



# Gatwick Airport Northern Runway Project

## Response to Rule 17 Letter - Parking

### Book 10

VERSION: 1.0

DATE: AUGUST 2024

Application Document Ref: 10.64

PINS Reference Number: TR020005

## Table of Contents

1	Response to Rule 17 Letter – Parking	2
	<b>Appendix A: Responses to parking-related questions at Deadline 7</b>	<b>21</b>
	Joint Local Authorities	1
	Joint Surrey Councils	6
	<b>Appendix B: New parking-related Requirement</b>	<b>9</b>
	1.1 Overview	9
	1.2 Car parking proposed as part of the Project	9
	1.3 New Requirement for car parking	10

## 1 Response to Rule 17 Letter – Parking

The below table sets out the Applicant’s response to the Examining Authority’s Rule 17 Letter issued on 15<sup>th</sup> July 2024 [[PD-025](#)].

R17c	Question to: Question:	
R17c.1	Applicant	<p><b>North Terminal Decked Long Stay Parking.</b></p> <p>As part of Project Change No. 4 for the proposed onsite Wastewater Treatment Works (WTW) it is proposed to replace the resulting lost surface car parking by increasing the size of the proposed decked car park on part of the North Terminal long stay surface car park. This revised decked car park would not increase in height but would increase in surface area. This enlargement of the area of this proposed decked car park would not require any alteration to the draft DCO [REP6-005]. The only control specified in the draft DCO is the 11.0m height shown on the Parameter Plans [REP6- 011] and in Schedule 13 of the draft DCO.</p> <p>ES Chapter 5 Project Description [REP6-013] has been updated to allow for the replacement of surface parking lost by increasing the size of this decked car park. In paragraph 5.2.116 and Table 5.2.2 the level of replacement parking has been increased. The draft DCO would allow for this increased number of decked car park spaces to be constructed and used even if the onsite WTW is not constructed and the existing surface car parking had not been lost. In this scenario there would be an additional 1162 spaces constructed, which have not been accounted for in any of the submitted assessments. How would this scenario be controlled by the draft DCO?</p> <p>The changes to the level of replacement parking presented in paragraph 5.2.116 and Table 5.2.2 of <b>ES Chapter 5 Project Description [REP6-013]</b> are contingent on the WWTW forming part of the final consented Project and being constructed. If the WWTW <i>does not</i> form part of the final consented Project and is not constructed, there is no permanent loss of approximately 1,162 car parking spaces and no further loss of approximately 250 car parking spaces on a temporary basis and therefore no need to accommodate those lost spaces within the Self</p>

		<p>Park North/North Terminal Long Stay Parking area. In this scenario, the Project would result in the loss of 8,905 existing car parking spaces which would need to be replaced, together with an increase of up to 1,100 car parking spaces for passenger growth, which brings the total proposed car parking provision as part of the Project to 10,005 proposed spaces.</p> <p>If the WWTW <i>does</i> form part of the final consented Project and is constructed, the loss of approximately 1,162 car parking spaces would be accommodated within the Self Park North/North Terminal Long Stay Parking area by increasing the approximate dimensions of North Terminal Long Stay Parking (from 350m x 225m to 350m x 325m). There is no resulting change to the area shown on the <b>Works Plans</b> (Doc Ref. 4.5) or maximum height on the <b>Parameter Plans</b> (Doc Ref. 4.7) which informed the EIA. In this scenario, the Project would result in the loss of 10,067 car parking spaces which would need to be replaced, together with an increase of up to 1,100 car parking spaces for passenger growth which brings the total proposed car parking provision as part of the Project to 11,167 proposed spaces. As noted in paragraph 3.1.1 of the <b>Second Change Application Report</b> [<a href="#">REP6-072</a>], the Applicant has undertaken a review and appraisal of the Proposed Change against all topics within the Environmental Impact Assessment (EIA) presented in the ES to determine if Project Change 4 would result in any new or materially different likely significant effects from those reported in the <b>ES</b> and concluded (at paragraph 3.1.3) that there would be no new or materially different likely significant effects from those reported in the <b>ES</b> for Project Change 4.</p> <p>Whether the WWTW forms part of the final consented Project or not, the net increase of car parking provision as part of the Project will remain at up to 1,100 spaces.</p> <p>The Applicant's response to R17c.2 below sets out the way in which car parking spaces are controlled and describes the effect of the Applicant's proposed new Requirement (as explained further in Appendix B) which sets an overall cap on the number of car parking spaces provided by the undertaker within the Order Limits (included as Requirement 37 in the draft DCO submitted at Deadline 8).</p>
		<p><b>Draft DCO [REP6-013] – Control Over Parking.</b></p>

R17c.2	Applicant	<p>The parking scenario set out in the above question raises the possibility that parking numbers on site could be increased without further consent. Estimate:</p> <ul style="list-style-type: none"> <li>i. The theoretical maximum increase of onsite parking numbers that could be achieved by increasing the plan areas of all proposed decked or multi storey car parking to utilise all practically available corresponding surface parking site areas; and</li> <li>ii. The theoretical maximum increase of onsite parking numbers that could be achieved by utilising existing permitted development rights under The Town and Country Planning (General Permitted Development) (England) Order 2015, Schedule 2, Part 8 Class F. This number should be based on the completed layout of the Proposed Development</li> </ul>
		<p>The Applicant still resists the proposition that its parking provision as originally promoted in the draft DCO was in any way 'uncontrolled' given the need to comply with its mode share commitments and its proposed related obligations in the SACs. The obligations in the SACs which control the provision of parking at the Airport include the obligation to 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 supply that is consistent with the mode share commitments (Commitment 8A), the obligation to use parking charges and forecourt charges to influence air passenger travel choices to achieve the mode share commitments (Commitments 9 and 10) and the obligations to limit staff parking provision and incentivise sustainable staff travel (Commitments 11 and 12), together with other obligations to support sustainable travel.</p> <p>However, the Applicant notes the concerns raised by the ExA and IPs and in an effort to alleviate such concern has proposed a new Requirement as described in Appendix B which sets an overall cap on the number of car parking spaces provided by the undertaker within the Order Limits. The cap on car parking spaces of 53,260</p>

		<p>reflects the existing “baseline” car parking provision, the maximum amount of parking capacity applied for through the DCO (1,100 additional spaces) and the expected increase of onsite parking numbers that could be achieved by utilising existing permitted development rights under The Town and Country Planning (General Permitted Development) (England) Order 2015, Schedule 2, Part 8 Class F (i.e. the 2,500 spaces associated with the phased Robotic Parking project and the 3,250 spaces within MSCP7 being delivered by GAL and under construction, for expected completion in 2025). The cap reflects the numbers assessed within the <b>ES</b> and controls the number of parking spaces that could be achieved within the Order limits. Any further parking provision beyond 53,260 car parking spaces within the Order limits would need to be agreed in writing by CBC and would need to demonstrate in accordance with Commitment 8A of the <b>Surface Access Commitments</b> that it provides 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. Commitment 8A also requires the Applicant to consult with the TFSG in advance of providing such parking.</p>
R17c.3	Applicant	<p><b>Response to Rule 17 Letter – Car Parking [REP6-067] – General Clarification</b></p> <p>Confirm that:</p> <ul style="list-style-type: none"> <li>• Public transport mode share is the annualised average and not peak month;</li> <li>• Estimated parking accumulation is peak August level; and</li> <li>• Traffic analysis undertaken in the TA and the ES is based on June peak traffic levels.</li> </ul> <p>The Applicant confirms that in <b>Response to Rule 17 Letter - Car Parking [REP6-067]</b>:</p> <ul style="list-style-type: none"> <li>▪ Public transport mode share quoted in Table 1 is the annualised average mode share for passengers.</li> <li>▪ For clarity, the car driver mode share quoted in Table 2 represents the proportion of drivers travelling in a single-occupancy vehicle (it excludes drivers of vehicles carrying another one or more staff members). The car driver mode share in Table 2 represents both the peak month (June), for the</li> </ul>

		<p>purposes of assessment) and the annual average. Staff travel behaviour is not assumed to change significantly across the year.</p> <ul style="list-style-type: none"> <li>▪ The estimated passenger parking accumulation in Table 1 is for an August busy day. The figures quoted for 2029, 2032 and 2047 future baseline and with Project correspond with those given in response to TT.1.41 in Table 4 in <b>The Applicant's Response to the ExA's Written Questions (ExQ1) - Traffic and Transport</b> <a href="#">[REP3-104]</a></li> <li>▪ All of the assessment related to road traffic in the <b>Transport Assessment</b> <a href="#">[REP3-058]</a> and <b>ES Chapter 12: Traffic and Transport</b> <a href="#">[REP3-016]</a> is based on traffic conditions on a busy June day, as explained in paragraph 8.1.13 of the <b>Transport Assessment</b> <a href="#">[REP3-058]</a>.</li> </ul>
R17c.4	Applicant	<p><b>Response to Rule 17 Letter – Car Parking [REP6-067] – Future Baseline Parking</b></p> <p>Paragraph 3.5.5 of the Car Parking Strategy [REP1-051] states “The calculations include authorised off-airport passenger parking sites continuing in operation and also assume that the maximum practical occupancy of on- and off-airport car parks would be 87.5% of total provision. This still allows for operational flexibility and reflects both the continued turnover of vehicles and some variability in passenger arrival times, which means that it is not possible for every individual space to be occupied at one time.”</p> <p>The revised Table 1 shows that with the currently proposed future baseline parking provision the maximum practical occupancy does not exceed the 87.5% level until 2046. The ExA understands that the MSCP7 (3250 spaces) is expected to be complete by 2025. This would take the total spaces in the future baseline to 43570 and at that level the maximum practical occupancy level of 87.5% would not be exceeded until 2038. The ExA would like to understand why the delivery of the 2500 robotic parking spaces, by means of permitted development, is planned to start to be delivered in 2025/26 when occupancy levels would be predicted to be less than 75% until beyond 2033.</p>

		<p>The Applicant has explained the rationale for the proposed robotic parking in previous submissions (including in response to the JLAs responses to REP1-065 Action Point 6 (Future Baseline Provision) at page 19 of <b>Annex A of the Response to Rule 17 Letter - Car Parking Version 2</b> [REP6-067], in response to Action Point 12 in <b>The Applicant's Response to Actions ISH7: Other Environmental Matters</b> [REP4-037], and in <b>The Applicant's Response to Actions - ISH 8: Car Parking</b> [REP6-079]). The Applicant is satisfied (as operator) there is a need to bring forward this project to improve the efficiency of its overall parking provision at the airport and to avoid pressure on less sustainable off-airport parking locations and it forms part of its current capital investment programme on that basis. The Applicant does not require permission from, or the approval of, any relevant authority to do so - it is at the Applicant's discretion and judgment as an airport operator. However, as part of its DCO, the spaces it provides is reflected in and will be captured by the proposed overall parking cap secured by Requirement 37 of the draft DCO.</p> <p>The Applicant is assuming a practical occupancy level of 87.5% which would be an increase on current occupancy levels due to the more efficient use of available capacity as part of the Project (as explained in paragraph 4.3.4 of the <b>Car Parking Strategy</b> [REP1-051]). Whilst increasing occupancy in the Future Baseline scenario to a level of 87.5% may be achievable over time, it would take longer in the absence of introducing new technology in association with new facilities constructed to replace capacity lost during construction as part of the Project. For this and other operational reasons (including providing customers with greater walk to terminal product choice), the delivery of the 2500 robotic parking spaces is planned to start to be delivered in 2025/26. As the Applicant has previously noted, the delivery of the spaces would be phased in line with demand and whilst ensuring the achievement of the Surface Access Commitments and decade of change commitments.</p>
R17c.5	Applicant	<b>Response to Rule 17 Letter – Car Parking [REP6-067] – Robotic Parking Provision</b>



		<p>Should the Secretary of State approve the DCO and based on the analysis provided in the revised Table 1, the ExA can understand how the 2500 robotic parking spaces may form part of the parking provision required for the Proposed Development. If the DCO is approved the future baseline parking provision would be subsumed into the Proposed Development case and in this scenario the revised Table 1 seems to provide evidence as to the need to increase spaces early on to allow for the construction programme to progress. On that basis why does the 2500 spaces requirement not form part of the Proposed Development case?</p> <p>The robotic parking spaces are proposed in the absence of, and not conditional on the Project. The basis for this has been explained in previous submissions and again in response to question R17c.4 above. It would confuse and conflate the purposes of an accurate Future Baseline were it to instead be included in the Project case as it would suggest that it these spaces would only be brought forward as part of the Project, which would be incorrect. However, in any case, those spaces would now be subject to and controlled by the overall cap on parking spaces proposed by Requirement 37 of the draft DCO.</p>
R17c.6	Applicant	<p><b>Response to Rule 17 Letter – Car Parking [REP6-067] - Use of Block Parking</b></p> <p>In the Car Parking Strategy [REP1-051] paragraph 3.6.3 states that “Although the full range of parking products available on-airport will be retained, GAL will continue to manage available spaces flexibly, in order to maximise efficiency during construction. This is likely to include the increased use of block parking temporarily while spaces lost to construction are replaced with new facilities.” Explain:</p> <p>i. If and how this use of block parking is quantified in the revised Table 1 in the “with Project” case?</p>

		<ul style="list-style-type: none"> <li>ii. If a more general change in parking management occurred towards providing block parking, provide an estimation of the maximum practical possible increase in parking numbers that could occur on site; and</li> <li>iii. The parking controls proposed in the draft DCO that would reassure the Secretary of State that more use of block parking would not lead to an overprovision of car parking on site than the levels assessed.</li> </ul>
		<p>Both the future baseline and with project scenarios assume a mix of block parking and self parking consistent with the Car Parking Strategy. Based on previous annual car parking counts the proportion of passenger long and short stay capacity operated as block park spaces has varied between 40% and 52%, the higher percentage being experienced in the two years immediately prior to the Covid pandemic, when the airport had its busiest summers.</p> <p>There is limited scope to increase the proportion of block parking in practice. Where there is scope to increase block parking this is usually a response to seasonal demand variation. The Applicant’s observed experience as operator is that passenger preferences are for some block and some self-park for surface car parks, and all MSCPs are self-park (except valet reception/return spaces). The Applicant intends to maintain the mix of parking products and would not implement a “more general change in parking management” that would lead it to convert fully to block park, or to materially change the proportions of self and block park spaces. The Applicant is proposing to cap the overall number of parking spaces (discussed further below), which would apply to and regulate both modes (self and block parking).</p> <p>In order to provide further clarity that the parking numbers on site could not be increased without further consent and scrutiny of the effects compared to those assessed in the ES, the Applicant has included a new Requirement as described in Appendix B which sets an overall cap on the number of car parking spaces</p>

		<p>provided by the undertaker within the Order Limits. The cap on car parking spaces of 53,260 reflects the existing “baseline” car parking provision, the maximum amount of parking capacity applied for through the DCO and the expected increase of onsite parking numbers that could be achieved by utilising existing permitted development rights under The Town and Country Planning (General Permitted Development) (England) Order 2015, Schedule 2, Part 8 Class F (i.e. the 2,500 spaces associated with the phased Robotic Parking project and the 3,250 spaces within MSCP7 being delivered by GAL and under construction, for expected completion in 2025). The cap reflects the numbers assessed within the <b>ES</b> and controls the number of parking spaces that could be achieved within the Order limits. Any further parking provision beyond 53,260 car parking spaces within the Order limits would need to be approved in writing by CBC and would need to demonstrate in accordance with Commitment 8A of the <b>Surface Access Commitments</b> that it provides 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). Commitment 8A also requires the Applicant to consult with the TFSG in advance of providing such parking.</p>
R17c.7	Applicant	<p><b>Response to Rule 17 Letter – Car Parking [REP6-067] – Mode Shares</b></p> <p>The ExA is unclear how the notes to the revised Table 1 signpost the modelled mode share in 2029, 2032, 2038 and 2047. Explain or signpost the following:</p> <ul style="list-style-type: none"> <li>i. Note1 – It is stated that these annual average values are taken from the Transport Assessment [REP3-058] but the location of the data is not clearly signposted as in Note 5. The ExA has assumed that Table 72 in the Transport Assessment Annex B – Strategic Transport Modelling Report [APP-260] is the source of the data but is unable to reconcile the figures. Provide a table reconciling the figures for the relevant years in Table 1 with their source information.</li> </ul>

ii. Note 5 - The location is clearly signposted as Table 135 of the Transport Assessment Annex B – Strategic Transport Modelling Report [APP-260]. The ExA is unable to reconcile the figures. Provide a table reconciling the figures for the relevant years in Table 1 with their source information.

The ExA is correct that Note 1 to Table 1 should reference Table 72 in **Transport Assessment Annex B – Strategic Transport Modelling Report** [APP-260] and we confirm that the reference to Table 135 of the same document, in Note 5 to Table 1 of [REP6-067](#), is also correct.

Tables 72 and 135 of **Transport Assessment Annex B – Strategic Transport Modelling Report** [APP-260] contain data which draws on the outputs obtained from the strategic transport model. In those tables, figures are rounded to the nearest whole number.

The annualised public transport mode share data presented in Table 1 of [REP6-067](#) draws on the same modelling output data that was used for Tables 72 and 135 of [APP-260](#). In Table 1 of [REP6-067](#) the data has been provided to one decimal place, the intention of which was to assist the ExA by showing the progressive change in mode shares on a year-by-year basis, which is not apparent when rounded to the nearest whole number.

Table 1 and Table 2 below show the information in Tables 72 and 135 of [APP-260](#) for the years 2029, 2032, 2038 and 2047, as published, together with the same data to one decimal place, as used in Table 1 of [REP6-067](#).

**Table 1: Comparison of data informing Table 72 of [APP-260](#)**

<b>As published in <a href="#">APP-260</a></b>					<b>Background data informing Table 72 of <a href="#">APP-260</a> and Table 1 of <a href="#">REP6-067</a></b>				
	2029	2032	2038	2047		2029	2032	2038	2047
Car (P&F)	19	18	19	19	Car (P&F)	19.1	18.4	18.6	18.8

Car (K&F)	12	12	12	12	Car (K&F)	12.4	12.2	11.9	11.5
Car rental	2	2	2	2	Car rental	2.1	2.1	2.1	2.0
Taxi	15	15	15	16	Taxi	14.9	15.1	15.3	15.7
Rail	44	45	45	44	Rail	44	44.6	44.5	44.4
Bus/coach	7	8	8	8	Bus/coach	7.5	7.6	7.6	7.6
<i>PT (rail+bus)</i>	<i>51</i>	<i>53</i>	<i>53</i>	<i>52</i>	<i>PT (rail+bus)</i>	<b>51.5</b>	<b>52.2</b>	<b>52.1</b>	<b>52.0</b>
						Figures highlighted orange are those used in Table 1 of <a href="#">REP6-067</a>			
<b>Table 2: Comparison of data informing Table 135 of <a href="#">APP-260</a></b>									
<b>As published in <a href="#">APP-260</a></b>					<b>Background data informing Table 72 of <a href="#">APP-260</a> and Table 1 of <a href="#">REP6-067</a></b>				
	2029	2032	2038	2047		2029	2032	2038	2047
Car (P&F)	17	16	16	15	Car (P&F)	16.9	16.1	15.7	15.4
Car (K&F)	12	12	12	11	Car (K&F)	12.2	12.0	11.7	11.4
Car rental	2	2	2	2	Car rental	2.1	2.1	2.1	2.0
Taxi	15	15	15	15	Taxi	14.6	14.6	14.9	15.3
Rail	46	46	47	47	Rail	45.5	46.3	46.6	46.9
Bus/coach	9	9	9	9	Bus/coach	8.7	8.9	9.0	9.0
<i>PT (rail+bus)</i>	<i>55</i>	<i>55</i>	<i>56</i>	<i>56</i>	<i>PT (rail+bus)</i>	<b>54.2</b>	<b>55.2</b>	<b>55.6</b>	<b>55.9</b>
						Figures highlighted orange are those used in Table 1 of <a href="#">REP6-067</a>			

R17c.8	Applicant	<p><b>Response to Rule 17 Letter – Car Parking [REP6-067] – With Project Parking Accumulation.</b></p> <p>Provide a detailed explanation, referencing source data and calculations as to how the Estimated Parking Demand falls from 32800 in 2023 to 30480 in 2029 and only rises to above the 2023 figure in 2031 by which time there is predicted to be almost 29 mppa more than in 2023. The ExA notes that in the future baseline case this does not occur.</p> <p>The parking demand provided in Table 1 of <a href="#">REP6-067</a> is derived from estimates of the change in the number of Park &amp; Fly trips between different years, as described in Table 2 of the <b>Car Parking Strategy [REP1-051]</b> and further in <b>The Applicant's Response to the ExA's Written Questions (ExQ1) - Traffic and Transport [REP3-104]</b>, in answer to questions TT.1.38 and TT.1.39. These are estimated through interpolation of the transport modelling set out in <b>Transport Assessment Annex B – Strategic Transport Modelling Report [APP-260]</b> and consistent with the proposed mitigation, including relative changes in cost between modes, such as through increased parking charges.</p> <p>The use of Park &amp; Fly trip numbers from the model takes account of changes in mode share when calculating the estimated car parking requirement. In the with Project case, Table 1 of REP6-067 shows that the public transport mode share starts to return towards pre-Covid levels from 2023 then increases more rapidly in the With Project case between 2025 and 2029, reflecting the fact that the Applicant would be implementing measures associated with achieving the commitments set out in <b>ES Appendix 5.4.1: Surface Access Commitments [REP7-042]</b> and would be doing so early in order to drive travel behaviour change before the increase in air passenger demand arising from dual runway operation. As a result, the proportion of Park &amp; Fly passenger journeys would reduce; even when combined with an absolute increase in passenger throughput, this leads to a net reduction in the absolute number of Park &amp; Fly trips in the period up to 2031. Peak parking demand is also, therefore, shown to reduce between 2023 and 2031, with the Project, in Table 1 of <a href="#">REP6-067</a>. Between 2029 and 2032 there is</p>
--------	-----------	---

forecast to be a significant increase in the total passenger throughput, which leads to absolute increases in the number of Park & Fly trips and therefore in parking demand.

By contrast, Table 1 of [REP6-067](#) also shows that in the future baseline case the change in mode share is expected to be more gradual than in the with Project case. Consequently, the reduction in the proportion of Park & Fly journeys made does not fully counteract the increase in total passenger throughput, and so peak parking demand increases steadily between 2023 and 2031.

Table 3 below sets out the basis of the calculation of the parking demand in 2029 and 2032 which is reported in Table 1 of [REP6-067](#). This follows a similar format to that in the **Car Parking Strategy** [[REP1-051](#)] and the answer to TT.1.38 in [REP3-104](#). Further explanation is provided below the table.

**Table 3: Derivation of peak parking demand for 2029 and 2032**

		2029 Future Baseline	2029 With Project	2032 Future Baseline	2032 With Project
A	Current on-airport passenger parking provision (2019)	40,600	40,600	40,600	40,600
B	Current authorised off-airport passenger parking provision (2019)	21,200	21,200	21,200	21,200
C	Total passenger parking provision (2019) <b>(A + B)</b>	61,800	61,800	61,800	61,800
D	Peak on-airport passenger parking accumulation (August 2019)	32,000	32,000	32,000	32,000
E	Assumed peak off-airport passenger parking accumulation (August 2019) (87.5% of off-airport provision)	18,550	18,550	18,550	18,550
F	Current peak passenger parking accumulation on and off-airport (August 2019) <b>(D + E)</b>	50,550	50,550	50,550	50,550
G1	Forecast June Park & Fly trips, 2019	31,768	31,768	31,768	31,768

G2	Forecast June Park & Fly trips, future year	32,869	30,962	33,006	34,485
G3	Estimated increase factor in number of Park & Fly trips with Project	1.03	0.97	1.04	1.09
H	Estimated total peak passenger parking accumulation, future year ( <b>F x G3</b> )	52,070	49,030	52,570	55,100
I	Estimated peak passenger parking accumulation accommodated off-airport (87.5% of off-airport provision, capacity unchanged from 2019, see <b>B</b> )	18,550	18,550	18,550	18,550
J	Estimated on-airport peak passenger parking accumulation to be accommodated, future year ( <b>H - I</b> )	33,520	30,480	34,020	36,550

The estimated peak parking accumulations for 2029 and 2032 are based on the modelled change in the number of Park & Fly trips between 2019 and these years, as explained in the Applicant's answer to TT.1.39 in [REP3-104](#). Those estimates include the effect of changing Park & Fly mode share across the years in both the future baseline and with Project cases.

The calculation is based on the on- and off-Airport parking provision in 2019 (rows A and B) and the observed peak parking accumulation in August 2019 (row D of Table 3 above) in order to maintain consistency with the calculations undertaken for the **Car Parking Strategy** [\[REP1-051\]](#) and the outputs from the strategic transport model (and for these purposes the calculations include the 290 "commuter" parking spaces which were removed prior to 2023 and which the Applicant is not seeking consent for, as described further in response to R17c.9 below. However, in Table 1 of [REP6-067](#), the figure quoted for 2023 is an *observed* figure, and estimates of parking demand between 2023 and 2029 in [REP6-067](#) are interpolated from that 2023 observed figure and the 2029 estimated demand indicated in Table 3 above.

Estimates of parking demand between 2023 and 2029, 2029 and 2032, and 2032 and 2047 are interpolated on a linear basis between the observed (2023) or calculated demand (2029, 2032, 2047) estimated for those years. Table 70 and Table 133 of **Transport Assessment Annex B: Strategic Transport Modelling Report** [\[APP-260\]](#) provide estimates of the number of Park & Fly trips on the busy June day for the future baseline and with



Project cases respectively, taken from the strategic transport model and rounded to the nearest 100 trips. However, the calculation of parking demand provided in Table 1 of [REP6-067](#) draws on the detailed data from the model that underlies Tables 70 and 133 of [APP-260](#); those are the figures in rows G1 and G2 of Table 3 above.

For completeness, the comparison between the Park & Fly figures given in Table 70 and Table 133 of **Transport Assessment Annex B: Strategic Transport Modelling Report** [\[APP-260\]](#) and those in Table 3 above is shown in Table 4 below.

**Table 4: Park & Fly trips – modelled outputs compared to rounded information in Tables 70 and 133 of [APP-260](#)**

	2019 baseline	2029 Future Baseline	2029 With Project	2032 Future Baseline	2032 With Project
Park & Fly trips – modelled outputs	31,768	32,869	30,962	33,006	34,485
Park & Fly trips – Table 70 of APP-260	31,800	32,900		33,000	
Park & Fly trips – Table 135 of APP-260	31,800		31,000		34,500

R17c.9

Applicant

**Response to Rule 17 Letter – Car Parking [REP6-067] - Commuter Parking Spaces**

Note 2 to Table 1 explains why the passenger parking capacity has been reduced to 40,320 by the removal of a total 290 “commuter” parking spaces. Provide:

- i. Location plan of this parking area;
- ii. An explanation of the term “commuters” in this context; and
- iii. An explanation of how this parking would be controlled in the draft DCO for this use and not be used as part of the overall passenger parking provision if required

- (i) See location plan below



		<ul style="list-style-type: none"> <li>• (ii) Commuters in relation to the commuter parking area refers to users that live in the areas surrounding Gatwick Airport that “park and ride” at the airport in order to access train services from Gatwick Airport Railway Station and travel north or south by train to their destination. This may include journeys for both employment and/or leisure purposes (proof of “commuting” is not required).</li> <li>• (iii) The Applicant has included a new Requirement as described in Appendix B and set out in further detail above in response to question R17c.2 which sets an overall cap on the number of car parking spaces provided by the undertaker within the Order Limits. The cap does not include the re-provision of 290 “commuter” parking spaces as the vehicles that previously used this area now park in the South Terminal short stay car parks, meaning that the Applicant is seeking consent for 290 less spaces than originally set out in the Application.</li> </ul>
R17c.10	Applicant	<p><b>Response to Rule 17 Letter – Car Parking [REP6-067] – Staff Parking</b></p> <p>Table 2 sets out details of staff mode share, employee numbers and car parking capacity. Given the shift working and mode share changes there is no direct comparison that can be drawn from the overall employee numbers between the current position and the 2047 position. The ExA would like to understand the likely parking demand given the changes in mode share and employee increases. Provide:</p> <ul style="list-style-type: none"> <li>i. Details of current peak parking demand and also an estimation of the 2047 “with project” peak parking demand; and</li> <li>ii. If the 2047 parking demand exceeds the available parking capacity, an explanation of how this demand will be met or parking demand will be constrained within capacity.</li> </ul>

		<p>In the Applicant's <b>Response to Rule 17 Letter - Car Parking [REP6-067]</b> Table 2 it is possible to derive a ratio of staff parking spaces to the number of single-occupancy car drivers by applying the annual car driver mode share to the total number of employees and dividing the maximum number of spaces by the resulting sum. This indicates that for 2023 employee numbers there are 0.44 spaces per car driver and therefore that each space is expected to be occupied more than twice per day. It should be noted that there is seasonal variation on the number of staff reporting for shifts in any one day, and also variation in the car driver mode share between shifts so we would expect this ratio to vary slightly according to shift patterns. It is further noted that the total employee numbers for 2023 is below that from pre-Covid indicating that the ratio would have been slightly lower in 2019, around 0.40.</p> <p>Our estimate for 2047 using the same calculation and data from Table 2 of the Applicant's <b>Response to Rule 17 Letter - Car Parking [REP6-067]</b> indicates a ratio of 0.41 spaces per car driver in 2047 with the Project.</p> <p>In accordance with the mode share commitments in <b>ES Appendix 5.4.1: Surface Access Commitments [REP7-042]</b> (including Commitments 11 and 12 in particular) the Applicant would incentivise the use of sustainable transport modes for employees, including measures that could be employed during seasonal peaks in demand in order to constrain staff parking demand within capacity and in line with expected ratios of spaces per car driver.</p>
R17c.11	Applicant	<p><b>On Airport Parking Not Operated by the Applicant.</b></p> <p>The ExA understands why the expired permission for 820 spaces has been removed from the parking numbers associated with the Project. However, the ExA is not clear why they were included in the original with project</p>

		<p>onsite parking numbers. Explain why these spaces were originally included within the on airport numbers when all other spaces not operated by the Applicant are regarded as offsite provision?</p>
		<p>The 820 spaces associated with the Hilton Hotel multi-storey car park which the Applicant is no longer treating as forming part of the future baseline were originally considered as “on-airport” because of the proposed change in parking provision which would otherwise be unaccounted for in the parking numbers, whereas other non-GAL operated car parking is assumed to remain constant in accordance with local policy GAT3.</p>

## Appendix A: Responses to parking-related questions at Deadline 7

At Deadline 7, a number of interested parties' submissions were parking related. Responses are provided in this document and made in relation to submissions provided by the following stakeholders:

- Joint Local Authorities – **Response to the Applicant’s Deadline 6 Submissions** [[REP7-103](#)], Table A1 provides the Applicant’s responses.
- Joint Surrey Councils – **Comments on any further information/submissions received by Deadline 6**, [[REP7-105](#)], Table A2 provides the Applicant’s responses.

## Joint Local Authorities

**Table A1: Responses to Joint Local Authorities comments at Deadline 7**

Ref	Joint Local Authorities Response	The Applicant's Response
10.2	<p>The revised Table 1 shows the increase in car parking for the Future Baseline and With Project scenarios. The Authorities note that the With Project scenario shows an increase of 1,110 spaces, rather than the 1,100-space increase that is referred to by the Applicant. It would be helpful if the Applicant could clarify why the figures differ</p>	<p>The difference of 10 spaces results from rounding of the information within the table and is not material to the outcome. The Applicant confirms that it is seeking an additional 1,100 spaces as part of the DCO and is proposing a new Requirement as described in Appendix B which sets an overall cap on the number of car parking spaces provided by the undertaker within the Order Limit which reflects the maximum amount of parking capacity applied for through the DCO (1,100 additional spaces) (included as Requirement 37 in the draft DCO submitted at Deadline 8).</p>
10.3	<p>Table 1 shows that under the With Project Scenario, whilst the total number of spaces ultimately increases between 2023 and 2047, there is some fluctuation, including two periods where the total number of spaces temporarily decreases to a level below current 2023 provision. The Applicant acknowledges (Paragraph 6) these temporal effects</p>	<p>Whilst the construction sequence is indicative at this stage, it is shown that some spaces are lost during the initial airfield construction works and are then re-provided in stages, with the last of the main car parking works completed towards the end of the construction phase (circa 2036/2037).</p>

	<p>occur due to construction work temporarily lowering available capacity compared with the Future Baseline. Table 1 (With Project) shows overall passenger numbers increasing year-on-year, and in this context, the Authorities seek clarification from the Applicant relating to the periods where total parking provision is reduced.</p>	
<p>10.4</p>	<p>Estimated Parking Accumulation (by day) does not appear to increase inline with passenger growth, and appears linked to numbers in the Total Spaces column. The Authorities assume this is because Estimated Parking Accumulation numbers are limited by the total number of spaces that are available, but it would be helpful if the Applicant could clarify.</p>	<p>There is no direct relationship between the estimated parking accumulation and the total number of spaces available; as the JLA’s own table in paragraph 10.5 of its <b>Responses to Deadline 6 submissions</b> <a href="#">[REP7-103]</a> shows, occupancy varies from year to year.</p> <p>The estimated parking accumulation is influenced by both growth in passenger numbers and the change in the proportion of Park &amp; Fly users over time (as a result of the measures in <b>ES Appendix 5.4.1: Surface Access Commitments</b> <a href="#">[REP7-042]</a>). The figures in Table 1 of <b>Response to Rule 17 Letter - Car Parking</b> <a href="#">[REP6-067]</a> are derived from:</p> <ul style="list-style-type: none"> <li>▪ The figures for parking accumulation for 2029, 2032 and 2047 provided in response to question TT.1.41 in <b>The Applicant's Response to the ExA's Written Questions (ExQ1) - Traffic and Transport</b> <a href="#">[REP3-104]</a></li> </ul>



		<ul style="list-style-type: none"> <li>Linear interpolation for values between these years, as explained in note 3 to Table 1 of <a href="#">[REP6-067]</a>.</li> </ul>
<p>10.5-10.9, 16.1</p>	<p>The Authorities seek clarification as to whether an apparent ongoing operation of car parks at greater than 87.5% capacity could result in implications for the achieving of the SACs.</p> <p>The Authorities note that Table 1 shows the projected public transport mode share falling slightly at 2036 (from 52.2% to 52.1%) and ask if this is a result of modelling that factors in the reduced headroom/flexibility associated with the operational capacity target being exceeded</p>	<p>The figures in Table 1 of <b>Response to Rule 17 Letter - Car Parking</b> <a href="#">[REP6-067]</a> for the with Project scenario are based on the current estimates of parking availability during construction. The Applicant acknowledges that these show greater occupancy levels than the optimum figure of 87.5%. As construction planning progresses, the Applicant will be taking opportunities to minimise the net loss of parking during construction. The Applicant is also able to influence demand through pricing at periods when parking supply is more limited. The Applicant does not believe this will lead to significant increases in the use of off-Airport car parking; off-Airport parking operators typically adjust their own pricing to broadly reflect that of on-Airport spaces, and the calculations set out in Table 1 of <a href="#">[REP6-067]</a> already assume that off-Airport authorised parking spaces are occupied at 87.5% of available capacity. The Applicant similarly does not consider these periods of higher optimization would have adverse implications for the achievement of the SACs, and the JLAs will note Table 1 confirms the</p>

		<p>continued achievement of the mode share commitment in these years.</p> <p>The JLAs note (paragraph 10.7 of <a href="#">[REP7-103]</a>) that Table 1 shows projected public transport mode share falling from 52.2% to 52.1% at 2036. For clarity, this occurs in the future baseline scenario, without the Project, and is therefore unrelated to the points made about parking occupancy in the with Project case.</p>
10.8	<p>Paragraph 2.3.24 of <a href="#">[REP6-085]</a> states that it would consider where possible opportunities to phase the removal/replacement of parking during construction to maximise passenger parking as far as possible, and could potentially reallocate staff parking for passengers (with incentives for staff to use sustainable modes) if needed. The Authorities are particularly concerned that during the airport’s busiest months for passengers (and therefore staff) that the staff car park will be made available for passengers to use. There is considerable likelihood that this would result in staff parking on-street and affecting local residents. As such, the Authorities request that the staff car park is made available to staff only.</p>	<p>The Applicant notes the Surface Access Commitments to achieve and maintain an annual staff mode share for sustainable modes. The proposal to potentially reallocate staff parking capacity to supplement passenger spaces during peak summer periods of high demand would be accompanied by incentives for staff to use other modes for short periods of time, in order to ensure sufficient on-airport parking for both passengers and staff.</p> <p>In practice, staff parking would only be used for staff if spaces were available. For example, on a peak Saturday of a bank holiday weekend where the staff car parks which accommodate office staff are not in use, those available spaces may be used to store valet cars for short periods before being moved to longer-term parking areas.</p>

10.10	<p>The emerging S106 relating to the DCO offers the Authorities financial support towards parking enforcement only for the nine-year monitoring period. The Authorities consider that such funding should not be limited just to the monitoring period, and Table 1 showing that the Applicant’s car parks from 2045 onwards will be operating at greater than optimal capacity lends further weight to concerns that unauthorised off-airport parking will likely require the Authorities’ intervention long after the monitoring period has concluded.</p>	<p>The Applicant is in ongoing discussions with the Authorities on the contributions secured in the <b>draft Section 106 Agreement</b>.</p>
10.11	<p>In Table 2: Comparison of Future Baseline and Proposed Development on airport employee parking, the Authorities note confirmation at Paragraph 4 (page 11) that “employee car driver mode share with the Project comprises data from the 2023 Staff Travel Survey”. The Authorities assume that it is appropriate for the Applicant to use the 2023 Staff Travel Survey as being indicative of the current position (i.e. current staff travel habits) but it would be helpful if the Applicant could clarify why it has used the Staff Travel Survey</p>	<p>The Applicant has previously responded to queries regarding the implications for the 2023 Staff Travel Survey on its assessment conclusions in <b>The Applicant's Response to Actions - ISHs 2-5</b> <a href="#">[REP7-071]</a> – Action Point 2 and Appendix D which is distinct from the assessment of effects provided in the <b>Transport Assessment</b> <a href="#">[REP3-058]</a> and <b>ES Chapter 12: Traffic and Transport</b> <a href="#">[REP3-016]</a>.</p>

	findings in this context, but not more widely in its DCO evidence.	
--	--	--

Joint Surrey Councils

**Table A2: Responses to Joint Surrey Councils comments at Deadline 7**

Ref	Joint Surrey Councils Response	The Applicant's Response
Page 1	The mode share presented in the table is not the mode share that will have driven the volume of parking demand presented. The JSCs request that mode share for August is also presented.	<p>The mode share presented in Table 1 of <b>Response to Rule 17 Letter - Car Parking [REP6-067]</b> is the annual average public transport mode share and is relevant because it is the mode share against which progress towards the commitments in <b>ES Appendix 5.4.1: Surface Access Commitments [REP7-042]</b> will be measured.</p> <p>The public transport mode share for the peak air travel season between June and August is typically lower than the annual average (and conversely, is higher during other months) as indicated by the differences between Tables 134 and 135 of <b>Transport Assessment Annex B - Strategic Transport Modelling Report [APP-260]</b>. The parking demand is calculated based on the changes in Park &amp; Fly trip totals for the busy June day, as explained in the answer to TT.1.38 in <b>The Applicant's Response to the ExA's Written Questions (ExQ1) - Traffic and</b></p>

		<b>Transport</b> <a href="#">[REP3-104]</a> and in the answer to point R17c.8 earlier in this document.
Page 2	The JSCs are concerned that should the approx. 3,100 extra employees in the NRP scenario not be sufficiently incentivised to use public transport or active travel, it would lead to considerable unauthorised on street parking on our network and affecting our community. This is not suggesting that more parking spaces are created, but shows the challenge of meeting SAC 2 and SAC 4	The Applicant refers to its response to 10.8 in Table A1 above.
Page 2	The JSCs are particularly concerned that during the airport’s busiest months for passengers (and therefore staff) that the staff car park will be made available for passengers to use. There is considerable likelihood that this would result in staff parking on-street and affecting local residents. As such, we request that the staff car park is made available to staff only. We are also concerned about how opening up more spaces for passengers to park will help mode share targets.	The Applicant refers to its response to 10.8 in Table A1 above.
Page 3	The JSCs have reviewed the SAC 8A and subject to the following amendment (in bold) being added, are content with this commitment.	The Applicant is proposing a new Requirement as described in Appendix B which sets an overall cap on the number of car parking spaces provided by the undertaker within the Order Limit which reflects the

	<p>.....and provide sufficient but no more additional on-Airport public car parking spaces than necessary <b>(and not exceed 1,100 spaces)</b></p>	<p>maximum amount of parking capacity applied for through the DCO (1,100 additional spaces) (included as Requirement 37 in the draft DCO submitted at Deadline 8).</p>
<p>Page 3</p>	<p>We seek clarification as to what has happened to the 820 Hilton car parking spaces in the transport modelling .</p>	<p>The Hilton car parking spaces remain within the transport modelling, with the assumptions and methodology as set out in Section 7.8 of <b>Transport Assessment Annex B Strategic Transport Modelling Report</b> <a href="#">[APP-260]</a>.</p> <p>It is important to note that the modelling uses the supply of car parking as a means to distribute Airport-related traffic across the highway network in the immediate vicinity of the Airport. The 820 Hilton hotel parking spaces would have been accessed from South Terminal roundabout. The removal of the 820 Hilton car parking spaces from the model would make only limited difference to the distribution of traffic and to the outcomes reported in the assessment, because the Hilton hotel spaces would have been a small proportion of the total of over 17,000 spaces which are accessed from South Terminal roundabout.</p>

## Appendix B: New parking-related Requirement

### 1.1 Overview

The Applicant's position remains that the mechanisms to control car parking described in its responses to questions and in its submissions to date<sup>1</sup> (which principally set out how a flexible and integrated approach to achieving mode share targets in the context of the **Surface Access Commitments ('SACs')**) ensures that the provision of parking at the Airport would be commensurate with the assessments contained within the **ES**.

However, in light of the Examining Authority's ("ExA") recent Request for Further Information under Rule 17 dated 15 July 2024 [[PD-025](#)] and questions in relation to car parking (including controls on car parking in particular), and the potential changes identified by the ExA in Annex B of the **Agenda for Issue Specific Hearing 9** [[EV20-001](#)], the Applicant has given further thought to the controls that could be included in the draft DCO that would reassure the Secretary of State that the level of car parking provided at the Airport in accordance with the DCO would remain consistent with the levels assessed within the Application.

The Applicant is therefore proposing to cap the overall number of parking spaces provided by the undertaker within the Order Limits by including a new Requirement in the draft DCO in the terms as described further below.

### 1.2 Car parking proposed as part of the Project

A full description of the car parking provision which forms part of the Northern Runway Project proposals for which development consent is sought is set out in Section 4 of the **Planning Statement** [[APP-245](#)] (at paragraph 4.5.73 onwards) and the **Environmental Statement Chapter 5 Project Description** [[REP6-013](#)] (at paragraph 5.2.115 onwards).

By way of overview, the car parking provision (including both replacement and for growth) proposed as part of the Project are as follows:

---

<sup>1</sup> Including as set out in the Car Parking Strategy [[REP1-051](#)], The Applicant's Written Summary of Oral Submissions - ISH 8 Car Parking [[REP6-079](#)], The Applicant's Response to Actions ISH8 - Car Parking [[REP6-085](#)], Response to Rule 17 Letter - Car Parking [[REP6-067](#)]

- 1,680 spaces for North Terminal Long Stay (decked parking) (Work No. 32)<sup>2</sup>
- 890 spaces for multi-storey car park ("MSCP") J (Work No. 22(g))
- 3,035 spaces for MSCP Y (Work No. 30)
- 3,700 spaces for MSCP H (Work No. 28(c))
- 700 spaces for Purple Parking (surface parking) (Work No. 33(d))

This results in a total number of 10,005<sup>3</sup> car parking spaces (which represents the replacement of 8,905 car parking spaces lost as a result of the Project together with a net increase of up to 1,100 car parking spaces).

### 1.3 New Requirement for car parking

The Applicant is proposing to include a new Requirement to control the total number of parking spaces provided. The new Requirement 37 in the draft DCO is as follows:

#### ***Car parking spaces***

*37. (1) The undertaker shall not provide more than 53,260 car park spaces within the Order limits unless otherwise agreed in writing by CBC.*

*(2) Upon commencement of the authorised development and by no later than each anniversary of that date, the undertaker must submit an annual report to CBC providing an update on the number of parking spaces provided by the undertaker within the Order limits.*

---

<sup>2</sup> Note this car park would accommodate the 1,162 spaces permanently lost as a result of the proposed onsite Wastewater Treatment Works (WTW) should it form part of the final consented Project and is constructed. In that scenario, the number of spaces attributed to this car park would be 2,842

<sup>3</sup> In the scenario where the WTW forms part of the final consented Project, the total number of car parking spaces proposed as part of the Project would be 11,167 (which represents the re-provision of 1,162 spaces lost to the WTW). Whether the WTW forms part of the final consented Project or not, the net increase of car parking consented under the DCO will remain at up to 1,100 spaces.



The proposed car parking cap of 53,260 represents the current parking provision of 40,320<sup>4</sup> passenger spaces, 6,090 staff spaces, 5,750 spaces assumed as part of the future baseline (2,500 spaces (robotics) + 3,250 spaces (MSCP7)), and the 1,100 additional spaces to accommodate the Project growth.

Any further parking provision beyond 53,260 car parking spaces within the Order limits would need to be agreed in writing by CBC and the Applicant would need to demonstrate in accordance with Commitment 8A of the **Surface Access Commitments** that it provides 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. Commitment 8A also requires the Applicant to consult with the TFSG in advance of providing such parking.

The cap acts as a restriction on the exercise of the Applicant's permitted development rights to bring forward any additional parking spaces in exceedance of the cap. For this reason, the Applicant does not consider there is a need for permitted development rights to be expressly restricted in the way identified by the ExA in Annex B of the **Agenda for Issue Specific Hearing 9** [[EV20-001](#)] because there would already be an effective control on the provision of parking at the airport to ensure that the impacts of the development as described in the Transport Assessment and the consequential effects set out in the Environmental Statement are not greater than those assessed within the Application.

In addition, the Applicant has restricted permitted development rights over the areas identified as of particular concern to the JLAs, including a full disapplication of permitted development rights altogether in respect of Museum Field and the water treatment works site and a disapplication for car parking development at Pentagon Field (article 9(6) of the draft DCO).

---

<sup>4</sup> Note the original "current provision" was 40,610 spaces, however, as explained in 10.21 Response to Rule 17 Letter - Car Parking [[REP6-067](#)] a total of 290 spaces associated with a separate commuter parking area have been removed from the total number of passenger spaces. This is set out in further detail in response to R17c.9 in Table 1 above.