



LONDON GATWICK



Gatwick Airport Ltd response on York Aviation Paper (PS/EGSM/GA/18)

December 2023

1 Introduction

- 1.1. This note has been prepared by Gatwick Airport Ltd (GAL) in response to the issues raised in the York Aviation paper 'Safeguarded land for car parking', November 2023, ('the YA Paper') (PS/EGSM/GA/18).
- 1.2. GAL maintains its objection to the removal of the 44ha area to accommodate the proposed allocation of Gatwick Green as a strategic employment location from the safeguarded land in the Submission Version Local Plan ("SVLP") (CBLP/01). This note responds to the following matters raised in the YA Paper:
 - the scale of land take to meet the parking requirement for the additional runway to the south ("southern runway") identified in the Gatwick Airport Masterplan 2019 ("2019 Masterplan");
 - consideration of recent parking provision delivered on-airport;
 - the car parking calculations, taking into account:
 - off-airport parking;
 - parking infrastructure changes at the airport;
 - mode share trends;
 - parking products;
 - car parking density;
 - consistency between the Northern Runway Project and southern runway; and
 - conflicts between the safeguarded area and the proposed allocation of Gatwick Green.

2 Car Parking in the Masterplanning

- 2.1. The apparent suggestion in paragraph 7 of the YA Paper that the 2019 Masterplan identifies safeguarded land on an “*excessively generous basis*” is not correct.
- 2.2. The extent of safeguarded land is based on proportionately detailed design work which was interrogated through the Airports Commission process (during 2013 – 2015) and reflects the minimum amount of land required to develop and operate any future additional runway scheme. The safeguarded area was recognised by the Airport Commission Final Report 2015 as being “*a credible option for expansion*” (Executive Summary, Page 9).
- 2.3. The extent of safeguarded land reflects the need for both the re-provision of existing car parking and the additional car parking need arising from the development of the southern runway.
- 2.4. Only land required to deliver the necessary infrastructure to support a southern runway at Gatwick Airport is included in the 2019 Masterplan. If the southern runway is delivered, long stay passenger spaces and staff spaces will be lost because of the reconfiguration of the airfield, with additional development in the northwest part of the airport and areas of parking along the southern boundary of the existing airport lost to the new terminal, piers and runway. These spaces are shown shaded red on Error! Reference source not found., together with existing long stay spaces which are already located east of the railway line and would be reconfigured as part of the project.
- 2.5. Our parking density assumptions are based on examples at Gatwick Airport, where GAL has direct experience in operating these car parks. The basis for the assumptions in the YA paper at Table 1.2 when calculating densities are unknown.
- 2.6. The overall space requirement for a surface car park may include vehicle accesses, barriers and associated approach areas, landscaping and walking routes. Additionally, the space required for decked and multi-storey car parking includes the structure, ramps, lifts and stairs. It is more than just car parking spaces but also the infrastructure around them to serve the facility. The extent of land required for biodiversity enhancement including the biodiversity net gain will in the future be greater than when the masterplan was prepared.
 - 2.6.1 There is no MSCP block parking at Gatwick Airport and the existing decked block parking forms part of a much larger surface car park which is not considered comparable. The YA paper quotes an 8,000-space long stay block parking MSCP at Manchester Airport on only 3ha of land. This car park utilises a brownfield site within the built-up area of the airport campus that is within a few minutes’ walk of Terminals 1 and 3, making it very attractive to users who wish to drop their care and walk into the terminal. It is a very different location to that east of Balcombe Road which is beyond walking distance from the airport and will require a shuttle bus to the terminals.
 - 2.6.2 We agree with paragraph 23 of the YA paper that building heights would be constrained in areas under the future take-off and approach slopes of the Obstacle Limitation Surface

(OLS). Consideration would also need to be given to landscape and visual impact on mid to long range views to the north and east of the airport which is more rural in character and subject to landscape, heritage and ecological designations, as well as requirements under biodiversity net gain, surface drainage and utility provision. It could not be assumed that multi storey and block parking products would be viewed as favourable or even acceptable by the Council at a high density and massing in this location due to other policy constraints and environmental considerations.

Figure 1 – Location of existing car parks that would need to be re-provided if the southern runway is delivered.



3 Parking requirement for the Southern Runway

3.1. Parking calculation for the Airport Commission Work 2014

3.1.1 In Appendix A5 (PS/EGSM/GA/16), Table 3.7_1 sets out the car parking requirement for the airport as shown in the 2019 Masterplan (on the basis of a 'with southern runway' scenario) as being 8,500 short stay spaces close to terminals, with 83,650 long stay spaces and 12,100 staff spaces located on other land east of the railway. This makes a total of 104,250 spaces. At the time of calculation of the baseline airport facilities (in May 2014), it was noted that there were some 26,280 existing long stay and staff spaces located off-airport (Table 1.2_1 of Appendix A5).

3.1.2 The method for estimating the required number of car parking spaces was to increase the 2012 existing car parking numbers pro-rata with growth in passenger and employee numbers. An adjustment was then applied to reflect the expectation of a reduced car mode

share in 2050 (compared to that in 2012), consistent with achieving a 60% public transport mode share overall. **Table 1** shows the calculation.

Table 1 – Car parking requirements for Southern Runway (based on existing parking provision in 2012) as shown in submission to Airports Commission, 2014

Demand		Car parking spaces					Total long stay & staff *
Pass'rs (mppa)	Staff	Short stay	Long stay on -airport	Long stay off-airport	Staff	Total	
Existing situation (2012)							
35	21,000	51,300			10,000	61,300	56,300
		5,000	20,020	26,280			
Car mode share adjustment factor, 2012 to 2050							
-	-	0.66			0.64	-	-
Pro-rata increase based on mppa and staff numbers, with mode share adjustment							
95	39,943	92,150			12,100	104,250	95,750
		8,500	57,370	26,280			

*The total of long stay and staff spaces is the total provision required to meet demand, excluding short stay spaces but including authorised and unauthorised off-airport parking spaces.

- 3.1.3 The Executive Summary of Appendix A5 (Page 10, last bullet point) stated that the main components of the Masterplan included “*The full 2050 long term and staff surface car parking demand on-airport and consolidated in an area to the east of the railway...*”. Table 3.7_1 of Appendix A5 included the off-airport long stay spaces within the total of long stay and staff parking required east of the railway. Table 1.1 of the YA Paper (PS/EGSM/GA/18) reports the same parking requirement as is reflected in **Error! Reference source not found.** above and also notes that the figures include the 26,280 off-airport parking spaces.
- 3.1.4 It was not the intention of the Masterplan to suggest that authorised off-airport parking provision would be removed and re-provided within the expanded airport boundary. It is recognised that authorised off-airport parking sites would legally be able to continue in operation. It is also acknowledged that the Arup 2021 note (REP-056-001E) incorrectly referenced this off-site parking provision.
- 3.1.5 Table 3.7_1 of Appendix 5 should therefore have explicitly identified a total of 77,970 on-airport parking spaces (8,500 short stay, 57,370 long stay and 12,100 staff). Of this total, 69,470 would be long stay and staff parking spaces located to the east of the railway (i.e. excluding short stay parking). The 77,970 is reached by subtracting the ‘off-airport’ parking of 26,280 but this figure comprises authorised and unauthorised off-airport car parking. GAL is not suggesting that it would re-provide authorised car parking spaces.

3.2. Updated parking requirement calculation

- 3.2.1 An updated version of the original calculation for the 2019 Masterplan is shown in **Error! Reference source not found.** using the same methodology as for the original calculation. This

uses existing parking provision, staff numbers and mode share information from 2019 which reflects the baseline situation set out in Table 4.2.2 of Chapter 4 of the Northern Runway Project (NRP) DCO Environmental Statement, included as Appendix 1 to GAL's 3 November 2023 representations (REP-056-001A). It therefore takes account of changes to existing provision that have occurred since 2012.

Table 2 –2019 Masterplan car parking requirements for Southern Runway (based on existing parking provision in 2019)

Demand		Car parking spaces					Total long stay & staff *
Pass'rs (mppa)	Staff	Short stay	Long stay on-airport	Long stay off-airport	Staff	Total	
Existing situation (2019)							
46.6	24,000	68,110			6,090	67,900	63,330
		4,570	36,040	27,500			
Car mode share factor adjustment, 2019 to 2050							
-	-	0.71			0.74	-	-
Pro-rata increase based on mppa and employee numbers, with mode share adjustment							
95	39,943	96,305			7,510	103,815	95,515
		8,300	60,505	27,500			

*The total of long stay and staff spaces is the total provision required to meet demand, excluding short stay spaces but including existing authorised and unauthorised off-airport parking spaces.

- 3.2.2 The passenger car mode share factor adjustment is based on the observed mode shares in 2019 and assumes the same target mode share for passengers and staff in 2050 as in the original calculation.
- 3.2.3 The updated calculation leads to a total parking requirement of 103,815 spaces. In 2019 there were approximately 21,200 authorised off-site parking spaces along with approximately 6,300 unauthorised spaces, and subtracting those leaves a parking demand of 76,315 spaces to be accommodated within the expanded airport boundary. Of those, 68,015 would be long stay or staff spaces. This is only around 1,450 spaces fewer than in the original calculation.
- 3.3. **Allowing for recent changes in parking at the airport**
- 3.3.1 The YA paper suggests in paragraphs 11-13 that changes have occurred in the parking provision at the airport since 2012 which should be taken into account and that this would lead to a reduced car parking requirement for the southern runway.
- 3.3.2 York Aviation suggests that new parking provision being made at the airport for business-as-usual reasons means that less parking would be required east of the railway than was previously calculated in the 2019 Masterplan (YA Paper paragraph 11). However, as explained earlier it cannot be assumed that existing parking spaces would remain in place. Although GAL would seek to minimise removal of existing car parking, the southern runway would necessitate relocating some existing car parking into a single zone east of the airport

in order to increase efficiency and allow the reconfiguration of the airfield and associated infrastructure.

3.3.3 Paragraph 11 of the YA Paper states that more MSCPs have been provided at the existing terminals (totalling 9,400), decking has been introduced on a significant area of the South Terminal's long stay car park (1,455 spaces) and that more MSCPs are proposed as part of the NRP. The NRP DCO application indicates that 'business as usual' projects would only provide an additional 3,250 spaces in MSCP7. These are set out in GAL's Response to Matter 5, Issues 5.11.

3.4. Mode share trends

3.4.1 York Aviation state that progress on sustainable transport mode shares should be reflected in the calculation of parking required for the southern runway.

3.4.2 The updated calculation described in section **Error! Reference source not found.** is based on the mode share information for passengers and staff in 2019, taken from observed and modelled data. Like the original calculation, it assumes that by 2050, a mode share of 60% of passenger journeys and 60% of staff journeys would be made by public, shared and active transport would be achieved.

3.4.3 The YA paper notes that GAL has indicated an aspiration to increase these to 60% over time but goes on to suggest that this means that a 60% sustainable mode share assumption for the southern runway is "*conservative*". We believe there is considerable uncertainty about whether sustainable mode share can be increased significantly beyond this level, given that there will always be a proportion of passengers and staff for whom there is little or no alternative to car travel. There is no other UK airport which is currently targeting sustainable mode share of over 60% for either existing operations or proposed masterplans.

3.4.4 It is therefore not reasonable to assume that sustainable mode shares for the southern runway would be substantially in excess of 60% and York Aviation offers no basis for suggesting otherwise.

3.5. Type of parking product

3.5.1 The YA paper suggests that the higher densities achieved by long stay block parking were ignored in our calculations, but that is not the case. As Table 3.7_1 of Appendix A5 of our submission to the Airports Commission in 2014 explicitly indicates, some 23,900 long stay block-parked surface spaces were assumed. This equates to about a third of the total on-airport long stay parking provision identified being in block parking.

3.5.2 York Aviation suggest that GAL could increase the amount of block parking, and/or the use of decked or multi-storey car parks for block parking. Our experience suggests that providing around a third of the long stay total as block parking is operationally efficient and reflective of passenger preferences for self-parking or valet parking. It also provides flexibility to respond to seasonal demand across the year. It is also relevant to note that a significant increase in

block parking, particularly beyond walking distance from the terminal, restricts passenger choice and has a higher cost for customers, some of whom may prefer cheaper self-park options.

- 3.5.3 From an operational perspective, block parking in MSCPs provides an operational challenge due to the logistics and difficulty of operating in such a restricted space. There is added complexity in the operation for block parking in future MSCPs, including but not limited to increased labour requirements; the need for additional technology and load bearing capabilities of such structures (especially given the increased weight of electrical vehicles); and fire prevention measures. Thus, it would not be sensible from an operational perspective to plan solely for this type of block park product.
- 3.5.4 **Table 3** below shows the current mix of self-park versus block park on-airport parking that was submitted to Crawley Borough Council for their parking count in September 2023. The mix of parking responds to customer preferences towards self-park and highlights one of the reasons that increasing block parking would be operationally challenging.

Table 3: Current number of car parking spaces at Gatwick Airport as at September 2023

2023	Number	% of total
Self- Park [Standard]	20,675	53%
Block Park [Standard]	17,492	45%
Other (PRM, Family, Electric etc.)	829	2%
Total	38,996	

4 Consistency of masterplans (Northern Runway Project and Southern Runway)

- 4.1. York Aviation suggest (in paragraphs 9 and 10 of the YA Paper) that the ratio of parking provision proposed in the NRP DCO application should be considered when setting the parking requirement for the southern runway parking requirements.
- 4.2. The 2019 Masterplan outlines three growth scenarios for the airport's long-term future:
- One where it remains a single runway operation using the existing main runway;
 - One where the existing runway is routinely used together with the main runway (this scenario is currently being progressed as the Northern runway Project "NRP", detailed further below); and
 - One where GAL continues to safeguard for an additional runway to the south.

- 4.3. GAL considers that these scenarios are not exclusive choices; Gatwick Airport could transition from one to another within the 2019 Masterplan lifetime (5-15 years).
- 4.4. Each project has distinct operational characteristics and requirements. The Northern Runway Project provides the ability to operate from the northern runway but retains the two terminal airport configuration. The 2019 Masterplan presents a development scenario for a wide-spaced two runway solution with an additional midfield terminal, expanded gate capacity, additional development elsewhere on the airport and a significantly different set of surface access works.
- 4.5. The updated calculation in section 3.2 shows a potential requirement of 7,510 staff parking spaces for the three-terminal airport. This compares with 6,100 staff spaces proposed in the DCO application for a two-terminal airport, which effectively keeps staff parking at current levels. The difference of 1,410 spaces compares to a difference in employee numbers of 7,143 (32,800 estimated for the Northern Runway Project and 39,943 for the southern runway). If staff parking for the southern runway were restrained to the current level, this would fail to recognise the wider staffing requirement of a three-terminal airport with associated facilities and workforce, and in any event would make little difference to the overall land requirement for car parking (less than 3 hectares of surface parking).

5 Conflicts between the safeguarded area and proposed Gatwick Green in the SVLP

- 5.1. The updated calculation of parking requirement in section **Error! Reference source not found.** indicates a need to accommodate 68,015 long stay and staff spaces on the safeguarded land, excluding the current number of authorised off-airport spaces. This is only slightly fewer spaces than calculated based on existing conditions in 2012, amounting to the equivalent of approximately 3 hectares of surface parking.
- 5.2. As explained, the need to re-provide parking lost to the airfield reconfiguration, together with additional parking required to support growth and the need to provide passengers with an appropriate mix of parking products means that the area safeguarded in the previous Local Plan would already have required us to increase parking density by including a greater proportion of decked parking than currently exists at the airport.
- 5.3. The SVLP proposes allocating up to 44 hectares for Gatwick Green. Up to a further 13 hectares of the residual land would be unsuitable for providing car parking because it would require longer access routes between parking and terminal, avoiding the Gatwick Green land, or because it does not provide the scale or shape of footprint that would allow an efficient car parking layout to be developed for long-stay or staff parking, effectively sterilising parts of the site. Taken together, there would remain a total of 81 hectares available for the delivery of the southern wide spaced runway, car parking and other infrastructure.

- 5.4. Even if this is a conservative estimate, it is clear that a significant amount of decked parking would have to be provided in order to accommodate the requirements for the southern runway project.
- 5.5. It is also important that the safeguarding includes allowance for 35 hectares of land for relocating businesses displaced by the southern runway. If businesses were to take up this opportunity, further decking would be needed for parking on the residual land, which would place further limitations on the ways in which GAL could implement a southern runway and operate and manage its parking provision.

6 Conclusion

- 6.1. GAL do not consider that the YA paper provides a sound basis for justifying the removal of 44ha of land within the safeguarded area and there is a robust justification for its retention for a future wide spaced southern runway scheme.
- 6.2. The proposed car parking densities suggested by the YA paper have not been explained or qualified and do not appear to take into consideration other infrastructure required to deliver car parking spaces such as roads, walkways, green infrastructure and street furniture. The parking calculations provided in this response demonstrate that the masterplan has not been '*excessively cautious*' in reserving land to the east of Balcombe Road for surface car parking and potential re-location of existing businesses.
- 6.3. As demonstrated the Airports Commission work did take account of off-airport car parking in the parking calculations and therefore GAL has not double-counted its parking future requirements for the southern runway, nor assumed we would replace existing lawful off-airport car parking.
- 6.4. The YA paper fails to recognise the planning constraints that could potentially arise when seeking to construct multi-storey and block parking in a more rural location, e.g. landscape and visual impact, heritage, ecological impacts including the provision of biodiversity net gain, sustainable drainage and utility provision.
- 6.5. The YA paper describes proposed high density block parking as an 'efficient' use of land and cites Manchester while failing to recognise the more developed context of that site and its proximity to the terminal. These characteristics are different to Gatwick where the car parking is more distant from the terminals and the scale of development may not be appropriate in a more rural context.
- 6.6. GAL's response demonstrates the strong rationale for having a balanced mix of car parking products available within its operational model so as to prevent less sustainable modes of travel, provide passenger choice, flexibility during peak periods, consideration of the site constraints of the airport (landscape, heritage, ecology etc.) and meet the future needs of the southern runway which is a different type of operation to business as usual and the Northern Runway Project.