the proposed baseline mode shares are achieved. CAGNE agrees with this opinion. The assessments made by the applicant are reliant on the immediate pre-opening assessment of predicted mode share being correct. A deviation from this (i.e. the mode shares are more favourable to car travel) means that the surface access commitments will need to work harder to achieve the stated outcomes albeit with no increase in the level and type of commitment or funding. In CAGNE's view this lack of certainty places the transport analysis conducted by the applicant as in effect baseless. This also in CAGNE's view impacts on the meaningfulness of the assessments in the ES that draw data from the transport analysis.

CAGNE shares the concerns expressed by the JLA in terms of the Network Rail responses to the deliverability and funding of the applicant's rail proposals. CAGNE has highlighted the high level of reliance that the applicant has placed on the ability of rail to deliver its mode share target. The position of Network Rail clearly states that the proposals made by the applicant are unfunded and undeliverable with the current delivery construct proposed by the applicant. CAGNE's view is that the JLAs position is of relevance given the role of some of the constituent authorities as the transport and highway authorities who will be required to deal with the adverse effects of a failure to deliver the rail mode share proposed by the applicant. CAGNE foresees a situation where journeys to / from the airport expected to be made by rail are made by road with consequential and unmeasured environmental impacts on local communities.

The JLA has reiterated their disappointment at the lack of ambition on the part of the applicant to provide improvements to available routes to make them more attractive and usable. CAGNE has noted previously that the active travel propositions advanced by the applicant are limited in nature. Given the focus on staff travel which occurs at various times of day, including in the small hours, and the relative remoteness of the airport from local settlements the focus on the 8km radius for sustainable travel journeys is not practical for many staff trips. This lack of focus by the applicant is reflected in the list of key routes that the JLA propose for improvement, a list which the JLAs highlight no progress being made on in negotiations with the applicant.

Kent CC

While Kent CC are supportive of proposed improved public transport between Kent and the airport, we continue to remain concerned about how achievable the targets set by the Applicant are. In this context, CAGNE share Kent CCs concerns. The lack of detail regarding these services, the timing of their delivery and even basic details such as the planned hours of operation are not provided by the applicant. CAGNE note that fixing the hours of bus service operation will be critical to ensure that the

National Highways

National Highways note in their D6 submissions that the applicant's mode share targets are ambitious in light of the lack of secured controls. National Highways indicate that the Surface Access Commitments do not clearly outline the consequences for the applicant should it fail to enter into (for example) arrangements for bus service provision. National Highways have sought to propose notable changes to the Surface Access Commitments document to reflect the concerns they hold about the mode share. In particular National Highways raise concern about the use of 'reasonable endeavours' in respect of contracting for surface access commitments. CAGNE has highlighted in previous submissions the weakness of the Surface Access Commitments in terms of securing the applicant's proposed travel mode share.

The Applicant

CAGNE notes the applicant has made extensive submissions at D6.

The applicant in response to the ExA questioning regarding the starting mode share states that the first annual monitoring report (AMR) would identify the mode share prior to opening of the dual runways and that additional monitoring will take place under the Airport Surface Access Strategy ("ASAS") which would be in place up until the first AMR is produced in accordance with the SAC. The applicant states that the SAC provides sufficient remedial measures should the starting mode share be not as favourable as predicated. The applicant has sought to decouple mode share from car use for journeys to/from the airport. Whilst this premise may be true given the wide variety of trip 'types' indicated by the applicant, it is CAGNEs view that a failure to meet the predicted mode share for surface access prior to the DCO runway operations commencing will lead to a series of unknown and therefore unassessed consequences in terms of trips routing through local communities and also in the context of the ES assessments of transport related topics.

CAGNE notes that the SAC whilst containing the potential for remedial measures does not provide a comprehensive mechanism for dealing with a less than satisfactory mode share at the starting point. The SAC at commitment 8A appears to provide the applicant with a free run on providing additional parking outwith any planning control imposed by the DCO during the construction phase in the following terms *"GAL shall assess the need for additional parking over and above that required to replace capacity lost as a result of construction in connection with the Project; and provide sufficient but no more additional on-Airport public car parking spaces than necessary to achieve a combined on and off airport supply that is consistent with the mode share commitments"*. CAGNE believes that this unfettered discretion to increase parking quantum, albeit on a temporary basis requires regulation by the DCO.

It is noted that the applicant has supplied a revised Surface Access Commitments document at D6. CAGNE notes that the sustainable transport fund remains capped at £10m (although whether this is in current monetary values or future year values is unclear) even though the revenue collection mechanisms would remain in place. CAGNE believes that the revenue collected but not deployed into the sustainable transport fund should be clearly accounted for. CAGNE holds this view on the basis that IPs including Network Rail have assessed the £10m capped fund as of inadequate value.

The applicant has submitted a revised car parking plan (in response to the ExAs Regulation 17 request) that sets out the applicant's latest view on parking quantum and capacity. CAGNE considers it unfortunate that the car parking numbers have required revision by the applicant late in the examination process. CAGNE welcomes that the assessment of car parking provision for both staff and passengers has been extended to 2047 from 2040. In our view this brings the additional 7 years of data into scope of the control mechanisms for mode share and deployment of the sustainable transport fund and transport mitigation fund. It is noted that staff car parking numbers are capped throughout the 2029 to 202747 period at 6,090 spaces. From this we see that staff driver mode share barely changes (from circa 45.0% to 45.3% in 2047) even though staff numbers continue to rise. This implies a greater turnover of space occupancy during the working day which is not set out in the latest information. We are of the view that the applicant's analysis is supportive of the position of other IPs who see the mode share targets presented by the applicant as "unambitious".

The mechanisms established by the SAC to control mode share lead through the local planning authority in conjunction with other authorities as required. CAGNE notes that the planned arrangements give no role for local communities who are actually the ones bearing the brunt of a failure by the applicant to meet its mode share targets.

2. Scope of Works

The applicant in the scope of works set out in the ES highlights a potential North Terminal link between the A23 London Road / North Terminal Link signal-controlled junction crossing and the proposed signalised crossing on Longbridge Way. Given the need acknowledged by the applicant to improve local connectivity for sustainable travel modes to ensure these are effective CAGNE considers that this work should be fully committed to by the applicant and not left as "optional extra" given the key link this creates in access to the north terminal from the A23 road.

The ES scope of works highlights that the Brighton mainline (railway) would need to be closed to allow works on the Airport Way bridge to take place. It is not clear from the information supplied whether these closures would take place within the standard Network Rail engineering access periods or be disruptive possessions outside of the times the line is usually closed for engineering works (essentially 2345 Saturday to 0840 Sunday each week with some diversion between fast and slow lines). The impact of disruptive possessions which would appear to be a complete blockade of the railway line for these bridge works will be significant given the likely need for complete and extended closures of the line. This state of affairs has received no consideration in any element of the transport or construction analysis presented by the applicant. Network Rail in their representations have not commented on the acceptability of the approach proposed by the

applicant in relation to these works nor offered confirmation that the appropriate agreements for the works to be conducted are capable of being entered into.

CAGNE considers that the approach of the applicant which appears to be to make consideration of the detail of the rail line closures at a later stage where the impact on local communities may not be assessed as flawed. The applicant should expose to the examination its strategy for the bridge works setting out the length and timing of closures of the rail line required (and presumably the closures of Airport Way link also). The applicant should also be explicit as to the measures to be put in place to replace rail services curtailed by their works and how this would affect the ability of mode share targets to be met should the closures be a long-term matter.

3.dDCO comments

The dDCO submitted at D6 has been reviewed by CAGNE. CAGNE is supportive of the changes to article 14 which requires the applicant to provide alternatives routes for streets to be stopped up. This is important to avoid diversion of traffic onto unsuitable local roads whilst construction is underway.

CAGNE has previously raised the method of securing surface access commitments and the lack of certainty that Requirement 20 currently gives in this regard. The comments of IPs and CAGNE in respect of the surface access commitments which are seen as limited in scope and lacking ambition lead us to the view that Requirement 20 should be more detailed to ensure that the surface access commitments are directly assessable rather than through a secondary mechanism.

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