

Date: 21 August 2024

Your Ref: TR020005 / GATW-AFP059

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

DWD

69 Carter Lane
London
EC4V 5EQ

INTRODUCTION

Airport Industrial Property Unit Trust ('AIPUT') hereby provides a brief Deadline 9 submission relating to the examination of the application made by Gatwick Airport Limited ('GAL') for a development consent order ('the DCO application') for the Gatwick Northern Runway Project ('the Project') under the Planning Act 2008 ('PA 2008').

AIPUT is a limited partner in the Airport Industrial Limited Partnership, the General Partner of which is Airport Industrial GP Limited ('AIGPL'). AIGPL, together with its wholly owned subsidiary Airport Industrial Nominees Limited ('AINL'), own the legal title to the leasehold land and have rights in certain parcels of land to which the DCO application relates (as described in their relevant representation and written representation). AIPUT, AIGPL and AINL make this Deadline 9 submission as a group under the name 'AIPUT'. The following Deadline 9 submission comprises:

- Comments on any further information/ submissions received by Deadline 8;

Comments on any further information/ submissions received by Deadline 8

AIPUT have instructed Motion Ltd to comment on their behalf. Motion have drafted a technical note which can be found in **Appendix 1** of this Deadline 9 Submission. The technical note comprises AIPUT's comments on the following Deadline 8 Submissions:

- Response to Rule 17 Letter - Parking (Doc Ref. 10.64)

In summary, AIPUT's position is that Document 10.64 has failed to provide clear answers to the queries raised and therefore the concerns of AIPUT set out in the 25th April 2024 technical note (REP4-085) remain the same.

Appendix 1

Transport Appraisal

Site: Gatwick Northern Runway DCO
Prepared by: John N Russell
Date: 21 August 2024



1.0 Introduction

Representations

- 1.1 This technical note is prepared on behalf of AIPUT and considers the potential transport implications arising from proposals to build a second runway at Gatwick airport ('the Project') which is the subject of a Development Consent Order (DCO) application.
- 1.2 AIPUT manages sites which have the potential to be adversely impacted by the Project as follows:
1. Viking House and Gatwick Gate: which are located immediately to the south of the existing runway and which are accessed from Old Brighton Road South / Perimeter Road South.
 2. Fleming Business Centre: which is located within the Manor Royal business area to the south of Gatwick airport.
- 1.3 Vehicular access to these sites will, in particular, be impacted by changes in traffic volumes at the following locations:
1. Lowfield Heath Roundabout;
 2. Gatwick Road Roundabout; and
 3. Along the London Road between the Tushmore Roundabout and the Longbridge Roundabout.
- 1.4 This technical note considers the transport evidence submitted in support of the Project in general and in particular, the potential access consequences arising from the Project in relation to these sites.

Author

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

Scope

- 1.6 A technical note (dated prepared by Motion and dated 25th April 2024 [REP4-085]) has already been submitted on these matters. However at the time of preparing 25th April 2024 technical note, the Applicant had not submitted a response to the Examining Authority's Rule 17 request (PD-013) for further information, which was due to be provided by 19th April 2024 (Deadline 3). Subsequent to this, the Applicant has submitted further information in the form of document reference 10.64 'Response to Rule 17 Letter – Parking' in response to PD-025.
- 1.7 This technical note provides a commentary on document reference 10.64 specifically but should be read in conjunction with the Motion Technical Note dated 25th April 2024.

Comments on Document 10.64

- 1.8 Document 10.64 has been reviewed having regard to the Rule 17 Letter request (PD-025). Document 10.64 does not provide the responses and clarification to queries raised in the Rule 17 Letter.
- 1.9 As just one example of the failure to provide clarification is the response on Page 4 (document 10.64) to concerns raised about staff parking off-site. The Applicant's response is as follows:
- '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.*
- 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.'*
- 1.10 In particular the phrase "In practice, staff parking would only be used for staff if spaces were available..." is noted. This raises the question of where staff will park if spaces are not available in the staff car park because, inter alia, they are being used by passengers and not staff? This is in fact the very question that was raised at 10.8 on page 4 of document 10.64 and which the above response to from the Applicant claims to answer.
- 1.11 Given that Document 10.64 has failed to provide clear answers to the queries raised, the concerns of AIPUT set out in the 25th April 2024 technical note remain the same which in summary are that:
1. With regards to parking provision, the Applicant has failed to identify that sufficient car parking will be provided to avoid unacceptable highway capacity and road safety impacts including impacts on 3rd party commercial operations.
 2. With regards to pick-up / drop-off provision, the Applicant has failed to identify that sufficient suitable and attractive pick-up / drop-off provision will be provided to avoid unacceptable highway capacity and road safety impacts including impacts on 3rd party commercial operations.
 3. With regards to mode choice, no clarification is provided regarding the number of vehicles arriving on the road network surrounding Gatwick Airport.
 4. With regards to the sustainable transport fund, no details are provided regarding how this is linked to additional car parking provision in the event that mode choice targets are not achieved and more cars arrive than forecast and / or what steps the Applicant will take to ensure that the car parking provided matches the demand: such steps including a cap on flights to reduce demand.
- 1.12 Failure to address questions concerning:
1. car parking and pick-up and drop off;
 2. the link between and parking and sustainable travel;
 3. how passengers and staff will be convinced not to drive in order to meet the mode split targets that the car parking and off-site highway mitigation is design around;
 4. what the mode split targets are and whether these are trips entering the airport area or on the surrounding road network; and
 5. the interventions the Applicant will be required to deliver to bring parking demand in line with parking supply including the possibility of a ceiling on flights.
- can be expected to result in unacceptable road safety, highway capacity and local amenity impacts to the detriment of local residents and businesses.