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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. The Applicant states in paragraph 3.4.3 of the Car Parking Strategy comprising **Document REP1-051** that as a consequence of changes to on-airport passenger car parking capacity, an additional 6,570 spaces are to be provided, increasing the total on-airport passenger car parking provision from the 40,611 total passenger car parking spaces to 47,181 spaces in preparation for dual runway operations expected to be completed in 2029. This analysis in **Document REP1-051** conflicts with the contents of paragraph 4.4.7 of **Document APP-029** in which it is said “*These projects (the three areas of increased airport capacity) are anticipated to be completed by 2027 and would add 6570 spaces to the existing provision to therefore provide 53,271 spaces without the Project.*”. In effect the 6,570 spaces have been added to the total existing passenger and staff car parking spaces set out in Table 4.2.2 of **Document APP-029**, on the premise that they are all required to be made available in advance of the completion of the Northern Runway Project.
2. Irrespective of the view taken of the eventual total passenger car parking capacity as a consequence of these three additional car parking elements, there is an absence of any evidence confirming that a material operation consistent with a commencement of Application No. CR/2020/0575/NCC has taken place. Moreover, as indicated in the third bullet point of paragraph 4.4.6 of **Document APP-029** it remains the Applicant’s intention that the three phases of robotic parking are still to come forward as permitted development GDPO consultations with Crawley Borough Council.
3. It follows in the light of these conclusions, that the 820 multi storey car parking spaces associated with the South Terminal Hilton Hotel, along with the 2,500 additional spaces to take place as part of robotic technology, resulting in a combined total of 3,320 car parking spaces should not be seen as additional on-airport passenger car parking capacity **in the absence of “the Project”**.
4. On the contrary, these two car parking components comprise an integral part of total passenger car parking capacity to be provided in advance of the completion of the Northern Runway Project in 2029, and should be delineated solid pink on Figure 5.2.1b: Proposed Parking, included in **Document AS-135** found at page 17 of these representations. There is added support for this reasoning in that the development of the South Terminal Hilton Hotel Multi Storey Car Park along with the 2,500 additional spaces in accordance with robotic technology on Car Park B, is to take place during the

period 2024 to 2035, being commensurate with the indicative sequencing of construction works associated with “*the Project*”, a matter revealed in Table 5.3.1 of **Document AS-133**.

5. This analysis has important implications casting doubt on the derivation of additional passenger parking provision for “*the Project*” set out in Table 2 of **Document REP1-051**. It also challenges the veracity of the Applicant’s claim of being able to manage on-airport passenger and staff car parking, consistent with promoting access to the airport by sustainable modes discussed later in these representations.
6. A revised Table 5.2.3 taken from **Document AS-133**, is set out at page 32 of this company’s main representations to Deadline 2. It shows the overall changes in car parking spaces as a consequence of the Northern Runway Project, from which a number of important conclusions emerge.
7. A loss of 1,630 car parking spaces is revealed, adding the total figures in the columns entitled “*proposed replacement spaces*” and “*proposed additional spaces*” before subtracting the resultant figure from the “*permanent loss of spaces*” column. This loss of on-airport car parking spaces is anticipated at a time when there is expected to be an increase in passenger throughput of 33.6mppa from a base figure of 46.6mppas in 2019 to a proposed 80.2mppa in 2047,
8. In the revised Table 5.2.3 it can be seen that a conservative approach has been adopted with respect to the loss of passenger car parking spaces on Car Park MA-1, as the majority of the same area is to comprise the Main Contractor Construction Compound to be operational from 2024 continuously through to 2035. Furthermore, in considering the same table, it will be seen that the South Terminal Hilton Hotel Multi Storey Car Park, together with the robotics technology have been included under the column “*proposed additional spaces*” when the Applicant has excluded both elements of car parking provision from “*the Project*”. If, as considered by GAL, these two car parking components should be removed from the “*proposed additional space*” column, the resultant loss of spaces will be far greater at 4,950 spaces.
9. The figures outlined in the revised Table 5.2.3 on page 32 of these representations, in the same way as that included in the same table in **Document AS-133**, have taken no account of car parking space occupancy levels; a relevant factor given the Northern Runway

Project envisages an up-gauging of aircraft, with increased load factors, at a time when doubts have been expressed surrounding the necessary funding required to resolve capacity problems on the London to Brighton Mainline.

10. Car Park Y is shown as being in continuous use as a contractors' compound from 2024 extending up to 2032 in **Document APP-088** "*Indicative Construction Sequencing*". As a consequence, 34% of the total replacement car parking spaces on-airport in Multi Storey Car Park Y will not come forward at the earliest until 2031, with Phase 2 of the same car park unlikely to be completed before 2035. This situation is required to be assessed in the light of the fact that a total of approximately 7,700 passenger car parking spaces will be added to existing car parking capacity prior to the completion of the Northern Runway in 2029, being derived from those car parks listed in paragraph 2.3.8 of **Document APP-258**. This is in spite of approximately 2686 passenger car parking spaces being lost in Car Park MA-1 from 2024 through to 2035, as a result of the same area being used as the main contractors' compound.
11. No details have been provided as to how incremental changes to public transport modes anticipated over the duration of "*the Project*" are expected to have an impact on the timing of construction or replacement of on-airport passenger car parking. Paragraph 2.3.8 of **Document APP-258** sets out the broad sequence in the provision of car parking from which it would appear there is no correlation between the timing of proposed replacement and additional passenger car parking capacity, with public transport mode share into the future, particularly in the period up to 2032.
12. Indeed it is only on the third anniversary of commencement of the dual runway operations that the Applicant sets out its first commitment of seeking a minimum of 55% of air passenger journeys being made to and from the airport by public transport. This would suggest that before 2032, the number of passenger car parking spaces being made available, particularly between 2025 to 2029, is unrelated to any improvements in sustainable access modal share.
13. In the light of the above considerations, it is difficult to reconcile the approach taken by the Applicant that it will be providing additional or replacement car parking within the airport boundary at a time when a need can be demonstrated, seen in the context of a sustainable approach to surface access to London Gatwick Airport.

14. In my client's opinion it is circumstances of this nature which in the light of extant development plan policy, and given improvements in terms of road access to the airport, will in all probability fuel an increase in the least sustainable modes, i.e. *"kiss-and-fly"* along with unauthorised long term off-airport passenger car parking.

15. I have set out four considerations which arise from Table 2 of **Document REP1-051** outlining the methodology used for deriving additional passenger parking provision for *"the Project"* based on information from the Strategic Transport Model Suite. These have led to an amended version of Table 2 on page 36 of the main representations at Deadline 2, from which it is considered there is an additional passenger car parking requirement of 7,530 spaces.