



LONDON
GATWICK



Gatwick Airport Northern Runway Project

The Applicant's Written Summary of Oral Submissions
ISH 8: Car Parking

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**") in relation to Car Parking 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. 10.50.2) 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, and the following persons:

- 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 Item 4.1: Discussion about parking numbers as set out in the Car Parking Strategy [[REP1-051](#)] and the Applicant's response to our Rule 17 letter about car parking [[REP4-019](#)].**

2.1.1 In response to the ExA's queries regarding the sustainability of airport car parking, the Applicant explained that on-airport parking is set within a wider strategy for sustainable surface access. Off-airport providers (authorised and non-authorised) do not necessarily have the same sustainable travel objectives as the airport and are more likely focused solely on maximising the occupancy of their car parks.

2.1.2 In response to the ExA's queries regarding controls for authorised and unauthorised parking, the Applicant noted that this was fundamentally what the **Surface Access Commitments ('SACs')** [[REP3-028](#)] are there for, and it would resist a reductive approach to carparking which says it is harmful in principle and a discrete control must be applied to it, particularly in the context of SACs which

are designed to provide an integrated toolkit of measures to allow for mode share targets to be met. There is a need to provide some car parking capacity for the needs of travellers coming to the Airport by car. The Applicant noted that there is nothing wrong in principle with airports making that provision, but it is recognised that it has to be balanced, so as to ensure that there is not unrestricted provision which makes car travel so attractive that it discourages public transport use; or that it is restricted and has the consequence of encouraging parking off-site which encourages greater numbers of trips. The Applicant recognises that there is a balance to be struck, and that this is most effectively done within a flexible and integrated approach to achieving appropriate mode share splits that involves a broad range of measures available to the airport (including pricing and incentives for public transport use).

2.1.3 The Applicant also highlighted that the SACs [REP3-028] submitted at Deadline 3 included a new provision (Commitment 8A) requiring the Applicant to consult the Transport Forum Steering Group ('TFSG') and assess need for additional parking over and above that required to replace what is lost through the construction. The Applicant also committed in the **Draft Section 106 Agreement** [REP2-004] to provide a contribution for the provision of parking controls in the surrounding area as part of a package of measures that sit within this fundamental commitment. These examples illustrate the advantages of a flexible toolkit approach to achieving mode share commitments.

2.1.4 **[Post-hearing note:** the Applicant has reflected on how it can provide the JLAs and the ExA with additional comfort that in addition to the existing controls in the SACs, (which for the reasons explained at ISH8 and above, the Applicant considers are an effective control), the Applicant is committed to achieving the mode share commitments and controlling its car parking spaces in order to do so. The Applicant is therefore proposing the following amendments (shown in underline and **bold**) in the SACs submitted at Deadline 6:

Commitment 8A - GAL shall assess the need for additional parking over and above that required to replace capacity lost as a result of construction in connection with the Project and provide sufficient but no more additional on-Airport public car parking spaces than necessary to achieve a combined on and off airport supply that is consistent with the mode share commitments (commitments 1-4) ; and GAL shall consult with the TFSG in advance of providing such parking.

2.1.5 This additional requirement is consistent with obligation 5.6 of the current s106 agreement (albeit amended to reflect the SAC mode share commitments) which the JLAs have stated "*provides a degree of control in that there is a clear*

commitment to provide sufficient but no more on-Airport public car parking spaces than necessary to achieve sustainable transport modal splits" at paragraph 10.4.3 of their Deadline 5 Submission [REP5-094].

- 2.1.6 The Applicant considers that the amended Commitment 8A requirement (together with the mode share commitments and other commitments included within the SACs) provides suitable controls on parking and will ensure that the Applicant demonstrates and provides appropriate evidence that sufficient but no more than is necessary car parking is provided. This amendment is intended to give the JLAs comfort that the SACs provide effective control and will avoid the scenario of excessive parking being provided which the JLAs say may contribute to the SACs not being met.
- 2.1.7 As above, the revision is intended to replicate the existing commitment and which GAL has followed in developing additional car parks, whilst still improving sustainable transport mode shares, in parallel to passenger growth over recent years. The Applicant considers this obligation was implicitly captured by the previous drafting in the SACs; however, is happy to make this express to confirm its intentions.
- 2.1.8 The Applicant considers that with those commitments in the SACs in place, car parking provision is properly a matter for the Applicant to monitor and control.
- 2.1.9 **[Post-hearing note:** Ultimately, GAL considers the risk lies with it as to the extent any supply of car parking was showing the potential effect of compromising its adherence to the mode share commitments then GAL would need to exercise its dynamic pricing to deter parking demand, meaning GAL would suffer commercially by having 'over-provided' in that context. However, the alternative, whereby GAL was constrained and "under-supplied" parking may lead to greater impacts off-airport by consequence, even in circumstances where the mode share commitments were being achieved. It is considered, in this context, that the risk of 'under-supply' would be more problematic/impactful than any 'over-provision'].
- 2.1.10 The SACs enable the Applicant to use car parking as part of a wider toolkit of measures to achieve mode shares that can be enforced through mechanisms set out in the SACs, by both the TSFG and if required, by the Secretary of State. It is not necessary to impose a control on parking levels in this context.
- 2.1.11 In response to queries from the ExA on the **Rule 17 Letter - Car Parking [REP4-019]** and **Car Parking Strategy [REP1-051]**, the Applicant confirmed that the daily roll up was taken into account in the peak parking calculations.

- 2.1.12 In response to queries from the ExA on why a practical capacity of 87.5% capacity level and carpark operation is assumed, the Applicant confirmed that given the practical constraints on the use of the spaces in terms of time of day movements, labour restrictions and other variables, 12.5% is an appropriate buffer. The Applicant also acknowledged that there are other methods of increasing capacity, but that the 87.5% figure is an average. It is possible to get higher but the figure of 87.5% leaves enough contingency to run the parking operation.
- 2.1.13 In response to the ExA's challenge of the Applicant's figures in Table 1 of the **Rule 17 Letter - Car Parking [REP4-019]**, and whether the robotic parking need was overstated, the Applicant apologised and explained that in preparation for the hearing, a calculation error was discovered which affects the demand figures. The Applicant explained that the numbers for car parking demand (and how it accumulates over time) were incorrect and would be corrected at Deadline 6.
- 2.1.14 The Applicant further confirmed that peak parking demand, construction changes, and the ratio of parking demand to capacity falling below aspirational parking occupancy levels were all attributable to the calculation error and would be corrected at Deadline 6.

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

3 **Agenda Item 4.2: Comparison of parking supply at London Heathrow and London Gatwick airports.**

- 3.1.1 In response to the ExA's questions as to how Gatwick and Heathrow's parking supplies compared, the Applicant committed to providing a comparison of how parking capacity relates to the number of car journeys by airport passengers for Gatwick and Heathrow at Deadline 6 and will make clear the assumptions underpinning the comparison.
- 3.1.2 **[Post-hearing note:** The data submitted in **The Applicant's Response to the ExA's Written Questions (ExQ1) - Traffic and Transport [REP3-104]**, at Deadline 3 (response to question TT.1.3) was supplemented with material submitted to Examination by Transport for London at Deadline 4 **[REP4-082]**, which provided data for London Heathrow Airport. As discussed during ISH8 there are a number of factors to be considered when comparing parking provision at different airports and this post-hearing note provides further information to assist the Examining Authority with their comparison.

3.1.3 The data previously submitted provides the number of on-airport spaces provided by the airport operator and the total number of annual airport passengers, expressed as million passengers per annum (mppa), summarised in the following table below for comparable data as at 2019.

	Total Passenger Parking Spaces provided by the airport operator	Annual passengers (2019, including transfers, million passengers per annum) ¹
Gatwick	40,600	45.1
Heathrow	23,500	80.5

3.1.4 The above table would indicate a ratio of spaces per million passengers per annum of 900 spaces/mppa for Gatwick and 292 spaces/mppa for Heathrow.

3.1.5 However, several other factors are relevant to the relationship between car parking spaces and passenger demand, which should be considered to make useful comparisons between airports.

3.1.6 Heathrow has considerably more transfer journeys (connections between flights, due to the nature of their “hub” operation) that don’t require a surface access journey. For Heathrow this was 33.6% in 2019 compared with 9.4% for Gatwick (also taken from the CAA Passenger Survey Report for 2019²).

3.1.7 Heathrow has a significant passenger catchment for taxi journeys and this is shown in the much higher taxi mode share recorded in the CAA 2019 Departing Passenger Survey³ – for Heathrow approx. 31.6% and for Gatwick approx. 14.4% (2019). By contrast Gatwick has a higher public transport mode share than Heathrow. These reduce the residual percentage of surface access trips that are made by private car (i.e. excluding taxi modes), combining those that park and are dropped off/picked up at Heathrow to 28.0% compared to 34.7% at Gatwick.

3.1.8 Applying these factors by excluding transfer passengers and referring only to car journeys at each airport reduces the reference annual passengers in accordance with the following table.

¹ CAA Passenger Survey Report, 2019 [t01_2019.pdf \(caa.co.uk\)](#)

² *ibid*

³ CAA Departing Passenger Survey, 2019 Table 7 “main mode of transport used” ([here](#))

	Total pax (mppa)	% transfers	Terminating pax (mppa)	% car journeys	Car journeys only (mppa)
Gatwick	45.1	9.4%	40.9	34.7%	14.2
Heathrow	80.5	33.6%	53.5	28.0%	15.0

- 3.1.9 As can be seen, the annual number of passenger car journeys being considered in respect of parking and forecourt demand is similar between the two airports.
- 3.1.10 The response by Transport for London in **Deadline 4 Submission - Comments on responses to ExQ1** [\[REP4-082\]](#) provides indicative figures for parking spaces provided by third parties at Heathrow, which when added to those of the airport operator shows a similar level of overall provision to Gatwick when combining both on-airport and off-airport capacity at both airports. The capacity indicated in shows 64,000 spaces currently provided at and near Heathrow, combining those operated by the airport and by third parties. This compares to 63,600 spaces at Gatwick as recorded in the 2019 Gatwick Parking Survey. Comparing these figures gives ratios of spaces per million car passengers of 4,478 spaces/mppa for Gatwick and 4,267 spaces/mppa for Heathrow, or 4.5 and 4.3 spaces per thousand annual car journeys respectively.
- 3.1.11 In response to the comments made by Holiday Extras Ltd in respect of car parking numbers, the Applicant confirmed that to the extent further information is submitted at Deadline 6 the Applicant will then respond to that accordingly. The Applicant's position at this stage is that the information relied upon in the annual Gatwick Parking Survey has been supplied by local authorities and it sees no reason not to be able to rely on that when preparing the car parking figures.
- 3.1.12 **[Post-hearing note:** in response to comments from Holiday Extras Ltd that the figures presented in the Annual Gatwick Parking Survey are not robust, the Applicant notes the following:
- 3.1.12.1. The figures presented in the Annual Gatwick Parking Survey have been questioned in a number of off-airport car parking appeals decisions, including in the appeal made by Holiday Extras Ltd against the decision of Crawley Borough Council in respect of off-airport car parking on land at Lowfield Heath (Ref: APP/Q3820/W/17/3173443), dismissed on 31 January 2019. In that appeal decision, the Inspector stated the following in respect of the Annual Gatwick Parking Survey at paragraph 18:

“Whilst the Surveys only provide a ‘snapshot’ of available parking on a particular day, I consider they provide a basis nonetheless on which to assess whether there is any pressure on parking availability. They have proven to be reliable over the years, having been carried out using a standard methodology at the same time each year.”

3.1.12.2. The methodology of the Annual Gatwick Parking Survey was explained in the evidence of Crawley Borough Council’s Planning Officer Tom Nutt. He stated at paragraph 102:

“The Gatwick Parking Survey takes place once a year in early to mid-September which is one of the busiest weeks of the year for parking at the airport. The survey is coordinated by Crawley Borough Council and involves participation by all local authorities surrounding Gatwick as set out in the MOU attached to the S106 Legal Agreement (page 42, para 6). Each Local Planning Authority survey their own area by visiting all known long stay parking sites relating to Gatwick Airport on the same day. The survey data is then collated into an overall number of vehicles parked on that day. The survey has been undertaken at the same time of year since it began in the 1987 to examine trends in airport parking:

The 2000 Annual Monitoring statement states:

The purpose of the annual monitoring statement is to examine trends in demand for airport-related parking, and in the provision of authorised parking spaces. The statement looks at likely trends in demand in the future taking into account policies for a more sustainable approach to air passenger transport, and considers whether adequate capacity is likely to be available or whether such demand should be met in the foreseeable future (page 1).”

3.1.13 The Applicant considers that the numbers presented in the Annual Gatwick Parking Survey should be preferred over those presented in the submissions by Holiday Extras Ltd for the reasons identified by the Planning Inspector in the Lowfield Heath appeal decision (ref. APP/Q3820/W/17/3173443) that “they have proven to be reliable over the years, having been carried out using a standard methodology at the same time each year” and for the reasons identified by Crawley Borough Council’s Planning Officer being that the data is collected with participation by all local authorities surrounding Gatwick Airport, involves site visits from the authorities on the same day and represents a historic base of evidence collected from 1987. The Applicant is satisfied those reasons remain valid today and is not aware, nor has the Applicant been made aware by the local planning authorities, of any reason why such survey data would not be reliable.]

- 3.1.14 The Applicant noted that it considered the approach of looking at every space to be disproportionate to the overall approach to looking at market demand and available capacity for car parking. In terms of overall capacity there is no expected change in off airport parking or on airport non-GAL operated parking spaces. If that capacity is applied then the future demand indicates a requirement for 1,100 additional spaces and the most sustainable location for those spaces is on airport.
- 3.1.15 In response to the broad point about the need for 1,100 spaces raised by interested parties, the Applicant considered that this ignored the wider context for parking provision. To the extent there is overprovision, this would be a matter for GAL and compliance with the SACs. To the extent there are issues with parking, the Airport still needs to meet the SACs and it is its risk as to how it delivers that. If there is an over-provision.