

# Appendix 3

## Assessment of the extent of Safeguarding east of Balcombe Road

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This assessment by Mott MacDonald covers additional material in relation to the extent of any safeguarding for a second runway at Gatwick from an airport masterplan / land-use planning and aerodrome safeguarding perspective:

### Current evidence on the extent of safeguarding

- 1 In the context of national aviation policy that no longer requires land to be safeguarded at Gatwick for a second runway, the case for any future safeguarding, and for its extent, must be made afresh by the airport operator in order to meet the requirements of the NPPF. The Gatwick Airport Master Plan 2019 (GAMP) contains the only available evidence in this new policy context. The GAMP contains only a short section on safeguarding land for an additional runway. This sets out a very high-level summary of the traffic, capital investment, surface access, safeguarding and community/environmental considerations and a plan (Plan 20) showing a broad disposition of land uses within a slightly modified safeguarded area. Plan 20 shows the land controlled by TWG as being used exclusively for surface car parking and appears to have the same land-use layout that was included in GAL's May 2014 Updated Scheme Design Submission SD2 Airport Masterplan. It is of great significance that the text and plan show no more background or technical justification for the land use disposition than that contained in previous airport master plans (2005, 2006 and 2012) or GAL's evidence to the Airports Commission.
- 2 Critically, there is an absence of any testing of alternatives to surface level parking east of Balcombe Road, an essential element of whether a policy can be found sound against the NPPF tests.
- 3 Given the absence of any policy requirement to safeguard land at Gatwick for a second runway and the 'robust' evidence and 'critical' tests contained in the NPPF, the burden of proof lies with GAL to demonstrate why any Safeguarded Land is needed and if it were justified, why it should extend over any land east of Balcombe Road. The GAMP contains no such evidence: it appears to proceed as though the past position justified the future, whereas circumstances have now fundamentally changed compared to the past. It is considered that there is no sound basis to safeguard the extent of land east of Balcombe Road in the Local Plan review.
- 4 If GAL were to seek to justify the safeguarding of land required for a second wide-spaced runway to the south, there are a number of significant factors that must be considered to adequately

demonstrate the land-use area requirements and the surface access strategy of the airport. This should include, but not be limited to, the considerations outlined below.

- 5 In GAL's May 2014 Updated Scheme Design Submission SD6 Surface Access Section 2 - Best in class for public transport share, the commitment to achieve 60% public transport use by passengers by 2050 is stated. The supporting graph shows the then anticipated passenger access to the airport via private car reducing from the circa 60% in 2018, to circa 55% in 2023 (Masterplan for next 5 years), to circa 45% in 2033 (Masterplan for next 15 years). This reduction in private car usage by passengers offsets the growth in air-traffic in the different airport development scenarios and should be applied to remodelling the land area safeguarding for long stay carparking associated with the additional runway to the south in the GAMP.
- 6 Within the private transport mode-share, analysis should give consideration to the longer-term trends of different forms of private transport including the relative use of taxi products as well as the tendency to use short-stay vs long-stay parking. The demand for car-parking generally should also take into account other trends in the transportation industry, such as emerging products such as 'mobility on demand', ride sharing and 'mobility as a service'. Early forms of these trends, such as Uber, have already proven disruptive to conventional transport models.
- 7 Of particular note is that the GAMP significantly relies on the conversion of existing surface car parks to decked parking in order to accommodate demand over the next 5 years (5,065 out of 9,565 additional spaces, or 53%) and to some extent over the next 5 - 15 years (maximum use of single runway and standby runway). However, it inconsistently reverts to an all surface parking solution for the second runway expansion proposals by showing approximately 92 ha (227 acres) of land for surface parking east of Balcombe Road: this is shown on Plan 20.
- 8 A comparison of the ratio of short stay to total parking provision published in the GAMP with the figures published in GAL's May 2014 Updated Scheme Design Submission SD2 Airport Masterplan highlights this inconsistency. The GAMP only provides specific information on car parking development over the next 5 years, which suggests a far lower ratio of short stay to total car park provision than the ratio published in GAL's May 2014 Updated Scheme Design Submission - Master Plan Appendix A5 – Operational Efficiency Section 3.7 (Eastern area development). The large shift from a more balanced ratio in the GAMP to a far lower ratio of short stay to total car park in the 2014 Appendix A5 needs to be further investigated.
- 9 Land use efficiency for car parking in the GAMP over the next 15 years utilises multi-story and decked parking structures that provide far greater car park space per hectare to facilitate GAL's anticipated on-airport passenger car park demand within the existing airport boundary. This approach to car park land use efficiency should be applied to the GAMP proposals for an additional runway to the south, thereby significantly reducing land-take for long stay car parking.

- 10 Direct comparison can be made against the scheme proposed by Heathrow for the expansion associated with a 3<sup>rd</sup> runway, which is arguably the most relevant benchmark to GAL's safeguarding of a second independent runway to the south. Information published in Heathrow's Airport Expansion Consultation (AEC) website shows the planned consolidated parking provision in new southern and northern parkways, via multi-storey long-stay parking, that minimises use of land for passenger car parks and serves as a benchmark for land use optimisation. Applying this example to Gatwick would minimise the land-take required for parking, which would be a key test for any Compulsory Purchase Order to acquire the necessary land.
- 11 In addition, Heathrow's Masterplan shows a continuous reduction in car park spaces down to approximately 331 passenger parking spaces per MPPA (million passengers per annum) by 2050, which is less than half the number of passenger parking spaces per MPPA shown in GAL's May 2014 Updated Scheme Design Submission - Master Plan Appendix A5 – Operational Efficiency Section 3.7 (Eastern area development). The pricing structure of car-parking products should also be considered as one of the factors that influences people's mode-share choices with a comparison of parking costs at Gatwick Airport relative to comparable benchmarks.
- 12 Parking land-use intensification should also take into consideration emerging technology trends. Gatwick airport has already been an early pioneer in the trialling of robotic block parking schemes, which seek to deliver greater land-use efficiency in various ways. This includes tighter spacing between parked cars (due to not needing to open doors) as well as the significant reduction in circulation roadways for both private vehicles and the larger shuttle busses to the terminals.
- 13 In addition to substantiating the area required for car-parking, the GAL additional runway safeguarding proposal must also consider and if applicable justify other associated land-uses. The 92 hectares of land for surface parking east of Balcombe Road is partially new parking areas associated with the growth in traffic enabled by the additional runway, but it is also partially generated in this location due to existing long-stay and staff parking being displaced by other functions. The North Terminal long-stay parking is being displaced by safeguarded growth in ancillary facilities such as cargo and MRO. Therefore, the cargo forecasts and projected requirements for MRO facilities should also be substantiated to justify the full safeguarding requirements.
- 14 The GAL proposed safeguarded land to the east of Balcombe Road is indicated to be exclusively surface parking, and notably excludes uses previously identified for this area and considered to be less directly related development (e.g. hotels, offices, leisure, retail). The absence of off-airport development of logistics, hotel and office infrastructure associated with passenger growth would suggest reliance on third party developers to provide these facilities. For Gatwick Airport to grow successfully, it must be supported by associated development including secondary and tertiary land-uses. In many cases these are in the best interests of the passengers (e.g. hotels) and third-

party tenants at the airport such as airlines and freight forwarders (e.g. offices and logistics facilities), which support and enable growth in the primary airport functions. They also benefit the local communities in terms of socio-economic benefits such as employment opportunities. These associated developments do not necessarily have to be on land owned and operated by the airport, but they do benefit from proximity to the airport.

- 15 Taken collectively, the evidence indicates that a second runway could be developed with significantly less land for long stay car parking, with such as is required to be provided in more land efficient multi-storey formats. In this context, new evidence should be provided to justify the extent of safeguarded land to the east of Balcombe Road, which addresses the points raised above and any other relevant matters.