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

**Deadline 2 - Tuesday 26 March 2024**

**PINS Reference No. TR020005**

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## 1.00 INTRODUCTION

- 1.01 These representations are raised on behalf of my clients, Holiday Extras Ltd, and are made in response to documents submitted at Deadline 1 stage, focusing attention on the Car Parking Strategy prepared by GAL [**Document REP1-051**]. They are required to be read alongside **Document REP1-194**, being the main document submitted on behalf of Holiday Extras Ltd at the Deadline 1 stage, as well as other related documents prepared as part of the original application. Where matters require alteration or amendment following the preparation of **Document REP1-194**, they are referred to in this submission and supersede what was previously stated in **Document REP1-194**.
- 1.02 Action Point 7 arising from Issue Specific Hearing 2: Control Documents/The Development Consent Order held on 1<sup>st</sup> March 2024 required the Applicant to consider whether the maximum number of spaces for each car park should be specified at the Deadline 1 stage.
- 1.03 The same general point was made by this company on behalf of Holiday Extras Ltd in **Document REP1-194** at paragraphs 9.08 to 9.12 inclusive. The Examining Authority's request has not been addressed in the Car Parking Strategy [**Document REP1-051**] submitted at the Deadline 1 stage, nor has the writer found any representation from GAL at the Deadline 1 stage which responds to the Examining Authority's Action Point 7.
- 1.04 This represents an important omission in my client's opinion when considering the underlying approach adopted by the Applicant, which is to ensure that *"parking is proportionate to the amount of activity at the airport so as to reflect air passenger demand and staff numbers, and to the mode share of journeys made, both of which change over time"*. (**paragraph 3.1.1 of Document REP1-051**)
- 1.05 As a consequence, Table 5.2.3 comprising part of **Document AS-133** remains confusing and unclear, and in certain cases incorrect, particularly when read in conjunction with **Table 4.2.2 of Document APP-029/Table 1 of Document REP1-051** which sets out existing car parking provision at London Gatwick Airport at 2019.

## **2.00 KEY POINTS ARISING FROM DOCUMENT REP1-051 CAR PARKING STRATEGY**

### **I. GAL's Position in terms of Airport Related Car Parking**

- 2.01 GAL enjoys a dominant position in relation to airport related car parking, in the sense that they are present in both the upstream (access to the airport) and downstream (services to get to the airport) levels of surface access. It means that the airport operator provides third parties access to facilities which are necessary for them to provide surface access services to their passengers, whilst at the same time competing with the same third party operators in the downstream market. In this way, the Applicant enjoys a powerful position in which to influence the formulation of planning policy by surrounding local planning authorities concerning airport related car parking, to a far greater extent and with increased leverage, than would be possible in the case of an individual long term off-airport car parking operator.
- 2.02 This situation manifests itself in the prohibitive nature of adopted local plan policy directed at airport related car parking by those local planning authorities lying in close proximity to London Gatwick Airport, a matter reaffirmed in Chapter 2 of the recently published Car Parking Strategy [**Document REP1-051**]. The Examining Authority will note that the policy of adjoining local planning authorities effectively prevents both responsible companies from entering the long term off airport car parking market, as well as existing lawful long term off-airport car parking operators from the ability to expand, despite fully complying with the Airport's Approved Operators Scheme.
- 2.03 There is a dichotomy concerning the position of the Applicant, in that on the one hand they wish to be seen as enhancing sustainable modes of surface access to London Gatwick Airport, whilst on the other, supplying on-airport car parking provision, which aside from representing a particularly important revenue stream for GAL, [**see paragraphs 2.40 and 2.41 of Document REP1-194**] is also necessary in order to support public transport initiatives through a Sustainable Transport Fund.
- 2.04 The second function performed by GAL in the previous paragraph, explains the approach adopted by the Applicant towards long term off airport car parking providers, as well as the associated need to be at the forefront of influence planning policy. It results in a paradoxical situation arising, in that through pricing of its own on-airport passenger car parking products, it inadvertently introduces a self-perpetuating mechanism which stimulates unauthorised long term off-airport car parking.

## II. Are the Commitments Set Out in the Car Parking Strategy Relating to Surface Access Appropriate seen in the context of a Climate Emergency?

2.05 In my client's view, it is only appropriate that the benefits and status enjoyed by the Applicant in terms of airport related car parking provision should be set out in a binding framework through the coming decades, according to definitive environmental limits. To this end, at the heart of surface access considerations should be a commitment on behalf of the Applicant to environmental sustainability, at a level commensurate with the significance which should be afforded to combating climate change. The assessment of performance in terms of surface access provision should be set against "*Limits*", with defined monitoring and reporting requirements outlined as part of a framework secured through the DCO.

### A. Green Controlled Growth

2.06 This process was referred to as Green Controlled Growth (GCG) in the case of the recent DCO application seeking an expansion of London Luton Airport to 32mppa. It sought to place controls on four key categories of environmental effects, one of which comprised surface access; with the others consisting of air quality, greenhouse gas emissions and aircraft noise. These topics were selected as the areas where environmental effects will continue to change over time as passenger numbers grow and technology improves. In the case of surface access, the "*Limits*" were based on percentages of passengers and staff travelling by unsustainable modes of transport.

2.07 The Green Controlled Growth framework in the case of the Luton DCO application sets out the numerical values for the "*Limits*", how they are to be developed, with two threshold levels lower than the "*Limits*" themselves. The thresholds provide an early warning of any potential increase in any environmental effects, with the aim of ensuring that the "*Limits*" are not breached.

2.08 It requires the airport operator to continually monitor and periodically report on the extent of the environmental effects associated with the airport in the four areas selected, one being surface access. The Applicant in the case of the Luton Rising DCO application will not be marking its own homework. A new independent body will be set up entitled the Environmental Scrutiny Group (ESG) whose responsibility is to oversee Green Controlled Growth and ensure it works in practice. The ESG is proposed to include independent members, representatives from Luton Borough Council and neighbouring

councils; supported by technical panels, one for each of the environmental topics. The process is also designed to ensure that community views are fully taken into account.

- 2.09 If monitoring indicates at any point that a “*Limit*” is in danger of being breached, then plans must be produced by the airport operator to set out how that breach will be avoided being sent to the ESG for approval. In the event that one of the environmental “*Limits*” is breached (unless for reasons outside the airport operator’s control), further growth of the airport will be stopped, with mitigation needed to be implemented if required, with the sanction that ultimately airport capacity is constrained until the environmental performance returns below the “*Limits*”.
- 2.10 It follows that GCG supplements the existing EIA process. It does not replace or substitute the need for any mitigation measures identified by the EIA, but provides the process giving additional certainty that the forecast environmental effects will not be exceeded, irrespective of the performance of the fixed mitigation measures initially secured.

### ***B. The Submitted Car Parking Strategy***

- 2.11 In contrast, the Car Parking Strategy [REP1-051] submitted by the Applicant is not based on any equivalent binding framework, but on a set of surface access commitments relating to parking and other mode shares both sustainable and unsustainable, influenced by the same parking strategy. No Airport Surface Access Strategy (ASAS) accompanies the Northern Runway Project, with GAL indicating that they will produce a new ASAS in line with policy requirements, which are to be subsequently updated regularly over the assessment period following commencement of dual runway operation.
- 2.12 The Car Parking Strategy confirms that what the Applicant is seeking as part of the DCO application is an absence of any controlling mechanisms, including any independent organisation overseeing and setting parameters to ensure its environmental performance in terms of surface access is met; an understandable consideration at a time of a climate emergency. In contrast, GAL wishes to avoid a cap being placed on on-airport car parking needs, in recognition of the airport being “*the most appropriate and sustainable location*”; whilst simultaneously requiring “*flexibility to respond to fluctuations in demand and to allow for efficient circulation and parking operations*”. In the 21<sup>st</sup> Century and given the

increasing attention focussed on climate issues generally, these stipulations appear unrepresentative and inconsistent with the expectations of the general public.

- 2.13 In my client's view, this situation simply represents a process of allowing the Applicant to mark its own homework, contrary to the position advanced at the Luton Airport DCO, at variance with earlier Transport Select Committee Reports on surface access considerations [**paragraph 2.27 of Document REP1-194**]. It is unreflective of the advantageous position which GAL currently enjoys in terms of surface access provision, devoid of any enforcement mechanism associated with performance thresholds measured in environmental terms relating to surface access provision in respect of unsustainable modes. There is no independent organisation overseeing surface access considerations, which is particularly worrying given that on 31<sup>st</sup> December 2024 the existing Section 106 Agreement entered into between GAL, Crawley Borough Council and West Sussex County Council comes to an end.

### **III. Provision of On-Airport Passenger Car Parking**

- 2.14 GAL considers on-airport car parking to be the most sustainable location for those trips that cannot be made by other modes, with the management of on-airport parking believed to ensure consistency with the promotion of access via sustainable modes. There is no documentary research which confirms this proposition; any more than there is evidence which reveals that long term off-airport car parking has either previously, or at present, prevented an airport from meeting its sustainable mode share targets.
- 2.15 The Applicant asserts that they achieve the balance between sustainable and unsustainable modes of access to London Gatwick Airport through what is referred to as flexing the availability and pricing of spaces on-airport, in order to ensure that capacity is in line with actual and forecast mode shares and demand throughout the year. If passenger demand increases, and mode share targets change; GAL argue that the provision of additional on-airport car parking spaces is to be delayed, in order to reduce the proportion of trips reliant on park and fly.
- 2.16 This contention has to be seen in the acknowledgement by the Applicant that "*Parking demand varies seasonally; the different journey purposes, destinations and passenger types at different times of year lead to different vehicle occupancy, durations of stay and mode shares*". [**paragraph 3.3.6 of Document REP1-051**]



- 2.17 Moreover, it fails to take into consideration the wide variety of alternative choices available to the passenger seen in terms of access to the airport by private car. A passenger is faced with a number of choices (i) authorised or unauthorised long term off-airport car parking (ii) “kiss-and-fly”, (iii) reliance placed on transportation network company’s such as Uber (iv) dependency on technological platforms such as JustPark, who provide alternative locations outside the airport, primarily on the driveways of residential properties, (v) parking on-street, and (vi) hotels/guest houses where the passenger’s vehicle is parked either at the respective on or off airport hotel/guest house, or parked elsewhere, either on-airport or off-airport.
- 2.18 The Applicant has only limited control over these alternative private car access modes, a factor accepted by GAL viz:- “...a switch to sustainable modes is not feasible or attractive for all air passengers due to a wide variety of factors affecting mode and travel choice”. **[Paragraph 2.4.3 of Document REP1-051]**.
- 2.19 GAL’s view that “flexing the availability and pricing of spaces on-airport, in order to ensure that capacity is in line with actual and forecast mode shares and demand throughout the year” pays little regard to the those controlling influences affecting the Applicant’s ability to influence pricing of its on-airport passenger car parking products. This matter becomes evident from GAL’s response to the CAA’s initial proposals under the Civil Aviation Act 2012, concerning the pricing of long term on-airport car parking seen from the viewpoint of economic regulation at Gatwick Airport from April 2014<sup>1</sup>.

*“The report also makes the mistake of assuming that, as we are the operator with the largest capacity in the Gatwick market, this equates to our being able to lead on price. This is only true if we wish to reduce price; in most cases our competitors will respond to this. However, if we raise prices, unless competitors are confident they will operate to near capacity they will not respond to these price increases, and in most cases demand will drop and overall revenue impact to us will be negative. There are a small number of occasions where for certain products (in particular short-stay and Valet North Terminal) at peak periods, we can raise prices independently of the “market” rate, as demand is sufficiently strong, but in most other cases doing this will be revenue negative.”*

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<sup>1</sup>An Act to make provision about the regulation of operators of dominant airports; to confer functions on the Civil Aviation Authority under competition legislation in relation to services provided at airports; to make provision about aviation security; to make provision about the regulation of provision of flight accommodation; to make further provision about the Civil Aviation Authority’s membership, administration and functions in relation to enforcement, regulatory burdens and the provision of information relating to aviation; and for connected purposes.

- 2.20 Holiday Extras Ltd consider that the explanation provided by the Applicant at **paragraph 3.2.2 of Document REP1-051** concerning staff parking is equally applicable to passengers. I have reproduced the same paragraph below substituting the word “staff” with “passengers” along with the word “work” with “the airport” in red type.

*“3.2.2 It is important to acknowledge that many **passengers** are required to travel at times when alternatives are less viable, for example in the early morning or late at night when public transport services are less frequent and active travel options may be perceived as less safe. Ensuring that **passengers** can get to and from **the airport** safely at all times is an important consideration in determining how **passenger** parking capacity is provided and managed.”*

### *C. Changing Passenger Mix*

- 2.21 The significance to be attached to the above paragraph can be more readily appreciated when assessing the anticipated market mix of passengers through to 2047 set out at Table 6.4-7 of the Needs Case for “The Project” [Document APP-250]. The same table reveals that over the duration of “The Project”, increased significance is expected to be placed on long haul passengers with a corresponding reduction in short haul passengers. This change in passenger profile will coincide at a time with an upgauging of aircraft, and an envisaged increase in average air traffic movement loads (i.e increased seat allocation).

### *D. Future Catchment Areas and Capacity Issues on the London-Brighton Mainline*

- 2.22 The planning statement [Document APP-245] along with Transport Assessment Annex A-Figures [Document APP-259] both show Gatwick Airport’s existing catchment by car and public transport, delineated by travel time isochrones. There are no similar diagrams reflecting the Airport’s future catchment areas in terms of travel time isochrones, and how these may change in the future, seen in the light of an expected rise in long haul flights and a corresponding reduction in short haul flights from the airport over the duration of “the Project”.
- 2.23 The extent of any future catchment areas associated with the Northern Runway Project, seen from a public transport perspective, is required to be viewed in the light of capacity issues on the London to Brighton Mainline railway. In respect of future passenger journeys by rail, based on Table 1 set out in Document APP-258, Network Rail Infrastructure Ltd in Document REP1-090 conclude:

- (a) Accounting for both airport staff and passengers, Gatwick’s model suggests a near doubling in rail trips to and from the airport by 2032 when the Northern Runway Project is factored in – an extra 47,000 additional two-way trips compared to 2016 (which is broadly similar to current passenger volumes).
- (b) Of this growth, according to the GHOST model, around 60% of these additional trips are forecast to occur without the Northern Runway Project and the remaining 40% directly as a result of the Northern Runway Project.
- (c) The 40% increase directly attributable to the Northern Runway Project equates to at least an additional 19,000 daily rail trips in 2032 when compared to the 2016 base. This is irrespective of the current variants between the future baseline level of demand indicated by the GHOST model for rail passengers at Gatwick Airport, and that forecast by the Department of Transport Exogenous Demand Growth Estimator (EDGE model) used as the basis for rail industry demand forecasting.

2.24 Network Rail Infrastructure Ltd’s evidence to the DCO application reveals that at the strategic level, there is no scope to increase the overall level capacity beyond that provided for in the December 2019 timetable, without major reconfiguration to the service and/or significant new infrastructure. This requires investment for which there is currently no public funding allocated or planned for such upgrades, resulting in the existing capacity being exhausted in the 2030s, absent the Northern Runway Project, with any remaining capacity exhausted at or around the point when there will be an uplift in passenger numbers attributable to the Northern Runway Project. It also raises the question as to whether the recent improvements to Gatwick Airport Station which culminated at the end of 2023 are themselves sufficient to cater for “*the Project*”.

2.25 It follows that significant investment is required to the rail system in order to comply with the Applicant’s sustainable mode share targets in favour of public transport access, since otherwise insufficient capacity will be available, with a consequential reduction in reliability. There is therefore a need for a firm financial commitment on the part of the Applicant to satisfy this additional significant investment, requiring the presentation of clear evidence to demonstrate that the necessary funding will be available through the

Sustainable Transport Fund or other similar mechanisms. To date, no such exercise has been undertaken by GAL as part of the Northern Runway Project.

#### *E. Implications Arising from the Strategic Road Network*

- 2.26 Anticipated improvements to the strategic road network are the subject of ongoing discussions between the Applicant and National Highways. It remains the case that interventions on the strategic road network can result in unintended consequences leading to an increase in “kiss-and-fly” trips. In advance of the local public inquiry into a temporary long term off-airport car parking facility promoted by Holiday Extras Ltd on land at Lowfield Heath, it was stated in a Briefing Note prepared by Mr Gary Wallace, Head of Car Parks & Commercial Products at GAL:-

*“4.1) An increase in rail mode share is most likely to result in pressure on those modes where there is direct competition. These are kiss-and-fly, bus and coach and taxi. Car parking and car rental are less affected by incremental changes to rail.”*

- 2.27 This comment avers that kiss-and-fly and taxis are more likely to be affected by improvements to the strategic road network, resulting in an potential increase in the least sustainable modes of access to the airport. It also implies that any increase in public transport mode involving rail journeys would have less impact on on-airport passenger car parking, with the same Briefing Note adding:-

*“5.0 Our ability to attract more passengers to public transport and then retain them is influenced by several factors, including the type of passenger, the availability and relative pricing of public transport, and the quality and convenience of the journey. In both the availability and price of travel choices, public transport is vulnerable to changes in other mode-based modes, especially the capacity and pricing of private car travel, including parking.”*

#### *F. Staff Parking*

- 2.28 The contents of **paragraphs 3.3.10 of Document APP-245**, reaffirmed in **paragraph 3.2.4 of Document REP1-051**, indicate that no additional car parking for airport staff is proposed as part of the DCO application. Historically, the Applicant has provided for around 7,200 spaces for staff, but with staff car mode share decreasing, GAL has taken steps to remove over 1,000 spaces in the last five years. In this regard, it is understood that the airport operator is committed to keeping staff parking capacity at or below the 6,090 spaces available in 2019, although staff numbers are expected to increase as a result of “the Project”. Interestingly, the 1,000 space reduction in staff parking provision over the

last five years is commensurate with the 1,100 additional passenger car parking spaces proposed as part of the same DCO application.

### *G. Mode Share Commitments*

2.29 **Document APP-090** provides a total of 16 mode share commitments. It is the view of Holiday Extras Ltd that in a number of instances these commitments are unlikely to be achievable, whilst in other cases, the use of the phrase “*reasonable financial support*” is considered to be loosely worded and open to wide interpretation, so as to appear more as an aspiration than a meaningful attempt to meet a commitment. There is no clear indication of the levels of financial support needed for future public transport provision as part of the Sustainable Transport Fund; nor is there any indication of estimated levels of funding required to overcome the capacity issues on the London-Brighton Mainline, including where and what sources the necessary financial support will be forthcoming.

### **3.00 FUTURE ON-AIRPORT CAR PARKING PROVISION**

3.01 I have included on the following pages of these representations (i) a plan indicating the location of the staff and passenger car parks at London Gatwick Airport; (ii) Table 1: Existing Parking Provision (2019) taken from the Car Parking Strategy **Document REP1-051** which is also contained in **Document APP-029** as Table 4.2.2 with the same title; (iii) Figure 5.2.1a indicating proposed airport works taken from the Environmental Statement associated with “*the Project*” found in **Document AS-135**; and (iv) Figure 5.2.1b outlining proposed car parks taken from the Environmental Statement associated with “*the Project*”, which is also found in **Document AS-135**.

3.02 All these plans, figures and tables are required to be read in conjunction with each other commencing with the location of existing on-airport passenger and staff car parks, and their respective numbers. However, when analysing the following four pages in combination, they do not indicate firstly how many existing passenger and staff car parking spaces are to be retained; secondly, the number of new passenger and staff car parking spaces to be provided as part of the DCO application; and thirdly, the resultant number of displaced passenger and staff car parking spaces as a consequence of other forms of development comprising an integral part of “*the Project*”. It is for these reasons that the representations raised on behalf of Holiday Extras Ltd at the Deadline 1 stage sought a replacement Table 5.2.3 comprising part of **Document AS-133**.



**Table 1: Existing parking provision (2019)**

	<b>Location</b>	<b>Spaces</b>
Short Stay	Multi-storey car parks 1, 2, 3 (South Terminal)	2,472
	Multi-storey car parks 5, 6 (North Terminal)	2,099
Long Stay	Self-park south	8,282
	Self-park north	6,266
	Valet 'Courtland'	3,285
	Valet north 'Flying Pan'	966
	Valet MA-1	5,372
	Valet 'Purple Parking'	821
	Summer Special	5,277
	Holiday Parking	1,546
	South valet	3,363
	Commuter and coach parking**	292
	Car park Z	570
<b>Total Passenger Parking (Short/Long Stay)</b>		<b>40,611</b>
	Car park B	414
	Car park H	1,170
	Car park L	362
	Car park M	463
	Car park W	121
	Car park X and V	2,644
	Car park Y	916
<b>Total Staff Parking</b>		<b>6,090</b>
<b>Total Spaces</b>		<b>46,701</b>

\* An area adjacent to the off-airport 'Purple Parking' site is operated by GAL as a valet storage facility.

\*\* Commuter parking for users of Gatwick Airport railway station and provision for coach layover, both of which are counted in the annual audit.



- Project Site Boundary**
- Existing
    - Terminal buildings
    - Existing lands
    - Cargo facility buildings
    - Existing taxiway
    - End Farm
    - Existing entrance taxiway
    - Hangar
  - Future Baseline
    - Pier 6 Extension
    - Rapid Exit Taxiway
  - Proposed
    - Heat shielding retained to grass
    - Replacement Northern Runway
    - Replacement Central Area
    - Replacement Airfield Surface
    - Replacement Airfield Surface Transport Facilities
    - Replacement Central Area
    - Replacement Taxiway (CAT)
    - Replacement Randomness Point North
    - Replacement Randomness Point South
    - Satellite Airport Fire Service Facility
    - Relocated Hangar 7 support structures
    - Autonomous Vehicle Maintenance Building
    - Reconfiguration of vehicle exit lanes to entrance lanes
    - Runway Access Track
    - Engine ground turning areas
    - Substation
    - Works to protect Substation L from flooding

Environmental Statement

DRAWING TITLE  
**Proposed Airport Works  
(Version 3 Clean with  
Project Change 1)**

DATE  
**February 2024**

ORIENTATION  
N

DRAWING NO.  
**FIGURE E2.1a**

REVISION  
**3.0**

DRAWN BY  
**MS**

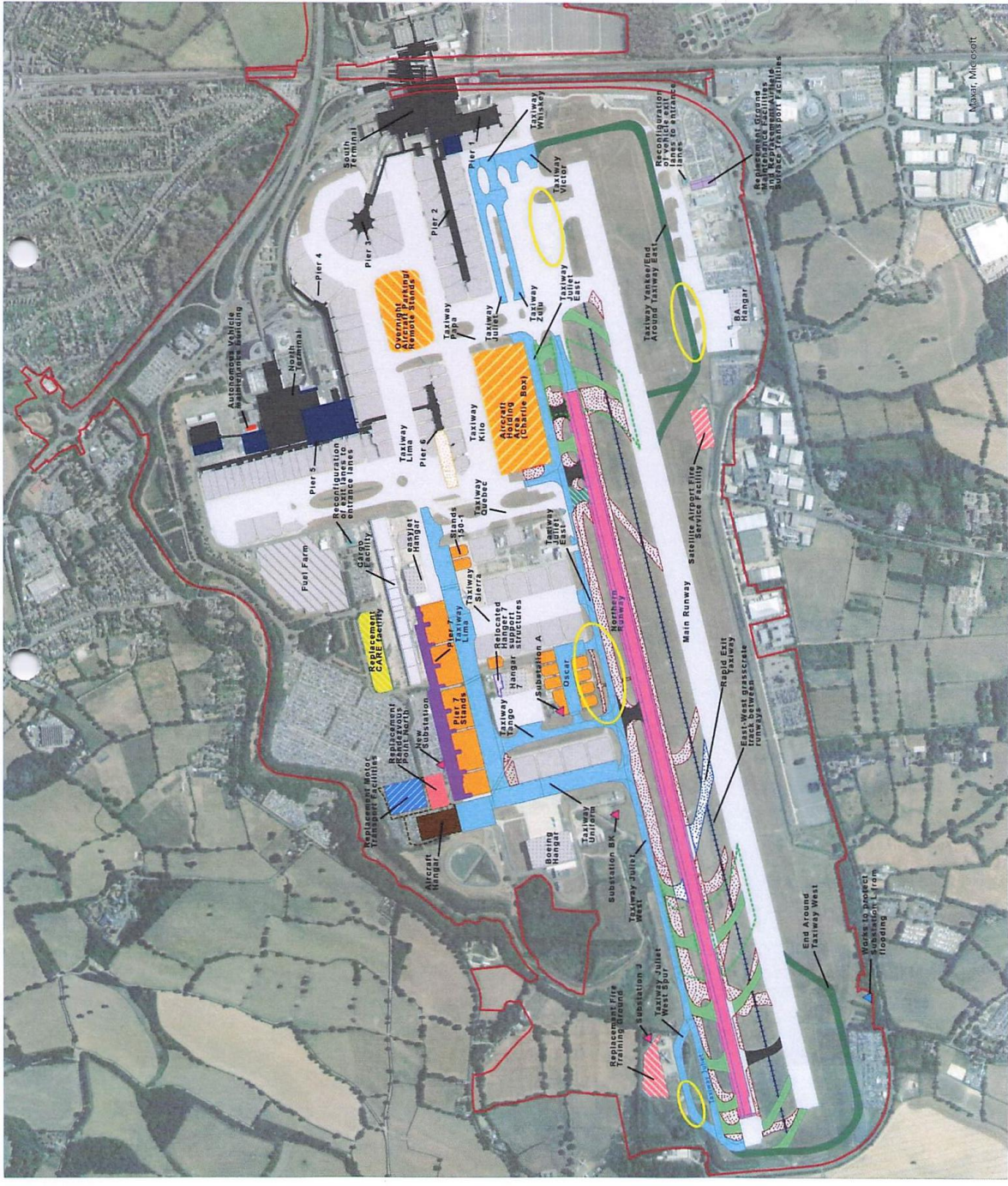
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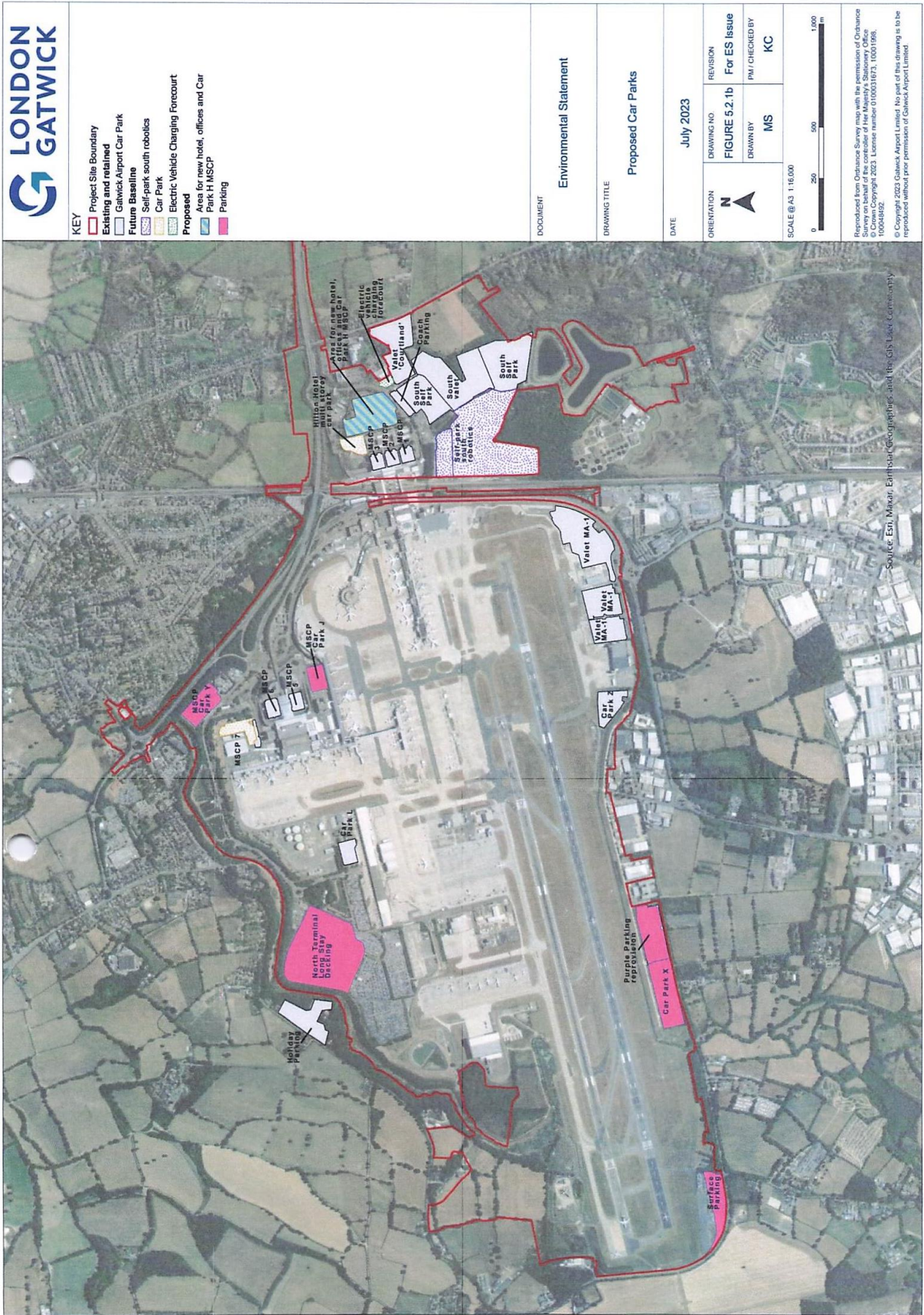
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Maxwell, MJC © 2024





3.03 The contents of paragraph 3.6.70 of Chapter 3: Alternatives found in **Document APP-028** provides details of additional on-airport passenger car parking capacity in the absence of “the Project”. The same information is provided at paragraph 4.4.6 of **Document APP-029** where again it is referred to as the number of new car parks planned for implementation in the absence of “the Project”, with the information subsequently repeated in **Document REP1-051** where it is referred to as additional on-airport car parking capacity assumed in the future baseline.

#### **I. Additional On-Airport Passenger Car Parking Capacity in the Absence of “the Project”**

3.04 In all three documents, the following details comprise the additional on-airport passenger car parking 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.*

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

3.05 The reconfiguration of the existing Hilton Hotel to provide an additional 50 rooms and 850 car parking spaces is a matter discussed in paragraphs 9.13 to 9.17 inclusive of the representations the subject of **Document REP1-194** raised on behalf of my clients, Holiday Extras Ltd at the Deadline 1 stage. Paragraph 4.4.6 of **Document APP-029** indicates that “the hotel’s planning agent has advised that works were expected to recommence in 2023 or 2024 with completion in 2024 or 2025.” There is no definitive statement that the development the subject of the amended planning permission Reference No. CR/020/0575/NCC has been the subject of a material operation in accordance with Section 56 of the Town & Country Planning Act 1990 (As Amended).

#### **B. Multi Storey Car Park 7 (MSCP7)**

3.06 Multi Storey Car Park 7 (MSCP7) is to comprise 7-storeys, 25-30m high including car parking dedicated to the Hampton by Hilton Hotel on land comprising Staff Car Park M, which according to Table 1 found at page 15 of these representations comprises 463 staff car parking spaces. MSCP7 is discussed in more detail in paragraphs 9.18 to 9.25

inclusive of **Document REP1-194** submitted on behalf of my clients at the Deadline 1 stage.

- 3.07 MSCP7 was previously the subject of considerable doubt over its timing and anticipated completion, having been referred to in the Gatwick Capital Investment Programme of 2017, before being re-assessed in the Gatwick Capital Investment Programme of 2018, with a start date “*yet to be programmed*”. The lack of programming of when MSCP7 was to commence, resulted in the withdrawal of the earlier application Reference No. CR/2019/0878/CON. A subsequent application Reference No. CR/2020/0707/NCC was submitted to Crawley Borough Council on 3<sup>rd</sup> November 2020. In this later application, discussion took place on whether the 60 standard car parking spaces along with 4 blue badge spaces previously provided within surface Staff Car Park M were to be replaced, and where the displaced staff car parking was to be accommodated.
- 3.08 It was the case as part of Application No. CR/2020/0707/NCC that the decanted staff car parking would be accommodated in Car Parks X and V, where Purple Parking as part of “*the Project*” is to be reallocated on the southern side of the airport. The contents of paragraphs 5.2.119 to 5.2.121 of Chapter 5: Project Description forming part of **Document AS-133** have referred to the relocation of the Purple Parking facility to the eastern section of the existing Car Park X, where it will displace 1,125 on-airport car parking spaces from Car Park X. The displaced car parking spaces from Car Park X are in turn expected to 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.
- 3.09 It can be seen from this brief analysis of the circumstances MSCP7, how its construction will displace staff car parking from other existing car parks on-airport, a factor considered in paragraph 9.18 to 9.25 inclusive of **Document REP1-194**. No details are provided of this displacement process, including how the 425 parking spaces from Car Park X are to form part of the increased capacity in the Northern Terminal Long Stay Car Park. The question to be raised seen in the context of Table 5.2.3 of **Document AS-133** is to what extent the 580 spaces comprising part of the “*proposed replacement spaces*” on NT

Long Stay Decking include the 425 spaces displaced from Car Park X, and where the remaining 155 spaces (i.e. the difference between 580-425) originate?

- 3.10 The contents of paragraph 4.4.6 of **Document APP-029** indicate that the MSCP7 works have commenced and are expected to be completed this year.

*C. Use of Robotics Technology within Existing Long Stay Car Parking Areas to Increase Capacity, Resulting in an Additional 2,500 Spaces*

- 3.11 The remaining source of additional on-airport car parking for passengers in the absence of “the Project” is concerned with the use of robotics technology in the existing long stay car parking area to increase capacity resulting in an addition 2,500 spaces. The contents of paragraphs 9.26 to 9.29 where they form part of **Document REP1-194** at the Deadline 1 stage submitted on behalf of Holiday Extras Ltd refer to Application No. CR/2018/0935/CON and the robotic car park pilot project which was to take place on part of Car Park B to last for a period of 3 months. This was to follow a decision on whether the same robotic car parking product offered a viable future car parking alternative for London Gatwick Airport.
- 3.12 No 3-month trial period took place, as a consequence of the Covid-19 pandemic, and to this end, no cost benefit assessment appears to have been undertaken by the Applicant. The details surrounding the robotics parking project taken from Application No. CR/2018/0935/CON are outlined in paragraph 9.28 of the representations raised on behalf of my clients at Deadline 1 forming part of **Document REP1-094**.
- 3.13 The Applicant provides no information regarding an assessment into the viability of using this robotic technology, despite the contents of paragraph 4.4.6 of **Document APP-029** outlining it is proposed to extend robotic parking over a larger area of Car Park B to provide an additional 2,500 spaces in three phases, namely 500 spaces in 2024; and 1,000 spaces in each of years 2025 and 2026.
- 3.14 Furthermore, no indication is given as to whether cabins are to be stationed on the land, as was indicated in the supporting material to Application No. CR/2018/0935/CON, or whether the Applicant is to dispense with the use of cabins and rely on robotic block parking. To these considerations can be added that what is referred to as 2,500 car

parking spaces devoted to robotic parking will of itself replace existing passenger car parking spaces in Car Park B, with no indication where they are to be relocated, if at all.

## II. Conclusions on the Three Areas Comprising Additional Car Parking Capacity

- 3.15 The Applicant states in paragraph 3.4.3 of the Car Parking Strategy comprising **Document REP1-051** that as a consequence of these 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.
- 3.16 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.
- 3.17 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”***.
- 3.18 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**.

- 3.19 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.

### III. Permanently Lost Passenger and Staff Car Parking Spaces

#### *D. Summer Special*

- 3.20 Historically two sub-areas can be recognised as comprising what is referred to as the Summer Special on-site passenger car park, a matter evident from the diagram on page 14 of these representations. It consists of a northern sub-area comprising land situated to the immediate south in Zones B and W where they comprise part of the Northern Terminal Long Stay Car Park. A later extension to the same car park was provided to the west of Zone W, being known as the Summer Special Car Park area.
- 3.21 Table 4.2.2 Existing Car Parks comprising part of **Document APP-029** set out at page 15 above shows the Summer Special Long Stay Car Park 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 26 January 2017, at which time a figure of 5,956 spaces was recorded.
- 3.22 A comparison of the drawing indicated at page 14 of these representations, when considered in conjunction with Figure 5.2.1a of **Document AS-135** shows that the majority of the area comprising the Summer Special Car Park will be removed as a consequence of other developments associated with the Northern Runway project, and in particular the northerly extension of the current standby (emergency) runway and consequential extensions of taxiways Lima and Unicorn, together with the construction of Pier 7 and stands. Similarly, 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 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.

- 3.23 Table 4.2.2 Existing Car Parks found at **Document APP-029**, comprising part of Table 1 of **Document REP1-051**, reveals that the existing Summer Special Passenger Car Park consists of 5,277 spaces. The figure in paragraph 5.2.116 of **Document AS-133** shows a permanent loss of car parking spaces on the Summer Special amounting to 3,345. No details are given in **Document AS-133** concerning the retention of the residual 1,932 car parking spaces comprising the Summer Special, and where it is to be provided.

#### *E. North Terminal Long Stay and Flying Pan*

- 3.24 It can be seen from the drawing on page 14 of these representations that the North Terminal Long Stay Car Park comprises six zones. Table 1 on page 15 above has been taken from Table 1 of **Document REP1-051**, being consistent with Table 4.2.2 of **Document APP-029**.
- 3.25 There is no indication of the number of existing passenger car parking spaces comprising each of the six zones relating to the North Terminal Long Stay Car Park, neither is it made clear how many car parking spaces are to comprise the proposed decking on the same long stay car park as part of “*the Project*”. It is understood that 1,680 passenger car parking spaces are to comprise the new North Terminal Decked Car Park (1,100 proposed additional car parking spaces + 580 proposed replacement spaces denoted as NT Long Stay Decking in Table 5.2.3 Car Parking Proposals forming part of **Document AS-133**). To these considerations should be added that no consideration has been given to whether there will be displaced passenger car parking spaces emanating from the construction of any decking, including the realignment of Larkins Road.
- 3.26 There is no reason why two separate on-airport passenger car parks forming the North Terminal Long Stay and the Flying Pan should be amalgamated, particularly as the latter is devoted to valet car parking purposes. Paragraph 5.2.116 and Table 5.2.3 are contained in **Document AS-133**, with Table 5.2.3 indicating there will be a permanent loss of 2,465 spaces on land comprising the North Terminal Long Stay and Flying Pan areas from a

total existing passenger car parking figure of 7,232 spaces as shown on Table 1 in **Document REP1-051** and on page 15 of these representations. It would therefore appear that a combined total of 4,767 car parking spaces would remain on the North Terminal Long Stay and Flying Pan Car Parks, unaffected by the Northern runway Project. There is an absence of any information of how this figure of 2,465 passenger car parking spaces has been derived in Table 5.2.3; or for that matter, how many passenger car parking spaces will be lost, retained, or represent new car parking provision on the same two amalgamated areas.

- 3.27 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 AS-135**.

#### *F. Staff Parking W, B and H*

- 3.28 The contents of Table 5.2.3 set out in **Document AS-133** shows a combined total of 1,150 staff car parking spaces will be lost from Staff Car Parks W, B & H shown on the drawing at page 14 of these representations. This figure does not comply with the total number of spaces recorded 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, and neither is it explained in terms of any retained staff car parking spaces on the same three car parking areas.
- 3.29 Staff Car Park W is to be lost in its entirety as part of the Northern Runway Project, whilst Staff Car Park B is shown to comprise a construction compound in **Documents APP-079 and APP-088**, being required for site welfare purposes during years 2029 and 2030 in conjunction with works to widen the Airport Way bridge over the London-Brighton Mainline. It appears that Car Park B will be retained for staff car parking purposes for a limited period of less than 5 years; paragraph 5.3.115 of **Document AS-133** confirming *“All temporary compounds will be restored to their previous land use following completion of the works except for the Car Park B compound that would become replacement open space”*. In short, Car Park B will in the mid to long term be used for replacement open space purposes resulting in a loss of existing staff car parking



- 3.30 Staff Car Park H is shown on Table 1 of **Document REP1-051** and page 15 of these representations, as providing 1,170 staff car parking spaces, or 19% of the total on-airport staff car parking provision. The same car park is shown on Figure 5.2.1b of **Document AS-135**, reproduced on page 17 of these representations, as being redeveloped for a new hotel, offices and multi-storey passenger car park. It poses the question as to where the existing staff car parking spaces decanted from Car Park H will be relocated elsewhere on airport in the longer term, including the extent to which existing staff car parking on Staff Car Park H will continue to contribute to the overall on airport staff car parking provision of 6,090 spaces. **[paragraph 3.4.3 of Document REP1-051]**.

#### *G. GAL Purple Parking Valet and Car Park X*

- 3.31 The contents of paragraphs 5.2.116 to 5.2.121 of Chapter 5: Project Description forming part of **Document AS-133** refers to the relocation of the existing Purple Parking facility devoted to passengers to the eastern section of existing Staff 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 catering for 700 car parking spaces for passengers, 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.

### **IV. Proposed Replacement Passenger and Staff Car Parking Spaces**

#### *H. Multi Storey Car Park Y (MSCP Y)*

- 3.32 Multi Storey Car Park Y is intended to be used for passengers in the longer term, displacing staff car parking on the same area comprising Staff Car Park Y, as shown on the drawing found on page 14 of these representations. Table 5.2.2 of **Document AS-133** shows that there will be approximately 3,035 additional passenger car parking spaces provided in MSCP Y, but this takes no account of the loss of 916 staff car parking spaces from Staff Car Park Y in accordance with Table 4.2.2 Existing Car Parks comprising part of **Document APP-029**.
- 3.33 No indication is provided by the Applicant of where these lost staff car parking spaces, or a proportion of them, are to be accommodated elsewhere within the airport boundary. In this way, the overall net additional passenger car parking spaces as a consequence of

the construction of Multi Storey Car Park Y is not 3,035 spaces, but 2,119 additional passenger car parking spaces (3035 – 916 = 2119).

- 3.34 The area to accommodate Multi Storey Car Park Y is primarily to be used throughout the Northern Runway Project as a compound and it is anticipated this is required until the surface access works are completed. In this way, **Document APP-088** which provides indicative construction sequencing, shows that what is referred to as the Car Park Y Compound is to be used continuously from 2024 through to 2032 as a material processing plant area; material storage and laydown area; wheel wash area for HGVs and a pick-up point for workforce vans and small parking area for operatives.
- 3.35 To these considerations should be added that Multi Storey Car Park Y is also to be used as a flood attenuation facility, with the greater the amount of flood storage provided, the greater the benefit in terms of flood extent and depth. The Applicant has tested a range of storage capacities, in which it was held that 32,000 cu.m of capacity within MSCP Y would significantly reduce the risk of flooding to the North Terminal. These factors are evident from paragraph 5.2.185 taken from **Document AS-133**.
- 3.36 The provisions of paragraph 5.2.186 of **Document AS-133** state that the flood attenuation facility would fit within the footprint of, and structurally support the proposed multi storey car park, which would be built above the storage facility. The excavation depth would be approximately 8-10m deep, depending on the foundation solution, before being backfilled and restored to a car park on completion. The storage area would be up to 125m x 75m, with a footprint of 9,375 sq.m.
- 3.37 These considerations have to be seen in the context of the indicative construction sequencing set out in **Document APP-088** which shows that the flood storage area on Car Park Y is expected to take place in 2024/2025, which is at the same time as the same area is proposed to be used as a site compound. It is therefore not surprising that Phase 1 of Multi Storey Car Park Y is not intended to commence until 2031/2032, with the second phase of the same multi-storey car park not due to start until 2034/2035.
- 3.38 It is therefore evident that the construction of the Multi Storey Car Park Y will not commence for at least seven years, and is not expected to be completed for at least a decade, with the intervening period prior to its use as a multi storey car park being

devoted to an important compound for the Northern Runway Project, at which time construction is also expected to take place as part of a flood attenuation area. It must follow that even if the figure of 3,035 car parking spaces in Table 5.2.3 of **Document AS-133** is accepted (which my clients contend should not be the case for the reasons set out in paragraph 3.34 above), Multi Storey Car Park Y is a long term commitment, programmed to take place towards the end of “*the Project*”.

- 3.39 It follows that of the total proposed replacement passenger car parking spaces amounting to 8,905 set out in Table 5.2.3 of **Document AS-133**, 34% are unlikely to be available for at least seven years, which can only lead to uncertainty surrounding future passenger car parking associated with “*the Project*”.

#### *I. Multi Storey Car Park J*

- 3.40 Table 5.2.2 forming part of **Document AS-133** refers to approximately 890 additional car parking spaces being provided in Multi Storey Car Park J, with no account taken of the fact that it lies in the same location as existing Surface Staff Car Park J as indicated on the plan at page 14 of these representations. The construction of Multi Storey Car Park J will result in the loss of 361 staff car parking spaces, a matter evident from the contents of Table 1 of **Documents REP1-051** and page 15 of these representations.
- 3.41 No information is provided by the Applicant confirming the number of staff car parking spaces in Staff 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 5.2.3 of **Document AS-133**, given that what is intended in this location is a reduction of 361 surface level staff car parking spaces. It follows that what is proposed in Multi Storey Car Park J is a reallocation of existing car parking provision, resulting in 529 net additional car parking spaces (890 - 361 = 529).
- 3.42 This is irrespective of the fact that Table 4.2.2 Existing Car Parks set out in **Document APP-029** repeated in Table 1 of **Document REP1-051** does not consider Staff Car Park J.

#### *J. Multi Storey Car Park H*

- 3.43 The land currently devoted to Staff Car Park H is to be redeveloped for mixed use purposes to accommodate office floorspace lost through the conversion of Destination

Place to a hotel; a new 400-bedroom hotel, along with a proposed multi storey passenger car park catering for an addition 3,700 spaces. The latter is to take place over two phases, the first occurring between 2025 and 2027, before a break in 2028, prior to a commencement of Phase 2 between 2029 and 2031. In this way Multi Storey Car Park H is to take place over a seven-year period, with no indication provided of how many staff car parking spaces will remain available before the commencement of Phase 1 between 2025 and 2026, and when the earliest passenger car parking spaces will be available.

- 3.44 Multi Storey Car Park H will be devoted to passenger car parking as part of a larger mixed use redevelopment scheme to take place on the site currently referred to as surface Staff Car Park H. 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 re-provided on airport.

#### *K. GAL Purple Parking Valet*

- 3.45 Figure 5.2.1e comprising part of **Document AS-135** reveals that the area comprising Car Park X is to form a flood compensation area to allow for the provision of additional flood plain capacity, taking on the role of a flood compensation area within the airport boundary. The contents of paragraph 5.2.182 of **Document AS-133** state that a lowering of the existing ground levels of Car Park X up to 2 metres will occur over an area of 90m x 300m having a footprint of 27,000sq.m.. This will create approximately 55,000cu.m of flood storage, before being reinstated as a surface car park.
- 3.46 Paragraph 5.2.182 of **Document AS-133** adds “*The car park would be used partly for staff car parking and partly for the re-provided Purple Parking following completion of the excavation works, with restrictions on its use when flooding is anticipated*”, although the proposed use does not sit comfortably with the operations and business case forming part of **Document APP-073**. In terms of the operations’ case, it is stated that Car Park X is situated in an area distant from the terminal and so would be used for the block storage of cars as part of the valet service or staff use (non-passenger facing). Similarly, in assessing the option of using Car Park X from a business case, it is said that staff/block parking use is only likely due to its location, with a cost benchmarking exercise for the decking to be undertaken as part of a reduced specification for its staff/jockey use. It is

proposed to utilise a standardised decking system with anticipated low construction complexity.

3.47 Paragraph 5.2.183 of **Document AS-133** adds that Car Park X would be connected to the River Mole, with an outfall structure, which may take the form of a flat culvert or other arrangement to allow fish to pass back into the River Mole following a flood event. A ramp from the existing road network would be provided to allow access to Car Park X.

3.48 In my client's view, this is not the ideal situation in which to accommodate passengers' cars on what is the 8<sup>th</sup> largest airport in Europe, with a likelihood that there will be certain times of the year when Car Park X will be unavailable for its intended purpose.

#### *L. North Terminal Long Stay Decking*

3.49 The North Terminal Long Stay Decked Car Park is to accommodate approximately 1,680 spaces in accordance with Table 5.2.2 of **Document AS-133** with Table 5.2.3 of the same document revealing 580 proposed replacement spaces, with the remaining 1,100 comprising proposed additional spaces. It is presumed that of the 580 proposed replacement spaces, 425 will be displaced spaces from Car Park X accommodated in the North Terminal Long Stay Car Park, in accordance with paragraph 5.2.121 of **Document AS-133**. It is not clear where the 155 spaces (580 - 425) forming part of the proposed replacement spaces in the North Terminal Long Stay Decking emanate from, in that it appears they have been displaced from other on-airport car parks.

#### **V. Other Car Parking Sites Not Catered for in Table 5.2.3 of Document AS-133**

##### *M. Staff Car Park L and Passenger Car Park Z*

3.50 Staff Car Park L and Passenger Car Park Z are referred to in Table 1 of **Document REP1-051** reproduced on page 15 of these representations, having been taken from Table 4.2.2 of **Document APP-029**. In both cases, they reveal a total of 570 and 362 spaces respectively. Staff Car Park L is situated to the east of the rectangular shaped area known as the Flying Pan on the drawing set out on page 14 of these representations, as well as on Figure 5.2.1b of **Document AS-135** found on page 17 of these representations.

3.51 Car Park Z is located on the southern boundary of the airport to the east of Car Parks V and X on Figure 5.2.1b taken from **Document AS-135** reproduced at page 17 of these representations. It is described as a staff car park on the drawing found at page 14 of

these representations, but this does not reflect the contents of Table 1 where it is shown as a passenger car park. The same area is also shown as a staging and laydown compound on Drawing No. 5.2.1f of **Document No. AS-135**. The intention for this area is that it be used as a staging area for workforce, vehicles and plant for the core and taxiway works. Vehicles and plant will be lined up for the workforce to go through briefings and rehearsals before entering the airside. Stockpiles of small quantities of soil and muck away will be present in the same area.

- 3.52 What is known as the Car Park Z compound is to be operational from 2024 continuously through to 2038 in accordance with **Document APP-088** and hence there will be a loss of 362 passenger car parking spaces in this area, but this is not reflected in Table 5.2.3 of **Document AS-133**.

#### *N. Valet MA-1*

- 3.53 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 1 of **Document REP1-051**, and 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*", which is to be in operation continuously from 2024 to 2035 in accordance with the indicative construction sequencing set out in **Document APP-088**.

- 3.54 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.

3.55 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”*

3.56 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.

3.57 It follows that adopting a conservative estimate at least 50% of the 5,372 spaces relating to valet parking MA-1 will be permanently lost.

#### **VI. Conclusions on the Revised Table 5.2.3 Concerning Additional Passenger Car Parking as a Consequence of “the Project”**

3.58 I have reproduced overleaf a revised Table 5.2.3 taken from **Document AS-133**, which shows the overall changes in car parking spaces as a consequence of the Northern Runway Project, from which a number of important conclusions emerge.

3.59 The revised Table 5.2.3 reveals a loss of 1,630 car parking spaces adding the total figures in the columns entitled *“proposed replacement spaces”* and *“proposed additional spaces”*

**TABLE 2**  
**Amended Version of Table 5.2.3 Car Parking Proposals Set Out in Document AS-133**

Permanently Lost Spaces		Proposed Replacement Spaces		Proposed Additional Spaces	
Summer Special	-3,345	MSCP Car Park Y <sup>^</sup>	2,119	NT Long Stay Decking	1,100
NT Long Stay & Flying Pan	-2,465	MSCP Car Park J <sup>^^</sup>	529	MSCP South Hilton Hotel +	820
Staff Parking W, B & H <sup>*</sup>	-1,705	MSCP Car Park H <sup>^^^</sup>	2,530	Robotics Technology+	2,500
GAL 'Purple Parking' Valet	-820	GAL 'Purple Parking' Valet	700		
Car Park X	-1,125	NT Long Stay Decking	580		
Car Park Z <sup>**</sup>	-362				
Car Park MA-1 <sup>***</sup>	-2,686				
<b>TOTAL</b>	<b>-12,508</b>		<b>6,458</b>		<b>4,420</b>

\* Staff Car Park W is to be lost in its entirety as part of the Northern Runway Project. Staff Car Park B is only in use for a limited period before being used as a construction compound in years 2029 and 2030, following which it will be used for replacement open space purposes. Staff Car Park H is to be redeveloped as part of a mixed-use scheme comprising a new hotel, offices and a new multi storey car park.

\*\* Passenger Car Park Z is to be used as a site contractors' compound continuously between 2024 until 2038 and so it will be permanently lost during the Northern Runway Project. No mention is made of the loss of Car Park Z in Table 5.2.3 of **Document AS-133**.

\*\*\* Passenger Car Park MA-1 is shown to accommodate 5,372 car parking spaces in accordance with Table 4.2.2 in **Document APP-029** and Table 1 of **Document REP1-051**, comprising three individual areas. At least half of Passenger Car Park MA-1 is shown to be used as a main contractors' compound in conjunction with "the Project" continuously from 2024 through to 2035. The loss of car parking spaces at 2,686 represents a conservative figure, being half of the total passenger car parking spaces provided.

<sup>^</sup> Multi Storey Car Park Y is situated in the same area as Staff Car Park Y where in accordance with Table 4.2.2 of **Document APP-029** and Table 1 of **Document REP1-051** there are 916 staff car parking spaces. The new multi storey car park will therefore provide 2,119 net additional passenger car parking spaces (3035 being that devoted to the new multi storey car park - 916). This is aside from the fact that Phase 1 of MSCP Y is not intended to be developed until 2031/2032 with Phase 2 due to start in 2034/2035 as the same area is to be used as a site compound, and where a flood attenuation facility is to be provided, prior being brought into use as a multi storey car park.

<sup>^^</sup> Multi Storey Car Park J is situated on the same site as Staff Car Park J, where in accordance with Table 4.2.2 of **Document APP-029** and Table 1 of **Document REP1-051** there are 361 staff car parking spaces. The new multi storey car park will therefore provide 529 net additional passenger car parking spaces (890 being that devoted to the new multi storey car park - 361).

<sup>^^^</sup> Multi Storey Car Park H is to form part of a mixed-use redevelopment for office floorspace, a hotel and a multi storey car park. Multi Storey Car Park H is situated on the same site as Staff Car Park H where in accordance with Table 4.2.2 of **Document APP-029** and Table 1 of **Document REP1-051** there are 1,170 staff car parking spaces. The new multi storey car park will therefore provide 2,530 net additional passenger car parking spaces, 3,700 being that devoted to the new multi storey car park - 1,170. Multi Storey Car Park H is to be developed over two phases between 2025 and 2031 with a break in 2028.

+ It is contended that the 820 multi storey car parking spaces associated with the South Terminal Hilton Hotel, along with the 2,500 additional spaces comprising part of robotic technology should be seen as part of "the Project" in that they are all required to be made available during the period 2025 to 2035 in advance of the completion of the Northern Runway in 2029.



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,

- 3.60 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.
- 3.61 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.
- 3.62 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.

- 3.63 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.
- 3.64 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.
- 3.65 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.
- 3.66 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.

#### **4.00 ESTIMATED PASSENGER PARKING CAPACITY REQUIREMENTS**

- 4.01 Table 2 of **Document REP1-051** outlines the methodology used for deriving additional passenger parking provision for “*the Project*”, based on information from the Strategic Transport Model Suite. Four considerations arise from an assessment of the same table.
- 4.02 Firstly, the provision of current authorised off-airport passenger parking in 2019 highlighted in Row B comprising both independent long term off-airport car parking sites, whether used in terms of the park and ride model or primarily by meet-and-greet operators, along with car parking at hotels outside the Operational Boundary of the airport, was at its highest level during the decade between 2013 and 2023. In omitting

those authorised car parking spaces at off-airport hotels, the number of car parking spaces on sites occupied by independent authorised long term off-airport car parking operators has never exceeded 15,639 spaces on the day of the annual count of the Gatwick Airport Long Term Car Parking Survey. The highest number of spaces attributable to authorised long term off-airport car parking operators was recorded in 2016, with the lowest being in 2020 as a consequence of the Covid-19 pandemic when 4,818 car parking spaces were recorded on the day of the count, which at that time was higher than that on-airport at 4,234. It follows that the figure of 21,200 in Row B of Table 2 is at the highest level.

- 4.03 Secondly, Row G of Table 2 uses an estimated increase factor in the number of park-and-fly trips associated with “*the Project*” between 2019 and 2047 as 1.20. There is no explanation as to how this figure has been derived, which is important as it largely dictates the estimated on-airport parking provision required in Row K of the same table.
- 4.04 There appears to be a mathematical mistake insofar as Row H which is concerned with the estimated total peak parking accumulation in 2047, being computed by multiplying Row F by Row G, would amount to 60,660 and not 60,810.
- 4.05 Lastly, it can be seen that the additional requirement for “*the Project*” revealed in Row N is predominantly based on how the three components of additional on-airport car parking referred to in paragraph 3.4.2 of **Document REP1-051** are treated in the sense of whether they should be absent of “*the Project*” or, as pointed out earlier in these representations, included as part of “*the Project*” given an absence of commencement of development or consultation applications having been submitted to Crawley Borough Council. In this regard, Row M should refer to Section 3.4.3 and not 3.3.4.
- 4.06 Taking into account the above comments, along with the previous paragraphs forming part of these representations, it is considered that Row M should be amended to reflect the fact that MSCP 7 will form part of the baseline of “*the Project*”, although the car parking provision comprising the Southern Terminal Hilton Hotel Multi Storey Car Park, along with robotic parking, should form part of “*the Project*” especially given the timing of their delivery in the context of other car parking expected to be completed at the same time.

4.07 I have therefore reproduced below an amended version of Table 2, from which it is considered there is an additional passenger car parking requirement of 7,530 spaces.

**Table 2**  
**Amended Derivation of Additional Passenger Parking Provision for the Project**

A	Current on-airport passenger parking provision (2019)	40,600
B	Current authorised off-airport passenger parking provision (2019)	21,200
C	Total passenger parking provision (2019) (A + B)	<b>61,800</b>
D	Peak on-airport parking accumulation (August 2019)	32,000
E	Assumed peak off-airport accumulation (August 2019) (87.5% of off-airport provision)	18,550
F	Current peak parking accumulation on and off-airport (August 2019) (D+E)	50,550
G	Estimated increase factor in number of Park & Fly trips with Project (2019 to 2047)	1.20
H	Estimated total peak parking accumulation, 2047 (F x G)	60,660
I	Estimated peak parking accumulation accommodated off-airport (87.5% of off-airport provision)	18,550
J	Estimated on-airport peak parking accumulation to be accommodated, 2047 (H - I)	42,110
K	Estimated on-airport parking provision required (allowing for max occupancy of 87.5% of provision) (J/0.875)	<b>48,200</b>
L	Additional on-airport provision required (over and above current) (K - A)	7,600
M	Less future baseline projects (see section 3.4.3)	-3,320 +3,250
N	Additional requirement for the Project (L - M)	<b>7,530</b>