



Gatwick Airport Northern Runway Project

Response to Rule 17 Letter – Car Parking

Book 10

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1 Introduction

- 1.1.1 This document contains Gatwick Airport Limited's (the "**Applicant**" or "**GAL**") response to the Examining Authority's ("**ExA**") request in its Procedural Decision letter of 8 April 2024 [PD-013] under Rule 17 of the Infrastructure Planning (Examination Procedure) Rules 2010 to request further information.
- 1.1.2 This document responds specifically to the ExA point R17a.3 relating to "Car Parking Strategy (CPS) and Indicative Construction Sequencing (ICS)".
- 1.1.3 The ExA's request is provided in full below.

Car Parking Strategy (CPS) and Indicative Construction Sequencing (ICS)

Following the submission of the CPS [REP1-051] and the ICS [REP2-016], the ExA would like to better understand the timing of the car parking provision in the context of the programmed construction at the airport.

Provide a table setting out the comparison between the future baseline and Proposed Development on airport passenger/ visitor parking at the start of each year from the indicative start of 2024 through to the year after completion of all new and replacement parking (shown as year ending 2035 in the ICS, or later year if there are changes planned for parking numbers after that date). Clearly identify each year in new rows and the following in columns for each year:

- 1. Predicted public transport mode share – future baseline (based on the Airport Surface Access Strategy (ASAS) targets);*
- 2. Parking provision on site – future baseline;*
- 3. Predicted peak parking accumulation – future baseline;*
- 4. Predicted annual passenger levels – future baseline (mppa);*
- 5. Predicted public transport mode share – Proposed Development (based on Surface Access Commitments [APP-090] (SAC) targets);*
- 6. Parking provision on site – Proposed Development;*
- 7. Predicted peak parking accumulation – Proposed Development;*
- 8. Predicted annual passenger levels – Proposed Development (mppa); and*
- 9. Provide notes in the table to provide explanation of the changes each year.*

Provide a similar table setting out the comparison between the future baseline and Proposed Development on staff parking at the start of each year from the indicative start of 2024 through to the year after completion of all new and replacement staff parking (no indicative date clear from ICS when staff parking

changes will be completed). Clearly identify each year in new rows and the following in columns for each year:

- 1. Predicted car driver mode share – future baseline (based on ASAS targets);*
- 2. Parking provision on site – future baseline;*
- 3. Predicted staff numbers – future baseline;*
- 4. Predicted car driver mode share – Proposed Development (based on SAC targets);*
- 5. Parking provision on site – Proposed Development;*
- 6. Predicted staff numbers – Proposed Development; and*
- 7. Provide note in the table to provide explanation of the changes each year.*

Additionally, to support the data provided in the tables, detail how all data that has been derived and/or signpost the origin of the data provided in any submitted document in the Examination Library.

- 1.1.4 Section 2 of this response provides the tabulated data as per the ExA response, with accompanying notes regarding the data provided. Section 3 provides further narrative regarding the proposed approach to the car parking strategy to provide the ExA and other parties with clarifications in relation to the tables provided.

2 Tabulated annual data for car parking, demand and mode share

- 2.1.1 Table 1 below provides annual estimates of air passenger parking demand and capacity for the future baseline and Proposed Development.

Table 1: Comparison of Future Baseline and Proposed Development on airport passenger/visitor parking

Passengers								
	Future Baseline				Proposed Development			
Year	PT Mode Share (%) ⁽¹⁾	Total Spaces ⁽²⁾	Est. Parking Demand (day) ⁽³⁾	Est. Annual Pax (mppa, inc. transfer) ⁽⁴⁾	PT Mode Share (Pax %) ⁽⁵⁾	Total Spaces (Pax) ⁽⁶⁾	Est. Parking Demand (day) ⁽⁷⁾	Est. Annual Pax (mppa, inc. transfer) ⁽⁸⁾
2023	44	40,320	34,500	40.3	44	40,320	34,500	40.3
2024	46	40,320	34,500	44.0	46	40,320	34,200	44.0
2025	47	45,020	34,500	47.5	47	39,650	33,900	47.5
2026	48	46,020	34,600	50.9	48	37,480	33,600	50.9
2027	49	46,520	34,600	54.2	50	38,050	33,300	54.2
2028	50	46,520	34,600	57.0	52	38,920	32,900	57.0
2029	51	46,520	34,600	57.3	53	40,400	32,600	61.3
2030	52	46,520	34,600	58.0	54	42,010	33,900	65.3
2031	52	46,520	34,700	58.7	54	42,010	35,100	69.0
2032	52	46,520	34,400	59.4	55	42,010	35,900	72.3
2033	52	46,520	34,700	59.9	55	41,300	36,100	72.9
2034	52	46,520	35,000	60.4	55	40,290	36,400	73.4
2035	52	46,520	35,300	60.9	55	39,380	36,600	73.8
2036	52	46,520	35,500	61.4	55	39,380	36,800	74.4
2037	52	46,520	35,800	61.9	55	43,330	37,000	75.0
2038	52	46,520	35,800	62.4	55	47,630	36,800	75.6
2039	52	46,520	36,000	63.0	55	47,630	36,900	76.2
2040	52	46,520	36,200	63.5	55	47,630	36,900	76.8

Notes for Table 1

1. Passenger public transport mode share for the Future Baseline comprises 2023 data from CAA Annual Passenger Survey and average annual values for 2029, 2032 and 2038 taken from the **Transport Assessment** [[REP3-058](#)] modelling consistent with the Airport Surface Access Strategy target for 2030. All other values are interpolated based on estimated trends.
2. Estimates of total car parking spaces for the Future Baseline are based on current provision with the addition of the baseline projects MSCP7 (3,700 spaces in 2025) and Robotic Parking (2,500 spaces delivered in three phases between 2025 and 2027). Note that the current provision is lower than the base case value of 40,610 spaces due to the removal of the separate commuter parking area from the total number of passenger spaces.
3. Estimated peak day parking demand for the Future Baseline is based on observed occupancy in 2023 (aggregated across all parking products) and values for 2029, 2032 and 2038 taken from the Transport Assessment modelling factored from a June weekday to an August Busy Day (using factors set out in Table 40 of the **Transport Assessment Annex B: Strategic Modelling Report** [[APP-260](#)]). All other values are interpolated based on estimated trends.
4. Estimated Annual Passengers for the Future Baseline comprise 2023 outturn passenger demand and values for 2029, 2032 and 2038 are taken from the **Forecast Data Book** [[APP-075](#)]. All other values are interpolated based on estimated trends and in accordance with the forecasts submitted.
5. Passenger public transport mode share for the Proposed Development comprises 2023 data from CAA Annual Passenger Survey and average annual values for 2029, 2032 and 2038 taken from the Transport Assessment modelling. All other values are interpolated based on estimated trends.
6. Estimates of total car parking spaces for the Proposed Development are based on current provision with the addition of the proposed projects to replace spaces lost due to construction and 1,100 additional spaces to cater for growth, both in accordance with the **Project Description** [[REP1-016](#)].
7. Estimated peak day parking demand for the Proposed Development is based on observed occupancy in 2023 (aggregated across all parking products) and values for 2029, 2032 and 2038 taken from the Transport Assessment modelling factored from a June weekday to an August Busy Day (using factors set out in Table 40 of the **Transport Assessment**

Annex B: Strategic Modelling Report [APP-260]). All other values are interpolated based on estimated trends.

8. Estimated Annual Passengers for the Proposed Development comprises 2023 outturn passenger demand and values for 2029, 2032 and 2038 are taken from the Forecast Data Book. All other values are interpolated based on estimated trends and in accordance with the forecasts submitted.

2.1.2 **Table 2** below provides annual estimates of airport employee parking demand and capacity for the future baseline and Proposed Development.

Table 2: Comparison of Future Baseline and Proposed Development on airport employee parking

Employees						
	Future Baseline			Proposed Development		
Year	Car Driver Mode Share (Staff %)⁽¹⁾	Total Spaces (Staff)⁽²⁾	Est. Total Employees (000s)⁽³⁾	Car Driver Mode Share (Staff %)⁽⁴⁾	Total Spaces (Staff)⁽⁵⁾	Est. Total Employees (000s)⁽⁶⁾
2023	71	6,090	20.7	71	6,090	20.7
2024	67	6,090	22.0	67	6,090	22.0
2025	64	6,090	23.4	64	6,090	23.4
2026	62	6,090	24.7	62	6,090	24.7
2027	60	6,090	26.1	60	6,090	26.1
2028	57	6,090	26.6	57	6,090	26.6
2029	55	6,090	27.1	54	6,090	27.1
2030	52	6,090	27.6	51	6,090	28.6
2031	52	6,090	27.8	49	6,090	29.5
2032	52	6,090	27.9	45	6,090	30.3
2033	52	6,090	28.1	45	6,090	31.2
2034	52	6,090	28.2	45	6,090	31.3
2035	52	6,090	28.3	45	6,090	31.5
2036	52	6,090	28.4	45	6,090	31.6
2037	52	6,090	28.5	45	6,090	31.7
2038	52	6,090	28.7	45	6,090	31.9
2039	52	6,090	28.8	45	6,090	32.0
2040	52	6,090	28.9	45	6,090	32.1

Notes for Table 2

1. Employee car driver mode share for the Future Baseline comprises data from the **2023 Staff Travel Survey** [\[REP2-005\]](#) and values for 2029, 2032 and 2038 taken from the Transport Assessment modelling, consistent with the 2023 Airport Surface Access Strategy target for 2030. All other values are interpolated based on estimated trends.
2. Estimates of employee car parking spaces for the Future Baseline are based on current maximum provision. Note that annual provision may vary lower than the base maximum value of 6,090 spaces from time to time depending on peak demand for spaces.
3. Estimated Annual Employees for the Future Baseline comprises 2023 estimated total employees whose normal workplace is at Gatwick and values for 2029, 2032 and 2038 taken from the **Forecast Data Book** [\[APP-075\]](#). All other values are interpolated based on estimated trends and in accordance with the forecasts submitted.
4. Employee car driver mode share for the Proposed Development comprises data from the 2023 Staff Travel Survey and values for 2029, 2032 and 2038 taken from the Transport Assessment modelling, consistent with the Surface Access Commitments target for 2032. All other values are interpolated based on estimated trends.
5. Estimates of employee car parking spaces for the Proposed Development are based on current maximum provision. Note that annual provision may vary lower than the base maximum value of 6,090 spaces from time to time depending on peak demand for spaces, the temporary impacts of construction and, where relevant to provide additional passenger parking capacity during construction.
6. Estimated Annual Employees for the Proposed Development comprises 2023 estimated total employees whose normal workplace is at Gatwick and values for 2029, 2032 and 2038 taken from the Forecast Data Book. All other values are interpolated based on estimated trends and in accordance with the forecasts submitted.

Further notes:

- All quoted car parking capacities are rounded to the nearest 10 spaces
- All daily values correspond to a peak August busy day to reflect the maximum estimated parking demand, which is used to determine required capacity.

3 Clarifications and supporting information

- 3.1.1 The data provided in this note should be read in conjunction with the **Car Parking Strategy** [REP1-051] and **Surface Access Commitments** [REP3-028]. The commitments set out the overall approach to parking capacity and a net increase of only 6,860 spaces compared to the number provided on the airport today (5,750 spaces proposed to be delivered as part of the Future Baseline and a further 1,100 spaces as part of the Project).
- 3.1.2 The additional spaces anticipated in the Future Baseline are predominantly associated with a current shortfall in short to mid stay products at North Terminal, to be provided through the construction of MSCP7 and through the automation of some of the self-park capacity in South Terminal, through the use of robotics which provides an enhanced customer experience and makes efficient use of existing car parking areas. Both projects are predicated on baseline growth to 67.2mppa, an increase of 44% over the pre-Covid peak of 46.7mppa in 2019 yet represent only a 14% increase in car parking capacity.
- 3.1.3 It should be noted that the total parking demand in proportion to spaces masks higher demand for some parking products and lower demand for others, which in turn results in a dynamic pricing approach to make efficient use of spaces and to maintain availability and choice without increasing the attractiveness of driving to the airport over alternative modes.
- 3.1.4 The additional 1,100 spaces proposed in the DCO Application for growth with dual runway operations represent less than an extra 3% of parking capacity against an increase in airport passenger demand of around 19%.
- 3.1.5 The delivery of additional capacity also needs to come forward in a timely manner due to the loss of existing spaces during construction, notably during 2026-2029 and to a lesser extent in 2032-2033. Some block-park storage spaces will be unavailable until 2038, meaning that spaces ultimately intended for long term growth will be required earlier, to replace lost capacity in the short term. During these periods it can be seen from Table 1 with the Proposed Development that forecast demand for on-airport parking approaches but does not exceed capacity. During these periods it is important that the Applicant retains its existing ability to manage parking effectively and efficiently so that it can respond to demand in a timely manner.
- 3.1.6 The Applicant will also support temporary reductions in the number of staff spaces available in the peak summer period should additional passenger capacity be required to avoid pressure on off-airport capacity and support sustainable mode share targets. It should be noted that in all cases the annual

number of parking spaces shown assumes all car parks are open and available. Should there be less than the predicted demand for spaces some car parks will be withheld, except where it would reduce the parking product choice offered to passengers.

- 3.1.7 To achieve this the Applicant is proposing to continue the flexible, proactive approach that has helped to deliver an increase in sustainable mode shares whilst accommodating growth. This flexibility is essential to contribute to the delivery of the Surface Access Commitments and wider surface access strategy at the airport and distinguishes airport-operated car parking from that provided by other, commercial “off-airport” providers who seek only to promote car travel.
- 3.1.8 For clarification, in the context of the current **Car Parking Strategy** [[REP1-051](#)] and the approach put forward as part of the **Surface Access Commitments** [[REP3-028](#)], “on-airport” means airport-operated, on-airport spaces only. These are the only spaces that the Applicant can influence and control directly and are therefore the only spaces within the capacity to flex to contribute to sustainable travel.
- 3.1.9 In the same context, “off-airport” refers to all the spaces and locations operated by third parties and counted in the annual Gatwick Parking Survey, published by Crawley Borough Council for each local authority area. For the avoidance of doubt this includes those sites located within or adjacent to the airport boundary including but not limited to the Hilton Hotel, Sofitel Hotel, Purple Parking and Povey Cross Travelodge.
- 3.1.10 Local planning policies restrict any increases in airport-related parking remote from the airport as being less sustainable than sites within the airport boundary. Planning enforcement also serves to close down any unauthorised sites that appear from time to time and the Applicant has included financial contributions in the **Draft Section 106 Agreement** ([REP2-004](#)) to support parking control and enforcement of unauthorised parking (see paragraph 7 of Schedule 3 of the draft Section 106 Agreement (which the Applicant notes is currently under discussion with the Joint Local Authorities to agree the appropriate sums)). Historically, the local authorities have sought GAL’s assistance with enforcement cases, calling on GAL to demonstrate the sufficiency of on-airport parking. Any increases in off-airport parking would be counter to the requirements to support sustainable travel mode shares.
- 3.1.11 The Applicant already acts to keep on-airport, airport-operated spaces and charges at levels that provide choice of parking product to passengers, ensuring that there is sufficient capacity on-airport as the most sustainable location. At the same time, the Applicant controls the amount of available capacity by

continuously monitoring pre-book demand for spaces and flexing the number of spaces provided through different parking products and their prices. The Applicant notes that many of the local authorities recognise the delicate balance of the provision of on-airport parking which must be achieved to manage supply in order to meet the Surface Access Commitments and avoid unlawful off-airport parking (see 17.1N of the Joint West Sussex Local Impact Report [[REP1-068](#)] and paragraph 10.123 of the Joint Surrey Councils Local Impact Report [[REP1-097](#)]).

- 3.1.12 In this way the Applicant is working proactively to minimise the potential for less sustainable forms of car parking, such as off-airport unauthorised parking, whilst maintaining its commitment to encouraging those that can shift to more sustainable modes do so. It does so by planning in advance of any adjustment that is necessary and using the flexibility it has within the operation of existing car parks, such as switching some spaces from self-park to block-park, to maximise efficiency before any changes take place. This dynamic process doesn't easily lend itself to simple control.
- 3.1.13 Retaining this current approach is an important part of managing car parking whilst achieving sustainable mode share targets. Any change to the way in which the Applicant is permitted to manage on-airport parking as part of a toolbox of measures would undermine the intended approach to optimising sustainable surface access. For example, a removal of the rights to manage on-airport parking flexibly would mean any changes would be reactive and would risk local authority planning policies, with a likely increase in the need for enforcement activities.

Appendix A: Responses to parking-related questions deferred from Deadline 3

At Deadline 3, the Applicant deferred elements of responses to certain interested parties' submissions on parking related to Deadline 4, in order to provide more substantive responses (partially informed by the work being progressed in response to the ExA's question in the Rule 17 request, discussed in section 2 above). The deferred responses are provided in this document and made in relation to two responses provided by stakeholders:

- Legal Partnership Authorities
- Holiday Extras Limited

Legal Partnership Authorities

Table A1 provides responses to the outstanding points made at Deadline 2 in relation to the Applicant's Car Parking Strategy submitted at Deadline 1.

Table A1: Legal Partnership Authorities Responses to REP1-065

Ref	Legal Partnership Authorities Response	The Applicant's Response
Action Point 6 (bullet 1)	The modelling shows there is no need for the extra spaces and, in terms of GAL saying that an additional 1,100 spaces are required, confirmation of how the need will be triggered is awaited. (This point has been made previously in SCC's LIR [REP1-097]).	<p>The point raised in Surrey County Council's Local Impact Report [REP1-097] and reiterated here relates to the estimated daily demand for the Future Baseline and Proposed Development in 2047 being almost the same, suggesting no further parking capacity is necessary for dual runway operation.</p> <p>The additional spaces are required both in the short term to supplement parking capacity during construction, when several existing car parks will be unavailable and in the longer term when peak parking demand is more sustained due to peak spreading as well as to accommodate an additional 13 million passengers.</p> <p>An increase in the capacity of North Terminal Long Stay is required to provide sufficient capacity both during and post-construction, when existing sites are either temporarily or permanently unavailable. This includes re-provision for other parking products, which need to be relocated due to construction that require the intensification (through decking) of existing long stay spaces.</p>

<p>Action Point 6 (bullet 2)</p>	<p>It would be helpful if the Car Parking Strategy could provide a more detailed commentary to explain how the mode share targets and uplift in Park and Fly trips, are factored into the calculation. This will need to explain more clearly how the proposed number of new passenger spaces links to the mode share commitments in the SAC. The Authorities’ understanding is that it is the “1.20 multiplier” that essentially factors in the Project’s mode share targets to the parking need equation, but it would be helpful if this could be clarified by the Applicant.</p>	<p>Further clarification on the Car Parking Strategy and derivation of factors used has been given in response to TT.1.39 in The Applicant's Response to ExQ1 - Traffic and Transport [REP3-104].</p> <p>Parking projects included in the Future Baseline provide an additional 14% of capacity compared with estimated growth to 2047 of 44% compared with pre-Covid passenger demand. The additional 1,100 spaces proposed in the DCO Application for growth with dual runway operation represent less than 3% extra parking capacity against an increase in airport passenger demand of a further 19%. It is clear from the relative level of growth that achieving this limited expansion of car parking is largely due to a continued reduction in car parking mode share as part of our commitments to sustainable travel.</p>
<p>Action Point 6 (bullet 3)</p>	<p>Table 1 of the Car Parking Strategy identifies 2019 passenger parking (GAL operated) totalling 40,611 spaces. This broadly reflects the equivalent figure shown in the September 2019 Local Authority Parking Survey, which identifies 40,790 GAL operated spaces. Whilst this shows the total number of GAL operated spaces, the Authorities</p>	<p>It should be noted that the parking capacity given as “on-airport” includes GAL-operated spaces only. There is a clear distinction in the annual car parking count undertaken and reported by Crawley BC in the Local Authority Parking Survey¹ between sites located in each local authority area and those for which Gatwick Airport are responsible. The proposals and</p>

¹ <https://crawley.gov.uk/sites/default/files/2024-01/Gatwick%20Parking%20Survey%20Results%20Summary%202023.pdf>

	<p>note that there are other passenger parking spaces on-airport, for example the 3,280 spaces at Purple Parking, and other spaces at on-airport hotels including Povey Cross Travelodge (623 spaces) and Sofitel (565 spaces). The omitted spaces, whilst not operated by GAL, are on-airport spaces that are used by passengers travelling to/from the airport. From the Car Parking Strategy, it is unclear if or how these (and other on-airport spaces not operated by GAL) have been taken into account in the Table 2 worked example.</p> <p>The Authorities would wish to understand how on-airport spaces not operated by GAL are taken into account in any calculations, as to exclude them may result in the Applicant overestimating the amount of new parking required as a result of the Project.</p>	<p>assumptions made by the Applicant for future parking at the airport only relate to those spaces that it is responsible for and can control. All other spaces provided, including those at Purple Parking and Povey Cross Travelodge where they are included in the Local Authority Parking Survey are considered as “off-airport” or more explicitly “not airport-operated” for the purposes of the calculations. No change is assumed in the capacity or operation of any of these other areas, and the Applicant has no responsibility or rights to influence their operation.</p> <p>Local Planning Authority policies restrict off-airport parking and the only proposal for a change in parking physically located on-airport but not controlled by GAL is the proposed car park at the Hilton Hotel, permission for which has now lapsed and is no longer included in the parking calculations.</p>
<p>Action Point 6 (bullet 4)</p>	<p>The Authorities note that the Applicant is including within its Baseline the 820 parking spaces proposed at the Hilton Hotel. Notwithstanding the Authorities’ concerns as to the appropriateness of some specific projects being included in the Baseline, there would seem to be a point of consistency as to why the non-GAL operated Hilton proposal is</p>	<p>The Applicant included the 820 parking spaces at the Hilton Hotel as it had received planning approval and could therefore be considered “near certain” or “reasonably foreseeable” for the purposes of modelling. The planning permission for the Hilton Hotel spaces has lapsed and as explained further in response to Action Point 11 in The Applicant's</p>

	<p>included, when existing non-GAL operated on-airport parking (as mentioned above) appears not to factor into the calculations.</p>	<p>Response to Actions ISH7: Other Environmental Matters (Doc Ref. 10.26.3) the Applicant has confirmed that it no longer assumes the addition of the 820 spaces in its future car parking estimates.</p> <p>It should be noted that the Applicant does not propose to replace the 820 spaces elsewhere as part of on-airport (airport-operated) capacity.</p> <p>As a result, only GAL-controlled on-airport parking spaces are included within the future baseline assumptions.</p>
<p>Action Point 6 (bullet 5)</p>	<p>The Applicant has identified authorised off airport provision for 2019 as being 21,200 total spaces. This does not appear to tally with the equivalent figure in the September 2019 Local Authority Parking Survey, which identifies 18,110 authorised off-airport spaces. It is unclear why the Applicant’s figure is higher. It may be that the Applicant has based its calculations on a different Airport Boundary to that used by the Authorities (for clarity, the Authorities have used the Gatwick Airport Boundary as shown on the Crawley Local Plan Map 2015 that should be used for the purpose of determining whether a location is on or offairport). It is possible that the Applicant may have included</p>	<p>It should be noted that the figure for 2019 reflects the position as at summer 2019 and therefore pre-dates the 2019 September survey and should be aligned to the September 2018 survey, noting the distinction that “on-airport” spaces in the context of the DCO submission relates to airport-operated spaces only. All other spaces are included as “off-airport” capacity provided by third parties over which the Applicant has no control.</p>

	<p>within this figure parking within the airport boundary that is not operated by GAL. It would be helpful if the Applicant could please clarify in more detail the sites included in its authorised on and off-airport figures.</p>	
<p>Action Point 6 (Staff Parking)</p>	<p>The Authorities previously noted that whilst supporting the objective to increase staff travel by sustainable modes, it is not clear how the 1,150 space reduction in staff parking relates to sustainable mode share objectives, especially since there will be more staff at the airport as a result of the project. The Car Parking Strategy confirms that, as of 2019, there are 6,090 staff parking spaces on-airport, and sets out a commitment to keep staff parking at or below this figure with the Northern Runway Project, noting that with staff numbers expected to increase, this effectively equates to a reduction in staff spaces relative to staff numbers. The Authorities understand the logic of this approach, with increased staff numbers meaning that the ratio of spaces to staff decreases over time. However, we remain unclear how the permanent loss of 1,150 staff spaces at W/B/H factors into this, as this would result in a significant loss of spaces, leaving 4,940 spaces to serve an increased number</p>	<p>The Applicant does not make a distinction over specific locations for staff parking, therefore the reduction of 1,150 spaces at particular staff parking locations will be re-provided elsewhere as part of changes set out in the Project Description. This also allows for the potential to flex the number of staff spaces available at any time, up to but not exceeding the total of 6,090 spaces set out in the Project Description, in order to support the approach to promoting more sustainable travel (through both mode share and car sharing) and achievement of the binding mode share commitments in the Surface Access Commitments [REP3-028].</p>

	<p>of staff. The loss of these 1,150 spaces would seem less gradual than the ‘reduction in spaces relative to staff over time’ approach referred to in the Car Parking Strategy.</p>	
<p>Action Point 6 (Future Baseline Provision)</p>	<p>In addition to the above comments on the Applicant’s Car Parking Strategy, the Authorities have the following concerns, as set out in the West Sussex Local Impact Report [REP1-068]. The Authorities do not concur with the Applicant’s assumption that the circa 3,300 parking spaces can be included in the baseline. It has not been demonstrated that the Hilton Hotel car park planning permission has been lawfully commenced and the permission may have lapsed. Additionally, the robotic parking, whilst coming forward as Permitted Development, CBC would be consulted at the appropriate times. As part of that Permitted Development Rights (“PDR”) consultation, CBC would ask the Applicant to demonstrate that a proposed increase in parking is justified by evidence of demonstrable need and having regard to GAL’s surface access commitments as per Local Plan Policy GAT3 and the existing S106 legal agreement. The assumption, to include the robotic</p>	<p>As previously confirmed, the lapse in the planning permission for the Hilton Hotel multi-storey car park has resulted in the withdrawal of the 820 spaces in terms of future capacity estimates. The implications of the reduction in car parking spaces assumed in the Future Baseline is explained further in response to Action Point 11 in The Applicant's Response to Actions ISH7: Other Environmental Matters (Doc Ref 10.26.3).</p> <p>In terms of the assumption that the 2,500 robotic parking spaces (proposed by GAL as permitted development) can form part of the future baseline, the Applicant considers the robotic operation of the car park in this way to be permitted development. The outcome could be achieved by manual valet parking. In the context of the overall scale of parking at and serving the airport no significant environmental effects would arise from managing the car park in this way. Even if that is not the case, it is reasonably</p>

	<p>parking in the baseline, is made in advance of the individual PDR consultations.</p>	<p>foreseeable that planning consent would be granted for these measures which help to reduce pressure for off-airport parking at the same time as growing on airport parking to a scale which is consistent with an improving public transport mode share.</p> <p>If it had to be assumed that the robotic car parking could not be included in the future baseline, passenger forecasts would be unaffected.</p> <p>The response to Action Point 12 in The Applicant's Response to Actions ISH7: Other Environmental Matters (Doc Ref 10.26.3) provides further details on the Applicant's use of permitted development rights.</p>
<p>Action Point 6 (Controls on Parking Capacity)</p>	<p>The Authorities would also wish to reiterate that there is a concern that there is no control through the draft DCO or proposed s106 agreement to prevent the current PDR being used to create an overprovision of parking in the future, undermining sustainable travel to the airport. It is therefore considered that the Applicant should waive permitted development rights for additional on-airport parking from the draft DCO, as this would enable the Local Planning Authority to effectively</p>	<p>The provisions made in the Surface Access Commitments require GAL to maintain and enhance sustainable mode shares through the use of parking controls and pricing. This effectively controls future airport parking to that which is set out in the DCO Application and it is therefore not in the Applicant's interest to pursue any further on-airport parking.</p>

	<p>control the provision of future airport parking and ensure that Gatwick provides sufficient parking, but no more parking than is required to support its sustainable strategy for airport access.</p>	<p>The SACs effectively enshrine outcomes which are consistent with the progress GAL has successfully made through a reasonably approach to sustainable transport management. There is no reason for that to change just because GAL is making a DCO application.</p>
<p>Action Point 6 (Pricing Strategy)</p>	<p>The Car Parking Strategy provides further detail on the pricing strategy and use by the airport operator of dynamic pricing to balance supply and demand for parking across its range of parking products, outlining that pricing offers an important tool to influence the level of parking demand and thus the mode share of Park & Fly trips. Paragraph 4.5.5 of the Car Parking Strategy explains that whilst GAL is not committing to implement a specific level of charge, it is committing to monitor the mode share trajectory and to use parking charges as one of the key influences in reaching its mode share commitments. This is also set out in the Surface Access Commitments. The Car 41 Parking Strategy (and cross reference to the relevant SAC) confirms that GAL will continue to use dynamic pricing for passenger parking to ensure a balanced approach. The Authorities welcome the continued use of dynamic pricing to ensuring a balanced approach in</p>	<p>Comment noted.</p>

	<p>supporting sustainable transport mode share and offering an appropriate range of on-airport parking for those who do need to drive (on-airport parking being more sustainable than off-airport parking).</p>	
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Holiday Extras Limited

The Applicant's responses to the outstanding points made at Deadline 2 in relation to the Applicant's **Car Parking Strategy** [[REP1-051](#)], submitted at Deadline 1 is set out below.

As a general response to Holiday Extras Limited's approach of indicating a specific number of spaces for each car park, the Applicant suggests this is not relevant to the understanding of the overall number of car parking spaces provided in the Future Baseline and with the Proposed Development in response to demand and mode share, both of which are presented for the airport as a whole (and the Applicant notes that an annual car parking count is undertaken and reported by Crawley BC in the Local Authority Parking Survey² between sites located in each local authority area and those for which Gatwick Airport are responsible).

The Applicant is able to respond flexibly within the car parks identified across the airport to ensure the on-airport spaces it operates reflect changes in demand for each parking product. Changes in pricing also enable the applicant to reduce demand for parking in line with its sustainable mode share targets. This is in contrast with off-airport providers who are seeking to increase car parking and maximise the use of spaces, both authorised and unauthorised with no regard to sustainability objectives.

The applicant sets out in the **Car Parking Strategy** [[REP1-051](#)], **The Applicant's Response to Actions ISH7: Other Environmental Matters** (Doc Ref. 10.26.3) and elsewhere in this document the relationship between proportionate increases in on-airport spaces operated by the Applicant while there is a higher percentage growth in airport passengers alongside a gradual increase in mode shares for sustainable modes, with a corresponding decrease in parking mode share.

As noted in the Car Parking Strategy, this flexible approach has been shown to be effective (even without binding DCO mode share commitments) which is evidenced by GAL's successful achievement of its mode share targets under the ASAS to date

The Applicant has further made clear that it has no desire to, or any responsibility or rights to reduce or otherwise change the operations of off-airport parking or on-airport parking provided by a third party.

The **Surface Access Commitments** [[REP3-028](#)] clearly sets out a regime for monitoring and includes specific financial contributions to support the achievement of the binding mode share targets, which it is noted go further than any other UK airport, either in their current airport surface access strategies or in published development plans (including proposed Development Consent Orders). The requirement for flexibility is not

² <https://crawley.gov.uk/sites/default/files/2024-01/Gatwick%20Parking%20Survey%20Results%20Summary%202023.pdf>

in order to increase car parking capacity above need, which would be equivalent to acting conversely to Gatwick's binding mode share commitments, but to proactively and in a timely manner ensure that on-airport capacity remains in balance with demand and mode share. This is not something that off-airport providers can achieve, as they are not required to, nor do they seek to reduce capacity in order to contribute to sustainable travel objectives, either in relation to the airport or more widely.

Further updates in relation to the Surface Access Commitments provide additional information in terms of monitoring and independent enforcement action should the mode share targets and other commitments not be met.

The consideration that on-airport parking is the most sustainable location is not one that the Applicant makes on its own behalf, it corresponds with local planning policy, which recognises the need to avoid airport-related trips from impacting local residential areas or from creating additional vehicle movements.

Draft Crawley Local Plan 2024-2040

Para 10.23 "Passengers that fly in and out of Gatwick need to be able to travel to and from the airport by a variety of means of surface transport. The airport operator is required, to prepare an Airport Surface Access Strategy (ASAS) (most recently published October 2022) to address and appropriately manage the surface access need of aircraft passengers and staff. Controlling the extent of airport related parking helps encourage the use of alternatives whilst ensuring sufficient parking is available to passengers who have no other option.

Para 10.27 "It is considered that sites within the airport boundary provide the most sustainable location for the additional long stay parking which needs to be provided as passenger throughput grows whilst still supporting the public transport target. Sites within the airport boundary are close to the terminals and can help reduce the number and length of trips. The Airport operator is responsible for meeting the modal split target for passengers and the level of provision of car parking spaces makes an important contribution to meeting this target. Therefore, it is important that the provision of car parking spaces is appropriately managed in the most sustainable way."

The development of airport mode share targets, both past and present is in the context of there being off-airport parking provision at the level allowed for under local planning policy, neither of which the Applicant can control or change. It is therefore incorrect to suggest that off-airport parking is somehow unrelated to the airport meeting its mode share targets. Were there no available off-airport parking and on-airport parking was constrained by available space it would be logical to assume that the reduced availability

would make other modes relatively more attractive and subsequently impact mode choice.

The Applicant included in its **Transport Assessment** [[REP3-058](#)] and accompanying annexes details of the extensive transport modelling undertaken in support of the Application. These documents set out all of the data sources and modelling assumptions made, which demonstrate all modes of access, including providers indicated by the respondent, were included in the assessment.

The operation of several different parking products at different prices on-airport supports the airport's ability to affect passenger choice, and is a differentiator alongside proximity to the terminals from the approach taken by off-airport providers.

The respondent has conflated two very separate points relating to the Applicant's influence over mode share for staff and passengers. They have also failed to acknowledge that passengers have the ability to re-time their journey to or from the airport in a way that staff generally do not, particularly so for shift-workers and operational staff. This means that travel by public transport for example is a viable option for some travellers who may choose to arrive several hours ahead of their flight time and is self-evidently distinguishable from staff travel.

The Applicant included in its Transport Assessment [APP] and accompanying annexes details of the extensive transport modelling undertaken in support of the Application. This includes a detailed assessment of the operation of Gatwick Airport Station in **Transport Assessment Annex D – Station and Shuttle Legion Modelling Report** [[APP-262](#)] and impact on the wider rail network in **Transport Assessment Annex B – Strategic Transport Modelling Report** [[APP-260](#)] both of which are the subject of continuing discussions with Network Rail that will be reflected in the Statement of Common Ground to be submitted at Deadline 5. The impacts at Gatwick Airport Station indicate that the recent improvements are sufficient to cater for the Proposed Development with similar operational performance both with and without the project.

Any requirements identified by Network Rail for projects to be funded by the Applicant in connection with the Project will be subject to further discussion but the Applicant has made clear that both the Sustainable Transport Fund and the Transport Mitigation Fund proposed in connection with this Application would in principle be available for consideration in support of rail projects, subject to the appropriate evidence being produced and the agreement of the Transport Forum Steering Group as set out in the **Surface Access Commitments** [[REP3-028](#)].

The respondent is correct that the total number of staff parking spaces has been reduced in the last 10 years, partly in response to higher sustainable mode shares. It is completely unrelated to the proposed increase in 1,100 *passenger* car parking spaces as part of the Project and it is misleading to imply otherwise.

The respondent does not provide any evidence or reference to support its view that a number of the commitments in the **Surface Access Commitments** [REP3-028] are unlikely to be achievable. These commitments are secured as a requirement to the dDCO, with a clear process prescribed in respect of their monitoring and governance. Information relevant to the levels of funding support proposed in relation to certain commitments will be available in future revisions to the Surface Access Commitments following discussions with key stakeholders.

The **Project Description** [REP1-016] sets out that the Future Baseline parking projects are intended to be completed by 2027, which is in advance of dual runway operations starting in 2029. The difference between 47,181 total passenger spaces and 53,271 spaces is the inclusion of 6,090 staff spaces. All of the proposed Future Baseline capacity is based on a future operation without the Northern Runway Project and should therefore reasonably be considered part of a Future Baseline, i.e. the comparative position in the absence of the Project over the duration of the Assessment period.

As detailed in responses at Deadline 3 the addition of 820 spaces at the Hilton Hotel in relation to a planning permission that has now lapsed is no longer considered as part of the Future Baseline.

The timing and delivery of MSCP7 is not the subject of this Examination as it relates to an existing planning permission, which is under construction and due for completion in 2024. MSCP7 occupies a site that formally included staff car park M, which numbered 463 spaces but these have not been in use since 2019. They are included in the calculations of “lost” staff spaces as they are withdrawn from the total staff capacity of 6,090 spaces. The respondent makes assumptions connecting the loss or displacement of specific numbers of staff and passenger spaces in different parts of the airport campus that are not relevant to the assessment of the Project and are not recognised by the Applicant.

The Respondent is incorrect in respect of the trial of robotic parking, which did begin prior to the pandemic but was curtailed to less than 3-months. The trial took place on part of the South Terminal Long Stay Car Park and not on Car Park B as the Respondent suggests. Further responses relating to the robotic parking spaces included within the Future Baseline is set out in response to Action Point 12 in **The**

Applicant's Response to Actions ISH7: Other Environmental Matters (Doc Ref. 10.26.3).

In common with all other parking provision operated by the Applicant on-airport it is for the Applicant to determine where and how best to accommodate the required capacity, within the limits set out and granted under the DCO in areas available to them and as described in the Project Description and assessed in the Environmental Statement and Transport Assessment.

In respect of Table 2 included in 3 of Holiday Extras Limited Comments on any submissions received by Deadline 1 [[REP2-075](#)], the Applicant does not accept the calculations presented by the respondent and maintains its position with respect to the additional car parking spaces proposed both for the Project and in respect of the Future Baseline. The Applicant also maintains its position with regard to the **Surface Access Commitments** [[REP3-028](#)] and proposals for additional measures and funding to support sustainable mode shares, including the approach to reduce car parking mode share.

The respondent does not make clear its position in respect of mode share targets contained in **Surface Access Commitments** [[REP3-028](#)], noting on the one hand that they believe targets to be unachievable and that more parking is required, but also supporting limits to surface access impacts and emissions.