

MAYOR OF LONDON

Stewart Wingate

Chief Executive Officer
Gatwick Airport Limited

Date: 1 December 2021

By email

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Cc: feedback@gatwickfutureplans.com

Dear Stewart,

I am writing in response to Gatwick Airport's consultation on proposals for the northern runway. I welcome the opportunity to comment on the critical issues this raises.

We are facing a climate emergency. COP26 has highlighted why we must redouble our efforts. National legislation has set a target of net zero emissions by 2050 and the science is clear that we must halve our emissions by 2030 to allow us to be on track for this and limit global temperature rise to 1.5C. This is why I have declared that London should achieve net zero emissions by 2030. The aviation sector needs to play its part and not undermine our collective efforts to rapidly decarbonise.

The Committee on Climate Change (CCC) has been clear in its Sixth Carbon Budget report that "there should be no net expansion of UK airport capacity unless the sector is on track to sufficiently outperform its net emissions trajectory to be able to accommodate the additional demand." Despite there being no evidence of this to date, the Government's consultation this summer on 'Jet Zero' failed to adequately address how UK aviation would support achievement of net zero carbon and explicitly avoided answering whether and how capacity growth could be accommodated. Due to this omission, I remain in agreement with the CCC's 2021 progress report to Parliament¹ which clearly stated that "some moderation of demand growth is likely to be required to meet the legislated emissions targets, as pre-pandemic trends in demand growth exceed what we expect can be accommodated in a Net Zero world". I fail to see how any airport expansion can be justified in this context and therefore oppose Gatwick's northern runway proposals, as I consider them incompatible with achieving the UK's net zero target.

At a local level, it is also incumbent on Gatwick to show how its expansion plans would support decarbonisation. This includes both the construction and operation of the new infrastructure associated with this scheme, without relying primarily on the development of new technologies. It must also address the way that passengers, staff and freight access the airport and include credible, ambitious targets for sustainable mode share. It is unacceptable that the airport does not plan to consult on a detailed Climate Change Action Plan in advance of the development consent submission. It is not possible to make a fully informed response to this consultation without this and the Development Consent Order stage is too late for such critical issues to be consulted upon.

¹ <https://www.theccc.org.uk/wp-content/uploads/2021/06/Progress-in-reducing-emissions-2021-Report-to-Parliament.pdf>


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I also expect Gatwick to fully address the surface access and air quality impacts of the scheme. I am concerned about the forecast increases in traffic on roads in South London and what they will mean for congestion and air quality. I have invested hundreds of millions of pounds cleaning up London's air in recent years, making rapid improvements to the health of millions of Londoners. These improvements must not be squandered on schemes that needlessly increase traffic. Gatwick should show far more ambition and commitment to reducing car trips, for example through increasing access charges. The substantial proposed increase in car parking runs directly counter to this.

Finally, in terms of noise impacts, Gatwick must ensure that these proposals do not exacerbate impacts on health and quality of life and must ensure any noise reduction resulting from new technologies benefits residents, rather than being banked to enable more flights. Given the potential impacts for London, it is important that any proposals are in line with the relevant plans and policies in my London Plan. Further information about the issues of concern is provided in the attached appendix.

I value the contribution that Gatwick Airport and its workforce make to London and its connectivity and prosperity and am acutely aware of the particular hardship that the aviation sector has faced during the pandemic. Together with partners on the London Recovery Board, I am exploring what help the sector needs to recover including reskilling and diversifying airport economies, prioritising sustainability and linking to emerging sectoral clusters. I welcome early signs of a recovery in the sector as a result of changes to pandemic travel restrictions. But as this continues, the sector must embrace decarbonisation to ensure a green recovery. Expansion threatens to undermine our efforts to decarbonise and I cannot support Gatwick's proposals unless it can demonstrate how they are compatible with our net zero and environmental ambitions.

Yours sincerely,

A handwritten signature in blue ink, appearing to read 'Sadiq Khan', with a small number '2' written below the name.

Sadiq Khan
Mayor of London

Appx.

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Appendix: Surface access and air quality factors ***Gatwick Northern Runway consultation response***

Modelling Assessment

The transport model architecture proposed by Gatwick Airport Limited (GAL) - consisting of the demand models (non-airport and airport), assignment models (highways, bus and coach, and rail), and simulation models – appears appropriate in principle. We do not currently have access to the models so we can only comment based on the materials released as part of the consultation.

The assumptions around demand also have an important bearing on the validity of the modelling. This includes the assumptions around staff efficiencies which have a direct bearing on staff surface access demand and as such need to be properly evidenced. There is a particular inconsistency evident in the comparison of the staff efficiency assumed between the 'Future Base' and 'With Project' scenarios. For example, it has been assumed that staff are 20% more productive in the Future Base and a further 50% more productive in the With Project (in terms of the ratio of staff employed per passenger). This assumption has not been substantiated.

Highway Modelling

Only a relatively small proportion of South London has been included in the 'Detailed Modelling Area'. The rest of London is modelled as part of the inappropriately termed 'Fully Modelled Area', but with fixed speeds, as taken from the South East Regional Transport Model (SERTM). Given the significant number of highway trips between Gatwick and London – including the areas not covered by the 'Detailed Modelled Area' – it is a concern that the full impacts have not been assessed.

Options to address this gap include increasing the geographical scope of the 'Detailed Modelling Area' or making use of TfL's LoHAM model – adding the scheme demand to the LoHAM Reference Case models to compare the traffic impacts with and without the scheme.

It is also an issue that the model calibration and validation are not compliant with the DfT's TAG. We acknowledge that development of the highway assignment model is ongoing and that this will be used to update and inform the final analysis underpinning the Environmental Statement and the Transport Assessment. But it should be noted therefore that the impacts identified in this assessment may be underestimated due to poor model validation and that other impacts may be missing.

While GAL has developed three VISSIM traffic simulation models for the local area, we would flag that further microsimulation or alternative models might be required to assess any areas of potential concern in London which might be identified by the strategic highway modelling.

The congestion threshold used to identify problem areas employs unduly generous impact criteria. These allow locations with volume/capacity (V/C) > 100% to be still be classed as medium rather than high, masking the severity of the negative impacts of the scheme. The criteria need to be reviewed and benchmarked against similar large scheme studies (e.g. HS2, Thames Tideway Tunnel, Heathrow Third Runway).

Until we have full confidence in the highway modelling, it is not possible to attach weight to any air quality assessment. In particular, the full assessment of traffic flows in London beyond the 'Detailed Modelled Area' will be essential to understand the congestion and likely consequent air quality impacts, notably on those corridors which are already air pollution hotspots.

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We do have some specific concerns arising from the air quality assessment as presented. In particular, the assessment is not consistent with the London Plan which sets a different standard for the air quality assessment level (AQAL) for PM_{2.5}, which in turn is likely to necessitate a reclassification of some of the impacts in London from “negligible” to slight or moderate adverse. The number of separately adjusted model verification zones (22 zones with 16 separate verification factors) is also a cause for concern and suggests that there may be deeper issues with the model.

Rail modelling

We understand that the rail modelling has been derived from the DfT’s PLANET South and expanded to cover time periods outside the AM peak and revised to 2016 demand, validated by time period. TfL would wish to obtain the calibration and validation technical note for review.

GAL should include a luggage load factor on public transport services as luggage can have a significant impact on crowding, particularly during peak hours. This can be modelled by factoring up the airport demand by 1.5 to reflect the average space taken up by luggage per passenger.

Emerging impacts

Highway PEIR Assessment

The model indicates that there are high impact areas in South London (Performance Area C - Inner London, PEIR appendix 12.9.1, section 10.4.16). But given our concerns about the modelling outside the ‘Detailed Modelled Area’, we would be concerned that this analysis potentially underestimates the scale and geographical scope of the traffic impacts. This also has critical implications for the reliability of the air quality analysis.

The Journey Time comparisons between ‘with’ and ‘without Project’ show no notable changes in journey times – this could be a function of how the road network has been modelled so TfL needs to have access to the models to verify.

Rail PEIR Assessment

The rail crowding assessment by GAL suggests that schemes already being planned and delivered will be sufficient to accommodate additional demand - though GAL needs to be careful not to rely on schemes with significant funding uncertainty nor substantially divert from non-airport users the envisaged capacity benefits of these schemes.

Nonetheless, the models indicate that there will be passengers standing on some services towards London north of Purley in the AM peak; and in the PM peak, there will be passengers standing on some services southbound out of London with seats only becoming available at Clapham Junction and East Croydon. The majority of Gatwick passengers would board the trains at Gatwick Airport or London Terminals where there are more likely to be seats available, and they will remain onboard on the most congested sections of the services (north of Purley, East Croydon and Clapham Junction). This puts extra stress on already congested services. Further investigation is required to determine whether additional mitigation is required.

Sustainable mode share & targets

If GAL is committed to supporting London and UK targets for securing net zero carbon emissions, it needs to demonstrate how the scheme could be delivered, at a minimum, without an increase in highway trips over pre-pandemic levels. It is of deep concern that GAL is forecasting that car passenger, ‘kiss and fly’ and taxi trips (two way weekday, in June) will increase from 78,800 in 2018/19 to 104,800 with the scheme in 2032, a 33% uplift.

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GAL aims to achieve a 60% sustainable mode share (public transport and active travel) for airport passengers and staff by 2030. But overall passenger and employee mode share targets should reflect the aspiration for no further growth in highway trips. GAL should work with stakeholders to identify what this revised target should be for surface access to play its role in reaching net zero.

We recognise that securing high sustainable mode share from its more rural catchment areas will be challenging. By contrast, GAL should be seeking a very ambitious target for its trips to and from London, including proposals for how to improve access from those areas away from the Brighton Main Line.

It is essential that GAL also plays its part to reduce air pollution and for those remaining highway trips, GAL needs to accelerate its efforts to increase the proportion of vehicles that are zero emission.

Longer term, the 'stick and carrot' measures modelled lead to an increase in passenger public transport mode share from around 45% prior to the Covid-19 pandemic up to 54% and 56% between 2029 and 2047 for both the future baseline and with Project. It is noted that these figures both fall below GAL's own 60% sustainable mode share target. As such GAL should assess what other levers – including increased forecourt and car park charging and reduced car parking supply – would be required to meet its 60% target both for 2030 and 2047. These should then be part of GAL's surface access package of measures.

Interventions

The provision of an extra 18,500 passenger car parking spaces (up from 53,451 to 71,951), an approximate 35% increase, seems to be wholly at odds with achieving net zero and increasing sustainable mode share. Indeed, it suggests the ratio of passenger trips to car park spaces remains largely unchanged from 2019 to 2038 – when air passenger trips are forecast to increase from 46.6m to 75.6m with the scheme.

Providing an extra 18,500 car park spaces and then adopting measures to try and discourage people from using them appears counterproductive. If GAL is committed to limiting private vehicle trips to the airport, it should not be providing additional car parking, but increasing both forecourt and car park charges to ensure that private highway trips do not transfer to the 'kiss and fly' and taxi trip categories instead. As such GAL should radically reduce the number of new car parking spaces under the proposed scheme.

The level of car park and forecourt charging can further be used to ensure the adopted mode share targets are reached, once various 'carrot' measures have been implemented. We would also urge hypothecation of these charges to fund sustainable surface access improvements.

We welcome GAL's readiness to work with operators to secure earlier services to meet early morning shifts and introduce cheaper travel for airport workers.

Targets should also be set for passenger and staff trips by zero-emission vehicles. Discounts on car parking and forecourt charges could help incentivise this, as well as greatly increased provision of rapid electric charging points in existing car parks for staff, passengers and taxis.

Rail will remain the primary sustainable mode for access to Gatwick from London and GAL should consider how to increase the attractiveness of its rail proposition, including ticketing and journey planning initiatives. It is also worth considering the role of certain key interchange stations as gateways to Gatwick Airport – such as East Croydon, Clapham Junction and Farringdon – and what scope there is for facilitating seamless trips to and from the airport.

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Nonetheless, there are also areas of London – notably in the south west and south east – where rail is a less attractive mode of travel to the airport and GAL should develop plans to improve public transport access from these areas, for example through new direct express bus services.

It could be considered that one of the most important aspects of mode choice is the differential cost in travelling to the airport by car compared to that by public transport. Ultimately the cost differential between the two offers needs to increase in real terms to facilitate a shift from car/taxi to public transport. This could be achieved by increasing car parking and forecourt charges and lowering the cost of public transport or a combination of the two.