

INTRODUCTION

Airport Industrial Property Unit Trust ('AIPUT') hereby provides a brief Deadline 2 submission relating to the examination of the application made by Gatwick Airport Limited ('GAL') for a development consent order ('the DCO application') for the Gatwick Northern Runway Project ('the Project') under the Planning Act 2008 ('PA 2008').

AIPUT is a limited partner in the Airport Industrial Limited Partnership, the General Partner of which is Airport Industrial GP Limited ('AIGPL'). AIGPL, together with its wholly owned subsidiary Airport Industrial Nominees Limited ('AINL'), own the legal title to the leasehold land and have rights in certain parcels of land to which the DCO application relates (as described further below). AIGPL and AINL have therefore received from GAL notice of acceptance of the DCO application in accordance with section 56(2)(d) of the PA 2008. Accordingly, pursuant to section 102(1)(a) of the PA 2008, AIGPL and AIN are each automatically an 'interested party' in the examination of the DCO application.

AIPUT, AIGPL and AINL make this Deadline 2 submission which follows the submission by the same of a Written Representation at Deadline 1, in each case as a group under the name 'AIPUT'.

REVIEW OF GATWICK AIRPORT LIMITED'S (GAL) DEADLINE 1 SUBMISSIONS

AIPUT has reviewed relevant documents accompanying GAL's Deadline 1 submission and would like to raise the following comments, which relate to the matters set out in AIPUT's Written Representation.

Car Parking Strategy

AIPUT have appointed Motion, a Transport Planning and Infrastructure Design Consultant, to provide a high level analysis of the Car Parking Strategy (Application Document Ref: 10.5) submitted by GAL at Deadline 1 of the examination. Motion note the following to be considered by the Examining Authority:

- The Car Parking Strategy contains an insufficient level of detail required for the scale of the Northern Runway Project
- The proposals are discussed but no commitment to parking provisions or a definitive strategy is made.
- More detail is required on mode split targets and penalties for not hitting mode split targets. GAL have demonstrated a predict and provide approach to planning for travel to and from the airport. By default, this will tend to replicate existing patterns rather than plan for more people to travel by sustainable modes. Whilst the DCO documents refer to mode split targets and timescales within which they are to be delivered, these are all post completion and opening of the new runway. AIPUT would therefore raise their concern with the lack of penalties in the event that GAL did not achieve their modal split targets during operation. AIPUT would suggest that appropriate penalties to incentivise sustainable transport through modal splits should be considered within the Development Consent Order
- The transport modelling and hence all the forecast highway impacts, are based on the assumption of minimum parking charges. Any changes in the car parking charging regime compared to that modelled, would nullify the results of the modelling. Of note is that Annex B of the Transport Assessment makes several assumptions on travel costs including costs for car parking / access charges. GAL should provide a summary table of these cost assumptions and provide a commitment that these are the charges that would apply during operation of the Northern Runway. In the absence of such a commitment little weight can be placed on the forecasting methodology which relies on future charges being implemented at a certain level (for example see Annex B Table 24). More detail or commitment on parking charges is therefore required.

Relevant Representation Report (Traffic and Transport)

AIPUT have reviewed the Relevant Representation Report (Application Document Ref: 10.2) submitted by GAL at Deadline 1 of the examination. AIPUT have multiple concerns relating to traffic modelling and surface access proposals, as previously raised in their Relevant Representation and Deadline 1 Written Representation. As such, Motion have provided the following comments on the Applicants responses to Relevant representations detailed in Table 4.26.1 (Thematic issues and the Applicant's response – Traffic and Transport) of the Relevant Representation Report:

- We do not consider that the capacity forecast will be delivered on the ground because highway schemes do not meet desirable minimum design standards; and
- There is no headroom in the traffic forecasts at all in terms of highway capacity being able to absorb increases in traffic in the event that the forecasts are even slightly out. Section 6.11 of Annex B to the Transport Assessment explicitly states that forecasting is "inherently uncertain". In this context it would be reasonable that a range of forecasts are tested in order to ensure that the mitigation proposed is sufficiently durable to absorb changes in traffic forecasts.
- Furthermore, to ensure the traffic modelling proposals are transparent and consulted upon effectively, the Local Model validation Report (LMVR) should be available for public comment in order to understand the strengths and weaknesses of the GHOST model.
- Additionally, the highway improvements are inadequate because they do not meet the Design Manual for Roads and Bridges (DMRB) standards and hence are unlikely to deliver the theoretical capacity improvements predicted. In the context of the current proposals and level of traffic modelling undertaken, the highway network will be working at the edge of its ability in the future. AIPUT and Motion therefore conclude that despite the additional information provided in the Relevant Representation Report, there is no sufficient evidence to suggest that the concerns raised in AIPUT's Written Representation at Deadline 1 are addressed.

Surface Access Highways Plans – Structure Section Drawings – For Approval

The structure section drawings are welcomed by AIPUT and provide some detail to the surface access highway plans being proposed. Motion would like to query on behalf of AIPUT, how the lane widths have been determined. For instance, the two-way single carriage ways are labelled as 7.25m despite a width of 7.3m being the established DMRB requirement, suggesting unfamiliarity with DMRB. AIPUT would also request that dimensioned plans are provided for junctions across the highway network.

In light of the above, AIPUT maintain their position detailed in their Written Representation submitted at Deadline 1.