Interested Party Reference 20041896

Gatwick Northern Runway

Written Representation by the Chartered Institute of Logistics and Transport (CILT)

Summary

1 We support the Gatwick Northern Runway project because we consider that it is possible to achieve the social and economic benefits of a growth in air travel in a sustainable manner. Our support is entirely dependent upon strict conditions relating to Greenhouse Gas Emissions as outlined in this representation.

Introduction

2 The Chartered Institute of Logistics and Transport (CILT) is a professional institution embracing all transport modes whose members are engaged in the provision of transport services for both passengers and freight, the management of logistics and the supply chain, transport planning, government and administration. Our principal concern is that transport policies and procedures should be effective and efficient, based on objective analysis of the issues and practical experience, and that good practice should be widely disseminated and adopted. The Institute has a number of specialist forums, a nationwide structure of locally based groups and a Public Policies Committee which considers the broad canvass of transport policy. This submission draws on contributions principally by the Aviation Policy Group, who have experience in airport and airline planning and operations and take a UK-wide view of airport expansion, noting in particular the implications for other modes and environmental effects.

3 In this written representation we comment on Demand and Capacity, Support Facilities, Surface Access, Noise, and Greenhouse Gas Emissions.

Demand and Capacity

4 It is clear that there is demand for additional air travel in the UK above the 2019 level. How much of this demand should be met is a matter for national policy and it has long been policy that not all demand should be met, primarily to ensure that the impacts are not greater than the benefits. At the regional level, it is also clear that demand for air travel in South East England will exceed available capacity in the next few years and this also applies to the local market around Gatwick, given that 2019 levels were already in excess of capacity at peak times.

5 We have noted the forecasts of future demand in the Needs Case (Document reference APP-250) and, in particular, how the forecasts are derived using a range of assumptions and with a range of sensitivity tests. It is always possible to make different assumptions but it notable that the point at which the existing runway capacity is exhausted is relatively consistent and that none of the assumptions or sensitivity tests demonstrate a scenario where additional capacity is not required. In terms of assumptions, our view is that the shorter term (2024-2027) may not see as much growth as the Base Case and, in the medium to longer term, Heathrow may be able accommodate more than 90 mppa even without a third runway, but theses scenarios do not undermine the case for the Northern Runway.

6 Our view on the cargo forecasts is somewhat different, based on our knowledge and understanding of the cargo market. While the DfT passenger forecasts are well developed, the

same cannot be said for cargo forecasts, an issue acknowledged by the DfT. There is therefore no top down forecast of UK air cargo and therefore more emphasis is placed on bottom up, airport specific cargo forecasts. We note the potential under-reporting of cargo tonnage and suggest that this would need a response from the CAA Statistics Department before it can be accepted. It is possible that this is cargo handled at Gatwick Airport but trucked to or from another airport for flight. This would be properly counted as not from Gatwick but nevertheless the airline or freight agent would record it at Gatwick. However, even if the revised figures are closer to reality, there are reasons why the forecasts of future cargo demand may be more modest. First, the pandemic brought about a trend towards all-cargo aircraft operations because passenger aircraft were simply not flying. This trend has reversed since the end of the pandemic, but not completely and all-cargo operations are finding new markets. Second, the main passenger aircraft operations at Gatwick, both now and in the future, are by Low Cost Carriers who, because of their short turnrounds, rarely carry any cargo. The main potential for cargo growth is in long haul operations but here the markets likely to be served at Gatwick, mainly leisure, also tend to be less important for cargo. In addition, the use of long haul narrow-bodied aircraft such as the Airbus A321, in particular the XLR versions, have limited cargo capacity because of both volume and weight limits. Our third reason for more modest forecasts of future cargo at Gatwick is the limited infrastructure provided by the cargo operators (airlines, agents, logistics companies etc.) who are more likely to focus on Heathrow because of its range of long haul full service carrier operations, and all-cargo airports such as East Midlands and Manston, which now has approval to provide significant new capacity. It is also noticeable that the current plans do not feature any major expansion of the cargo facilities at Gatwick.

7 It is possible that the actual growth may turn out to be less than as indicated in the Need Case, for example if the strict conditions we propose for carbon emissions, noise and surface access restrict such growth or add to the cost of air travel. However, in such circumstances, the financial impact will be borne by the entities who own the airport. In other words, those entities will have to have confidence that the demand will be there and that the conditions can be met before they decide to invest.

Airport Support Facilities

8 Chapter 5 of the Environmental Statement, Project Description (APP-030), includes a few paragraphs on Power Strategy (5.2.142 to 5.2.145). These paragraphs relate to changes needed to facilitate the Northern Runway as associated facilities. Paragraph 5.2.145 notes that 'The relocation of substations and provision of additional capacity would allow for additional loads….' It is essential that these additional loads should include allowances for a major increase in electricity supply for charging the batteries of electric aircraft. Such aircraft may form a significant element of the fleets of aircraft operating at Gatwick and, indeed, if airlines are going to be able to meet the path towards net zero. The type of fuel for zero emission aircraft is still open to developments and it may be that a combination of electric and hydrogen power will be needed. Paragraph 5.2.55 has noted that refuelling facilities will be provided for electric and or hydrogen vehicles but the project must allow for facilities related to aircraft power to be provided. Sustainable Aviation Fuel is also likely to play a significant role but the facilities for this are, in general, the same as for current aviation fuels, although some additional facilities may be required to enable blending.

Surface Access

9 We have considered the Transport Assessment (APP-258) and Chapter 12 of the Environmental Statement (APP-037) and we consider that the assumptions, assessments and predictions, including mode share targets, are appropriate and satisfactory for this project.

10 We note that the impact of construction traffic has been noted as a worst case without the use of rail for construction materials. However, we suggest that there is an opportunity that should be taken to transport construction materials by rail to a railhead to reduce construction traffic.

11 For the longer term, it is possible that further interventions will be needed, in particular in public transport for both passengers and staff. East-west connectivity, particularly from Kent, remains limited and the prospects for coach links will become increasing subject to road congestion, particularly on the M25. We remain of the view that a dedicated non-stop Gatwick Express service is a vital component of any future rail service pattern.

12 We propose that the surface access targets should form part of a set of conditions for growth. If these conditions are not met at defined points in time, then further growth from that time should not be permitted. Conditions can, of course, be changed but a formal process through the planning system would be required.

Noise

13 We have considered Chapter 14 of the Environmental Statement, Noise and Vibration (APP-039), and accept that the assessment methodology and results are a proper representation of the situation. In summary and in general terms, the growth of aircraft movements will slow an otherwise reduction in noise levels such that, on average, air noise remains at about the same level as 2019. This does not meet the objective of sharing improvements in individual aircraft noise levels with the community. In addition, the operation of a new runway, albeit close to the existing one, will create new routes and it is clear that new routes cause more disturbance than changes to noise levels on existing routes. In our view, respite is one of the key benefits that the community seeks and, while this is not possible at Gatwick in terms of runway alternation, some respite should be provided at night. We are very conscious of the type of operation at Gatwick which involves making use of aircraft over many hours of the day, in particular resulting in late evening arrivals. We therefore suggest that a night respite period should begin at 0100 hours and continue to 0600 hours, after which the first long haul arrivals and short haul departures can operate.

Greenhouse Gas Emissions

14 We have noted in Chapter 16 of the Environmental Statement, Greenhouse Gases (APP-041) that future aviation emissions are by far the largest part of the total and, as the trajectory towards net zero occurs and Carbon Budgets reduce, so aviation emissions, while reducing in absolute terms, become increasingly significant as a proportion of the total. We also note that the proposal is to follow the policy that has thus far been applied that the total GHG emissions from aviation are controlled at national level, primarily through the Carbon Budgets. Previous expansion permissions have also been tested in the courts. We do not dissent from this view, but suggest that for the proposals for Gatwick, which are for an NSIP, the result is potential GHG emissions of a sufficient amount that a specific control on growth related to GHG emissions is appropriate. We are confident that the aviation industry and, specifically the manufacturers, the airport operator, the airlines that operate at the airport and all the other associated organisations can achieve reductions in GHG emissions but we recognise that other

parties need to be assured that this is the case. Our proposed addition of GHG emissions from all flights departing from the airport will provide this assurance.

15 We therefore propose that the conditions should include a mechanism for relating growth to Scope 1, 2 and 3 emissions and, in particular, emissions from aircraft departures in flight. The detail of how the reduction in GHG emissions should be included in the mechanism should be a matter of negotiation and agreement between the airport and the planning authority and decided through the DCO process. However, in principle, the GHG emissions should be calculated for a baseline period (eg. 2019, or possibly for a multi-year period up to 2019) and then forecast for the periods covered by the Carbon Budgets (for example, specifically for CB6 2033-2037). Initial figures are contained in the Environmental Statement Chapter 16. These two figures should then be expressed as a percentage of the total UK GHG emissions. The control would then be that, if GHG emissions in 2033-2037 remain below the baseline percentage related to Carbon Budget 6, growth can continue. If emissions are above the baseline percentage, further growth would not be permitted. The detailed mechanism for GHG emissions would be similar to that for other conditions, for example in terms of a noise envelope.

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