

Crawley 2040

Draft Crawley Borough Local Plan 2023 – 2040
May 2023

Response to York Aviation paper

Gatwick Green Limited



Gatwick**Green**

WHERE THE FUTURE WORKS

Response to York Aviation paper

Reference: 055

Mott MacDonald on behalf of Gatwick Green Limited

1.0 Introduction

- 1.1 This document provides Gatwick Green Limited's response to the paper prepared by York Aviation on behalf of Crawley Borough Council (CBC), in accordance with the examining Inspectors' letter dated 20 November 2023. It has been prepared by Mott MacDonald Limited on behalf of Gatwick Green Limited (GGL), who own and will deliver the strategic employment allocation under Strategic Policy EC4 within the Submitted Crawley Borough Local Plan, May 2023 (SBCLP).
- 1.2 Mott MacDonald as experienced airport master planners agree with the points raised by York Aviation. Mott MacDonald draw the Inspectors attention to the following key considerations when assessing the soundness of the SBCLP.

Demand for Car Parking Lacks Evidence

- 1.3 York has reviewed whether the GAL claimed car parking need has been assessed on a correct basis. York has found that the 2014 and 2019 Airport Master Plans provide only an overview of the anticipated requirement and that, "the figures provided for numbers of spaces required are not backed up with any detail or the calculations underpinning the scale of the land-take".
- 1.4 York observes that "car mode-share reductions are not adequately taken into account". Despite current trends and GAL's commitments to incentivise mode-share shift to public transport, this has not been clearly factored into their calculations for future car parking requirements. York considers this "another reason why the assessment exaggerates the overall future requirements for parking spaces."
- 1.5 Mott MacDonald agrees with York's findings.

Supply of Car Parking

- 1.6 York correctly observes that there are a number of inconsistencies and oversights in the GAL Reg 19 representations relating to the existing availability of car parking.
- 1.7 First, that land-take is based on earlier master plans and takes no account of the proposed parking developments within their own Northern Runway Project DCO application, including decking of north terminal long-stay parking areas and the development of new multi-story car parks.

- 1.8 Second, that GAL have failed to take into account their recent MSCP developments and the increased capacity at both south and north terminals, as well as increased intensification of long-stay parking through decking and robotic block parking.
- 1.9 Third, and very significantly, York confirms that GAL have, “Failed to account for lawful established off airport parking”. York reports this as 19,000 spaces with information provided by CBC in 2022, a slight reduction from the 21,200 spaces that GAL acknowledge in their 2012 and 2019 master plans, yet failed to consider in their 2014 submissions to the Airports Commission (GAL Second Runway Operational Efficiency Masterplan, May 2014). It is this 2014 submission that has been used as the basis for justifying the extent of safeguarded land required at this Examination.
- 1.10 By considering just these three points and making no other adjustments, York reaches the conclusion that GAL only requires 65,000 car parking spaces east of the railway, significantly less than the 95,750 claimed by GAL.
- 1.11 It should be noted that York’s assessment takes GAL’s starting point of 95,750 as if it is true and accurate, despite the fact that there is no robust evidence to substantiate this figure.
- 1.12 York’s focus has been on the land areas safeguarded for parking, whereas a robust justification for safeguarded land from GAL would consider opportunities within the whole airport master plan area.
- 1.13 Mott MacDonald agrees with York’s findings.

Efficient Use of Land

- 1.14 York’s next step is to consider how much land is needed to accommodate the number of parking spaces and whether this is being done in an efficient manner. They also consider “whether concerns of Arup (GAL) on matters such as the viability of decking, multi-story and mechanized car parking are justified”.
- 1.15 In reviewing the car parking densities used in land-take calculations, Table 1.2 of the York paper shows two significant factors: first, that “the comparison illustrates starkly that Arup’s assessment of parking requirement was conservative and not in line with the efficiencies available from modern car parking solutions” based on York benchmarks from Gatwick and Manchester airports; and second, that Arup have failed to take account of the improved efficiency of block parking.

- 1.16 GAL are using decking in their DCO application and have already implemented more robotic (mechanised) block parking in their south terminal long-stay car parks. GAL has signalled its intention to investigate and deploy new technology to achieve more space-efficient parking. The DCO Transport Assessment confirms this when it states that “*GAL is already exploring optimising long-term parking through its robotic valet pilot, which uses small tows capable of lifting a vehicle by the wheels and moving it to secure storage area. This system has the potential to store 50% more vehicles within a given area than traditional, self-parking arrangements (Airport Technology, 2019)*”¹. These established features of GAL’s operation have not been factored into their demands for more safeguarded land. GAL also sees a long term “*reduction in overall parking requirements*” arising from the likely significant deployment of self-driving vehicles in the 2030s and 2040s¹.
- 1.17 York considers the omission of block parked MSCP solutions is a key omission, based on two recently implemented examples at Manchester Airport as an efficient land-use solution.
- 1.18 GGL has consulted with Manchester Airport Group and confirmed that these recent MSCP developments have been funded by a 3rd party and are clearly commercially viable. They deliver more efficient operations than surface block parking (due to quicker turn-around of parking jockeys) and have increased parking revenues.
- 1.19 This is further reinforced by Heathrow Airport’s 3rd runway DCO consultation materials in which all their long stay and staff parking was to be provided as MSCPs to minimise their CPO land-take.
- 1.20 York confirm that the Obstacle Limitation Surfaces (OLS) associated with GAL runways do not constrain building heights to the extent indicated by GAL/Arup and that a range of decked and MSCP solutions are viable across the site.
- 1.21 York concludes that “it would be possible to accommodate any future parking requirements for up to 95 MPPA on an area much smaller than the available area”. They reach this conclusion by summarising four very specific and valid reasons: 1) that lawful off-site parking must be accounted for, 2) that provisions elsewhere on the airport must be accounted for, 3) that an efficient use of land should be assumed, and 4) that there is no reason why decking and MSCPs cannot be used for long stay car parking.

¹ Gatwick Airport Northern Runway Project, Transport Assessment, London Gatwick, July 2023 – Chapter 17, paras 7.2.19-7.2.20

1.22 Mott MacDonald agrees with York's findings.

Safeguarded Land Area Summary

1.23 The land east of the railway is measured as 138 hectares. By allocating 44 hectares within Policy EC4 for strategic employment, the SCBLP safeguards 94 hectares of land for GAL long-stay and staff parking.

1.24 Table 1 describes just a few examples of the many possible parking solutions are that are viable within this safeguarded land area.

Table 1: Examples of viable parking solutions

Parking solution	Parking density	Area required for parking	Surplus area, not needed for parking (with Gatwick Green allocated) ¹ .
All block parking	13.3 sqm/bay (50% more efficient - GAL)	88 hectares	6 hectares
All single decking	12.5 sqm footprint/bay (25 sqm/bay/level - York)	82 hectares	12 hectares
Two-layer decking	8.3 sqm footprint/bay (25 sqm/bay/level - York)	55 hectares	39 hectares
Multi-story car parks (6 story)	5.8 sqm footprint/bay (35 sqm/bay/level - MM)	38 hectares	56 hectares
Block parking MSCP (6 story) - York	3.9 sqm footprint/bay (23 sqm/bay/level) (50% more efficient - GAL)	26 hectares	68 hectares
Combination of parking solutions	22,000 block parking 22,000 single decking 22,000 MSCP spaces	70 hectares	24 hectares

Note:

¹ With the SCBLP allocating EC4 for strategic employment, the safeguarded land for GAL long stay and staff parking is 94 hectares. This surplus column indicates how much excess land is left over, after meeting GAL's parking requirements, in the case of each of these viable parking solutions.

1.25 It can be seen that if GAL were to select the most efficient use of land, as recommended by York Aviation (based on the recent Manchester Airport model), less than a third of the safeguarded land area in the SCBLP would be required.

1.26 Even if they take a much more conservative approach of a mixture of decking, block parking (robotic or valet) and conventional MSCPs, there would still be a surplus of 24 hectares left over.

The SCBCLP safeguards sufficient land for potential future parking needs

1.27 There is sufficient retained safeguarded land to accommodate future parking needs, so there is no case to seek all, or any part of, Gatwick Green for that purpose. In the future, the land needed for parking can only be less, as the historic and current trends are of proportionally less travel by car and increases in parking density. Consequently, more land would never be required. The amount of land still safeguarded for potential future parking represents a no-risk approach to the potential expansion of the airport.

Timing of a Southern Runway development

1.28 Timing issues should also be considered when reading the York paper. The essential point is that even if a third southern runway were to ever come forward at Gatwick, it is likely that it would not be at full capacity until sometime after 2065. By that time, parking demands will be radically different and lower than they are now, for reasons that are already becoming apparent (see para 1.16). The reasons for this time frame are summarised below.

1.29 Within the 2014 submissions to the Airports Commission, GAL indicated that a southern runway was estimated to be deliverable within a 10-year period. The GAL 2014 master plan includes phasing diagrams showing that the project would be developed in phases with a period of 25 years from runway opening to full utilisation.

1.30 The Airports National Policy Statement (2018) indicates that the Government's preferred scheme is the Heathrow Northwest runway, based on the findings of the Airports Commission. While this DCO application has been postponed due to a Judicial Review, the findings of the Airports Commission still stand in this ANPS. Therefore, the Heathrow 3rd runway would be the next airport development to have government support to proceed to DCO and deliver additional capacity to the South East of the UK. This project would similarly take 10 years to deliver a new runway and a further 20 years to fully utilise the released capacity.

1.31 To change the current status quo, a further (Airports Commission) study would have to reach a different conclusion than was found by the 2015 Davies Commission based on the evidence presented (including by GAL) in 2014. The current government has not provided any indication that it intends to do so.

1.32 In the light of the above, it seems sensible to assume that a Gatwick southern runway development, whether following Heathrow's 3rd runway or resulting from change in

Government policy, followed by a 10-year DCO and construction period, would be highly unlikely to occur within the next 20 years and would likely be considerably later. If a GAL southern runway were to open in the early 2040s, followed by the 2014 master plan development phasing, it would not fully utilise this capacity for a further 25 years (i.e. until beyond 2065).

- 1.33 By this time, it is likely that the parking requirements will have changed significantly, reducing the quantum of safeguarded land that would be required.

Conclusion

- 1.34 The York paper demonstrates that the extent of safeguarded land within the SCBLP is more than sufficient to accommodate a wide range of viable parking solutions for a demand of 65,000 long-stay and staff car parking spaces; therefore, the Submitted Crawley Borough Local Plan is sound.

Response to York Aviation Paper

List of Appendices:

Appendix 1 - Car Parking Area Diagrams



GatwickGreen

WHERE THE FUTURE WORKS

Appendix 1

Car Parking Area Diagrams



GatwickGreen

WHERE THE FUTURE WORKS

Appendix A – Car Parking Area Diagrams

The following diagrams show the safeguarded land area available for parking (Figure 1) and some examples of the various parking solutions that could be accommodated within this area (Figures 2 to 5).

It can be seen that there is a surplus of excess land left over after any of these parking solutions, which is a significant area in many cases.

