



LONDON
GATWICK



Gatwick Airport Northern Runway Project

The Applicant's Written Summary of Oral Submissions
ISH 8: Surface Access Commitments

Book 10

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1 Introduction

- 1.1.1 This document contains Gatwick Airport Limited's (the "**Applicant**") summary of its oral evidence and post hearing comments on its submissions made at Issue Specific Hearing 8 ("**ISH 8**") held on 18 June 2024. Where the comment is a post-hearing comment, this is indicated. The Applicant has separately submitted at Deadline 6 (Doc Ref. 10.50.1) its response to the Examining Authority's ("**ExA**") action points arising from ISH 8, which were published on 18 June 2024 [[EV17-018](#)].
- 1.1.2 This document uses the headings for each item in the agenda published for ISH 8 [[EV17-001](#)].
- 1.1.3 The Applicant, which is promoting the Gatwick Airport Northern Runway Project (the "**Project**") was represented at ISH 8 by Scott Lyness KC, who introduced the following persons to the ExA:
- Richard Higgins, Surface Access Lead, Development, Gatwick Airport Limited;
 - Oliver Bedford, Director of Ecommerce, Parking and Commercial Products, Gatwick Airport Limited; and
 - Stuart Jenkins, Associate Director, Arup.

2 Agenda Items 1 and 2: Welcome, introductions and arrangements for the Hearing; Purpose of the Hearing

- 2.1.1 The Applicant did not make any submissions under these agenda items.

3 Agenda Item 3.1: Mode share targets and controls

- 3.1.1 The Applicant confirmed that pursuant to paragraph 6.2.1 of the **Surface Access Commitments** ("**SACs**") [[REP3-028](#)] it will produce an Annual Monitoring Report ("**AMR**") at least six months before commencement of dual runway operations which is expected to commence by the end of 2029.
- 3.1.2 In response to queries from the ExA regarding the differences in figures between Table 1 of the **Rule 17 Letter - Car Parking** [[REP4-019](#)] and Table 4 in TT.1.41 of **The Applicant's Response to ExQ1 - Traffic and Transport** [[REP3-104](#)], the Applicant confirmed that the figures in Table 4 of the TT.1.41 response are based on the modelling and are correct; 54.2% is the modelled value for the public transport mode share in 2029.

- 3.1.3 The Applicant confirmed that the first AMR would identify the mode share prior to opening of the dual runways and that additional monitoring will take place under the Airport Surface Access Strategy ("ASAS") which would be in place up until the first AMR is produced in accordance with the SACs.
- 3.1.4 In response to the ExA's statement that the implication of the mode share target not being met would be that vehicle traffic levels are likely to exceed those assessed in the Transport Assessment and the controls available to the Secretary of State in such a scenario, the Applicant confirmed that a control on the start of dual runway operations is not considered necessary. The Applicant explained that if the AMR identifies that mode share commitments are not being met, the SACs already provides for remedial action to be taken. The measures in the SACs are engaged through Requirement 20 of the **Draft DCO** [\[REP5-005\]](#) once the DCO is implemented and if remedial action needs to be taken, the SACs set out a procedure whereby an action plan must be prepared.
- 3.1.5 In response to the ExA's queries in respect of a breach that is apparent from an AMR and the controls to preclude further deterioration, the Applicant explained that it did not accept that a control on growth or control on dual runway operations is appropriate. There is nothing in policy to suggest that constraints in growth are necessary to achieve acceptable controls over transport impacts for airport or any other form of development. In this context, it would be disproportionate for there to be a constraint on growth to be related to adherence to such commitments which are enforceable in their own right. In the event that growth did result in an anticipated failure to meet these commitments as the airport grows, the SACs provide a mechanism for further mitigation measures to be taken in order to meet the mode share commitments. In these circumstances it would be unnecessary and inappropriate to effectively prevent the airport from growing or even operating the new runway in the event that a potential issue with meeting mode share commitments was identified before it had occurred, or in the event that it had. The SACs provide a means for any issue to be corrected by focussing on the action that needed to be taken to achieve the required mode shares and it would be disproportionate to effectively prevent the airport from operating or impose growth controls on the project when the SACs provide a toolbox of measures and a process to enable mode share commitments to be met. The Applicant confirmed that the SACs do not just deal with anticipatory breach but also where breach has taken place. The Applicant must prepare an action plan to be approved by the Transport Forum Steering Group (TFSG) which must set out the measures which will be utilised to ensure a correction to any non-compliance with the mode share commitments, or trajectory towards

them. The Applicant considers that to be the appropriate way to deal with a breach or anticipated breach of mode share commitments.

- 3.1.6 In response to the ExA's query as to whether the Applicant considers that in circumstances where the mode share commitments were not met that traffic levels would not necessarily exceed those assessed in **ES Chapter 12: Traffic and Transport** [REP3-016], the Applicant explained that a breach of an aspect of the mode share commitments would not necessarily correlate into a problem on the highway. The Applicant did not accept the proposition that just because there is either a forecast breach or actual breach of the mode share commitments shown in the AMR that there is necessarily an issue on the local or strategic road network. In any event, there would be measures in place through the **SACs** [REP3-028] which would take place to correct any issue that had been identified. The SACs provided mechanisms to address any potential issue.
- 3.1.7 In response to the ExA's query in relation to the TFSG and the role of the Secretary of State in the SAC Mitigation Action Plan process, the Applicant explained that the drafting of the **SACs** [REP3-028] allows the Secretary of State to require such additional alternative interventions that are considered reasonably necessary to achieve the mode share commitments having regard to all the materials submitted to it. This is left deliberately broad. There is a discretion for the Secretary of State to require whichever measures are thought necessary to achieve the mode share commitments. That may mean a refocusing or ramping up of existing commitments that are set out in the **SACs** [REP3-028] whether that be through parking charges, or forecourt charges for example. There would be a range of measures which could be adjusted to achieve the mode share commitments.
- 3.1.8 Provision had been made in the **SACs** [REP3-028] for steps to be taken already in anticipation of a breach before reaching that stage. The Applicant has the ability to implement measures consistent with the **SACs** [REP3-028] well before reaching that stage. The Applicant did not accept the proposition that one is going to be in a situation where there are unacceptable effects on the highways network, because the procedure set out in the **SACs** [REP3-028] provides for remedial action to be taken before one reaches that stage.
- 3.1.9 In response to the ExA's queries as to what controls the Applicant envisages the SoS could impose on the airport to prevent a situation from worsening, the Applicant explained that the SACs set out a toolkit of several measures that could be implemented, such as an increase in parking or forecourt charges if they have not succeeded already. The Applicant explained that beyond the substantial contributions towards bus and coach provision (a minimum of £10

million), as well as the Sustainable Transport Fund (which is now secured in Commitment 13 of the SACs submitted at Deadline 6 (shifted from the draft section 106 agreement at the request of the JLAs) with provisions setting out the funding arrangements which include tariffs on parking spaces, the SACs made further specific provision through the Transport Mitigation Fund (TMF), in the sum of £10 million, to allow for the implementation of measures to address any issues which may not have been foreseen at this stage. Further measures would still remain capable of being required by the Secretary of State, if necessary, by redoubling the efforts that are made under each of those commitments. The funds in the SACs were substantial but they sit within the wider mode share commitments and the Secretary of State has been given a wide discretion to impose measures that he or she may consider necessary to achieve those commitments.

- 3.1.10 In response to the ExA's queries about the limitation of the measures and what the proposed approach is where the commitment is not met, the Applicant stressed that the toolkit measures being proposed include strong controls - parking and forecourt charges being two examples - and they are available even where it is anticipated that there may be an issue with mode share commitments being met, before they actually are. The SACs include clear monitoring commitments which will allow for any issues to be anticipated. However it is also necessary to have regard to the Applicant's history and track record of successful management and achievement of the mode shares over the last 10-15 years. The Applicant has managed to increase its mode share targets over successive Airport Surface Access Strategies in parallel with passenger growth and has an established mechanism through the Transport Forum Steering Group which has enabled oversight of its progress in improving mode shares. The Applicant already uses some of the measures inherent in the Surface Access Commitments to control and manage mode shares, including the control of parking charges that can be varied dynamically by time period or day of the week during the busy summer period.
- 3.1.11 The Applicant explained that it has very strong rail access which supports a high public transport mode share. The Airport has had some progressive upgrades and improvements, which has been reflected in the mode shares achieved. These have been achieved through the application of surface access strategies and action plans and would continue right up to the point at which the first AMR is produced in connection with the surface access commitments. As such, the Applicant would have a rich data set and understanding of both changing mode shares and the efficacy of actions taken between now and the beginning of dual runway operation, which would allow the Applicant to fine tune its actions, to

have the greatest impact on achieving mode shares. This is the same approach that has been taken successfully by the Applicant over recent years and is already under the scrutiny of the Transport Forum Steering Group.

- 3.1.12 The Applicant has a toolkit of measures for addressing road traffic and has a range of options it can control and others it can influence through shared objectives with other stakeholders. The Applicant can act dynamically in terms of parking controls and can look at measures which have short term impact, to deal with peak congestion in summer months for example and have experience in doing that with stakeholders including National Highways and local highway authorities. The Applicant maintains flexibility in its day-to-day operations of surface access and parking which will continue.
- 3.1.13 The Applicant went on to explain that it would resist the suggestion that the mode share commitments are a “notional” target that do not have to be met; the mode share commitments are specific commitments set in the SAC supported by comprehensive monitoring and an action plan process in conjunction with the TFSG to deal with measures that can correct any issues indicating targets may not be met should they occur or be anticipated. The Applicant cannot, as was suggested, sit back and watch a breach without any consequence. It must, where necessary, prepare an action plan based on the proposed monitoring which must be approved by the TFSG and if for whatever reason that does not work the Secretary of State may then impose whichever measures are considered necessary to remedy an existing issue, or even a potential issue that has been identified by the Applicant or by the TFSG as a result of the extensive monitoring that must take place.
- 3.1.14 In response to the ExA's query about backstop controls, the Applicant responded that, similar arguments are being raised by the JLAs in respect of green controlled or environmentally managed growth. The Applicant has firmly resisted that proposition and considers that it is entirely disproportionate and is not supported by policy. The SACs provide a toolkit of strong measures, including the backstop of the substantial Transport Mitigation Fund, to ensure that the mode share commitments are met. They also allow for action to be taken as a result of significant monitoring, such that anticipatory measures can be implemented to avoid any potential breach. These controls operate in the conventional way – as indeed they would for other developments - by providing for mitigation that can respond to the specific issue in question (mode share), if it arises at all. There is nothing in policy or otherwise to suggest that any other approach, in particular stopping the development itself, or controls over the operation of the new runway or the air traffic movements at the airport is necessary. The appropriate response to any perceived issue is to provide for

mitigation to remedy the specific mode share (as the SACs are designed to achieve), rather than simply to prevent either the operation or any growth of the airport- both of which are supported by policy.

- 3.1.15 **[Post-hearing note:** the Applicant has made further submissions on this point in **Response to JLA's EMG Framework Paper** (Doc ref. 10.52.3) submitted at Deadline 6.]
- 3.1.16 In response to the ExA's suggestion that, if 54.2% was not reached how else would people travel to the airport if not by car, the Applicant explained that it was necessary to consider how mode shares operate. **[Post-hearing note:** the Applicant has provided further explanation on this query in its separate responses to the ExA's action points arising from ISH 8 on **Surface Access Commitments** (Doc ref. 10.49.2) in response to **Action Point 1**]. The mode shares are annual mode shares and that the Transport Assessment and the ES looks at a busy summer day in terms of impacts. The annual mode share may actually be reflective of different levels of mode shares at different times and these are assessed and reported on a quarterly basis to the CAA. This means there are short term fluctuations in mode shares that do not necessarily translate into changes in traffic flow on any particular day or impacts on peak periods of traffic. The peak levels of traffic that are included in the model are based on a robust set of assumptions which have been validated and checked through the modelling process and the Applicant is confident that the mode share commitments in the SACs are realistic and achievable based on both pre-COVID and post-COVID traffic levels.
- 3.1.17 In response to the ExA's query on the modelling, the Applicant confirmed the modelling informs the scale of mitigation and the measures that are included to deliver the mode share targets in the SAC. There is a wider toolkit which talks to the flexibility and the experience that the Applicant has in delivering high mode shares over a period of time with various changes in both the transport network and in the way that travel behaviour changes over time in response to a wide range of factors, both airport related and non-airport related.
- 3.1.18 The Applicant further noted that the mitigation measures proposed are consistent with meeting the mode share targets. The purpose of the TMF is to provide mitigation that may be required that has not been foreseen at this stage; it is effectively a failsafe to make sure that the Applicant can respond at the relevant time to any issues that have been identified. And part of the reason for suggesting it is that if there is such an issue identified, the way to remedy that is to provide further mitigation or make provision for further mitigation to address it, not to place controls on the growth of the airport.

3.1.19 In response to the ExA's request for the Applicant to explain why the mode share target does not necessarily correlate to more traffic, the Applicant outlined the various types of private transport trips and the nature of the impacts of those trips on the network. The Applicant confirmed that it could influence the attractiveness of some of the more impactful modes (i.e. drop off and pickup), which may reflect a change in the traffic flow greater than the corresponding impact on meeting the mode shares. In the case of staff, the same applies in that the Applicant can drive down the most impactful car journeys and change the balance within the remaining car modes. It would also be possible to use tools at the Applicant's disposal to reduce the impact of car journeys specific to peak periods, such as using dynamic parking charging or staff travel initiatives to discourage car journeys during peak hours when congestion is likely to be greatest. This approach to managing the most impactful car journeys is not exclusively relevant to, but is complementary towards, the achievement of the mode share commitments. This gives greater confidence in the assessment of traffic impacts indicated in the Transport Assessment and wider Environmental Statement for the Project. The Applicant noted that in terms of the impact of that traffic on the local road networks, the spread of airport related movements across the day is more balanced than the typical uni-directional, peak characteristics of commuter journeys. The Applicant can influence the timing of when people may access car parks outside of peak periods in order to balance out the potential impact on the local road network, without that necessarily being a direct transfer from one mode to another. This is also true for crowding levels on train services, which typically occur on services towards Central London in the morning peak hours and out from Central London in the PM peak hours. By contrast, rail demand to and from the airport occurs in both directions throughout the day, reducing the overlap with commuting passengers and supporting efficient use of network resources.

[Post-hearing note: the Applicant has provided further explanation on this query in its separate responses to the ExA's action points arising from ISH 8 on **Surface Access Commitments** (Doc ref. 10.49.2) in response to **Action Point 1**].

3.2. In response to comments from the JLAs regarding perceived policy support for growth constraints linked to mode share commitments, the Applicant responded:

3.2.1 The Applicant's position is that the quoted policies (Beyond the Horizon paras 1.5-6 (government is supportive of airports wishing to make best use of their existing runways "subject to environmental issues being addressed"); and para 1.24 (airports will need to demonstrate "how they will mitigate local environmental issues")) do not in any way provide support for the proposition that controls on

growth through environmentally managed growth are necessary. Fundamentally, the purpose of this examination is to work out whether what the Applicant has proposed in terms of surface transport mitigation is suitable and if the JLAs are suggesting that some form of control on growth through EMG should be imposed then they must show it is necessary. Nothing in the policies suggests that "subject to environmental issues being addressed" involves a constraint on the growth of an airport. The policies allow for environmental issues to be addressed in exactly the way that the Applicant is proposing in the surface access context through the SACs in the way described earlier. It would be a very extreme measure to suggest that one should somehow stop the operation or growth of nationally significant infrastructure in those circumstances, as opposed to dealing with the normal route, which is to provide a specific means to address the issue that has been identified. Nothing in Beyond the Horizon suggests that such measures are intended to be imposed, particularly given the general support for airports making best use of their existing runways; if such extreme measures were intended the policy would have said so.

- 3.2.2 The Applicant confirmed that its proposals are entirely consistent with these policy references and that the SACs proposed by the Applicant is the appropriate response to that policy context. Those policy references do not in any way suggest environmentally managed growth and it would be entirely disproportionate for the reasons given.
- 3.2.3 In respect of the specific query on whether the 55% public transport mode share commitment to and from the airport is inclusive of the parking spaces not operated by the Applicant, the Applicant confirmed it does include those spaces (which are largely associated with on-airport hotel provision and are included in the annual Gatwick Parking Survey) and would clarify that position in writing.
- 3.2.4 **[Post-hearing note: a revised Surface Access Commitments is submitted at Deadline 6 (Doc Ref 5.3 v3) with amendments to the definition of "air passengers" and the inclusion of a new definition of "Airport related facilities" which includes on-airport and off-airport car parking whether operated by GAL or not – this is intended to provide the clarity sought by the JLAs that non-GAL operated car parking spaces at the airport are included in what is needed to achieve the 55% public transport commitment].**
- 3.2.5 The Applicant explained that those car parks exist within the overall parking capacity and airport journeys associated with them have been captured in the data collection exercise because they would appear as if they were coming to park on airport. It would be indistinguishable within the transport data collection whether they were actually going to a hotel car park versus an airport car park.

The quantum of that car parking has been identified as 4,000-4,500 spaces but comprises approximately 850 spaces close to airport terminals (four hotels in number), approximately 1,260 spaces in hotels adjacent to the hotel boundary (two further hotels) and 3,280 spaces in the Purple Parking site on the southwestern edge of the airport. If those spaces had been excluded from the analysis, then the figures for off airport or non-airport operated spaces would be in the region of 17,000, but the Applicant has used all of the capacity included in the Gatwick Parking Survey, which includes these sites, that varies from year to year but is between 21,000 and 22,000 spaces. It is very clear that those car parks are included and have been accounted for in the analysis and the assessment (see Table 2 of the **Car Parking Strategy** [[REP1-051](#)], in particular line B which identifies 21,200 off-airport parking spaces (2019)).

- 3.2.6 The Applicant also confirmed it has transferred the commitments relating to surface access from the draft Section 106 Agreement into the SACs.
- 3.2.7 **[Post-hearing note:** these amendments requested by the JLAs are reflected in the revised Surface Access Commitments (Doc ref 5.3 v3) and the draft Section 106 Agreement (Doc ref 10.11), both submitted at Deadline 6.]
- 3.2.8 The Applicant confirmed that in respect of active travel, the proposals to provide enhanced facilities for cycling and walking at Longbridge Roundabout, the introduction of a pedestrian crossing at the new signalised junction on the A23 London Road, and improvements to the existing National Cycle Route 21 provide sufficient access to the airport along with new shared and segregated routes. The Joint Local Authorities have suggested additional measures and further meetings were held to discuss these and other rights of way proposals. The Applicant will respond directly to the JLAs on the merits of these suggestions in relation to mitigating the Project impacts for sustainable access to the airport.
- 3.2.9 In respect of a point made by other respondents regarding bus and coach mode share, the Applicant noted that Stansted airport has a very strong bus and coach mode share and leads in the comparison with other UK airports for that mode. The Applicant has the highest rail mode share of any UK airport, as evidenced by historic CAA Departing Passenger Survey results and this illustrates the differences that exist between airports. There is a degree to which the catchment area for airports dictates the contribution of different public transport modes which tends to be either predominantly bus or predominantly rail or may lead to competition between the two.

3.3. In response to comments from other interested parties, the Applicant noted:

3.3.1 In response to National Highways' ("NH") comments on the SACs, the Applicant noted that positive discussions were ongoing, and specific points on drafting matters could be responded to as part of continuing discussions.

[Post-hearing note: the Applicant had a positive meeting with NH on 21 June 2024 to discuss these comments and has reflected the outcome of those discussions in the revised Surface Access Commitments (Doc ref 5.3 v3) submitted at Deadline 6.]

3.3.2 In response to Network Rail's comments, the Applicant noted the points raised at Deadline 5. The Applicant's position is that it has not identified a need for specific additional mitigation as part of the assessment work undertaken, noting further work by Network Rail in connection with understanding the Project impacts is ongoing, and a series of further meetings will be held to review these analyses during the next few weeks. The Applicant is committed to continuing the discussions with Network Rail with a view to understanding the basis for seeking specific mitigation. With regard to the suggestion from Network Rail for a specific rail mode share, given the nature of the catchment and extent of rail network the Applicant explained it is reluctant to set out a mode share for an individual mode because it may detract from a balanced approach and create unintended friction between measures for different modes. The Applicant has specifically set out mitigation to provide for bus and coach for those areas where rail does not attract significant patronage and where rail is not a feasible option to access the airport.

3.3.3 The Applicant confirmed in response to interested parties who raised concerns about the issue of off-site parking, the Applicant noted that it has committed within the s106 agreement to make a parking contribution to help address off-site unauthorised parking in recognition of policy in local plan GAT3. That policy recognises that off-site parking is not the most sustainable. Commitment 8 of the **SACs** also sets out the Applicant's commitment to support local authorities in their enforcement actions against unauthorised off-airport passenger car parking. That contribution sits within the wider SACs.

3.3.4 In response to Holiday Extra's comments regarding the MSCP7 capacity figure included in the Rule 17 Response, the Applicant explained that there was an error in Table 1 of that response and the figure should be 3250. An updated version of the Rule 17 Response would be submitted at Deadline 6 to make those corrections.

[Post-hearing note: an updated Response to Rule 17 Letter - Car Parking is submitted at Deadline 6 (Doc ref 10.21 v2)]

- 3.3.5 In response to CAGNE's comments as to TMF adequacy, the Applicant explained that the TMF needs to be seen in its proper context. It is a contribution that can be called upon as a failsafe to address any unforeseen issues, which follows from the significant commitments made for bus and coach funding and the STF. The mode share commitments under the SACs are not limited to this funding and will in any event still need to be met; and the SACs include monitoring and compliance mechanisms to achieve this.
- 3.3.6 In response to comments from Kent CC the Applicant explained that it did not consider any further sensitivity analysis to be necessary. Effects have been assessed through the TA and ES. The Applicant has also provided a toolkit of measures to achieve the mode share commitments, including mechanisms which allow for those measures to be adjusted and supplemented as necessary, including a Transport Mitigation Fund to provide for further measures to address unforeseen impacts.
- 3.3.7 In addition, the Applicant noted it has supported bus and coach operators in establishing coach links to Kent in the past. One of the issues that has been experienced is that previously trialled services were not maintained in place for a significant period of time and were subsequently withdrawn by operators. The SAC specify services that are introduced would be operated and funded for a minimum of five years to ensure that demand has an opportunity to grow and for services to succeed. The Applicant also confirms that it has provided indicative service provision to which funding would be applied, but those services would of course be finalised in consultation with local authorities and operators to ensure they are optimised. It is not possible to define those commercial terms at this stage, it is far too early to set out the service provision and cost of routes and the Applicant would go through the necessary negotiations in due course.
- 3.3.8 In response to comments from Ms Scott of Charlwood PC, the Applicant clarified that NCR 21 runs in a north-south orientation geographically and as such does not directly connect north and south terminals. In relation to comments regarding the potential impacts of housing development around Hookwood and Horley the Applicant noted that the methodology for undertaking transport assessment and forecasting of background traffic included planned development and the trips associated with new commercial and residential properties in accordance with guidance.
- 3.3.9 Further clarification was offered by the Applicant referring to a cycle link through Riverside Garden Park as proposed by the JLAs. This related to a new, direct connection from the Riverside Garden Park carpark, located off Riverside on the northern boundary of the park, to emerge from the park just east of the new

signalised junction on the A23 London Road. The Applicant did not consider it appropriate to provide for an additional cycle link through the park given the existing provision and the additional connectivity that is being provided as well as consideration to the recreational amenity function of the park.

- 3.3.10 In response to the comments from Holiday Extras Ltd, the Applicant noted that the annual Gatwick Parking Survey is available and published by the local authority which gives a reference figure against which local parking activity and overall parking market is set. The Applicant considers that this is the right benchmark to use and can be referenced, and changes monitored over time. The Applicant noted it would welcome opportunities to improve off-airport parking monitoring but considers the Annual Gatwick Parking Survey to capture the whole of the parking market capacity, which is in the assessment. The off-airport provision is assumed to remain fixed in the market in accordance with local plan policy GAT3. This would indicate that in respect of future parking demand, the only extent of car parking provision forecast to change is on airport parking operated by the Applicant. The Applicant has set out assumptions on how busy those car parking spaces would be. Off airport or non-Applicant operated parking spaces is assumed to routinely operate up to 87.5% in aggregate, noting that some providers can operate at higher occupancy and others lower. Looking at the Gatwick Parking Survey for 2018 and 2019, which covers the reference information used for the Transport Assessment, the indications are that overall aggregate occupancy of off-airport parking was about 80% at that time.

4 **Agenda Item 3.2: Transport Steering Group/ Transport Forum Steering Group/ Transport Mitigation Fund Decision Group.**

- 4.1.0 The Applicant did not make any submissions under this agenda items.

5 **Agenda Item 3.3: Staff travel – Drop off and pick up.**

- 5.1.1 In response to the ExA's query as to whether Commitment 4 of the SACs excludes drop off and pick up, the Applicant responded that no, all journeys are included.
- 5.1.2 The Applicant noted that the current level of staff pick-up and drop off is approximately 1% of staff travel, which is taken from the 2023 staff travel survey. The survey sought a response on which mode of transport staff "usually" took and it is considered that the 1% survey result would not include the occasional journey where someone is dropped off because of a particular event on the day,

but it accounts for regular journeys. In response to follow up questions from the ExA as to whether charges apply, the Applicant responded that no, in contrast to passenger drop-off and pick-up there is an opportunity for staff to use the forecourts for free (subject to an application being accepted), which is also the case for operational and emergency service vehicles. It was also noted that staff and passengers both have the opportunity to drop-off and pick-up for free in the long stay car parks.

- 5.1.3 In response to the ExA query whether there will be more drop off and pick up in the future when staff parking is static, the Applicant did not consider this likely to be a problem, and that further measures relating to charging for any type of car journey made by staff, may be one of a series of measures which the Applicant could take alongside other incentives to use sustainable modes.
- 5.1.4 In response to comments from Counsellor Essex, the Applicant noted that in the context of staff parking, the Applicant will continue to provide incentives to encourage staff to use sustainable modes including measures such as discounts for rail travel to work. The Applicant acknowledges that drop off and pick up may be the only reasonable option for some employees, including those working particular shift patterns when public transport alternatives are not available. In order to meet SAC mode shares, measures such as charging for staff access to forecourts is not off the table and could be considered as an option within a wider package of options.
- 5.1.5 The Applicant further noted that the Airport already achieves high public transport mode share, particularly with respect to rail and compares favourably with other airports. There are some areas within the catchment where it should be recognised that rail is not an available option and there will be some access via car modes. Although the Applicant is committing significant investment in other modes to achieve higher sustainable mode shares, it is unrealistic to expect zero growth of car trips. What the Applicant has done in modelling and work underpinning the SAC is identify measures that can be delivered and these have been tested through the transport modelling so the Applicant does not accept the proposition that there should be zero traffic growth. Noting comparison with the cited example of Heathrow's proposals for its third runway, which has yet to come forward for a planning application, Gatwick already achieves a higher public mode share and the Project's SAC commitments would be going further than those quoted for Heathrow.
- 5.1.6 In reference to comments regarding meeting the travel needs of staff and the suitability of active travel options, the Applicant noted that for certain shift patterns some staff would not consider cycling or walking to be attractive. The

Applicant believes it would be inappropriate to designate and mandate a certain type of journey for specific areas and proposes to maintain choice for employees whilst encouraging them to use sustainable modes where possible.

- 5.1.7 In response to comments regarding its support for low emission journeys the Applicant noted both the recently opened Gridserve electric charging forecourt and the Applicant's funding support for the successful ZEBRA grant funding led by Metrobus and in partnership with local authorities that will extend the roll out of hydrogen buses in the local network, some of which already serve Gatwick. The Applicant is continuing to develop solutions to help both staff and passengers' access electric vehicle charging.
- 5.1.8 In response to questions from Ms Scott, Charlwood PC, the Applicant noted that it would be happy to provide further information regarding ongoing work to enhance provision for cyclists by improving on-airport facilities. This particularly notes the comment from Ms Scott regarding facilities at North Terminal. **[Post-hearing note:** the Applicant responded directly to Ms Scott on 26 June with further details.] The Applicant acknowledged its duty to support and encourage people who choose to cycle but is not relying on that for significant mode shift as it's not always suitable.