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

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1. 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.

2. 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.

3. 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.

4. 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.
5. 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.
6. 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.
7. "*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.

8. 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.
9. 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. 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.
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.

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.
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.
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.
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.

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.
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.
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.
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.

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.
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.
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.
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.

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.
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**.
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**.