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**Representations prepared on behalf of Holiday Extras Ltd as it relates to
Gatwick Airport DCO application**

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CONTENTS

1.00	INTRODUCTION	3
2.00	FACTORS INFLUENCING AIRPORT RELATED CAR PARKING	4
	I. The Need for a Flexible Approach to Long Term Off-Airport Car Parking	5
	II. Choice	9
	III. Airport Surface Access Strategy	13
	IV. Important Factors Surrounding Public Transport Provision	15
3.00	LEAST SUSTAINABLE TRIPS TO LONDON GATWICK AIRPORT	20
4.00	THE SIGNIFICANCE TO BE ATTACHED TO TRANSPORTATION NETWORK COMPANIES (TNCs)	21
5.00	THE RISE IN TECHNOLOGICAL PLATFORMS	23
6.00	AIRPORT PASSENGER CATCHMENT AREAS	25
7.00	AIRPORT SLOT ALLOCATION SYSTEM	28
8.00	THE RELATIONSHIP BETWEEN ON-AIRPORT HOTELS AND ON-AIRPORT PASSENGER CAR PARKING PROVISION	30
9.00	FUTURE ON-AIRPORT CAR PARKING PROVISION	39
	I. The Need for a Replacement Table 5.2.4 Comprising Part of Document APP 030	41
	II. On-Airport Car Parking Provision under the Future Baseline Scenario in the Absence of “The Project”	42
	<i>A. Reconfiguration of the Existing Hilton Hotel to Provide 50 Additional Rooms and 820 Parking Spaces</i>	42
	<i>B. Multi Storey Car Park 7 (MSCP7)</i>	45
	<i>C. Use of Robotics Technology Within Existing Long Stay Car Parking Areas To Increase Capacity, Resulting In An Additional 2,500 Spaces</i>	47
	III. Additional Passenger Car Parking Forming “The Project”	49
	<i>D. North Terminal Long Stay Decked Parking</i>	49
	<i>E. Multi Storey Car Park J</i>	50
	<i>F. Multi Storey Car Park Y</i>	50
	<i>G. Multi Storey Car Park H</i>	51
	IV. Other Permanently Lost Car Parking Space Provision	51
	<i>H. Summer Special</i>	51
	<i>I. North Terminal Long Stay and Flying Pan</i>	52
	<i>J. Staff Car Parks W, B and H</i>	53
	<i>K. Staff Car Parks G and L, and Passenger Car Park Z</i>	53
	V. Other Material Considerations Relating to On-Airport Parking Provision	54
	<i>L. Valet MA-1</i>	54
10.00	CONCLUSIONS	56

1.00 INTRODUCTION

- 1.01 These representations are raised on behalf of my clients Holiday Extras Ltd, a leading UK and European distributor of on and off airport related car parking spaces. My client sells a range of holiday related products in addition to airport related car parking, including airport hotels, airport lounges, travel insurance and car hire. These products are sold directly to customers on their database which extends to approximately 6 million UK homes, as well as to a wide range of business partnerships and other travel related organisations.
- 1.02 Initial representations were raised on behalf of my clients in November 2021 to the Autumn 2021 Pre-Application Consultation exercise entitled “*Our Northern Runway: Making Best Use of Gatwick*” with its underlying intention to bring the existing northern runway into routine operation alongside the main runway, where at present it is restricted to use as a stand-by or for emergency purposes only. In July 2022 further representations were submitted by this practice on behalf of Holiday Extras Ltd to the Consultation Document Summer 2022 “*Our Northern Runway: Making Best Use of Gatwick – Highway Improvement Changes and Project Update*”.
- 1.03 Holiday Extras Ltd have sought at all times to support the Applicant in their underlying intention through their DCO application to bring the existing northern runway into routine operation alongside the main runway. They appreciate that what is now proposed will deliver significant socio-economic benefits both regionally as well as nationally.
- 1.04 My client’s support for the current DCO application should be seen as neither removing nor diluting the serious concerns which they have surrounding the topic of airport surface access, with particular reference to on- and off-airport related passenger car parking provision. Through their subsidiary company, Airparks Services Ltd, they have considerable experience in the provision of long term off-airport car parking facilities, based on the traditional park-and-ride model, raised by my clients in the two earlier consultation exercises have been not been addressed in subsequent documents forming part of the current DCO application.
- 1.05 A series of consultations along with various documents and announcements provide the framework for a new aviation strategy being promoted by the Government. The list

includes two consultations carried out on 7th April 2018 and 17th July 2022; ten documents published between 5th April 2018 and July 2022, together with three announcements between 17th December 2018 and 22nd May 2022.

1.06 Of Primary importance amongst these documents includes *“Beyond the Horizon – The Future of UK Aviation – Making Best Use of Existing Runways”* (hereinafter referred to as MBU) which was published in June 2018 around the same time as the Airports National Policy Statement (ANPS). The ANPS confirms the Government’s support for airports beyond Heathrow making best use of runways, but this aim does not exclude DCO applications from ensuring a balance is achieved between economic benefits and environmental costs, including how the latter are to be mitigated.

1.07 More recent documents include *“Flightpath to the Future”* published in May 2022 which sets out how the Government and the aviation sector can work together on four key themes: i) enhancing global impact for a sustainable recovery; ii) embracing innovation for a sustainable future; iii) realising benefits for the UK; and iv) delivering for users. This was followed two months later in July 2022 with the publication *“Jet Zero Strategy: Delivering Net Zero Aviation by 2050”* in which the overarching approach was to set clear decarbonisation goals in addition to the 2050 net zero target, requiring all domestic flights to achieve net zero by 2040, and for all airport operations in England to be zero emissions by the same year.

2.00 FACTORS INFLUENCING AIRPORT RELATED CAR PARKING

2.01 Airport related car parking is calculated by way of a series of assessments of how many passengers or movements can be handled over the busy hour. There is no simple definition to airport capacity in that it is influenced by a range of individual capacities which themselves are derived from a number of parameters, including i) flight departure and arrival times; ii) runway length; iii) apronage; iv) passenger terminal facilities; and v) surface access considerations with restrictions attributable to sustainable transport modes.

2.02 To these considerations may be added a number of issues which have an impact on airport related car parking demand. The more important factors include the availability of a private car; accessibility to public transport modes; price, associated with the opportunity cost of public transport or the individual car parking product; the role

played by local carriers in route selection and journey frequency; intensity of hourly arrivals/departures based on slot allocations; highway capacity; historic parking demand and estimated non-UK leisure and business passenger throughput.

- 2.03 Equally relevant in assessing airport related car parking demand is a wide variety of considerations falling under the umbrella of customer behaviour. These involve needs and attitudes in making air travel decisions encompassing matters such as safety, security and more recently the Covid-19 pandemic, all of which comprise behavioural considerations. In addition, considerations governing passenger catchment areas and route overlaps between competing airports are relevant factors.
- 2.04 The numerous material considerations relating to airport related car parking demand are required to be seen not only in terms of the number of on and off-airport car parking spaces, but more particularly in terms of their occupancy, a factor which becomes increasingly important in circumstances where it is envisaged there will be an increase in long haul flights with a consequential reduction in short haul provision over the period of the DCO application to 2047. The anticipated growth in London Gatwick Airport's annual passengers and market mix becomes evident from an examination of Figure 6.3-7 and Table 6.3-1 found on page 6-54 of the Needs Case [APP 250].

I. The Need for a Flexible Approach to Long Term Off-Airport Car Parking

- 2.05 In themselves, these various considerations dictate that a flexible approach should be taken when assessing airport related passenger car parking demand and supply. Without lawful long term off-airport car parking facilities, London Gatwick Airport would cease to operate efficiently; failing to meet current, let alone future airport related passenger car parking supply, regardless of any modal shift in favour of public transport. These are factors which become immediately apparent from the total authorised capacity of long term off-airport car parking operators outlined in the September 2022 Gatwick Airport Car Parking Monitoring Statement, coordinated and prepared by Crawley Borough Council, set out overleaf.
- 2.06 Regrettably, there has been an absence of any effective dialogue involving the Applicant and long term off-airport car parking companies in considering airport related car

Gatwick Parking Survey 2022 Location	Authorised	Unauthorised	Total Vehicles	Authorised Capacity	Vacant Authorised Capacity	Council Area
Tinslow Farm	165	0	165	298	133	Crawley Borough Council
Hilton South Terminal	0	0	0	106	106	Crawley Borough Council
Europa Gatwick Balcombe Road	266	0	266	395	129	Crawley Borough Council
Lowfield Heath Service Station (London Road)	228	0	228	385	157	Crawley Borough Council
Crown Plaza Langley Drive, Tushmore Roundabout	90	0	90	122	32	Crawley Borough Council
Travelodge (Fm Mecure/Renaissance) Hotel, Povey Cross Roundabout	525	0	525	623	98	Crawley Borough Council
Ibis Hotel	0	0	0	70	70	Crawley Borough Council
Airport Inn Britannia (Fmly Gatwick Best Western Moat House)	0	0	0	135	135	Crawley Borough Council
Premier Travel Inn, Gatwick Manor (London Road)	0	0	0	178	178	Crawley Borough Council
Field adj. to Premier Travel Inn, Gatwick Manor (London Road)	0	0	0	0	0	Crawley Borough Council
Sofitel MSCP North Terminal	355	0	355	565	210	Crawley Borough Council
Purple Parking, Lowfield Road (Formerly Airparks, Q and BCP)	2941	0	2941	3265	324	Crawley Borough Council
City Place by Nestle (fmr BT) building	0	594	594	0	0	Crawley Borough Council
City Place SE Corner	0	191	191	0	0	Crawley Borough Council
Gatwick House, Peeks Brook Lane	0	151	151	0	0	Crawley Borough Council
Brook Lane House, Peeks Brook lane	0	330	330	0	0	Crawley Borough Council
Radisson Red, Lowfield Heath	0	0	0	0	0	Crawley Borough Council
Gas Holder Site	0	0	0	0	0	Crawley Borough Council
Land North of Gas Holder Site	0	0	0	0	0	Crawley Borough Council
Black Corner Small Holdings, Balcombe Road	200	0	200	250	50	Crawley Borough Council
Southways, London Road	0	0	0	0	0	Crawley Borough Council
Old Brighton Road Warehouse (Site A2)	0	0	0	0	0	Crawley Borough Council
Arora Hotel, Southgate Avenue	0	0	0	230	230	Crawley Borough Council
Maple Manor Hotel, Charlwood Road	0	0	0	12	12	Crawley Borough Council
Hawthorn Farm	0	141	141	0	0	Crawley Borough Council
Sandman Signature (Fmr Ramada Plaza)	79	0	79	117	38	Crawley Borough Council
The Berries, Balcombe Road	0	0	0	0	0	Crawley Borough Council
Schlumberger House, Buckingham Gate	0	134	134	0	0	Crawley Borough Council
TOTAL FOR AREA	4849	1541	6390	6751	1902	
Long Stay Car Parks	22854	0	22854	32,581	9,727	Gatwick On Airport
Short Stay Car Parks	3196	0	3196	4556	1360	Gatwick On Airport
TOTAL FOR AREA	26050	0	26050	37,137	11,087	
Cambridge Hotel	427	0	427	492	65	Reigate & Banstead
The Grove	0	0	0	279	279	Reigate & Banstead
Menzies Chequers (was Thistle) Hotel	47	0	47	95	48	Reigate & Banstead
Gatwick House	1	0	1	30	29	Reigate & Banstead
Best Western/Gatwick Skylane Hotel	223	0	223	338	115	Reigate & Banstead
TOTAL FOR AREA	698	0	698	1234	536	
Crawley Down Garage (Snow Hill)	0	0	0	1500	1500	Mid Sussex
Wakehams Green	2785	0	2785	3250	465	Mid Sussex
Copthorne Hotel	0	0	0	759	759	Mid Sussex
Holiday Inn (Formerly Gatwick Worth)	262	12	274	650	388	Mid Sussex
Keepers Knight	309	89	398	309	0	Mid Sussex
Bridges Breakers Yard, Pease Pottage	0	975	975	0	0	Mid Sussex
Acacia Grove	129	283	412	129	0	Mid Sussex
TOTAL FOR AREA	3485	1359	4844	6597	3112	
Holiday Inn	372	0	372	636	264	Mole Valley
Gatwick Filling Station, Tudor Rose	196	0	196	400	204	Mole Valley
Russ Hill Hotel	0	0	0	400	400	Mole Valley
Ricketts Wood	0	0	0	200	200	Mole Valley
Wagoners Farm	62	0	62	131	69	Mole Valley
Stan Hill Hotel	0	108	108	0	0	Mole Valley
Gatwick Business Park, Reigate Road, Hookwood	0	102	102	0	0	Mole Valley
Trumbles Guesthouse	30	0	30	40	10	Mole Valley
Hookwood Lodge, Reigate Road	0	0	0	0	0	Mole Valley
TOTAL FOR AREA	650	210	870	1507	1147	
Kilmarnock Farm	0	0	0	0	0	Horsham
Ifield Court Hotel	200	69	269	200	0	Horsham
Curtis Farm	0	0	0	250	250	Horsham
Little Park Enterprises	439	55	494	586	147	Horsham
Waterhall Country House Hotel	6	2	8	14	8	Horsham
Little Foxes Guesthouse	32	0	32	50	18	Horsham
Outaway, Bonnetts Lane	466	0	466	950	484	Horsham
Rear of Copatch Farm, Newdigate	0	0	0	0	0	Horsham
Rear of Brooklyn Farm, Bonnetts Lane	0	0	0	0	0	Horsham
North West of Old Pound Cottage (Old Pound Nursery)	0	0	0	0	0	Horsham
Field off Bonnetts Lane (opp Manor Lodge B&B)	0	0	0	0	0	Horsham
Crawley Horsham MOT Centre (adj. Stumbleholm)	0	100	100	0	0	Horsham
Prestwood Farm	0	0	0	18	18	Horsham
Furong Farm, Rusper Road	0	0	0	0	0	Horsham
TOTAL FOR AREA	1143	226	1369	2068	925	
Cophall Farm	1630	0	1630	1653	23	Tandridge District Council
Leylands (incl extension)	236	0	236	236	0	Tandridge District Council
Westlands Farm	962	0	962	1486	524	Tandridge District Council
The Terning Wheel	472	0	472	580	108	Tandridge District Council
Old Mushroom Farm, Church Lane	0	0	0	0	0	Tandridge District Council
The Oak Tree, Effingham Road	19	0	19	21	2	Tandridge District Council
Effingham Park Hotel	72	0	72	600	528	Tandridge District Council
Kiln Heath Farm, Antlands Lane	17	0	17	20	3	Tandridge District Council
TOTAL FOR AREA	3408	0	3408	4596	1188	
TOTAL FOR ALL SITES	40293	3336	43629	60,190	19,897	

Gatwick Parking Notes:
Cars parked are total number of long stay vehicles counted at 9am on Friday 9 September
Short Stay figures exclude Kiss and Fly, and only relates to pre-booked cars.
Would otherwise overstate real peak occupancy on this day as it assumes all prebooked cars are present for entire 24 hour period

parking demand and supply, with GAL seeking with the assistance of Crawley Borough Council, to prevent long term off-airport car parking facilities from becoming established in sustainable locations in close proximity to the same airport. This is achieved through a policy which **only** seeks to allow airport related passenger car parking on-airport.

- 2.07 This is in spite of the fact that historically a number of long-term off-airport car parking applications have been allowed on appeal by The Planning Inspectorate, as well as granted permission by the local planning authority in “sustainable locations”¹ on land beyond the operational boundaries of London Gatwick Airport. To this consideration should be added the terms of Clause 5.6.1 of the latest Section 106 Planning Obligation involving Crawley Borough Council, West Sussex County Council and Gatwick Airport Ltd, executed as recently as 24th May 2022, from which it can be seen that the target figure of 48% of passengers travelling to the airport by public transport requires an assessment of **combined on and off-airport supply**, and not simply on-airport passenger car parking spaces.

“5.6.1 Provide sufficient but no more on-Airport public car parking spaces than necessary to achieve a combined on and off airport supply that is proportionate to 48% of non-transfer passengers choosing to use public transport for their journeys to and from the airport by end of 2024.”

- 2.08 At this point it is worth recalling what was stated in an Advisory Letter dated 20th December 2016 from the Civil Aviation Authority, Consumers and Markets Group, sent to airports and surface access operators concerning the provision of surface access at UK airports. In the Advisory Letter which post-dated the publication by the same organisation of CAP 1473 entitled “Review of Market Conditions for Surface Access at UK Airports – Final Report” paragraph 9 stated:

“9. The CAA recommended that each airport operator develop a series of principles on how they approach providing access to their surface access facilities that reflects competition and consumer law. We welcome the approach airport operators have taken so far in developing principles and encourage them to continue the development process following this Advisory Letter.”

¹ See appeal decisions at Acacia Grove, Copthorne (PINS Ref. No. 2153589); City Place, Crawley (PINS Ref. Nos 2171971 & 2171972); and the Case Officer’s Reports at Southways Business Park (Crawley BC Ref. No. CR/2013/0094/FUL); Site E2 Crawley Business Quarter (Crawley BC Ref. No. CR/2014/0080/FUL) and the Former BOC Edwards Site (Crawley BC Ref. No. CR/2014/0615/FUL).

2.09 The approach taken with respect to long term off-airport car parking proposals as part of the current DCO application is in contrast to that adopted by the Applicant in the case of the Luton Rising (London Luton Airport) DCO application which envisages a throughput of 32mppa by 2043. In the Luton Rising DCO application, the Applicant is on record as stating “*Holiday Extras are clearly a really important partner at the airport.*”

2.10 The Luton Rising DCO application had the following comments to make on the future of off-airport car parking in what was referred to as the Outline Transport Related Impacts Monitoring and Mitigation Approach (OTRIMMA):

“3.4.2 The airport is not pursuing off-site third party parking options as part of the DCO but anticipates that third party off-site car parking providers will seize the opportunity created by airport growth to provide proportionately greater capacity of their own operation, subject to separate planning applications. The applicant will engage with any off-site parking operator if a positive initial response is received from the relevant local planning authority, with regard to additional or extended off-site parking facilities.”

2.11 The Issue Specific Hearing 7 relating to the Luton Rising DCO application was held in the afternoon of Tuesday 28th November 2023, in which the Applicant is on record as stating:

“With regard to how off-site car parking is dealt with in the Transport Assessment it was assumed there would be a growth in off-site car parking trips associated with the airport development, and this approach was basically using the same trip distribution for those off-site car parks as existed today, and in growing that in line with the growth in trips as a result of the airport phases. I think it was acknowledged by the Applicant that there would be a market for that off-site car parking and they would expect car parking operators to make planning applications to increase the amount of off-site car parking to meet that demand. If that demand did not materialise, there would obviously be controls set out in the Green Controlled Growth that would prevent the airport from growing unsustainably, and would require that any additional car drivers over and above that level to be taken up by sustainable modes, so I think it is an acknowledgement that airport off-site car parks do play an important role in managing parking supply, but that mode share is assumed to stay the same and that the market would take up the opportunity to deliver that additional parking as part of the airport expansion.”

2.12 Unlike the Gatwick Airport DCO application, the DCO application advanced by Luton Rising introduced an innovative new framework entitled “*Green Controlled Growth*” as a means of managing the growth of the airport through the coming decades in accordance with defined environmental limits. This mechanism provided additional certainty over

and above the contents of the submitted Environmental Statement as a means of ensuring the environmental effects forecast would not be exceeded, irrespective of the performance of fixed mitigation measures initially secured.

II. Choice

2.13 In April 2018, the Government's document entitled "*Beyond the Horizon: The Future of UK Aviation – Next Steps Towards an Aviation Strategy*" took into account responses obtained from the Call for Evidence, as part of an early exercise in formulating an updated aviation strategy. It placed at the forefront of the aviation strategy the requirement to ensure that customers get the best deals and a quality of service, with the Government committing itself to continue "*to work with industry to make sure that the right level of competition exists to bring benefits to passengers.*"

2.14 The "*Next Steps Towards an Aviation Strategy*" document included six core objectives; paragraphs 6.42 and 6.43 being of relevance when examining surface access:-

"6.42 As airports grow, surface access options need to be developed in tandem to cater for increased passenger numbers travelling to and from the airport. As highlighted in a number of call for evidence responses, this coordination of public and private investment is difficult and at time can seem uncoordinated. This challenge can often be compounded by the private ownership structure of UK airports, which can potentially make providing necessary funding for road and rail infrastructure in line with government expectations and timescales difficult.

6.43 It was also noted in a number of responses that consumer access to appropriate sustainable travel solutions and environmentally beneficial mode-share targets are important considerations in the provision of surface access links to airports. Historically, there has been an emphasis on moving traffic from roads to coach and rail, however, in the longer term, government would like to consider the impact of surface access planning that incorporates likely environmentally friendly technological developments such as the use of electric vehicles."

2.15 Long term off-airport car parking offers the passenger choice, consistent with those consumer principles used in devising CAA's Consumer Strategy published as recently as 29th September 2023. Of particular importance in promoting consumer principles in the context of aviation it is said:

*"One of the CAA's purposes is to support consumers in relation to **choice, value and fair treatment**. The consumer principles can help provide a framework to enable this.*

Access

Consumers should be able to access services at a price and quality that suits their needs. Barriers to access should be identified and addressed, Barriers could include price or difficulty finding relevant information for example.

Choice

Where consumers have choice, they should be able to affect the way goods and services are provided through the choices they make in the marketplace. In order to exercise choice, consumers need to be able to find meaningful information, at the right time, in a format that makes it easy to compare. To be able to exercise choice confidently consumers also need a strong regulatory framework to protect them if things go wrong.” (highlighting as per original document)

2.16 Those passengers who have to rely on early morning departure flight times will have to factor into their modal choice to London Gatwick Airport not only price considerations; but competing airports offering equivalent destinations. A consideration of “lead time” will be relevant, calculated as the time spent from the point of entry into the terminal, passing through check-in and security and proceeding to the flight departure gate. It also necessitates, in terms of UK based arriving passengers, taking into consideration the “lag time”, being the time spent from landing, passing through passport control; collecting any luggage from the baggage reclaim, before proceeding through customs and exiting the terminal. These time periods shown diagrammatically below, are likely to be prolonged at periods when large numbers of passengers are passing through the airport, between 0400 and 0700 hrs, or arriving at the airport between 2200 hrs and midnight.

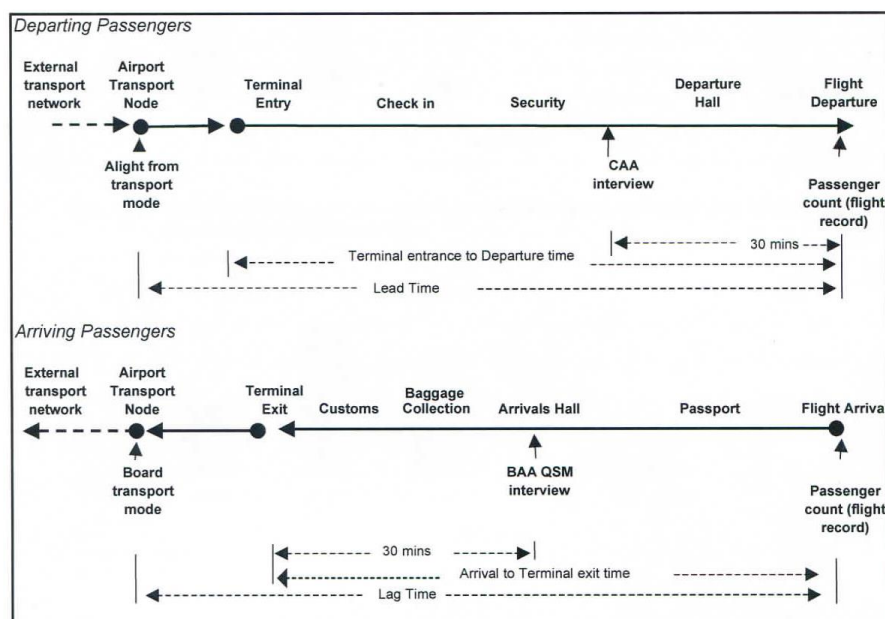
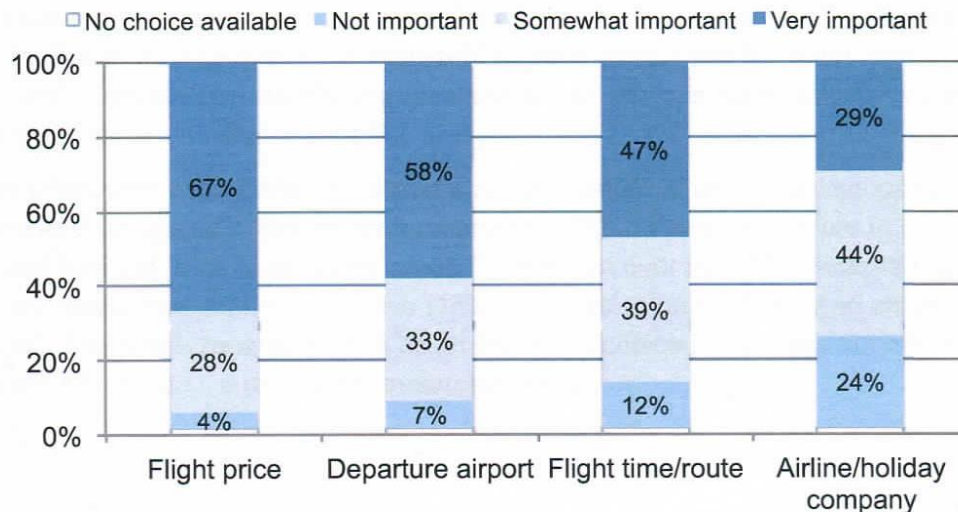


Figure 1: Activities Involved in Traversing an Airport

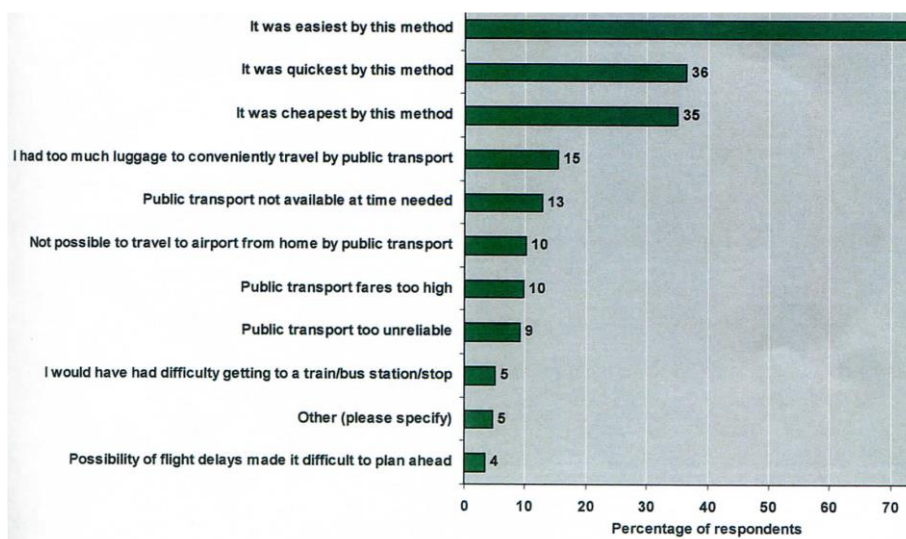
2.17 A series of other factors influencing flight choice have a knock-on effect on modal choice, as evident from Figure 12 taken from the Final Report entitled “Consumer Research for UK Aviation Sector” CAP 1303, prepared by Collaborative Research published by the CAA in 2015.



Q23 To what extent were the following factors considerations in your choice of this flight?
Base: decision-makers who have flown in past 12 months (1,330)

2.18 In considering modal choice, reference should be made to a module of questions commissioned and designed by the Department of Transport which was included in the Office for National Statistics Omnibus Survey in February 2010. The table reproduced below sets out the reasons for choosing to travel by car/van or taxi (private transport) on their last trip to an airport, taken from a sample of 1005 respondents, from which it can be seen that convenience, speed and cheapness all formed principal considerations.

Reasons for Travelling to the Airport by Car/Van or Taxi



2.19 Appeal decisions involving long term off-airport car parking uses have demonstrated the significance to be attached to customer choice in the provision of surface access to an airport. In two separate appeals allowed by The Planning Inspectorate on 18th May 2011² involving Austin Hayes (UK) Ltd and land at Sentinel Car Park, Warren House Lane, Yeadon, Leeds LS19 7FT; and Learmonth Property Investment Co Ltd on land at Unit 1A Leeds Bradford Airport Industrial Estate, Harrogate Road, Leeds LS19 7WP, the Inspector Mr. P.J. Asquith MA(Hons) MA MRTPI concluded on the topic of “customer choice”:-

“55. A further factor to be borne in mind is that the proposals for off-airport parking provision would provide an element of customer choice compared with the near-monopolistic offer that would exist in their absence. Increased choice is a thrust of PPS4 and one which is repeated in the Ministerial Statement of 23 March 2011, Planning for Growth by the Minister for Decentralisation.”

2.20 A similar conclusion was reached in two appeals concerning land at City Place, Crawley, West Sussex, allowed on appeal on 17th August 2012³, in which the Inspector had the following comments to make on the subject of “consumer choice”:-

“23. However, the Council states the Annual Parking Survey indicates that the existing long-term sites, both within and outside the airport boundary, are not fully occupied. While this may be so, there are many reasons for airport visitors choosing a particular car park, including, price, type of parking offered, (e.g. self-drive, meet-and-greet, open air, covered multi-storey), proximity and ease of access to terminal, ease of access from their point of origin, security, and reliability of the parking operator.

24. Although full occupation of the existing car parks cannot be guaranteed, and thus there is some spare capacity to cater for future needs, this does not mean that all parking proposals for new car parking should necessarily be refused. The Gatwick Master Plan Draft for Consultation 2011 (some two years after the Car Parking Strategy) identifies that attractive long-term parking is shown to be successful in reducing the proportion of passengers being dropped off, thereby reducing the volume of road trips to and from the airport.”

2.21 A factor which remains important, being accepted by most airport operators, is that there will always be passengers who will continue to choose to travel to and from an airport by private car. These passengers include the elderly, those who are mobility impaired, and those who travel from locations that are not well served by public transport, including groups and larger families, often with young children. The same passenger cohorts will

² PINS Ref. No. APP/N4720/A/10/2139567 and APP/N4720/A/10/2138849 refer

³ PINS Ref. No. APP/Q3820/C/12/2171971 and APP/Q3820/C/12/2171972 refer

also include those who are required to leave early in the morning to access London Gatwick Airport, and those passengers arriving home in the early hours, who may have to interchange, or live some distance from the point at which they can access public transport.

III. Airport Surface Access Strategy

- 2.22 The most recent Airport Surface Access Strategy is that covering the period 2022 to 2030 published in October 2022 (hereinafter referred to as the ASAS 2022-2030). This document goes further than the recently executed Section 106 Planning Obligation, with Target 1 seeking to achieve 52% of passenger journeys to the airport by public transport by 2030, as part of meeting a target of 60% of trips being made by sustainable modes and ultra-low and zero emission vehicles.
- 2.23 In the absence of a new ASAS, the surface access commitments are to be secured under the DCO application, with the Applicant committing to achieving the following annualised mode shares three years after the opening of the new Northern Runway in 2032 [para 53 of APP 258]
- *A minimum of 55% of air passenger journeys to and from the Airport is to be made by public transport (rail, local bus, regional/express bus or coach or another commercially-operated shared transport service for public use).*
 - *A minimum of 55% of staff journeys to and from the Airport to be made by public transport, shared travel (a journey made by private car containing more than one person) and active modes (walking and cycling).*
 - *A reduction of air passenger drop-off and pick-up car journeys at the Airport to a mode share of no more than 12% of surface access journeys; and*
 - *At least 15% of airport staff journeys to work originating within 8km of the Airport to be made by active modes.*
- 2.24 It is argued that neither the 48% figure set out in the May 2022 Section 106 Planning Obligation, nor the 52% figure in the latest version of the ASAS, nor indeed the 55% figure expected during the period between 2029 and 2047 as part of the “With Project” scenario is considered to be a challenging target, given that in the fourth quarter of 2017 (October to December), CAA’s O & D reveals that a public transport modal share figure of 48.3% was achieved.

2.25 With this in mind, it is contended that the expected minimum of 55% of air passengers journeys being made by public transport is in all probability likely to be met, especially when it is realised that non-UK business and leisure passengers are always more likely to use public transport than those living and working in the UK. In my client's opinion these modal share target figures are not considered to be challenging. This is irrespective of the fact that no evidence has been produced at any time by the Applicant demonstrating that long term off-airport car parking has been a contributory factor in either preventing, or having an adversely impact on the respective public transport modal share being achieved in any submitted ASAS.

2.26 The Environmental Statement Appendix 5.4.1 Surface Access commitments [APP 090] reveals at paragraph 7.1.3:

“GAL has identified the following aspirational mode share targets which indicate GAL's longer-term goals. These are not commitments under the document (which is intended to mirror and secure the outcomes shown in the Transport Assessment) but will provide context for future actions in relation to surface access interventions and for the development of future ASAS action plans and targets:

- *A minimum of 60% of air passenger journeys to and from the Airport is to be made by public transport;*
- *A minimum of 60% of airport staff journeys to and from the Airport to be made by public transport, shared transport and active modes*
- *A reduction of air passenger drop-off and pick-up car journeys at the Airport to a mode share of no more than 10% of surface access journeys;*
- *At least 20% of airport staff journeys originating within 8km of the Airport to be made by active modes; and*
- *At least 50% of airport staff journeys originating within 16km of the Airport to be made by public transport.”*

2.27 The DCO application involving London Gatwick Airport does not embody within its terms, any monitoring or enforcement regarding the appropriateness, effectiveness and environmental impacts associated with surface mode share targets, whether aspirational or not, through the Airport Transport Forum. The same matter was initially raised in the Transport Select Committee's Surface Access First Report of Session 2015-16, February

2016; at which time the Committee recommended on the topic of “*Passenger Preference and Modal Shift*”:-

“There is too little scrutiny of individual strategies and plans which is akin to letting airports set and mark their homework themselves. We recommend that the Government consult on the institution and governance arrangement merely to ensure airport operators are setting meaningful targets and being held to account for their performance. Any arrangement for greater scrutiny should provide the Department with an assurance that such targets and actions are aligned with the Department’s own policy objectives on modal shift.”

In reply, the Government said:

“We note the Committee’s comments about the current arrangements for setting monitoring and enforcement of mode share targets. As part of our work to develop a new aviation policy framework, we will review our guidance on airport Master Plans, surface access strategies and air transport forums, including the recommendations, monitoring and enforcement of mode share, to see whether there is a case for change.”

The same considerations have more recently been highlighted at paragraph 4.35 of the December 2018 document entitled “*Aviation 2050 – The Future of UK Aviation*”.

2.28 In contrast to the kind of controlling mechanisms set out in the DCO application promoted by Luton Rising, through the aegis of an independent Environmental Scrutiny Group, the Gatwick Airport DCO application both sets and marks its own homework, devoid of any continuing robust monitoring or assessment of environmental performance, including sanctions, financial or otherwise, in the event of failing to meet any mode share target.

IV. Important Factors Surrounding Public Transport Provision

2.29 The Applicant has limited control over external stakeholders involved in public transport provision, who pursue different policy objectives, and for which there is no coordinated procedure between different public transport providers. To this end the Applicant can only encourage new connections and services, as GAL is not the service provider, and neither does it control fares which are set by the public transport companies.

2.30 This relationship was highlighted in the written evidence of Paul Harwood, Strategy and Planning Director of Network Rail, to the House of Commons Transport Select Committee relating to surface transport to airports held on 26th October and 9th and 16th

November 2016. On the topic of airport passengers as a proportion of demand, Paul Harwood stated:

“4.3 Therefore, while it is important to accommodate rail passengers who are travelling to airports, they do not represent a game changer for rail demand at the busiest time of day on the train network. The increase in demand faced by the railway is driven by the commuter market which is creating peak passenger growth as high as 5-6% annually on some routes. This said, the rail industry appreciates the wide economic value of airport passengers.”

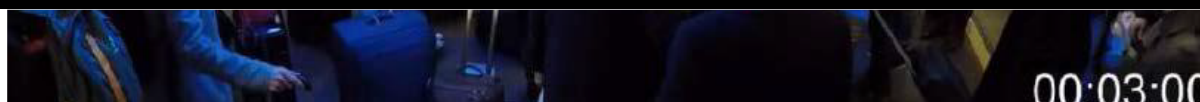
- 2.31 Govia Thameslink Railway (GTR) were present at the Issue Specific Hearing 4: Surface Access held in the afternoon of Tuesday 5th March 2024 at which time they reiterated the main points in their original relevant representations submitted to the Examining Authority on 18th October 2023. GTR confirmed that their original response to GAL’s earlier consultation exercises regarding capacity issues on the London Victoria – Brighton Railway (Brighton Main Line BML) had not been addressed.
- 2.32 The train operating company pointed out that there was a need for additional capacity on the BML, and that simply expanding the use of London Gatwick Airport will lead to increased crowding on trains between the Sussex Coast and London, at rates worse than exist at present in both peak and off-peak periods. This will suppress economic growth insofar as it fails to take into account increased housebuilding in the region around London Gatwick Airport, a matter unrelated to the proposed expansion of the airport. It was pointed out that BML has significant numbers of passengers standing in uncomfortable crowded conditions with a lack of funding to carry out upgrades on the same line, particularly the Croydon Area Restructuring Scheme. It was the view of the train operating company that additional capacity at Gatwick Airport should not be provided until sufficient capacity exists on the BML to enable passengers to travel comfortably.
- 2.33 The Gatwick Airport Railway Station improvements which were completed at the end of last year originate from the submission of Application No. CR/2018/0273/FUL, at which time the planning statement prepared by Network Rail, along with the Case Officer’s Report to the Council’s Planning Committee clearly state that what was being proposed was improvements to cater for a “one runway, two terminal airport”.

- 2.34 The underlying basis of the same application in terms of passenger usage is a matter outlined in paragraph 2.15 of the submitted planning statement prepared by Network Rail, reproduced below, from which it can be seen that the improvements carried out seen in terms of its overall design capacity, was to alleviate current performance, and not to take into account what is currently predicted by the current DCO application.

“2.15 Gatwick airport is expected to experience an increase in airport users, increasing to 48 million passengers per annum by 2050. In the central appraisal case rail mode share is expected to remain at 38%, leading to an increase in rail passengers of 19 million by 2050 – around 75% higher than the 14.5 million passenger footfall forecast for 2014. These air passengers are joined by an additional 1-2 million rail users that do not travel by air but access the rail station for work opportunities at Gatwick, in London, or for other purposes. A further 4-5 million passengers are expected to use the rail station concourse which will act as a connection between the Passenger Transport Interchange (PTI) facility, car parking, taxi and coach facilities and the terminal building - the over-bridges connecting the two currently serve this function. Together the increase in annual users in the period to 2050 is almost 8 million passengers.”

- 2.35 The DCO application, if approved by the Secretaries of State would lead to an increase in passenger throughput to 80.2mppa by 2047, 32mppa more than Gatwick Railway Station is expected to handle, at a time when the Applicant’s aspiration is for 60% of passengers to access the airport by public transport, the majority of which will be by rail. The contents of paragraph 9.5.3 on page 82 of **Document APP 258** estimates that there would be around 84,000 rail passengers per day associated with the Airport on a June weekday in 2047. The effect of “the project” and the sustainable access commitments would be to increase this figure by 23,500 passengers in 2047, representing a substantial additional level of potential rail patronage.

- 2.36 The conclusions to arise from these points pose serious questions on (i) the ability of Gatwick Airport Railway Station to cater for the levels of future rail passengers in accordance with the terms of the current DCO application, particularly where medium and large luggage is involved, and (ii) the Fruin Levels of Service assessment set out in Document **APP 259**. The latter are required to be assessed in the context of the photograph reproduced overleaf taken on 12th February 2016 forming part of Network Rail’s planning statement on the construction of a new station concourse/airport entrance area, link bridges, platform canopies, back of house (BoH) TOC accommodation building and associated improvement works at Gatwick Airport Station. (Application No. CR/2018/0273/FUL refers).



2.37 Tables 11.3.2 and 11.3.3 found on page 132 of **Document APP 245** reveal proposed routes and frequencies for new regional bus and coach services and enhanced local bus services, seen in terms of the future baseline and the “*with project*” proposals. It is unclear how these interventions are to be financed. If it is intended to rely on the Sustainable Transport Fund to finance these proposed new and enhanced bus and coach services, then there must be a figure in mind which can be called upon, dependent on any deliberations carried out by the Airport Transport Forum. In any event, new bus and coach services need to be properly pump primed and require time to become established. No exercise has been prepared on which to judge whether these new or enhanced services will become self-financing or viable in the longer term.

2.38 It is understood from relevant representations raised at the start of the process that views have been expressed that local road improvements are required to manage increased traffic levels arising from the DCO application, and that these should be financed by the Applicant. It is understood that National Highways have also expressed concerns over modelling of the strategic highway network. To the extent that improvements to the strategic highway network will be necessary, that in itself can have unintended

consequences in attracting less sustainable modes of access to the airport, i.e. “*kiss-and-fly*”⁴. This is an issue which has not been addressed in the DCO application.

- 2.39 In any event, there are inherent contradictions between the Applicant’s understandable aim in its DCO application of focusing attention on public transport access to London Gatwick Airport, with the need to maximise revenue derived from forecourt charges paid by passengers, long term off-airport car parking operators and on-airport passenger car parking provision; comprising an important component of non-aeronautical revenue and the most important contributor supporting the Sustainable Transport Fund.
- 2.40 The importance to be attached to car parking revenue is evident from the latest Annual Report for the year ending 31st December 2022 prepared on behalf of Ivy Holdco Ltd, a group of companies which own Gatwick Airport Ltd. Car parking revenue during the calendar year 2022 amounted to £101.7m contributing 13% of total revenue, being the largest contributor after retail revenue and aeronautical and other traffic charges. However, in contrast to all other principal revenue streams, car parking revenue had increased since 2019 by £14.5m despite a backdrop of 13.8 million fewer passengers.
- 2.41 The latest report and unaudited condensed interim consolidated financial statement prepared on behalf of the same holding company for the six month period ending 30th June 2023 reveals car parking revenue at £59.5m, an increase of £20.7m on the same period in 2022, representing a revenue growth of 53.4% compared with a passenger growth of 41%. This represents a net car parking income per passenger for the six months ending 30th June 2023 of £2.62, an increase of 8.8% compared with the same period in 2022.
- 2.42 These figures are testimony to the views which have been expressed by local residents that on-airport passenger car parking is expensive, a matter which cannot be divorced from continued unauthorised long term off-airport car parking, along with parking in residential streets, sometimes known as fly-parking, found within the vicinity of London Gatwick Airport.

⁴ Kiss-and-fly is where the passenger is driven to the airport by a friend or relative and then dropped off, with the driver returning to their home or business, with the reverse occurring following the return of the passenger to the airport.

3.00 LEAST SUSTAINABLE TRIPS TO LONDON GATWICK AIRPORT

- 3.01 The DCO application does not in any way grapple with one of the most frequent and common forms of least sustainable means of passenger access to London Gatwick Airport, being described as “*kiss-and-fly*”, which together with taxis and minicabs, sometimes referred to as “*drop off*”, consists of modes involving a doubling of trips to the airport.
- 3.02 The impact of “*kiss-and-fly*” as a mode of access has been studied by Dr. Greg Marsden of the Institute of Transport Studies at Leeds University. He examined passenger access to Leeds Bradford International Airport through the provision of two studies undertaken in 2004 and 2005. The results of his studies found that over 40% of passengers were dropped off at the airport by friends, involving a 36% increase in terms of total distance travelled to the same airport over and above that which would have resulted if passengers had driven and parked themselves. He calculated that the 36% increase in travel distance equated to an additional 19.4 million kilometres. It is my client’s view that this mode has not been sufficiently considered in terms of airport related car parking supply at London Gatwick Airport into the foreseeable future.
- 3.03 Dr Greg Marsden’s research concluded that restricting parking spaces, and raising charges at the same airport, was only likely to have a marginal effect on modal split, and if anything, adopting this strategy was likely to have a potentially significantly negative impact through additional miles travelled as a consequence of people accessing the airport by the “*kiss-and-fly*” mode. He concluded that far greater benefits were likely to accrue to the environment, congestion and safety if the double journeys generated by “*kiss-and-fly*” could be reduced, than could otherwise be made from small modal shifts to public transport usage, however desirable that may be.
- 3.04 The same “*kiss-and-fly*” and “*drop-off*” modes also have to be examined in the context that where no parking restrictions are in force in neighbouring residential streets, any subsequent increase in on-airport parking charges relating to the dropping off or picking up of passengers has the prospect of decanting cars, using neighbouring residential streets for the same purpose. This is an issue which has been singled out for specific mention by local residents as part of their relevant representations to the DCO application.

- 3.05 The management of passenger vehicle demand through the use of access and parking charges, whilst a key component associated with incentivising sustainable modes, vehicle choice and protecting surrounding communities; has the ability to give rise to unintended consequences in terms of fly-parking in surrounding residential streets, in order to avoid having to pay costly on-airport car parking charges. In this way, the pricing strategy adopted by the applicant towards all passenger car parking products is strongly correlated to the demand for on-airport passenger car parking, which cannot be divorced from the extent to which passengers would then rely on the least sustainable access modes to the same airport.
- 3.06 To the extent that all the proposed interventions and measures governing choice of access to London Gatwick Airport require funding to support their capital and operating costs, it is surprising that the DCO application has failed to assess the costs and benefits of each surface access intervention, if only to ensure investment decisions maximise the opportunity for reaching set targets, when measured against the choice of modal access share generally. In terms of airport related passenger car parking, this requires consideration to be given to the period of occupancy of the respective car parking space, and not simply account taken of the number of on-airport passenger car parking spaces.
- 3.07 Any aim of incentivising the use of cleaner green vehicles to access the airport as part of a move to zero emissions has an opportunity cost; with the passenger asking themselves the question of whether there are alternative, more reliable, cheaper options. This is an important consideration to those households confronting cost of living difficulties or other financial challenges.

4.00 THE SIGNIFICANCE TO BE ATTACHED TO TRANSPORTATION NETWORK COMPANIES (TNCs)

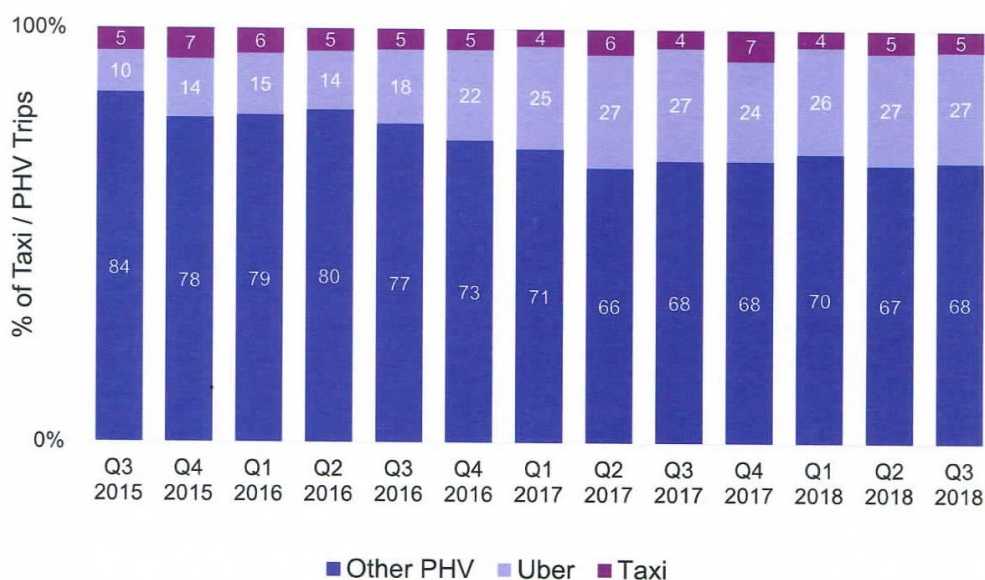
- 4.01 A further aspect of surface access provision to London Gatwick Airport which it is contended has not been afforded the necessary weight in the submission of the DCO application submitted on behalf of the Applicant concerns the rise in recent years of a number of technological platforms, which match drivers with car parking spaces through their websites and apps, representing part of what has been referred to as the “*sharing economy*”.⁵ It is operated in the same way that historically AirBnB has helped people

⁵ These ride-sharing/ride-hailing services such as Uber, Lyft and DiDi are sometimes referred to as TNCs

share their houses with holidaymakers, or Uber and Lyft have allowed drivers to share their cars with passengers.

4.02 TNCs comprise the first of a number of new mobility options which in time may include connected or autonomous vehicles (CAVs). TNCs generate substantially less revenue per passenger than on-airport parking, taxis and rental cars, effectively cutting the airport’s income. Research relating to New York’s three airports supports the view that TNCs have resulted in a sizeable reduction in on-airport car parking. The same situation is becoming evident at UK airports with their increasing impact gauged by Graphic 3.66 taken from the London Heathrow Surface Access Proposals dated June 2019:

Graphic 3.66: Taxi / PHV passenger share¹¹⁶



4.03 A number of benefits can be identified from TNCs which offer all the advantages of a traditional taxi service. These include:

- *Uber offers flexibility to drivers in controlling their level of income in accordance with their own working hours, with the driver being the boss.*
- *Uber offers flexibility to customers as they can use the application any time whenever they want to book a ride.*
- *Uber is generally secure for passengers making travelling comfortable and safe;*
- *Cost effectiveness. Uber journeys tend to be cheaper than traditional taxis in that they do not have a fixed pricing system. However, it is worth noting that Ubers rely on “surge*

pricing” which means that pricing either increases or decreases in accordance with demand and supply of customers.

4.04 The growth of TNCs means that passengers are effectively trading down from a higher trading product or taxi service, to a lower-revenue higher-volume TNC product, with potentially severe implications for airports, in that they face declining financial revenues as TNC usage increases. It is contended that airports must consider the role and impact of pricing as a demand management tool, for example, using pricing to reduce terminal kerbside congestion, directing private vehicles relating to the “*kiss-and-fly*” mode to different parking areas or encouraging mode share shifts through the provision of satellite facilities.

5.00 THE RISE IN TECHNOLOGICAL PLATFORMS

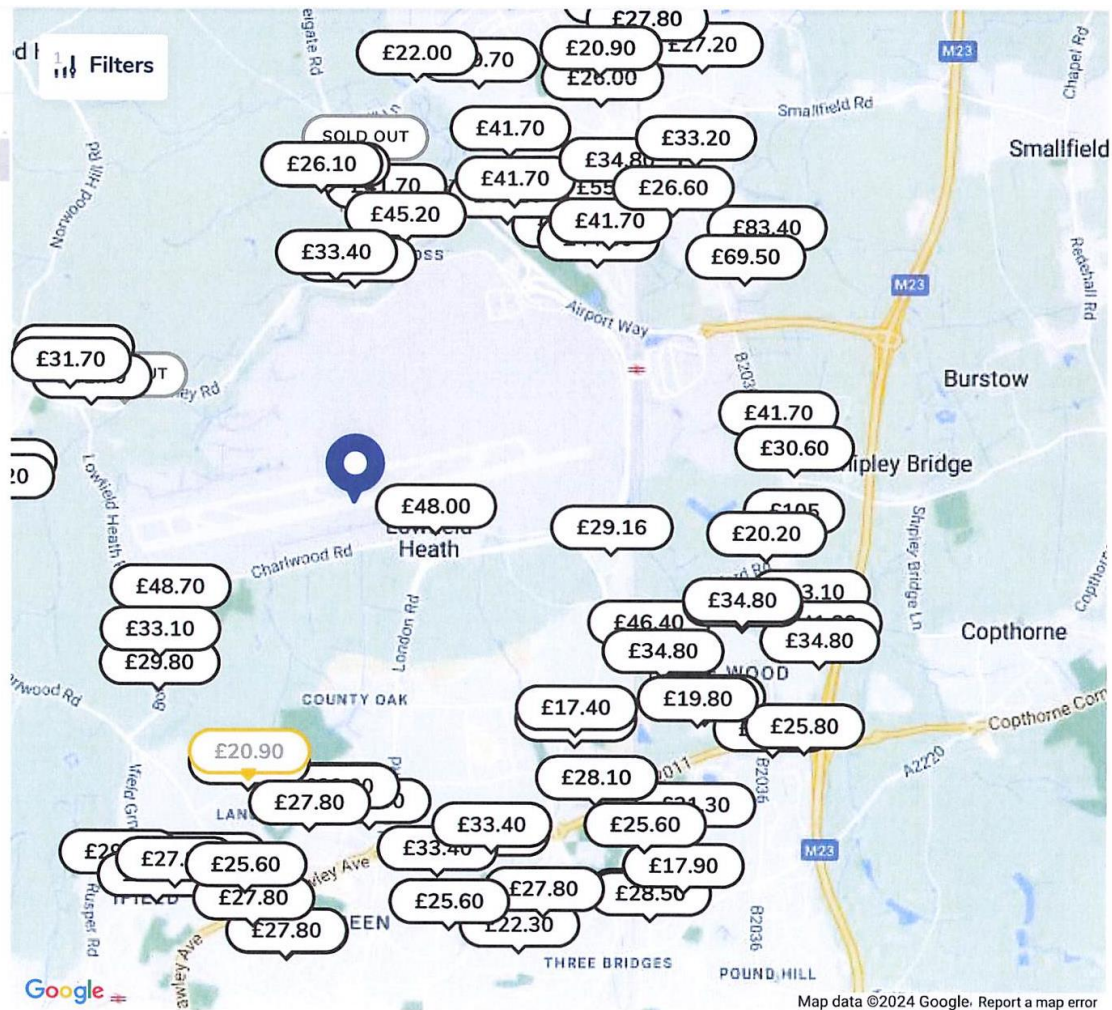
5.01 JustPark is one of a number of technological platforms which has as its mission to transform the way drivers look for parking spaces, whilst delivering cash to homeowners who rent out their driveways, enabling other business such as hotels to maximise their income from airport related car parking. The company has claimed that over 23% of car journeys involve some kind of parking pain – that is 190 million trips per month, with drivers suffering from both uncertainty (availability, prices, restrictions, etc) and inconvenience (full car parks, slow payments, fines) on a daily basis.

5.02 JustPark is a major player in all forms of parking provision, leading a £50 billion industry into the digital age. It operates in the airport related car parking market, and has as its remit, amongst other factors, assisting hotels to maximise their revenue from their parking spaces by “*driving new customers to your car park and optimising your yield through dynamic prices.*” It operates for over 300 hotels in the UK, including the Marriott, Hilton, Premier Inn and Holiday Inn, managing their car parks more effectively, resulting in a 20% increase in parking revenue and a 96% customer satisfaction.

5.03 JustPark operates in the airport-related car parking market, and to appreciate the significance of this mode an exercise was undertaken searching for available car parking spaces within the immediate vicinity of London Gatwick Airport. These car parking spaces were primarily on the private driveways of individual residential properties lying in close proximity to the airport, with the parking space required from 0400 hrs on 15th

March 2024 to catch an early morning flight, returning on at 2200 hrs on Monday 19th March 2024, leaving the vehicle at the same address.

- 5.04 I have reproduced below an extract from the Justpark Gatwick Airport website indicating the availability and cost of a car parking space over the duration sought, from which there were 251 available addresses, ranging in price from £17.40 to £105.



- 5.05 I have previously indicated that London Gatwick Airport’s pricing strategy has resulted in unintended consequences, with the cost of mid and long stay on-airport passenger products, resulting in either parking on surrounding residential streets or passengers relying on the least sustainable mode to access the airport. The same conclusion is equally applicable in the event that GAL rely on pricing strategies to influence trips made by taxi and minicab by passengers both arriving and departing London Gatwick Airport.

5.06 An assessment of responses to airport related passenger car parking on the driveways of residential properties close to the airport involving one technological platform JustPark, reveals that in a number of cases the passenger either walked, or was driven to the airport by the property owner, or ordered a taxi/Uber to transport the customer either to or from the two terminals to the residential address where their car was kept for the duration of the passenger's visit.

5.07 It follows that whilst the need to ensure that journeys made to and from the airport by taxi/minicab are efficiently organised in the sense of the taxi/minicab not remaining empty on a return trip for understandable sustainability reasons; the same process also results in unintended consequences for London Gatwick Airport. Firstly, this process results in a loss of revenue to the airport as a consequence of passengers parking their vehicles on the driveways of properties in surrounding residential areas at considerably cheaper rates than that offered on-airport. Secondly, it assists those passengers who wish to rely on technological platforms such as JustPark to park their car on the driveways of residential properties, in the knowledge that the airport will be encouraging taxis/Ubbers not to leave the airport without passengers. Thirdly, it actively encourages trips to and from the airport by taxi/Uber, with resultant consequences for congestion, carbon emissions and air quality considerations.

6.00 AIRPORT PASSENGER CATCHMENT AREAS

6.01 Passenger catchment areas and route overlaps are often not afforded the weight they deserve by transport planners; their importance being highlighted in paragraph 4.37 taken from the CAA final report entitled "*Review of Market Conditions for Surface Access at UK Airports*" (CAP 1473):

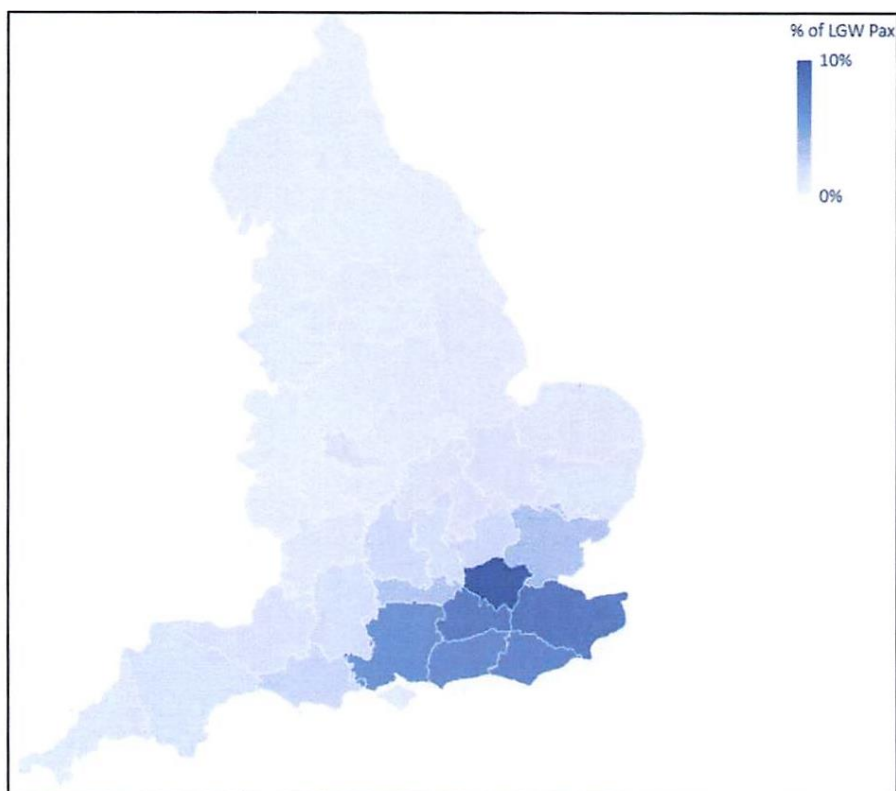
"4.37 Gatwick Airport stated that our catchment area analysis for airports verified that the overlaps are very large based on actual usage (with the potential overlaps based on travel times being even more significant):

- *34 percent of Gatwick Airport's passengers are drawn from districts that are in the catchments of all four of the largest London airports;*
- *12 per cent from districts that are in the catchment for Heathrow and either Stansted or Luton airports;*
- *18 per cent from districts where Gatwick overlaps with Heathrow airport only;*
- *22 per cent of Gatwick airport's passengers are from outside of Gatwick airport's catchment area; and*

- *13 per cent of Gatwick airport's passengers being drawn from districts where there is no overlap with another airport."*

6.02 The ability and willingness of passengers to switch airports to suit their particular preferences, based for example on preferred flight departure and arrival times, depends in part on the extent to which the customer regards services at a particular airport as reasonably close substitutes, along with the cost faced in switching demand to the best alternative.

6.03 Figure 4.1-8 found on page 4-26 of **Document APP 250** reveals the passenger catchment areas of London Gatwick Airport measured by the percentage of Gatwick passengers by Counties, and provides in diagrammatic form information provided by CAA survey data, revealing that 81% of Gatwick's terminating passengers, (i.e. excluding transfer passengers) were travelling to/from destination in London or the South East. Greater London is the largest source market amounting to approximately 42%, with Kent, Surrey and Sussex accounting for a further 27%.

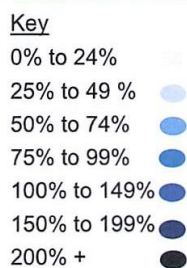
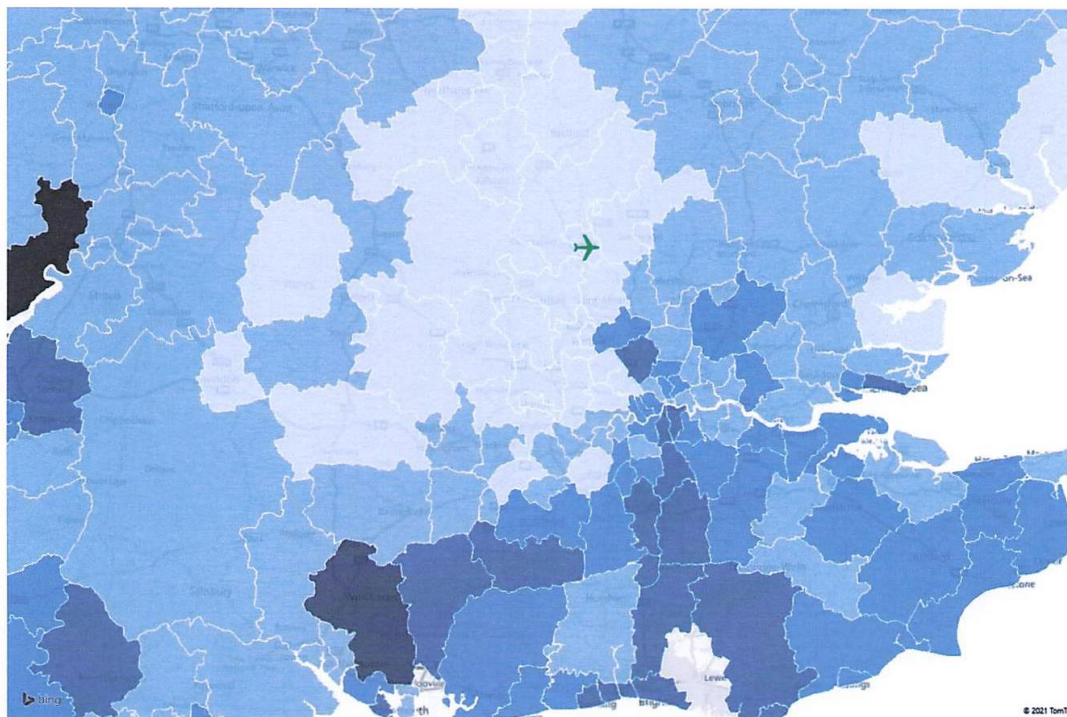


Source: CAA Survey

6.04 These Counties reflect the fastest growing markets have future implications for surface access in terms of the expansion of London's five principal airports. It is contended the

catchment area of London's respective airports will also change through more recent improvements to accessibility, especially that provided by Govia Thameslink in which through services are provided from Brighton to Bedford.

6.05 Luton Rising's DCO application promotes an increase in passenger throughput at London Luton Airport to 32mppa by 2043. It expects to expand its catchment area particularly to the south, from which passengers will be drawn over time, reflecting greater attractiveness in terms of its range of services. This is consistent with the map outlining passenger growth between 2018 and 2050 based on local authority boundaries comprising part of its core planning case, which includes the provision of a third runway at London Heathrow Airport.



Source: York Aviation

6.06 Figure 6.6 above taken from the Luton Rising's recent DCO Needs Case, reveals those darker shaded authorities representing the faster growing sources of demand. What this

diagram shows is the increasing choice of airport available to passengers living in Greater London and the South East region, and as a consequence the enhanced competition between airports in the same area, especially seen in the context of any airport slot allocation reforms, at a time when the current slot allocation system struggles to meet increased demand.

6.07 With the above considerations in mind, it is contended that passenger profiling techniques should have been explored as part of the current DCO application, in order to understand anticipated changes in customer behaviour. Customer profiling in this context means not only assessing the popularity of certain destinations, flying frequencies, trip duration and trip frequencies as part of a wider understanding of the cyclicity of passenger parking demand throughout the year; but also extends to demand management measures. The demand management measures include sensitivity testing particularly regarding the extent to which variations in access charges for taxis/mini cabs, “*kiss-and-fly*” modes and on-airport passenger car parking is likely to influence modal share to the airport, especially at peak flight arrival and departure periods.

7.00 AIRPORT SLOT ALLOCATION SYSTEM

7.01 An airport slot is the permission given to an airline operator to use the full range of airport infrastructure (runway, terminal, gates, etc) at a specific date and time for landing or take-off at an airport. The number of slots available at an airport are intrinsically linked to the airport’s infrastructure capacity and the number of flights that can operate from it. Slots are allocated in series, i.e. sequences of at least five slots at the same time on the same day of the week, which are distributed regularly in the same scheduling season. This means the slot series would, for example, be a 0915 departure slot over at least five consecutive Mondays in the summer season.

7.02 Airports are divided into three categories, with London Gatwick Airport being a Level 3 Coordinated Airport. This means that it comprises an airport where capacity providers have not developed sufficient infrastructure, or where Governments have imposed conditions that make it impossible to meet demand. An independent coordinator (Airport Coordination Ltd - ACL) is appointed to allocate slots to airlines and other aircraft operators using or planning to use the airport as a means of managing the airport’s declared slot capacity.

- 7.03 Current legislation on slot allocation is set out in Regulation (EEC) No. 95/93 which was amended and retained in UK law following the UK's departure from the EU. This is supplemented by the Worldwide Airport Slot Guidelines (WASG) which are maintained by the Worldwide Airport Slot Board (WASB). The WASB provides guidance on slot scheduling and seeks to achieve consistency in approach taken by slot coordinators internationally. Coordinators must allocate and monitor slots in a mutual, transparent and non-discriminatory way, with the WASG setting out primary and secondary criteria which are followed by coordinators when allocating slots for passenger and cargo flights.
- 7.04 The primary criteria set out in the Regulations require that slots are first allocated given precedence to historic slots, referred to as "*Historic Rights*" or "*Grandfather Rights*". To retain slots under these rights, airlines must fly at least 80% of each series of slots during a season. This is known as the "*80:20*" or "*use it or lose it*" rule, meaning that as long as airlines continue to maintain 80% and above usage of their slots each year, they maintain their Historic Rights and retain that series of slots in perpetuity.
- 7.05 Once slots have been allocated based on historic rights, the remaining slots are placed in a pool and the slot coordinator, ACL, allocates them based on additional secondary criteria set out in the WASG and reflecting factors such as connectivity, competition and operational considerations.
- 7.06 When the regulation and slot allocation process based on primary and secondary criteria were first introduced, airline demand for slots was below the available capacity of airports across the UK. Airport growth created opportunities for new airlines, destinations and routes to become available for businesses and passengers. However, growth has meant that airport capacity and with it, slot capacity, has become more congested, making it increasingly challenging for new airlines to obtain slots at the busiest airports. It has meant that slots at London Gatwick Airport have become increasingly allocated on the basis of the primary criteria of Historic Rights, with approximately 98% of slots at London Gatwick Airport based on Historic Rights.
- 7.07 The allocation of slots based on Historic Rights have provided airlines, businesses and consumers with a degree of reliability and consistency, enabling new routes to be started, particularly as airlines require confidence to make investments. These benefits in terms of delivering economies of scale and feeder services to long haul airlines and hence

improved connectivity also have to be seen in the context of inhibiting competition, resulting in fewer opportunities for airlines to commence services at London Gatwick Airport. In this context, fewer opportunities for new airlines mean limited choice and connectivity for businesses and passengers.

7.08 This situation has resulted in the Department for Transport embarking on a consultation in December of last year on proposals to reform the airport slot allocation system, being the continuation of a process which commenced in 2015 with the Independent Airports Commission, extending through into the document “*Aviation 2050: the Future of Aviation*” in which it was suggested that the existing slot allocation system might not promote fair and competitive growth or deliver the best consumer outcomes, where significant new slot capacity is released at a severely congested airport.

7.09 The Applicant in their DCO application has not considered the consequences of a reform to the airport slot allocation system, including what that may mean in terms of the introduction of new airlines, increases in connectivity, improved feeder services and hence increased attractiveness for all categories of passengers using London Gatwick Airport; a matter having an potentially profound impact on surface access considerations.

8.00 THE RELATIONSHIP BETWEEN ON-AIRPORT HOTELS AND ON-AIRPORT PASSENGER CAR PARKING PROVISION

8.01 It is contended that both existing and future car parking provision associated with off-airport hotels found in close proximity to London Gatwick Airport cannot be adequately accommodated on-airport. This is due to the Applicant needing to satisfy all other passenger car parking products, including the needs of airport staff and the various special offers which GAL promotes to the local community. The latter have been referred to as “*Residents Discounted Car Parking Scheme*”, allowing persons to accompany “*their friends and loved ones to the airport and see them off and collect them with no extra hassle of parking fees.*” The same parking product encompasses what is referred to as “*short stay evening special transactions*” in which a 50% reduction on the standard price is available, for example, to those wishing to travel to London to visit the theatre or friends.⁶

⁶ The special offers promoted by GAL are set out in the presentation to the Gatwick Airport Consultative Committee held on 26th January 2017 under the title “*Car Parking Update*”.

8.02 Application No. CR/2010/0692/FUL granted a change of use of Longbridge House, a former office building, to a hotel along with the construction of two further floors and changes to the external appearance of the building, with the hotel being opened in early 2014. A total of 60 car parking spaces to serve 192 rooms associated with the same hotel were provided on land known as Car Park M, which at that time was being used for airport staff car parking purposes. Condition No. attached to Application No. CR/2010/0692/FUL along with the reason for its imposition are set out below:

“3. The Hotel shall not be occupied until the parking spaces shown on the submitted plans have been provided and constructed. The areas of land so provided shall not thereafter be used for any purpose other than the parking of customers’ vehicles.”

The reason for imposing this condition read as follows:

“To ensure that adequate and satisfactory provision is made for the accommodation of vehicles clear of the highways in accordance with Policy GD3 of the Crawley Borough Local Plan 2000.”

8.03 A subsequent application Reference No. CR/2020/0707/NCC was made pursuant to Section 73 of the Town & Country Planning Act 1990 (As Amended) seeking permission to allow the continued operation of the hotel without complying with Condition No. 3 attached to the original planning permission Reference No. CR/2010/0692/FUL. One of the key factors advanced on behalf of the Applicant, GAL to justify an absence of any dedicated car parking associated with the Hampton by Hilton Hotel was as follows:

“The Hilton by Hampton Hotel would not be alone in not having any designated parking. The 245-bedroom Bloc Hotel at South Terminal (permitted in 2012) has no parking. Nor has any parking been required as part of a recent (2019) permission for its extension. The 46 room “Yotel” at South Terminal similarly has no car parking”.

8.04 The justification set out in the Case Officer’s Report for granting permission removing Condition No. 3 attached to Application No. CR/2010/0962/FUL stated:

“The principal concern with the removal of this condition is that if the hotel has no parking then it won’t be able to meet its own operational requirements and that this in turn would adversely impact upon the operation of the roads around the airport. This in turn could result in parking in places that could affect highway safety or result in congestion.

GAL has stated that it would provide 60 parking spaces within its existing car-parks for use by hotel visitors. This would however be outside the red-line of the application site and so would therefore be difficult to control through the planning process. The removal of this condition would therefore effectively result in GAL controlling the parking for the hotel as their public car-parks would be available in close proximity to be used by visitors. The application is therefore being considered on the basis that no specific parking will be provided for the hotel.

It is recognised that the hotel is located immediately adjacent to the North Terminal with its existing multi storey car-parks and drop off and pick up points. It is therefore considered that visitors to the hotel arriving by car can still be dropped off close to the hotel at locations already provided for these purposes, and specifically provided for all visitors to the airport and its associated uses such as the on airport hotels.

It is recognised that whilst North Terminal is not quite as easy to access by public transport as the South Terminal, (where the railway station and main area of bus stops are located), the provision of the internal rapid transit system however results in there being good access to public transport for both South and North Terminals. It is therefore considered that Gatwick Airport, and this hotel within its boundary is a relatively sustainable location.

The airport already provides approximately 40,000 on airport car-parking spaces for visitors, for both long and short term stays. There are also significant numbers of off airport car-parking spaces available. It is therefore considered that the existing stock of off and on airport car-parking spaces available could accommodate both the short and long term requirements of passengers using this 192 space hotel.

The roads around Gatwick Airport are subject to extensive controls to ensure that there is no unauthorised parking, and there are also controls on the major access roads/dual carriageways/M23 restricting parking. The closest on street parking is therefore outside the airport (and Crawley Borough) boundary in Horley to the north-east and Hookwood /Povey Cross to the north. Given the overall scale of parking, and parking provision at Gatwick Airport, and the services available to hotel users, it is not considered that removing the 60 spaces from this hotel, in the context of approx. 60,000 predominantly on and also off airport car-parking spaces already being available, would be likely to result in increased pressure on these neighbouring areas."

- 8.05 It can be seen from the Case Officer's Report that the 60 on-airport car parking spaces to meet the needs of the hotel guests associated with the Hampton by Hilton Hotel, previously provided on Staff Car Park M, were to be relocated on existing on-airport car parks.

- 8.06 The Gatwick Airport DCO application reveals that additional on-airport passenger car parking capacity is to be provided in the absence of “*The Project*” in the future baseline scenario. Paragraph 3.6.70 of Chapter 3: “*Alternatives Considered*” comprising **Document APP 028** reveals that one of the areas planned for additional passenger car parking provision is Multi-Storey Car Park 7 (MSCP 7) situated at the North Terminal where an additional 3,250 spaces are to be provided. MSCP 7 is to be constructed on same land where Staff Car Park M is situated. During the construction of MSCP 7 it is understood GAL will be making provision in either of the two existing multi storey car parks at the North Terminal, that is MSCP5 or MSCP 6 for the Hampton by Hilton Hotel’s clients’ use.
- 8.07 The intention in this respect is to remove the 60 spaces previously comprising part of Staff Car Park M, which in accordance with Table 4.2.2 found on page 4-6 of **Document APP 029** accommodates a total of 463 spaces, in order to construct MSCP7. The construction of MSCP 7 not only removes the 60 spaces associated with the Hampton by Hilton Hotel, being included within the total of the 463 spaces previously comprising Staff Car Park M, but no indication is provided where these staff car parking spaces are to be reallocated on-airport.
- 8.08 To these considerations relating to car parking provision associated with the Hampton by Hilton Hotel, reference should also be made to Application No. CR/2019/0802/FUL which sought permission for a further net 288 rooms as part of an extension to the existing 4-storey 245-room BLOC Hotel situated on the roof of the South Terminal building. The principal purpose of this hotel extension was to provide overnight accommodation for passenger who had book flights at the airport.
- 8.09 The planning statement in respect of Application No. CR/2020/0707/NCC submitted on behalf of GAL reveals that the BLOC Hotel has no designated on-airport car parking provision. It was asserted in the planning statement relating to the same application that having no designated car parking spaces would encourage the use of public transport by hotel guests and staff, although there was a singular lack of evidence to justify the same contention. Equally important, there was no support for the claim made by Arup in the submitted Transport Statement relating to the same application that hotel passengers would be able to park elsewhere on- airport, viz:

“The hotel has 14 spaces for staff use; these are located in the main staff car parks. Hotel guests can use the variety of existing car parks located around the airport. The hotel offers guests a discounted rate for Gatwick Airport Valet parking which is located in the South Terminal short-stay car park.

Blue badge bays are provided in both the long and short stay car parks at the South Terminal. BLOC is within walking distance from the South Terminal short stay car parks. Passengers parking in long stay car parks can use the frequent shuttle buses to get to the terminal ...

Gatwick has increased the supply of parking spaces in recent years, in line with demand, and will continue to do so.”

- 8.10 It is worth recording that planning permission has been granted for the construction of a multi-storey car park at the London Gatwick Airport Hilton Hotel (Reference No. CR/2018/0337/OUT in which the following comments were made in planning statement:-

“6.7 As detailed more particularly within the submitted Transport Statement, there is an acknowledged shortfall in passenger car parking at Gatwick Airport, with high parking charges in comparison to many other airports and large numbers of airline passengers using the many off-airport car parks, often many miles from the airport. Accordingly, the provision of additional car parking at the Hilton Hotel would directly boost the provision of airport related car parking within Gatwick Airport in accordance with long-established planning policy. Indeed, the ability to park at a terminal hotel such as the Hilton avoids the need for hotel guests flying from Gatwick to drive their cars to the long-stay airport car parks (returning on the car park shuttle buses), or using meet-and-greet valet services to do this. This is a significant benefit for hotel guests and also avoids additional trips between the hotel and airport car parks.”

- 8.11 In the submitted Transport Statement relating to the same application, the contents of paragraphs 1.10, 4.1 and 4.2 are also noteworthy:

“1.10 These additional spaces are required in order to help the hotel operate more efficiently in terms of car parking with the current significant reliance on the use of other on-airport or off-airport parking (including third party valet parking). The additional parking will also allow the hotel to better provide for car parking associated with functions at the hotel, particularly conferences and meetings (up to 400 delegates). The additional parking will also bring the parking provision in line with the Council’s current parking standards.

4.1 As previously mentioned, it is envisaged that the net increase of 839 car parking spaces will actually result in a reduction in traffic on the road network. The provision of additional parking at the hotel will release other on-airport parking spaces. GAL are already planning to further increase on-airport car parking in order to meet growth in demand and growth at the airport with the

aim of reducing off-airport parking. The new spaces will mean that there will be less demand and need to construct other on-airport parking. The overall increase in parking provision should actually reduce vehicle trips to the airport by reducing the “kiss and fly” trips which result in twice as many journeys compared with on-airport parking. Airline passengers parking at the airport generates a total of 2 trips (1 to and 1 from the airport) and this will generally replace kiss and fly where taxis or friends or family drop-off the passenger(s) for the departing flight and then return to pick them up from their return flight, resulting in a total of 4 trips to and from the airport.

4.2 While the overall number of vehicle trips to the airport will be reduced by the overall increase in the number of on-airport car parking spaces (or potentially a decrease in off-airport parking), it is acknowledged that many of the hotel guests are already parking at other on and off-airport car parks, and therefore the reduction in vehicle trips to the actual hotel by guests will only be marginal. There will be some additional reduction in local trips from a reduced volume of valet parking which would no longer be required.”

- 8.12 It is pertinent to set out how GAL viewed the proposed Hilton Hotel multi storey car park proposals in their consultation response of 9th August 2018 to Application No. CR/2018/0337/OUT:-

“... Whilst the proposed development is within the airport boundary, GAL do wish to clarify that the application is for car parking for Hilton Hotel guests only. It should not be regarded as part of GAL’s supply airport car parking to meet the needs of passengers using the airport. GAL is to meet growing demand for airport car parking on its own land. GAL has plans in place to continue to meet planned incremental increased parking demand arising from projected passenger growth over the next 5 years. We do not agree with the statement in the planning statement accompanying the application that “there is an acknowledged shortfall in passenger car parking with high parking charges in comparison to many other airports”, or that “the provision of additional car parking at the Hilton Hotel would directly boost the provision of airport related car parking within Gatwick airport in accordance with long established planning policy.” We do acknowledge that the provision of additional parking at the Hilton for its guests may avoid the need for hotel guests flying from Gatwick to drive their cars to the long stay airport car parks, or to utilise the MSCP 1 or 2, and thus may free up spaces and indirectly contribute to the overall parking capacity at the airport.”

- 8.13 Application No. CR/2018/0337/OUT was granted outline planning permission at the Council’s Planning Committee meeting of 27th August 2019 at which time the Case Officer’s Report stated:

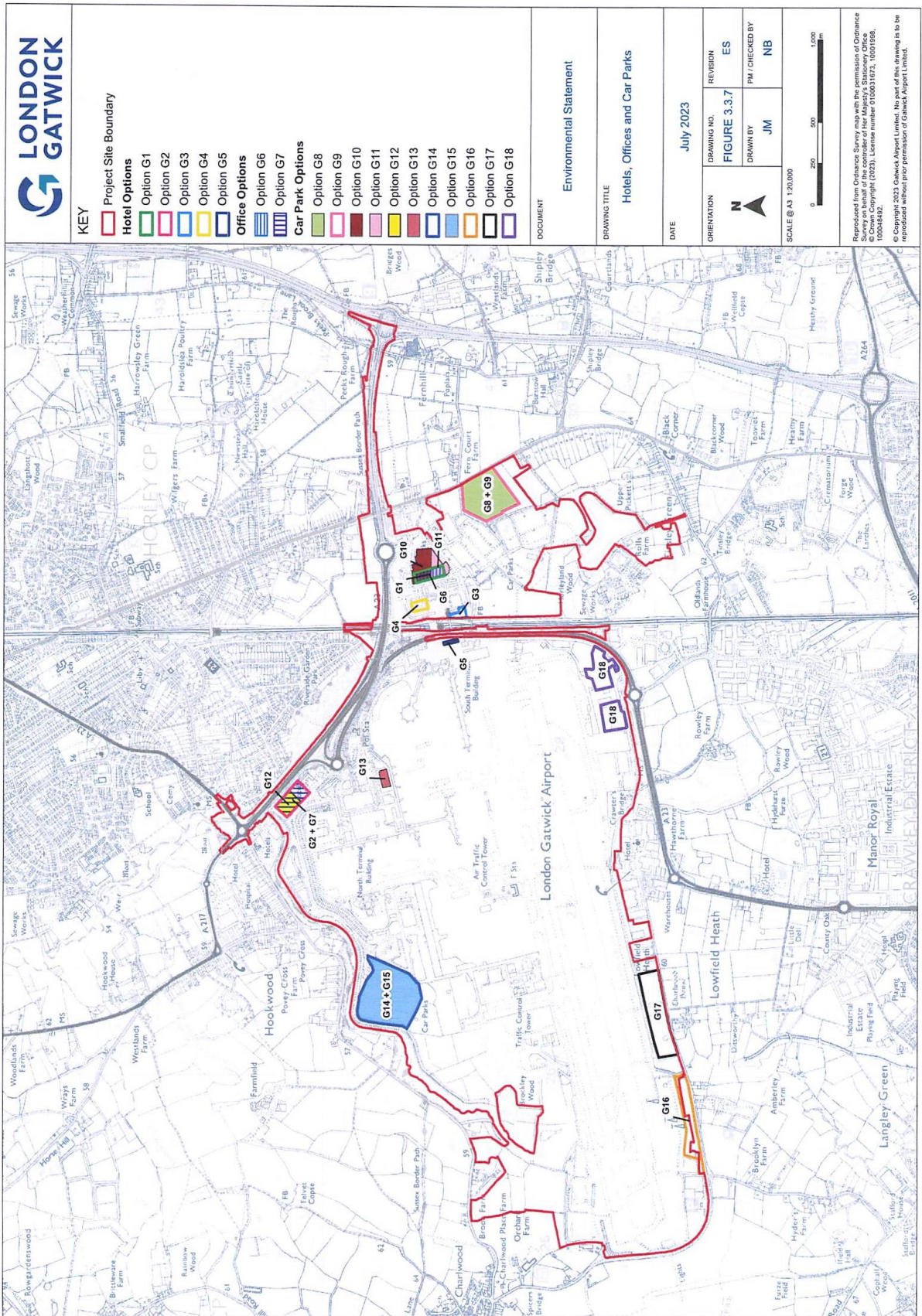
“5.32 Whilst a reduction in kiss and fly as a result of the proposal is not clearly evidenced by the applicant, the contribution to parking capacity on-airport as passenger numbers increase provides the option of parking adjacent to the hotel/terminal rather than using kiss and fly or less sustainable locations off-

airport. It is therefore considered in this regard that the proposal could help to discourage kiss and fly.

5.33 The number of trips per hotel guest could also decrease as guests would be parking at the hotel rather than at other long stay locations further away which would involve either longer trips, more trips and/or the use of shuttle buses which add to road traffic. However, the proposal would potentially free up spaces elsewhere on-airport and it is likely that those spaces would then be filled up to meet demand as passenger numbers increase. The proposed development would therefore indirectly increase the number of trips overall at the airport but at the same time reduce the number and length of trips per hotel guest. On balance it is considered that an increased number of trips at the airport but fewer trips per hotel guest and implementation of a travel plan would be likely to have an acceptable impact in terms of increased traffic congestion and it would therefore be in accordance with Local Plan Policy IN3 in this regard. "

8.14 The Applicant's DCO application contains four separate locations forming part of the preferred options for hotel development on land at the South Terminal, to comprise in total 1,250 additional on-airport bedrooms. Two of the preferred locations in the DCO application are commensurate with proposals in the earlier Summer 2022 consultation exercise, with one of the current four locations not forming part of the Summer 2022 consultation. The four locations are as follows and should be assessed in conjunction with Figure 3.3.7 taken from **Document APP 049**, set out overleaf.

- A new hotel on existing Car Park H comprising up to 400 bedrooms known as Option G1 on Figure 3.3.7 comprising part of **Document APP 049** to form part of a mixed-use development on the same land where a multi storey car park is also proposed to be sited catering for 3,700 spaces, along with office accommodation to include an addition 350 sq.m. to replace office floorspace lost through the conversion of Destinations Place to a hotel. This preferred option involves the loss of car parking which is expected to be provided elsewhere within the airport boundary.
- A new hotel on the former car rental site comprising up to 200 bedrooms known as Option G3 on Figure 3.3.7 comprising part of **Document APP 049**. This site is located within a flood plain, meaning that this option is not deemed fully compliant with policy. Its deliverability will be affected by the proximity to the South Coast Mainline railway between London and Brighton. No comments are raised on the relocation of the former rental car parking facility.



- A new hotel adjacent to and north of Multi-Storey Car Park 3 (MSCP3) known as Option G4 on Figure 3.3.7 comprising part of **Document APP 049** accommodating up to 400 bedrooms. This site comprises an existing surface car park with it is said minimal flood risk, although the DCO application confirms further exploration of this factor is required.
- A new hotel involving the conversion of Destination Place being an existing office building known as Option G5 on Figure 3.3.7 comprising part of **Document APP 049** and catering for approximately 250 bedrooms. The Applicant states that GAL will need to demonstrate the loss of office space which is not considered to be detrimental.

8.15 The following conclusions emerge from recent applications relating to the requirement for dedicated car parking spaces to serve existing on-airport hotel accommodation. The same conclusions are equally applicable when considering future on-airport hotel accommodation in circumstances where there is an absence of any dedicated car parking spaces being provided:

- A.** Firstly, there have been recent cases in which on-airport hotel applications have provided no dedicated car parking spaces, or where car parking spaces previously provided as part of a staff car park have been lost. The justification for taking this action is contradictory, in that on the one hand it is stated that it will encourage hotel guests to use more sustainable modes of access to the airport; and on the other, it is stated that hotel guests will simply have access to existing on-airport passenger car parks. In other cases, dedicated car parking spaces to service the needs of a hotel have been provided, ostensibly on the basis that it would release existing on-airport car parking spaces for passengers, reduce “*kiss-and-fly*” trips, and/or remove the need for trips to off-airport car parks. It therefore can be seen that there is a lack of consistency when contemplating dedicated car parking spaces to meet on-airport hotel provision.
- B.** Secondly, in circumstances where there is an absence of dedicated car parking for both existing and future on-airport hotel developments will mean passengers having to use existing on-airport passenger car parks, resulting in increased pressure being placed on available on-airport car parking provision for

passengers. No studies have been undertaken by the Applicant which consider the impact of using on-airport passenger car parking spaces to meet the needs of on-airport hotels.

- C. Thirdly, the absence of dedicated car parking provision associated with both existing and future on-airport hotel developments has the propensity to encourage the least sustainable modes of access to the airport, namely “*drop-off*” and “*kiss-and-fly*”. There have been no studies carried out by the Applicant of the relationship between future on-airport hotel car parking supply, and “*drop-off*” and “*kiss-and-fly*” modes.
- D. Fourthly, the absence of any dedicated on-airport car parking spaces for existing as well as future on-airport hotel accommodation has the propensity for passengers to use either long term off-airport car parking, if only because it is less expensive than on-airport car parking, or alternatively, rely on fly parking in surrounding residential streets. This issue has not been assessed as part of the DCO application.

9.00 FUTURE ON-AIRPORT CAR PARKING PROVISION

9.01 No information has been provided on the selected methodology in calculating the levels of future short, mid and long term passenger car parking, along with staff car parking, over the duration of the DCO application to meet a throughput of 80.2mppa. It appears that the exercise conducted by the Applicant has been simply to replace existing passenger car parking provision lost through other developments required in association with “*The Project*”, with new multi-storey car parks. In contrast, individual methodologies have been employed in the expansion of other airports, taking into account daily and peak hour traffic flows; airport surface access peak hour traffic flows; peak network demand relying on the busy hour; car occupancy factors; origin/destination of passenger trips, and passenger profiling considerations, amongst other parameters, to explain and justify levels of forecast on-airport passenger demand.

9.02 Holiday Extras Ltd agree with the views expressed by the Gatwick Airport Consultative Committee (GATCOM) over the need to ensure there is sufficient on-airport passenger

car parking provision to accommodate those who choose to travel by car to the airport, or where there are no suitable alternative sustainable transport modes.

9.03 GAL at the recent Examination in Public into the emerging Crawley Borough Local Plan 2024-2040 challenged the removal of 44ha of safeguarded land to accommodate a strategic employment site known as Gatwick Green. This was on the basis that the area, comprising part of safeguarded land, was required to accommodate 95,750 car parking spaces in conjunction with a separate additional wide-spaced runway, to meet a throughput of 95mppa, capable of being delivered in approximately 10 years from the commencement of the planning process. The Applicant's objections were not sufficient to persuade the LPA from continuing to support the Gatwick Green strategic employment allocation in its recently published Main Modifications to the same emerging Local Plan.

9.04 The Applicant's position in respect of the current DCO application is that 10,005 car parking spaces are required to meet the anticipated throughput of 80.2mppa by 2047; 8,905 of which are stated to be purely replacement spaces for those already in existence at the airport due to various developments associated with "The Project". As a consequence only 1,100 additional on-airport passenger car parking spaces are expected to be provided over the entire duration of the DCO. This figure is considered by my clients to be insufficient to meet a throughput of 80.2mppa.

9.05 Paragraph 3.6.70 of Chapter 3: Alternatives (**Document APP 028**) provides details of additional on-airport passenger car parking capacity in the absence of "The Project".

- *Reconfiguration of the existing Hilton Hotel to provide 50 additional bedrooms and 820 parking spaces*
- *Multi Storey Car Park 7 (MSCP7) (North Terminal – 3,250 additional spaces)*
- *Use of Robotics technology within existing long stay car parking areas to increase capacity, resulting in an addition 2,500 spaces.*

9.06 In a similar way, paragraph 5.2.3 of Chapter 5: Project Design (**Document APP 030**) sets out the proposed additional passenger car parking comprising part of "The Project" :

- *North Terminal Long Stay Decked Parking (the footprint of which is recorded at 7.9ha at a maximum height above ground level of 11m) (estimated 1,680 spaces).*

- *Car Park J Multi Storey (the footprint of which is recorded at 1ha at a maximum height above ground level of 27m) (estimated 890 spaces)*
- *Car Park Y Multi Storey ((the footprint of which is recorded at 1.9ha at a maximum height above ground level of 27m) (estimated 3,035 spaces)*
- *Car Park H Multi Storey (the footprint of which is recorded at 1.5ha at a maximum height above ground level of 27m) (estimated 3,700 spaces)*
- *At the Existing GAL Purple Parking Valet site the footprint of which is recorded at 2.9ha at surface level only) (estimated 700 spaces)*

9.07 It can be seen that the total proposed additional on-airport passenger car parking comprising part of “*The Project*” encompasses 15.2ha of land, accommodating 10.005 estimated car parking spaces.

I. The Need for a Replacement Table 5.2.4 Comprising Part of Document APP 030

9.08 Holiday Extras Limited raised representations to an equivalent Table 3.1 set out in the Summer 2022 Consultation Document “*Our Northern Runway: Making Better Use of Gatwick – Highway Improvement Changes and Project Update Impact*” on the basis it was considered incorrect and misleading.

9.09 It remains my client’s view that the details which have now been set out in Table 5.2.4 of **Document APP 030** are equally confusing, unclear and in certain cases incorrect, with the only exception to this criticism being the explanation being afforded in relation to Purple Parking and the displacement of spaces on Car Park X referred to in paragraphs 5.2.86 to 5.2.88 of **Document APP 030**.

9.10 It has been noted Action Point 7 arising from the Issue Specific Hearing 2: Control Documents/The Development Consent Order held on 1st March 2024 requires the Applicant is to consider whether the maximum number of car parking spaces for each car park should be specified at the Deadline 1 stage.

9.11 It is my client’s firm opinion that what is required is a replacement table for that set out in Table 5.2.4 of **Document APP 030** which should have as its basis all those car parks comprising Table 4.2.2 Existing Car Parks found at page 4-5 of **Document APP 029**. The replacement table should include not only all those existing car parks set out in Table 4.2.2, but also incorporate those locations comprising the future baseline scenario in the

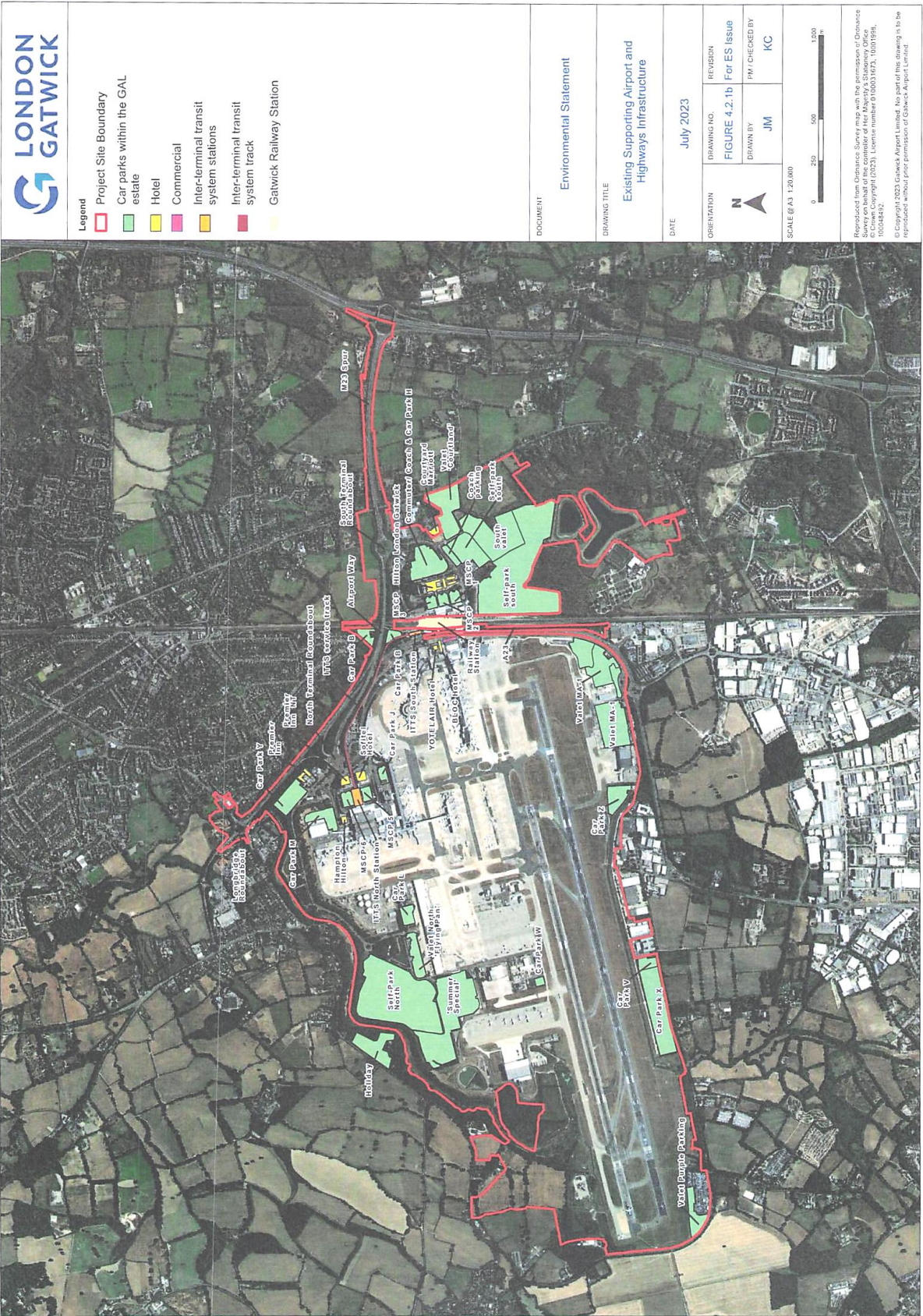
absence of “*The Project*”, along with the five locations set out under the “*With Project*” scenario set out in Table 5.2.3, indicated in **Document APP 030**. In addition, a further diagram should be produced revealing all those existing car parks whether in use by staff, passengers or by hotels, at the same time outlining the various zones in the North and South Terminal areas in the same way as depicted on the following page.

- 9.12 The replacement table should include three separate columns for each on-airport car park, which should indicate i) the number of existing passenger and/or staff car parking spaces to be retained as part of the DCO application; ii) the number of new passenger and/or staff car parking spaces to be provided as part of the DCO application; and iii) the resultant number of displaced passenger and/or staff car parking spaces, as a consequence of other forms of development comprising an integral part of the same DCO application.

II. On-Airport Car Parking Provision under the Future Baseline Scenario in the Absence of “*The Project*”

A. Reconfiguration of the Existing Hilton Hotel to Provide 50 Additional Rooms and 820 Parking Spaces

- 9.13 The existing Hilton Hotel forming part of Future Baseline Scenario in the absence of “*the Project*”, was granted planning permission by Crawley Borough Council under Reference No. CR/2018/0337/OUT for the erection of a multi storey car park, in which all reserved matters were considered at the outline stage, with the exception of landscaping. Reserved matters for the landscaping were subsequently approved under Application No. CR/2019/0885/ARM. A subsequent application Reference No. CR/2020/0575/NCC was granted planning permission for variation/removal of Condition 3 (approved plans) and Condition 9 (amended building height) pursuant to Application No. CR/2018/0337/OUT.
- 9.14 The original 2018 outline application granted planning permission for 831 new car parking spaces, which along with undercroft parking, resulted in 874 car parking spaces including 62 disabled spaces, no electric vehicle spaces, 73 motor cycle spaces and 22 cycle spaces. The amended scheme granted planning permission under Reference. No. CR/2020/0575/NCC resulted in alterations to the elevations and a reduction in the floor heights, with 20 fewer car parking spaces amounting to 811, which alongside the



undercroft car parking resulted in 854 car parking spaces available for use by hotel guests for long stay parking and for conferences.

- 9.15 The Case Officer's delegated report on Application No. CR/2020/0575/NCC added:

"It should be noted that this standard [854 spaces for an 821 bed hotel] is not representative for a hotel at an on-airport location where guests often stay a night and travel from the airport, leaving the car. It is therefore proposed that demand for parking for Hilton Hotel users could be higher than the number of spaces proposed. However, demand can be accommodated on other airport parking sites although with the erection of this car park this is likely to be lower than is currently the case."

- 9.16 It can be seen that doubts were expressed on whether the quantity of car parking spaces provided was sufficient, especially during those busy periods of the year, given the nature of this hotel which was directed at passengers using London Gatwick Airport. This is despite Crawley Borough Council having agreed to on-airport hotel accommodation being provided in the absence of any dedicated car parking; a process which GAL is now advancing in respect of further on-airport hotel developments comprising part of the current DCO application.
- 9.17 The provision of an addition 50 bedrooms is likely to lead to further doubts being expressed on the sufficiency of car parking spaces, with added pressure placed on either existing long term on and off-airport passenger car parking provision.

B. Multi Storey Car Park 7 (MSCP7)

- 9.18 Application No CR/2019/0878/CON sought consultation from the Local Planning Authority for a seven-storey multi storey car park, known as MSCP7, 25-30m high, including car parking dedicated to the Hampton by Hilton Hotel on land comprising Staff Car Park M. Staff Car Park M is shown on the plan found at page 42 of these representations, with Table 4.2.2 "*Existing Car Parks*" found on page 4-5 of **Document APP 029** revealing a total of 463 car parking spaces.
- 9.19 The supporting statement to the same application stated "*The main purpose of the development is to provide increased passenger parking at the airport in line with Gatwick's Car Parking Strategy which sets out Gatwick Airport Limited's (GAL) forecasts and investment plans for providing additional on-airport car parking*"; before adding "*The proposed MSCP7*

development will not have parking spaces allocated for staff and the existing 450 staff car parking spaces at the current Staff Car Park M will be reallocated within other staff car parks including Y, B, H and Z.” The application was withdrawn on 27th October 2022.

- 9.20 In the intervening period prior to the withdrawal of Application No. CR/2019/0878/CON, a separate application Reference No. CR/2020/0707/NCC was submitted to the LPA on 3rd November 2020. This later application sought the removal of Condition No. 3 pursuant to Application No. CR/2010/0692/FUL, itself granting planning permission for the original Hampton by Hilton Hotel, along with two further floors and changes to the building’s external appearance. The covering letter of support to Application No. CR/2020/0707/NCC referred to 60 standard car parking spaces along with four blue badge spaces used in connection with the hotel, being provided within what was known as surface Staff Car Park M, before adding “I can advise that on completion of the planned MSCP7, it is intended that 60 of its parking spaces will be made available for parking use in connection with the hotel.”(my emphasis)
- 9.21 The PEIR Chapter 4: Existing Site and Operations September 2021 Appendix 12.9.1: Preliminary Transport Assessment Report (PTAR) paragraph 8.5.15 states “Staff car parking provision in Car Park M is expected to become a new multi storey car park for passengers, with parking provision for staff moving across to Car Park H in the Future Baseline Scenario, and Car Parks X and V in the With Project Scenario, with the additional closure of Car Park Y to staff.” (my emphasis) The same paragraph in the same document reveals that Car Parks X and V, where Purple Parking is to be relocated. are found on the southern side of the Airport, as shown on Figure 4.2.1b comprising part of **Document APP 055** found at page 43 of these representations.
- 9.22 The contents of paragraph 5.2.86 to 5.2.88 of Chapter 5: Project Description forming part of **Document APP 030** refers to the relocation of the Purple Parking facility to the eastern section of the existing Car Park X, which will displace 1,125 on-airport car parking spaces from Car Park X, which in turn will be accommodated on the re-used existing Purple Parking site. The former Purple Parking decking will be demolished and in its place surface parking to cater for 700 car parking spaces, partially providing for the displaced 1,125 spaces from Car Park X. The remaining 425 spaces from Car Park X are to be accommodated through an increase in capacity in the North Terminal Long Stay Car Park.

9.23 Two important conclusions arise from the reallocated Purple Parking provision. Firstly, not all the car parking to be provided at the North Terminal Long Stay Car Park will be proposed additional spaces, as 425 car parking spaces will be those decanted from Car Park X. Secondly, there is no evidence to support the view in the current DCO application that Multi Storey Car Park 7 will accommodate any parking spaces for the exclusive use of the Hampton by Hilton Hotel.

9.24 It is noted that the contents of paragraph 5.2.89 of Chapter 5 Project Description comprising part of **Document APP 030** reveal:-

“5.2.89 No increase in car parking for airport staff is proposed and where staff parking is located may change as a result of the Project works. Historically Gatwick had around 7,200 spaces for staff. However, as staff car mode share has decreased, GAL has taken steps to reduce this by over 1,000 spaces in the last five years. GAL is currently reviewing the optimum allocation of spaces and location for these staff spaces, taking into account an increase in staff numbers and the changing work patterns but alongside promoting use of more sustainable travel to work, including car sharing and active travel. Overall, it is proposed to continue to reduce the total number of spaces provided per 1,000 employees across the airport.”

9.25 The conclusion to arise from this section found under the title “Multi Storey Car Park 7” is that the Examining Authority are provided with no information of where the Applicant’s staff car parking will be provided on-airport in the future, and at what quantity. It is for this reason that I have indicated at the beginning of Sub-Section I of Chapter 9 that a replacement table should be provided for each on-airport car park, which should indicate i) the number of existing passenger and/or staff car parking spaces to be retained as part of the DCO application; ii) the number of new passenger and/or staff car parking spaces to be provided as part of the DCO application; and iii) the resultant number of displaced passenger and/or staff car parking spaces. This is required due to other forms of development comprising an integral part of the same DCO application resulting in the loss of existing passenger and/or staff car parking spaces on various existing on-airport car parks. This will allow the reader to understand where staff car parking in particular has been removed, and where it is to be re-sited.

C. Use of Robotics Technology Within Existing Long Stay Car Parking Areas To Increase Capacity, Resulting In An Additional 2,500 Spaces.

9.26 Application No. CR/2018/0935/CON was a consultation by GAL relating to a robotic car park pilot project to take place on part of Car Park B and to last for a period of three

months, following which a decision was to be taken on whether the same robotic parking product offered a viable future car parking alternative for London Gatwick Airport. Passenger Car Park B can be identified on the drawing found at page 42 of these representations.

- 9.27 It is understood that the three-month trial period took place in the summer of 2019, although no details have been provided by the applicant of the outcome of the scheme. To this end, aside from the space taken up by the cabins, no firm commitment has been given when robotic parking technology is expected to be introduced, and the respective on-airport car parks intended to make use of the same technology.
- 9.28 The three-month trial period involved the stationing of 8 free standing cabins positioned along the northern boundary of passenger Car Park B, in a row facing onto the existing car park access road, each cabin having a roller shutter door to the front and rear. The intention is for the passenger to drive into the car park area, and park in one of the numbered vehicle cabins. A touch-screen kiosk on the cabin allows the passenger to confirm their parking booking. The passenger then leaves the vehicle in the cabin, retaining their keys, making their way to the terminal, which in the case of the pilot scheme involves taking a long-stay shuttle bus. Once the passenger has left the cabin, it is automatically secured. The valet robot collects the car by sliding the carrier underneath the car and taking it to a car parking space in the secured car parking area. The car parking service is connected to the customer's flight information so that upon a passenger's return the car is retrieved by the robot and returned to the designated vehicle cabin ready for the passenger's arrival.
- 9.29 The Examining Authority has been given no information on how much space will be taken up by the various cabins; how many cabins are expected to be provided on-airport in Car Park B, and what benefits are to be derived from the introduction of robotic parking provision, compared with block parking of passengers' cars. In this regard, the space required through construction of the cabins is likely to reduce the increased space which would otherwise be achieved through rows of block parked cars. It appears there has been no cost benefit analysis undertaken by the Applicant in respect of the proposal for robotic parking.

III. Additional Passenger Car Parking Forming “The Project”

D. North Terminal Long Stay Decked Parking

- 9.30 The existing North Terminal Long Stay Car Park consists of six separate car parking zones which are variously referred to as Zones U, V, W, X, Y and Z depicted on the drawing inserted at page 42 of these representations. The Examining Authority have not been provided with any information as to how many car parking spaces comprise each of these six zones, and to what extent they remain unaffected by the proposed decked car parking which is to take place over part of the North Terminal Long Stay Car Park.
- 9.31 The number of passenger car parking spaces attributable solely to the decked car park in the North Terminal area is confusing. A figure of 1,100 proposed additional spaces is attributable to the “*NT Long Stay decking*” in Table 5.2.4 on page 5-17 of **Document APP 030**, whilst a figure of 580 spaces is also shown in the same table as being attributable to NT Long Stay decking under the column “*Proposed Replacement Spaces*”.
- 9.32 No information is provided of the impact of the proposed realignment of Larkins Road and the relocation of the motor transport facility on the number of passenger car parking spaces which are to be retained in Zones V and W.
- 9.33 The approximate figure of 1,680 car parking spaces which form part of the proposed additional car parking in Table 5.2.3 of **Document APP 030** does not indicate to the reader how many existing passenger car parking spaces are to be retained in the North Terminal Long Stay area, and how many existing passenger car parking spaces in the same North Terminal Long Stay area are to be lost by decking in the same area due to ramps, lighting, circulation space, etc. Indeed, there is no proper correlation surrounding the numbers of car parking spaces attributable to the North Terminal Long Stay decking between Tables 5.2.3 and 5.2.4 in **Document APP 030**.
- 9.34 Above all, Table 5.2.4 in **Document APP 030** does not indicate as part of the car parking proposals, how many car parking spaces are currently present; how many car parking spaces are proposed, and how many existing passenger/staff car parking spaces will be displaced in each of the selected areas. There is simply no indication of how the figure of 2,465 permanently lost spaces in the North Terminal Long Stay Car Park and Flying Pan area has been derived in Table 5.2.4 of **Document APP 030**.

E. Multi Storey Car Park J

- 9.35 Similar circumstances arise in respect of Multi Storey Car Park J in which Table 5.2.3 forming part of **Document APP 030** refers to an approximate number of additional passenger car parking spaces amounting to 890. The same table takes no account of the fact that Multi Storey Car Park J lies in the same location as existing Surface Staff Car Park J indicated on the plan at page 42 of these representations, where, in accordance with the details provided in earlier consultation applications, a total of 361 spaces are expected to be lost.
- 9.36 No information is provided by the Applicant confirming the number of staff car parking spaces in Car Park J, with no indication given where any of these displaced staff car parking spaces or a proportion of the same are to be provided on-airport. My clients consider it is misleading to state that Multi Storey Car Park J will involve 890 proposed replacement spaces as set out in Table 5.2.4 of **Document APP 030**, given that what is intended in this location is a reduction of 361 surface level staff car parking spaces. That said, Table 4.2.2 Existing Car Parks set out in **Document APP 029** makes no reference to Staff Car Park J.

F. Multi Storey Car Park Y

- 9.37 A similar situation exists with respect to Multi Storey Car Park Y in that it is intended to displace staff car parking on the same area, comprising Staff Car Park Y, which for ease of reference is shown on the drawing set out at page 42 of these representations. Table 5.2.3 of **Document APP 030** indicates that there will be approximately 3,035 additional passenger car parking spaces in Multi Storey Car Park Y, but this takes no account of the fact that the same location is used for surface staff parking and where, according to Table 4.2.2 Existing Car Parks comprising part of **Document APP 029**, there will be a loss of 916 spaces.
- 9.38 No information is provided as to where any of these lost staff car parking spaces or a proportion of them are to be accommodated elsewhere within the Airport's boundary. In this way, what is proposed in this location is a reallocation of existing surface staff car parking with a new multi-storey passenger car park resulting in 2,119 net additional passenger car parking spaces (3,035 - 916 = 2,119).

G. Multi Storey Car Park H

- 9.39 Multi Storey Car Park H is to be constructed on land where existing Staff Car Park H is situated on the drawing reproduced at page 42 of these representations. In accordance with Table 5.2.4 of **Document APP 030** proposed Multi Storey Car Park H is expected to provide for an additional 3,700 passenger car parking spaces. Table 4.2.2 Existing Car Parks set out in **Document APP 029** refers to the fact that Car Park H currently comprises a total of 1,170 staff car parking spaces.
- 9.40 The area taken up by former surface staff car park known as Car Park H is to accommodate office floorspace lost through the conversion of Destination Place to a hotel; along with a new 400-bedroom hotel, together with a proposed multi storey passenger car park catering for an addition 3,700 spaces. It can be seen that in terms of passenger car parking provision, Multi Storey Car Park H will result in 2,530 net additional passenger car parking spaces (3,700 - 1,170 = 2,530), with no indication given where the lost staff car parking spaces are to be provided.

IV. Other Permanently Lost Car Parking Space Provision

H. Summer Special

- 9.41 Historically two sub-areas can be recognised as comprising what is referred to as the Summer Special on-airport passenger car park, a matter which can be more easily identified by reference to the diagram on page 42 of these representations. A northern sub-area is evident, consisting of an area of land located to the immediate south of Zones V and W where they comprise part of the Northern Terminal Long Stay Car Park. A later extension of the same car park was provided to the west of Zone W and is also known as the Summer special Car Park area.
- 9.42 Table 4.2.2 Existing Car Parks forming part of **Document APP 029** records the Summer Special Long Stay Car Park as accommodating 5,277 spaces, a figure which is lower than that in the car park update presented to a meeting of the Gatwick Airport consultative committee on 26th January 2017, at which time a figure of 5,956 spaces was recorded.
- 9.43 It is evident from the drawing indicated at page 42 of these representations, when read in conjunction with Figures 4.2.1b of **Document APP 055**, and then compared with Figures

5.2.1a and 5.2.1h⁷ of **Document APP 053**, that the area consisting of the Summer Special Car Park is to be removed in its entirety, as a consequence of the northerly extension of taxiways Lima and Unicorn, along with the construction of Pier 7 and stands. In a similar way, the extension of the Summer Special Long Term Passenger Car Park situated to the west of Zone W is to be removed, as a consequence of the construction of a new aircraft hangar for Code E aircraft; the relocated motor transport facility; and the Rendezvous Point North, the latter comprising a large area of hardstanding for external emergency vehicles (police, fire and ambulance services), required as a holding position in the event of a notified aerodrome incident.

- 9.44 Table 4.2.2 Existing Car Parks found within **Document APP 029** reveals that the existing Summer Special passenger car park comprises 5,277 spaces, whilst paragraph 5.2.84 of **Document APP 030** reveals that 3,345 spaces would be permanently lost at the Summer Special site as a consequence of “*The Project*”, resulting in the retention of 1,932 car parking spaces. There is no indication in Table 5.2.4 of **Document APP 030** of where the residual retained car parking spaces comprising the Summer Special are to be provided, which in itself conflicts with Figure 5.2.1h showing all the Summer Special car Park to be removed, despite the incorrect notation of part of the area described as Flying Pan parking.

I. North Terminal Long Stay and Flying Pan

- 9.45 Reference has been made in these representations to the North Terminal Long Stay Car Parking area revealed on a drawing found at page 42 as comprising six zones, and to the difficulties confronting the Examining Authority on the number of existing passenger car parking spaces provided on the same land; the number of new passenger car parking spaces to be delivered as part of the proposed decking forming part of “*The Project*”; and the number of displaced passenger car parking spaces as a consequences of the construction of any decking, or other developments such as the realignment of Larkins Road.

⁷ Figure 5.2.1h shows existing facilities proposed to be demolished or removed in solid blue shading. It is clear that part of the Summer Special car parking area has been incorrectly notated as Flying Pan Parking which itself is a rectangular shaped area lying to the immediate west of Zone V forming part of the North Terminal Passenger Car Park.

- 9.46 There is no reason why two separate on-airport passenger car parks forming the North Terminal Long Stay and the Flying Pan should be combined, particularly as the latter is devoted to valet car parking purposes. The contents of paragraph 5.2.84 and Table 5.2.4 of **Document APP 030** reveal that the North Terminal Long Stay and Flying Pan areas will lose 2,465 spaces, although there is an absence of any information of how this figure of 2,465 has been derived.
- 9.47 All the passenger valet car parking taking place at the Flying Pan is to be removed, as the same area is to be redeveloped as a Central Area Recycling Enclosure (CARE) consisting of a biomass boiler, a waste processing building, together with a compound area and bin store, along with a flue extending to 50m in height above existing ground floor level. This is evident from an examination of Figure 5.2.1a comprising part of **Document APP 055**. It follows that the Examining Authority will wish to be assured of how many long term passenger car parking spaces will be lost from the Flying Pan as part of the overall loss of long term passenger car parking spaces from the combined area incorporating both the North Terminal Long Stay and Flying Pan areas.

J. Staff Car Parks W, B and H

- 9.48 The contents of Table 5.2.4 set out in **Document APP 030** reveals that a combined total 1,150 staff car parking spaces will be lost from Staff Car Parks, W, B and H, shown on the two drawings on pages 41 and 42 of these representations. This figure does not comply with the number of spaces in the same car parks set out in Table 4.2.2. Existing Car Parks forming part of **Document APP 029** where a combined total of 1,705 spaces is recorded. No explanation is provided of the difference in the figures between these two tables, or where the displaced staff parking will be located on-airport.

K. Staff Car Parks G and L, and Passenger Car Park Z

- 9.49 The drawing on page 42 of these representations reveals a finger shaped area of land orientated in a north-south direction to the west of the Summer Special, referred to as Staff Car Park G. This car park is not referred to in Table 4.2.2 Existing Car Parks forming part of **Document APP 029**, and neither is it referred to in any of the drawings comprising **Documents APP 049, 053 and 055**, and to that extent it appears to be staff car parking which has already been lost at the baseline date.

- 9.50 Staff Car Park L and Passenger Car Park Z are both referred to in Table 4.2.2 of **Document APP 029** comprising 570 and 362 spaces respectively. Staff Car Park L is referred to in Figure 4.2.1b of **Document APP 055** lying to the immediate east of the valet parking site, and on Figure 5.2.1b as part of existing Gatwick Airport car parking., and to this end it is considered this will remain for staff car parking purposes unaffected by “*The Project*”.
- 9.51 Passenger Car Park Z is revealed on Figure 4.2.1b of **Document APP 055** as lying on the southern boundary of the airport, to the east of Car Parks V and X. The same area is shown as an existing passenger car park on Figure 5.2.1b of **Document APP 053** but also as a proposed staging and laydown compound on Figure 5.2.1f of the same document, where it is to be used as a staging area for the workforce, vehicles and plant for the core and taxiway works. In accordance with paragraph 5.3.96 of **Document APP 030** the proposed compound on land at Car Park Z comprising an area of 1.8h is to be fenced, providing for approximately 20 cars, 2 vans and 4 HGV spaces; a mobile crusher; a security screening area and a warehouse.
- 9.52 In this way, and as stated in paragraph 3.6.233 on page 3-45 of **Document APP 028** “*Option S6 (Car Park Z) has been identified to fulfil this role considering a reduction in on-airport parking demand forecast, thereby resolving one of the original concerns in progressing this option.*” It would appear that Car Park Z is to be lost for on-airport passenger car parking purposes as part of “*The Project*” and this needs to be reflected in an amended Table 5.2.4 in **Document APP 030**.

V. Other Material Considerations Relating to On-Airport Parking Provision

L. Valet MA-1

- 9.52 There are three separate areas situated on the southern side of the airport used for long term passenger car parking which collectively accommodate 5,372 cars in accordance with Table 4.2.2 Existing Car Parks comprising part of **Document APP 029**. The largest of the three areas forming part of Valet MA-1 amounting to approximately 4ha, is a preferred location for a main contractors’ compound associated with “*The Project*”. It is here where the majority of the daily construction workforce and project management team are to be based. The following are to be accommodated within this 4ha site, alongside components of a batching plant, standing at a height of 25m above ground level:

- Main office and welfare facility (including meeting room space, canteen, locker rooms and waste processing areas);
- Two batching plants, with associated bulk material storage and handling bays;
- Material storage areas;
- Airside processing facility for people, vehicles and materials;
- Short term material laydown;
- Parking (approximately 500 car, 10 van and 5 bus spaces) for contractor, project manager and supply chain vehicles restricted parking spaces based on the assumption that three people would use two vehicles and the provision of car pooling and public transport options, safe walking routes; and
- Staff bus stops.

9.53 No information has been provided as to how many passenger car parking spaces will be retained in the two smaller areas forming part of Valet MA-1. Furthermore, the writer can find no application having been submitted by the applicant to the local planning authority relating to Car Park Valet MA-1, casting doubts on its lawfulness in the light of the provisions of Schedule 2 Part 8 Class F.2 of the Town & Country Planning (General Permitted Development) (England) Order 2015 (As Amended):

“F.2 Development is permitted by Class F subject to the condition that the relevant airport operator consults the local planning authority before carrying out any development unless that development falls within the description in paragraph F.4”

9.54 No evidence has been provided to confirm that the valet parking area taking place on land known as MA-1 was *“urgently required for the efficient running of the airport”* in accordance with paragraph F.4. The consultation process does not give rise to planning permission as defined in the Town & Country Planning Act 1990 (As Amended), and to that end doubts must be expressed on whether Car Park MA-1 is capable of forming part of a retrospective permission in accordance with Section 73A or 73B of the same Principal Act.

9.55 It follows that the majority of the 5,372 spaces relating to valet parking MA-1 should be shown as being permanently lost. This leads to the conclusion that doubts must be cast when considering valet parking area MA-1 in isolation, on whether the DCO application

will lead to an additional 1,100 car parking spaces in accordance with the provisions of Table 5.2.4 forming part of **Document APP 029**.

10.00 CONCLUSIONS

- 10.01 These representations have revealed that there are many different factors influencing airport related car parking extending to more than the number of on-and off-airport car parking spaces, to encompass their occupancy and the period over which they are in use by airport passengers. The various considerations having an impact on airport related car parking dictate that a flexible approach should be taken when assessing airport related passenger car parking demand and supply. Without lawful off-airport car parking facilities, London Gatwick Airport would cease to operate efficiently; failing to meet current, let alone future airport related passenger car parking supply, regardless of any modal shift in favour of public transport. This situation is not helped at a time when planning policies around the airport prevent long term off-airport car parking facilities from becoming established in sustainable locations in close proximity to the same airport.
- 10.02 Choice is an important factor which has been placed at the forefront of aviation strategy with the requirement since the publication in April 2018 *“Beyond the Horizon: The Future of UK Aviation - Next Steps Towards an Aviation Strategy*, being to ensure that customers obtain the best deals and quality of service. Its importance has been emphasised more recently in CAA’s Consumer Strategy published as recently at 29th September 2023. Modal choice in terms of access to London Gatwick Airport dictates that passengers have to consider lead and lag times, as much as flight price, departure airport, flight time/route and airline/holiday company. The significance to be attached to customer choice has been highlight in appeal decisions where planning permission has been granted for the use of land for long term off-airport car parking purposes.
- 10.03 The Applicant has committed itself to achieving a number of targets in terms of surface access provision, to be achieved three years after the opening of the Northern Runway in 2032. It has also set out a number of further aspirational mode share targets as part of longer term aims. Holiday Extras Ltd do not consider these target figures are challenging, especially as the Applicant has not sought to embody within its terms any monitoring or enforcement regarding the appropriateness, effectiveness and environmental impacts associated with surface mode share targets. In this way, there is an absence of controlling mechanisms, devoid of any continuing robust monitoring or assessment of

environmental performance, including sanctions, financial or otherwise, in the event of failing to meet any mode share target.

- 10.04 It has been revealed that the Applicant has little control over external stakeholders involved with public transport provision, who pursue different policy objectives and for which there is no coordinated procedure between different public transport providers. Govia Thameslink Railway (GTR) in their own relevant representations at the Issue Specific Hearing 4 have confirmed that their responses to GAL's earlier consultations have not been addressed. They consider that there is a need for additional capacity on the Brighton Mainline which at present caters for significant numbers of passengers standing in uncomfortable crowded conditions, and for which there is a lack of funding to carry out important upgrades on the same line. These concerns are exacerbated when it is appreciated that the capacity of Gatwick Airport Railway Station has been devised to cater for a one runway two terminal airport. In themselves, these factors pose serious questions on the ability of Gatwick Airport Railway Station to cater for increased levels of future rail passengers in accordance with the terms of the current DCO application.
- 10.05 It is understood from relevant representations, that views have been expressed that local road improvements are required to manage increased traffic levels arising from the DCO application, and that National Highways have expressed concerns over modelling of the strategic highway network.
- 10.06 The representations raised on behalf of Holiday Extras Ltd have shown that there are inherent contradictions between the Applicant's understandable aim in its DCO application of focusing attention of public transport access to London Gatwick airport, with the need to maximise revenue derived from forecourt charges, which comprise an important component of non-aeronautical revenue, as well as being an important contributor to the Sustainable Transport Fund. Local residents have expressed the view that on-airport passenger car parking is expensive, a matter which cannot be divorced from unauthorised long term off-airport car parking, along with fly parking on surrounding residential streets.
- 10.07 "*Kiss-and-fly*" is one of the least sustainable means of access to London Gatwick Airport. It is a topic which has received little research, but where it has been studied, the results have shown that far greater benefits were likely to accrue to the environment, congestion

and safety if the double journeys generated by “*kiss-and-fly*” could be reduced, than could otherwise be made from small modal shifts to public transport usage, however desirable that may be.

- 10.08 There has been no consideration by the Applicant of the increasing significance to be attached to Transportation Network Companies (TNCs) such as Uber, which offer advantages to their drivers as well as passengers and which it is contended airports must consider in term of the impact on pricing as a management tool. The same contention equally applies to the absence of any consideration given by the Applicant to the rise in technological platforms such as JustPark in which passengers can access a wide variety of parking spaces, and homeowners and others can gain pecuniary benefits. The exercise undertaken in these representations reveal that in a number of cases passengers can walk to the airport; have been driven to the airport by the property owner, or order a taxi/Uber to transport them to one of the two terminals, from the residential address where their car is parked for the duration of their visit.
- 10.09 There is increasing catchment area and route overlaps for passengers in the London region, as a consequence of the enhanced competition between airports in the same area, a matter which has to be seen in the context of any airport slot allocation reforms, at a time when the current slot allocation system struggles to meet increased demand. With these considerations in mind, passenger profiling techniques should have been explored by the Applicant as part of the current DCO application, in order to understand anticipated changes in customer behaviour. Customer profiling means not only assessing the popularity of certain destinations, trips duration and trip frequencies as part of a wider understanding of the cyclical nature of passenger parking demand throughout the year, but also extends to demand management measures.
- 10.10 The Applicant in their DCO application has not considered the consequences of a reform to the airport slot allocation system, including what that may mean in terms of the introduction of new airlines, increases in connectivity, improved feeder services and hence attractiveness for all categories of passengers using London Gatwick Airport.
- 10.11 It is contended that both existing and future car parking provision associated with off-airport hotels found in close proximity to London Gatwick Airport cannot be adequately accommodated on-airport, as a consequence of the wide variety of car parking products

offered by the Applicant. GAL's DCO application contains four separate locations forming part of the preferred options for hotel development on-airport, which is to comprise a total of 1,250 additional on-airport bedrooms.

10.12 The following conclusions arise from recent applications relating to the requirement for dedicated car parking spaces to serve existing on-airport hotel accommodation. The same considerations are equally applicable when considering future on-airport hotel accommodation in cases where an absence of any dedicated car parking spaces is to be provided.

- A. Firstly, there have been recent cases in which on-airport hotel applications have provided no dedicated car parking spaces, or where car parking spaces previously provided as part of a staff car park, have been lost. The justification for not providing dedicated hotel car parking is contradictory, in that on the one hand it is stated that it will encourage hotel guests to use more sustainable modes of access to the airport; and on the other, it is stated that hotel guests will simply have access to existing on-airport passenger car parks. In other cases, dedicated car parking spaces to service the needs of a hotel have been provided, ostensibly on the basis that it would release existing on-airport car parking spaces for passengers, reduce "*kiss-and-fly*" trips, and/or remove the need for trips to off-airport car parks. It therefore can be seen that there is a lack of consistency when contemplating dedicated car parking spaces to meet on-airport hotel provision.
- B. Secondly, in circumstances where there is an absence of dedicated car parking for both existing and future on-airport hotel developments will mean passengers having to use existing on-airport passenger car parks, resulting in increased pressure being placed on available on-airport car parking provision for passengers. No studies have been undertaken by the Applicant which consider the impact of using on-airport passenger car parking spaces to meet the needs of on-airport hotels.
- C. Thirdly, the absence of dedicated car parking provision associated with both existing and future on-airport hotel developments has the propensity to encourage the least sustainable modes of access to the airport, namely "*drop-off*".

and “*kiss-and-fly*”. There have been no studies carried out by the Applicant of the relationship between future on-airport hotel car parking supply, and “*drop-off*” and “*kiss-and-fly*” modes.

- D. Fourthly, the absence of any dedicated on-airport car parking spaces for existing as well as future on-airport hotel accommodation has the propensity for passengers to use either long term off-airport car parking, if only because it is less expensive than on-airport car parking, or alternatively, rely on fly parking in surrounding residential streets. This issue has not been assessed as part of the DCO application.
- 10.13 No information has been provided on the selected methodology in calculating the levels of future short, mid and long term passenger car parking, along with staff car parking, over the duration of the DCO application to meet a throughput of 80.2mppa. It appears that the exercise conducted by the Applicant has been simply to replace existing passenger car parking provision lost through other developments required in association with “*The Project*”, with new multi-storey car parks. In contrast, individual methodologies have been employed in the expansion of other airports, taking into account daily and peak hour traffic flows; airport surface access peak hour traffic flows; peak network demand relying on the busy hour; car occupancy factors; origin/destination of passenger trips, and passenger profiling considerations, amongst other parameters, to explain and justify levels of forecast on-airport passenger demand.
- 10.14 These representations have shown the considerable disparity which exists in the approach adopted by the Applicant between car parking provision to service a separate additional wide spaced runway to meet a throughput of 95mppa; and car parking spaces required to meet an anticipated throughput of 80.2mppa by 2047, as a consequence of the current DCO application. It is my clients’ opinion that a figure of only 1,100 additional on-airport passenger car parking spaces to meet the requirements of the current CCO application is insufficient.
- 10.15 In my clients’ view there is a need for a replacement Table 5.2.4 where it forms part of **Document APP 030**. This replacement table should include three separate columns for each on-airport car park, which should indicate i) the number of existing passenger

and/or staff car parking spaces to be retained as part of the DCO application; ii) the number of new passenger and/or staff car parking spaces to be provided as part of the DCO application; and iii) the resultant number of displaced passenger and/or staff car parking spaces, as a consequence of other forms of development comprising an integral part of the same DCO application.

- 10.16 These representations have considered details of additional on-airport passenger car parking capacity in the absence of “*The Project*”. In those locations where staff car parking is proposed to be displaced to allow for new passenger car parking spaces, no account has been taken of where displaced staff car parking is to be provided on-airport. Moreover, no information has been provided in considering the use of robotic technology as to how much space will be taken up by the various cabins, how many cabins are expected to be provided on-airport in the respective car park(s), and what benefits would arise from the introduction of robotic car parking provision compared with block parking of passengers’ cars. In respect of the latter, the space required through construction of the cabins is likely to reduce the increased space that would otherwise be achieved through rows of block parked cars.
- 10.17 In considering the additional passenger car parking forming part of “*The Project*”, no information has been made available as to how many car parking spaces comprise each of the six zones which collectively form the existing North Terminal Long Stay Car Park. The number of car parking spaces attributable to the decked car park on the North Terminal is unclear. No information is provided of the impact of the proposed realignment of Larkins Road and the relocation of the motor transport facility on the number of passenger car parking spaces to be retained in Zones V and W. Table 5.2.4 in **Document APP 030** does not indicate how many car parking spaces are currently present; how many car parking spaces are proposed, and how many existing passenger/staff car parking spaces will be displaced in each of the selected car parks. No indication is provided as to how the figure of 2,465 permanently lost spaces in the North Terminal Long Stay Car Park and Flying Pan has been devised.
- 10.18 In respect of Multi Storey Car Parks J, Y and H, no account has been taken of the displacement of staff car parking, and where that is to be provided elsewhere on-airport.

- 10.19 The area consisting of the Summer Special Car Park is to be removed in its entirety as a consequence of the northerly extension of Taxiways Lima and Unicorn, along with the construction of Pier 7 and stands. In a similar way, the extension of the Summer Special Car Park, situated to the west of Zone W is to be removed as a consequence of the construction of a new aircraft hangar for Code E aircraft; the relocated motor transport facility; and Rendezvous Point North, the latter comprising a large area of hardstanding for external emergency vehicles (police, fire and ambulance services), required as a holding position in the event of a notified aerodrome incident.
- 10.20 Table 4.2.2 Existing Car Parks found within **Document APP 029** reveals that the existing Summer Special passenger car park comprises 5,277 spaces, whilst paragraph 5.2.84 of **Document APP 030** reveals that 3,345 spaces would be permanently lost at the Summer Special Car Park as a consequence of “*The Project*”, resulting in the retention of 1,932 car parking spaces. There is no indication in Table 5.2.4 of **Document APP 030** of where the residual retained car parking spaces comprising the Summer Special Car Park are to be provided, which in itself conflicts with Figure 5.2.1h which shows all the Summer Special Car Park to be removed, despite part of the same area being incorrectly described as Flying Pan parking.
- 10.21 There is no reason why two separate on-airport passenger car parks forming the North Terminal Long Stay and the Flying Pan should be combined, particularly as the latter is devoted to valet car parking purposes. The contents of paragraph 5.2.84 and Table 5.2.4 of **Document APP 030** reveal that the North Terminal Long Stay and Flying Pan areas will lose 2,465 spaces, although there is an absence of any information of how this figure has been derived.
- 10.22 All the passenger valet car parking taking place at the Flying Pan is to be removed, as the same area is to be redeveloped as a Central Area Recycling Enclosure (CARE) consisting of a biomass boiler, a waste processing building, together with a compound area and bin store, along with a flue extending to 50m in height above existing ground floor level. This is evident from an examination of Figure 5.2.1a comprising part of **Document APP 055**. It follows that the Examining Authority will wish to be assured of how many long term passenger car parking spaces will be lost from the Flying Pan as part of the overall loss of long term passenger car parking spaces from the combined area incorporating both the North Terminal Long Stay and Flying Pan areas.

- 10.23 The contents of Table 5.2.4 set out in **Document APP 030** reveals that a combined total 1,150 staff car parking spaces will be lost from Staff Car Parks, W, B and H, shown on the two drawings on pages 41 and 42 of these representations. This figure does not comply with the number of spaces in the same car parks set out in Table 4.2.2. Existing Car Parks forming part of **Document APP 029** where a combined total of 1,705 spaces is recorded. No explanation is provided of the difference in the figures between these two tables, or where the displaced staff parking will be located on-airport.
- 10.24 Passenger Car Park Z is revealed on Figure 4.2.1b of **Document APP 055** as lying on the southern boundary of the airport, to the east of Car Parks V and X. The same area is shown as an existing passenger car park on Figure 5.2.1b of **Document APP 053** but also as a proposed staging and laydown compound on Figure 5.2.1f of the same document, where it is to be used as a staging area for the workforce, vehicles and plant for the core and taxiway works. In accordance with paragraph 5.3.96 of **Document APP 030** the proposed compound on land at Car Park Z comprising an area of 1.8h is to be fenced, providing for approximately 20 cars, 2 vans and 4 HGV spaces; a mobile crusher; a security screening area and a warehouse.
- 10.25 In this way, and as stated in paragraph 3.6.233 on page 3-45 of **Document APP 028** *“Option S6 (Car Park Z) has been identified to fulfil this role considering a reduction in on-airport parking demand forecast, thereby resolving one of the original concerns in progressing this option.”* It would appear that Car Park Z is to be lost for on-airport passenger car parking purposes as part of *“The Project”* and this needs to be reflected in an amended Table 5.2.4 in **Document APP 030**.
- 10.26 Three separate areas comprise Valet MA-1 situated on the southern side of the airport used for long term passenger car parking, which collectively accommodate 5,372 cars in accordance with Table 4.2.2 Existing Car Park comprising part of **Document APP 029**. The largest of these three areas, amounting to approximately 4ha is a preferred location for main contractors compound associated with *“The Project”*. No information has been provided as to how many passenger car parking spaces will be retained in the two smaller areas forming part of Valet MA-1. It follows that that the majority of the 5,372 spaces relating to valet parking MA-1 should be shown as being permanently lost. This leads to the conclusion that doubts must be cast when considering valet parking area MA-1 in isolation, on whether the DCO application will lead to an additional 1,100 car

parking spaces in accordance with the provisions of Table 5.2.4 forming part of
Document APP 029.