

Date: 6th June 2024

Your Ref: TR020005 / GATW-AFP059

Our Ref: 15849 / Airport Industrial Property Unit Trust ('AIPUT'), on behalf of both Airport Industrial GP Limited ('AIGPL') and AIGPL's wholly owned subsidiary Airport Industrial Nominees Limited ('AINL').

DWD

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INTRODUCTION

Airport Industrial Property Unit Trust ('AIPUT') hereby provides a brief Deadline 5 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 in their relevant representation and written representation).

AIPUT, AIGPL and AINL make this Deadline 5 submission as a group under the name 'AIPUT'.

- The following Deadline 5 submission comprises comments on any further information/submissions received by Deadline 4.

Comments on other information submitted at Deadline 4

AIPUT has instructed Motion Transport Limited to comment on the following Deadline 4 submissions:

- Response to Rule 17 Letter – Car Parking (Doc Ref. 10.21)
- Document Ref. 10.21: Response to Rule 17 Letter - Car Parking
- Document Ref. 10.23: The Applicant's Response to Written Representations on Project Changes 1-3
- Document Ref. 10.24: The Applicant's Response to Deadline 3 Submissions - Appendix H - Note on Excepted Development and the Airport Development Principle
- Document Ref. DL4: National Highways - commentary on outline CTMP

AIPUT/Motion's comments on the relevant information submitted at Deadline 4 can be found in Appendix 1. AIPUT separately notes that the incorrectly drawn width of the carriage way (raised by AIPUT at Deadline 2) has been amended in 'Surface Access Highways Plan – Structure Section Drawings v3'. AIPUT welcomes the amendment and acknowledge the plans now reflect the industry standard.

APPENDIX 1: TRANSPORT NOTE PREPARED BY MOTION

Transport Appraisal

Site: Gatwick Northern Runway DCO
Prepared by: John N Russell
Date: 06 June 2024



1.0 Introduction

Representations

- 1.1 This technical note is prepared on behalf of AIPUT and provides comments regarding the transport elements of Gatwick Airport Limited's (GAL or 'the Applicant') response to the Examining Authority's (ExA) request for further information (under letter dated 8th April 2024) under Rule 17 of the Infrastructure Planning (Examination Procedure) Rules 2010.
- 1.2 AIPUT manages the following sites which have the potential to be adversely impacted by proposals to build a second runway at Gatwick airport ('the Project'):
1. Viking House and Gatwick Gate: which are located immediately to the south of the existing runway and which are accessed from Old Brighton Road South / Perimeter Road South.
 2. Fleming Business Centre: which is located within the Manor Royal business area to the south of Gatwick airport.
- 1.3 Impacts of concern arising from the Project relate to additional traffic on the road network and additional demand for car parking. Both of these impacts could result in adverse road safety and highway performance impacts which have the potential to be unacceptable and / or severe.

Author

- 1.4 This technical note is authored by Mr John Russell. Mr Russell holds an Honours Degree in Civil Engineering and is a Chartered Transport Planner, being a Chartered Member of the Institute of Logistics and Transport (CIMILT) and a Member of the Institution of Highways and Transportation (MIHT). Mr Russell is a Director and owner of Motion Consulting Limited, which specialises in transport planning, traffic engineering and highway design with offices in Guildford and Reading. Mr Russell has worked in the field of traffic engineering and transportation planning for 30 years.

Relevant Documents

- 1.5 Documents which this technical note relates to comprise:
1. Document ref. 10.21: Response to Rule 17 Letter - Car Parking
 2. Document ref. 10.23: The Applicant's Response to Written Representations on Project Changes 1-3
 3. Document ref. 10.24: The Applicant's Response to Deadline 3 Submissions - Appendix H - Note on Excepted Development and the Airport Development Principle
 4. Document ref. DL4: National Highways - commentary on outline CTMP
- 1.6 The comments made by National Highways and contained in document ref. DL4 are acknowledged and endorsed. The remainder of this document therefore considers documents 10.21, 10.23 and 10.24.

Summary and recommendations

- 1.7 It is accepted and commendable that GAL will seek to reduce the number of people driving to access the airport facilities and would do with or without the Project being delivered. This includes, inter alia, passengers,

deliveries and staff. However the mode choice forecasts submitted by the Applicant, and consequently the assessment of traffic impacts including car parking demand, appear to be based solely on aspiration rather than evidence.

- 1.8 An aspirational mode choice split that GAL can work towards to minimise its impact is welcomed and commendable. However, it should not form the sole basis for determining car park space requirements or highway impacts.
- 1.9 The core assessment of car parking demand (and hence the level of provision required for the project) and highway impact should be assessed having regard to a realistic demand that can be supported by evidence. This would enable an appropriate level of car parking to be determined together with scale and nature of off-site highway mitigation.
- 1.10 In contrast, the Applicant is seeking permission for a Project for which car parking demand and off-site high impact mitigation is predicated on an unevidenced, aspirational mode split being achieved. Failure to meet this mode split will result in much larger increases in both traffic volumes and car parking demand than forecast resulting in severe, adverse impacts on the highway network to the detriment of local residents and businesses. This is especially the case given how marginal the performance of the road network is, even after mitigation has been provided, meaning that any increase in traffic volume, however slight, would result in disproportionately large, adverse impacts on queues and delays, potentially leading to severe impacts.
- 1.11 Failure to accept, assess and mitigate a realistic number of vehicles attracted to the Project will inevitably lead to an increase in demand for car parking and highway space resulting in:
1. insufficient car parking provided leading to an increased pressure on the adjacent road network / private parking areas both for parking and for pick-up / drop-off;
 2. incorrect traffic forecasts because these are based on the mode split assumptions resulting in much higher volumes of traffic; and therefore
 3. actual road traffic impacts being significantly worse than those currently predicted.
- 1.12 This will in turn result in an unacceptable and / or severe adverse impact on the access to and operation of businesses in the vicinity of the airport including Viking House, Gatwick Gate and Fleming Business Centre.
- 1.13 PINS is therefore respectfully requested to seek further information and clarification regarding the points raised above.

2.0 Mode Choice

- 2.1 The appellant states¹:
- "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%."*
- 2.2 The Applicant's aspiration that so many additional people (compared to the current situation) will travel by non-car modes is commendable. However the Applicant has continued to fail to demonstrate that this significant reduction in car drivers is achievable.
- 2.3 It is accepted and commendable that GAL will seek to reduce the number of people driving to access the airport facilities and would do with or without the Project being delivered. This includes, inter alia, passengers, deliveries and staff. However the mode choice forecasts submitted by the Applicant, and consequently the assessment of traffic impacts including car parking demand, appear to be based solely on aspiration rather than evidence.

¹ Document Reference 10.21 paragraph 3.1.4

- 2.4 The fact remains that GAL has failed to demonstrate that their aspirational mode choice for passengers, deliveries and staff etc is in any way achievable. The forecasts provided are a purely academic exercise, omitting any auditable evidence to support them. Worryingly the evidence submitted by GAL implies their view is that limiting the volume of car parking spaces will directly result in fewer people passengers, deliveries and staff etc driving². In short GAL is predicting that the use of sustainable travel modes and hence traffic volumes associated with the Project will be significantly related to car parking provision. Therefore restrictions in car parking will also result in restrictions in traffic volumes.
- 2.5 This is an overly simplistic approach viz. that restricting car parking supply will directly reduce the demand to travel by car and indeed the strength of such a relationship has been discredited by observed outcomes³ of such approaches, which notes that in the absence of severe car parking restrictions in the vicinity of a development, a shortage of car parking within the development merely leads to overspill, nuisance car parking in the surrounding area.
- 2.6 In the case of the Project, it is instructive to consider a London competitor to Gatwick such as Heathrow, which is a major national air hub. It is noteworthy that Heathrow forms part of the London Transport Network and hence is arguably spatially, a more sustainable location per se than Gatwick. Heathrow also benefits from national public transport connections. London Heathrow reports⁴ (2019) that between 2013 and 2019, the public transport mode share for passengers remained unaltered at around 40%. During the same time period, the public transport mode share for staff was circa 28%. What is important to note is that the Heathrow data is based on the main form of travel. This is a more realistic measure of the potential highway impacts arising from a land use than simply considering the mode of travel at the gate of the land use. The latter approach can disguise the fact that people have driven to within walking distance / local park and ride distance and hence have already contributed towards traffic impacts in the vicinity of the land use.
- 2.7 The Heathrow measured data puts into context the challenge facing GAL if it is to deliver on their aspirational mode choice targets.
- 2.8 The 2023 GAL passenger PT mode share⁵ is stated as being 44%. This level of PT mode share is in alignment with that observed at Heathrow Airport, which has the advantage of forming part of the London Transport Network. Turning to staff travel⁶, GAL estimates this to be 71% car driver in 2023. This compares to 67% observed at Heathrow.
- 2.9 GAL goes on to estimate that by 2040, the 71% of staff car drivers estimated in 2023 will be reduced to just 45%. During the same period, the number of passengers using PT will increase to 55%. Both forecasts are based on an overall increase in passenger and staff numbers.
- 2.10 What is not clear from the data provided by GAL, which in contrast is very clear from the Heathrow data, is if the GAL forecasts relate to entry to the airport area or to the main mode of travel. For example the reduction in staff travel by car from 71% to 45% could be achieved by providing off-site car parking combined with local PT connections such as a shuttle bus. This would have the effect of reducing the volume of traffic at the gate of Gatwick but without a reduction in traffic at currently unknown locations elsewhere on the local road network, which could potentially cause unacceptable road safety or severe operational impacts.

3.0 Traffic Impacts

- 3.1 An aspirational mode choice split that GAL can work towards to minimise its impact is welcomed and commendable. However, it should not form the sole basis for determining car park space requirements or highway impacts.

² Document reference 10.21 paragraphs 3.1.7, 3.1.8 & 3.1.12 (inter alia)

³ Just one example is - Guidance Note: Residential Car parking published by the Chartered Institution of Highways and Transportation and the Institute of Highway Engineers

⁴ Heathrow 2019 Travel Report

⁵ Document reference 10.21 Table 1

⁶ Document reference 10.21 Table 2

- 3.2 The core assessment of car parking demand (and hence the level of provision required for the project) and highway impact should be assessed having regard to a realistic demand that can be supported by evidence.
- 3.3 This would enable an appropriate level of car parking to be determined together with scale and nature of off-site highway mitigation.
- 3.4 Recognising that the Applicant would be working to achieve an aspirational mode split, the delivery of car parking and off-site highway mitigation can be phased so that delivery of specific elements is linked to out-turn, monitoring of actual car usage. Hence if the aspirational mode splits are met, then elements of car parking provision and off-site highway mitigation will not need to be delivered.
- 3.5 In contrast, the Applicant is seeking permission for a Project for which car parking demand and off-site high impact mitigation is predicated on an unevidenced, aspirational mode split being achieved. Failure to meet this mode split will result in much larger increases in both traffic volumes and car parking demand than forecast resulting in severe, adverse impacts on the highway network to the detriment of local residents and businesses. This is especially the case given how marginal the performance of the road network is, even after mitigation has been provided, meaning that any increase in traffic volume, however slight, would result in disproportionately large, adverse impacts on queues and delays, potentially leading to severe impacts.
- 3.6 It is emphasised that, even if the Applicant is required through this consent to investigate and mitigate future car parking and highway impacts in the event that mode splits are not achieved, retro-fitting physical infrastructure to mitigate severe impacts on the highway network is extremely difficult. Hence the importance of understanding what these would be at this stage and linking the mitigation to the current application.
- 3.7 In the alternative that the gamble is taken that the unevidenced, aspirational mode splits are likely to be deliverable, it is recommended that ways to ensure compliance with control measures' are identified at this stage that will bring the car parking demand and off-site highway impacts in line with the current forecasts. This could include, but not be limited to, a restriction on the number of passengers travelling through Gatwick airport to ensure that the overall number of people arriving by car (staff, passengers etc) does not exceed the forecast in the assessments provided by GAL. Importantly though, this should be based on the main mode of travel and not "at the point of entry" in order to avoid skewing the data through "park and walk / ride". This is because remote car parking (however close) will continue to cause an impact on the local road network.
- 3.8 Failure to accept, assess and mitigate a realistic number of vehicles attracted to the Project will inevitably lead to an increase in demand for car parking and highway space resulting in:
1. insufficient car parking provided leading to an increased pressure on the adjacent road network / private parking areas both for parking and for pick-up / drop-off;
 2. incorrect traffic forecasts because these are based on the mode split assumptions resulting in much higher volumes of traffic; and therefore
 3. actual road traffic impacts being significantly worse than those currently predicted.
- 3.9 This will in turn result in an unacceptable and / or severe adverse impact on the access to and operation of businesses in the vicinity of the airport.