

# GACC BRIEFING

## Gatwick DCO Consultation Part 2

July 2022

Note: Italics are used to quote statements from GAL's documents.

### **Transport – Highways and road networks:**

The highway changes include additional highway capacity and improvements to make it easier for highway traffic, including widening of the M23 eastbound spur, at South Terminal junction a "lane gain arrangement to avoid traffic weaving", North Terminal junction reverted to a roundabout with extra capacity at the A23 signalised junction.

*2.1.2 Although the Project would contain proposals to reduce the proportion of staff and passenger trips to and from Gatwick that are made by car, the combination of airport growth and an increase in non-airport traffic over the next 25 years means that some improvements will be necessary to ensure the safe and efficient movement of vehicles on the road network." ... "Our proposed investment in the roads and junctions close to the airport provides important benefits to local communities as well as supporting airport access."*

*3.2.10As part of this consultation, we are seeking views on whether we should continue to include, within our parking proposals for the Project, the identified 3,300 spaces that may be needed to replace off-airport unauthorised spaces and which are included in the revised parking proposals discussed above."*

The proposals from Gatwick Airport need to be honest in that they are adding highway transport capacity, which will seek car dependency in travel to/from the airport. Additional highway capacity can provide, at best, a short term benefit in reducing congestion and improving journey times, but the benefit will erode, as new or more traffic is attracted by the extra capacity which gradually fills until rising congestion again acts as a deterrent, albeit with more traffic on the roads. The net effect is more traffic on the roads, and precisely the opposite of the transport response required to tackle the climate emergency and other environmental targets (including through a modal shift to walking and cycling, buses and trains).

New transport modelling will be needed to reflect the highways revisions. This must also include analysis of the impact of changes in mode share estimates, transport derived noise pollution and air quality. We are concerned that these proposals have been put out for consultation whilst the modelling is still ongoing and not shared. Therefore this consultation is too early – future consultation is still required.

We disagree with paragraph 2.1.2 that highway "improvements" are necessary. The need for additional highway capacity represents a failure of the surface access strategy to prevent airport growth generating [additional] car traffic. Any growth in surface access should be carried by service and capacity improvements on the public transport network and the (relatively small) expected share of travel by walking and cycling. We are not convinced by the argument in paragraph 2.1.2 that the transport infrastructure investment proposed will be a net benefit to local communities when comparing a scenario without the additional access traffic generated by the project with a scenario with the additional traffic and the proposed investment in roads and junctions. Highway modelling using the appropriate models meeting Government Transport Analysis Guidance should be presented which demonstrates the effects of these scenarios, and the full cost or benefit to local communities presented,

including the indirect impact of social and environmental externalities including air pollution, noise and loss of amenity.

In addition, this consultation coincides with Surrey County Council approving its new Local Transport Plan 4, which sets out a new hierarchy for road transport of avoid; shift; improve – prioritising removal of the need to transport, walking and cycling, and public transport ahead of the car. This is a significant policy change for the Highways Authority for Surrey. This consultation's proposals to expand the main transport network is completely at odds with this new strategy.

In addition, we challenge the removal of the current (poorly maintained) walking and cycling path from the Longbridge roundabout along the A23 towards Gatwick. Instead of removing this path it should be improved. This is (or at least should be) an important link for those cycling from Horley to Crawley, especially in the dark in winter months where some people will choose not to cycle through the Riverside Gardens for personal safety reasons.

The consultation fails to consider the impact of the increased traffic on the main road network on surrounding local roads. The additional main highway network capacity proposed will tend to remove the natural deterrent that makes public transport more attractive, so will suck in more local traffic and increase traffic on the wider network. Instead of increasing traffic on surrounding roads Gatwick should invest to ensure that road traffic to the airport uses the strategic highway network, and introduce measures that reduce traffic on local roads including in Horley and Crawley as well as villages in the surrounding areas.

The proposed transport measures are too narrowly focused on the airport for public transport as well as for changes and impacts to the highway network. The extent of public transport improvements required must include the catchment area that the airport has for both passengers, and staff. This should include significant investment in E-W links such as bus and train routes between East Grinstead and Horsham and train routes from Kent and Surrey (e.g. Maidstone-Gatwick and Reading-Gatwick). To ensure that no-one is left behind this should ensure disabled/step free access from across the network.

It is notable that whilst specific details have been presented in relation to the highway improvements, in contrast, there are far less details of the public transport and walking and cycling improvements that would be delivered. It is noted that the "Airport Surface Access Strategy (ASAS) will be produced as part of the DCO submission, that GAL is part way through analysis of the proposals and that these will be discussed further with local authorities and key stakeholders." We look forward to having an opportunity to review the draft ASAS. At this stage, improvements to sustainable transport, including rail, bus and active modes, to be delivered with the project are vague and uncommitted. The overall public transport target – and detailed measures setting out how it will be met – must be higher to prevent any additional road traffic movements by passengers, staff, freight or service vehicles. It is unclear if the proposed (and still awaited) ASAS will set out how the strategy will include detailed delivery of new infrastructure and transport services, and the required budget for delivery, and over what timescale. These elements should be included when the ASAS is presented.

The ASAS should also be clear about what is required to happen for passengers and staff to make the shift from car to public and active transport modes. It cannot be assumed that the ASAS, on its own, will deliver the modal shift envisaged. There is no evidence provided of any attempt to understand the barriers of staff and passengers in not using their private car to travel to the airport. This needs to be understood such that there is a greater planned and

realised strategy to enact a modal shift in the travel to/from Gatwick Airport, in line with Surrey County Council's new Local Transport Plan 4.<sup>1</sup>

The reduced uplift in car parking provision is welcomed, however the consultation is not clear to what extent the reduction of new airport parking is simply a reflection of increased existing approved parking. It should be clear, rather than risk misleading those participating in the consultation. However, the smaller level of additional car parking remains unwelcome as it will still lead to a growth in car traffic beyond levels that would exist with the project. In addition, parking controls or other legitimate measures should be imposed to prevent off-airport parking (including nuisance parking in residential streets) - provision of additional spaces within the airport is the wrong solution. Modelling is required to demonstrate that there is sufficient shift in public transport to remove the need for increased road traffic overall. Otherwise the reduction in journeys reflected in the reduction in airport parking will not materialise and the modelling will also be incorrect.

### **Central Area Recycling Enclosure (CARE) facility**

This centre is described as a recycling facility and as a biomass boiler. The consultation should set out details of the proposed feedstock mix for the boiler. The treatment for food waste (presumably either composting or anaerobic digestion) should be clarified.

### **Air Quality and Ecology**

The inappropriateness of the highway plans presented is exemplified by the proposed significant removal of mature trees at the Longbridge roundabout, along London Road and along the side of Riverside Park. The loss of these mature trees is not supported. Replacement planting will not be an ecological enhancement, but a loss of biodiversity, carbon sequestration, natural screening and amenity. The proposal to justify this loss through offsetting the biodiversity lost to elsewhere (such as Museum Field) is not supported. This location provides no amenity or visual respite against the noise and air pollution of the A23 to the residents of Horley Riverside Estate and results in a reduction in the ecological value of the Riverside area.

The proposals to widen the strategic road network even further, as well as the potential increase in traffic on local roads will further increase traffic noise and air pollution.

## **3.8 CARBON**

*3.8.9 The compatibility of forecast aviation growth with carbon commitments is addressed in the Government's Jet Zero consultation and has been elaborated in further technical documents published this year by the Government which provide more background.*

*3.8.10 The Jet Zero consultation provides four different trajectories or scenarios through which aviation forecasts can be met at the same time as achieving net zero by 2050. These involve different combinations of increased aircraft and operational efficiency, the development of Sustainable Aviation Fuels (SAF), the development of zero emission flights through electric or hydrogen powered flight and the use of carbon trading markets or greenhouse gas removal technologies. The Government is investing in the development of each mitigation option but the Jet Zero consultation makes clear that its focus is on achieving net zero, while being flexible over the precise pathway to achieve it. To ensure that net zero is achieved, the Government will closely monitor the carbon trajectory of aviation and intervene to ensure that its absolute commitment is met.*

*3.8.11 The further technical information released by the Government this year is helpful in demonstrating that aviation can continue to grow in response to demand, whilst remaining*

<sup>1</sup> <https://www.surreycc.gov.uk/roads-and-transport/policies-plans-consultations/transport-plan>

consistent with climate change policy. In particular, using a core or mid case scenario for economic growth and carbon pricing:

- it forecasts the growth in air passengers taking into account a range of factors, including that airlines will need to pay for the forecast increased costs of carbon;
- those forecasts nevertheless show a growth in passenger numbers of 70% between 2018 and 2050; and
- it assumes that average passenger numbers per flight will increase, so that air transport movements in the same period are forecast to grow by 35% to accommodate the growth in passenger demand.

3.8.12 The airport capacities assumed in the Government's assessment in support of Jet Zero incorporate known airport expansion plans/commitments, including the third runway at Heathrow and the NRP at Gatwick, and assumes a maximum capacity of 386,000 air transport movements for Gatwick in 2050.

3.8.13 Whilst the 'cost' of carbon paid for by airlines through trading schemes needs to increase significantly, comparison of the core demand forecasts in Jet Zero with the Department for Transport's (DfT) 2017 aviation forecasts, show that other factors will nevertheless push forecast demand to very similar levels (see Table 3.2 below):

3.8.14 The NRP is not only consistent with this work, therefore, it is assumed as part of it. Table 3.3 below shows that Gatwick's currently forecast growth in passengers and flights (as set out in the PEIR) is consistent with the core national forecasts which underpin the Jet Zero consultation:

3.8.15 Whilst some may doubt the success of initiatives such as SAF or increased aircraft efficiency, it is important to recognise that the carbon and aviation forecasts set out above are the Government's forecasts. Even more importantly, the Government has a binding legal duty to meet its climate change commitments and will be obliged to monitor and take further measures to ensure their successful delivery.

3.8.16 The implications of this are profound. In order for the trajectory to net zero to be met, Government will need to actively review progress and take such action as is necessary. It cannot be known at this stage what, if any, further action may be necessary and so, for the purposes of Gatwick's NRP DCO application, it is appropriate to assess the environmental implications of our full forecast growth – particularly as those forecasts are compatible with the forecasts that have informed the Government's Jet Zero consultation.

3.8.17 In our Autumn 2021 Consultation, the PEIR included an assessment of the carbon emissions from growth at Gatwick, including the NRP. The assessment reported that the NRP would result in an increment of 1.387 million tonnes CO<sub>2</sub>e or 0.7% of the Government's Sixth Carbon Budget.

3.8.18 The estimate of aviation emissions explained that it took no account of the likely impact of measures to limit carbon emissions such as enhanced efficiency, SAF or zero emission flights and was therefore very much a worst-case assessment.

3.8.19 For the DCO assessment, we propose a more realistic approach, which will estimate emissions taking into account the effect of the measures assumed in the Government's Jet Zero carbon trajectories. Whilst the precise mix of measures cannot be known with certainty, it is clear that measures that produce a downward trajectory in sectoral greenhouse gas (GHG) emissions will be necessary in order to accord with Government's commitments and that the Government is obliged to ensure that this downward trajectory is achieved. In other words, those outcomes will have to be enforced if they do not occur without intervention. For

*the purposes of monitoring, the Government proposes to monitor aviation emissions against its 'High Ambition' scenario. We propose to do the same – i.e. to forecast conformity with that scenario as the most likely outcome for aviation emissions at the airport.*

## **Response**

We do not agree with Gatwick's analysis or its proposal that it should forecast conformity with the government's High Ambition scenario "as the most likely outcome for aviation emissions at the airport".

Gatwick's states that "measures that produce a downward trajectory in aviation greenhouse gas emissions will be necessary in order to accord with Government's commitments and that the Government is obliged to ensure that this downward trajectory is achieved". That is not correct. Whilst the government asserts that it wants aviation greenhouse gas emissions to reduce there is nothing in law or regulation that obliges either the sector or the government to achieve any specific level of reduction in aviation emissions. In the Final Strategy, the Government commits only to reviewing the situation every five years "to take stock of how emerging technologies are developing, whether they are developing at the pace required and if they are being adopted by the sector. If we find that the sector is not meeting the emissions reductions trajectory, we will consider what further measures may be needed to ensure that the sector maximises in-sector reductions to meet the UK's overall 2050 net zero target."

Rather, there is substantial doubt that the measures the government has proposed will in fact achieve aspirational aviation emission reductions and considerable concern that there are no regulatory or other mechanisms – beyond economy-wide targets - to ensure such reductions are delivered.

The CCC's June 2022 Progress Report says "there are significant risks to achieving the Government's pathway [for aviation emissions], particularly due to the heavy reliance on a technology-driven approach without sufficient attempts to constrain demand". It also says "The Government's pathway for aviation relies heavily on very nascent technology being scalable and deployed relatively quickly for commercial use. There is no policy framework ready to implement that would mitigate demand growth if these technologies are not deployed as planned".

Gatwick's assertion that aviation emissions reduction is somehow assured is therefore incorrect and misleading. It follows that the airport's proposal that it should forecast conformity with the Government's 'High Ambition' aviation emissions reduction scenario as the most likely outcome for aviation emissions at the airport is irrational and unacceptable. Whilst the High Ambition scenario might be one outcome that could be illustrated as a sensitivity, the DCO assessment must also set out other, probably more likely, scenarios in which aviation emissions reductions are much lower.

3.8.25 *In our Autumn 2021 Consultation, we published our Economic Impact Assessment which considered the economic effects of the Project. In September 2021, and after our Economic Impact Assessment was completed, the Department for Business Energy and Industrial Strategy updated the carbon values it uses to appraise policy proposals. Whilst the carbon values used in our Economic Impact Assessment were up to date at the time of its preparation, we will be updating the assessment to reflect the latest carbon values as a part of the planned update to the EIA as part of the DCO submission.*

3.8.26

## **Response**

Gatwick is continuing to attempt to mislead the public on the economic costs of its proposals.

The airport is well aware that the carbon values upon which its initial consultation was based were materially incorrect at the time that consultation was published. It is also well aware that its initial consultation failed to quantify both the non-CO<sub>2</sub> effects of air travel and the climate impacts of arriving flights and that Government guidance requires all these costs to be monetized in project appraisals.

It is likely that Gatwick and its economic consultants were aware of these deficiencies when the consultation was published, and knew that correcting them would have a very material impact on the project's economic appraisal. The airport nonetheless decided to proceed to publish a consultation that was materially misleading in crucial respects. It has failed to correct these errors and continues to seek to hide the fact that the economic analysis in its consultation was misleading.

Gatwick says it will correct the economic analysis in its DCO submission next year. It should of course do so. But that is not sufficient. It is now clear that the climate costs set out in the airport's consultation were underestimated by many billions of pound and that the consultation therefore gave a false impression of the project's climate impacts and economics. The scale of these errors and omissions is such that responses to the consultation cannot be relied upon. Gatwick should carry out a further full public consultation using correct carbon values and taking into account all climate costs. If it does not voluntarily do so the Planning Inspectorate should reject the DCO application on the grounds of inadequate consultation.

### **3.9 Noise**

#### **Consultation references:**

*3.9.2 We have formed a Noise Envelope Group with the aim of engaging with stakeholders to further explore the Noise Envelope proposal set out in the Autumn 2021 Consultation. The first meeting of this Group took place in May 2022. The Group will focus discussions on the themes identified in the consultation feedback to support the creation of a feasible, clearly defined, measurable and enforceable noise envelope proposal.*

*3.9.3 The engagement structure will be based upon the existing Noise Management Board (NMB), in particular utilising the memberships of the NMB Community Forum (NCF) and NMB Delivery Groups (NDG) to form sub-groups. Input will also be sought from airlines, air traffic control, Airport Coordination Ltd, the DfT, Environmental Health Practitioners for Local Authorities, and other industry experts and specialists as appropriate. The materials discussed and resulting discussions will be made available to the public on the NRP website <https://www.gatwickairport.com/business-community/future-plans/>*

#### **Suggested Draft Response:**

Gatwick's engagement on its noise envelope proposals has so far been of little value. The engagement arrangements the airport has put in place are wholly unsuitable given that the noise envelope is by far most important noise management development at Gatwick for many years and is likely to determine the noise environment around the airport and under flight paths for decades to come. In addition they are incompatible with good practice at other airports and do not comply with the CAA's advice on noise envelope development. In particular:

- 1 The airport has imposed terms of reference for the process that are one-sided. In particular Gatwick proposes that the starting point for the exercise should be its own noise envelope proposals. In our view those proposals do not comply with government policy and CAA guidance to such an extent that using them as the basis

for engagement is not credible. The process should instead examine all noise envelope options, metrics and limits from a first principles basis. The fact that Gatwick's noise envelope proposals were only supported by 9% of respondents to its DCO consultation further supports the need for a first principles approach.

2 The process Gatwick has set up lacks any independence. The Noise Envelope Group is chaired by an airport employee and advised by subject matter experts whose role is to promote the outcomes Gatwick is seeking to secure. Luton and Heathrow, the only other airports to have done work on noise envelopes, set up independently chaired and advised, well-resourced, multi-stakeholder groups. The CAA recognises the potential need for independent third parties to assist stakeholders to reach agreement, but no such involvement is proposed at Gatwick.

3 Gatwick has imposed a wholly unrealistic timetable. It requires the process to have been completed by 9 September 2022, allowing only three months, over the summer holiday period. It is proposing that the Noise Envelope Group should only meet three times in that period. Luton's noise envelope development work took over 18 months and the group it set up met 15 times in that period. We do not believe there is any prospect of completing the work required in the period Gatwick has allowed.

4 The airport is withholding, or refusing to generate, information and analysis which only it is able to provide and which is an essential input to effective noise envelope engagement. Without this information and analysis it will not be possible to formulate, let alone agree, noise envelope proposals in the way the Airports National Policy Statement and the CAA's guidance require.

Each of these facts suggests that the exercise is intended to serve a presentational purpose for the airport but is not a serious attempt to achieve the agreement between all stakeholders that the CAA says is essential.

Finally, the airport is proposing nothing to alleviate the continued and now increased road noise impacts on residents, including the increased use of local roads connected to the strategic road network around Gatwick, including traffic passing through Horley, Crawley and Charlwood.

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