Dear Sir/ Madam,

Gatwick Airport Limited Formal Comments to:

**Inspectors Matters, Issues and Questions for the Tandridge District Council Local Plan: Our Local Plan 2033.**

Introduction

- Gatwick Airport Ltd (GAL) has been notified about the aforementioned consultation calling for comments on the Tandridge District Council draft Local Plan ‘Inspectors Matters and Issues’ (MIQ’S).

- This note sets out GAL’s formal comments as an interested party and as the owner and operator of Gatwick Airport.

- GAL representation provides further comment to Matter 8 of the MIQ’s. GAL’s representation is made with particular regard to the catchment of Tandridge District Council being in close proximity to the airport.

- GAL would like to highlight that we do wish to attend the Examination in Public of the draft Local Plan.
Gatwick Airport Limited Consultation Comments:

In response to the draft Local Plan MIQ Matter 8 Policy TLP51 (Airport Related Parking) GAL would like to put forward the following comments:

**Policy TLP51 – Airport Car Parking**

**Inspectors Matter 8: Airport Related Parking PolicyTLP51:**

**Question:** Is the Policy justified in prohibiting any additional or replacement airport related parking in Tandridge?

**Summary**

Gatwick Airport Limited (GAL) fully supports Policy TLP51: Airport Car Parking.

Policy TLP51 is purposefully drafted so as to be consistent with airport parking policies in the adopted and emerging plans of other authorities in the area around Gatwick Airport, because it is part of a coordinated approach by these authorities to ensure future need for airport related parking is planned and provided in the most sustainable way.

The policy approach is that ‘on airport’ is the most sustainable option for meeting future demand for car parking.

This approach is justified because ‘on airport’ parking has a number of inherent advantages over provision of ‘off airport’ parking:

i) On airport parking sites are more accessible from the strategic road network, are closer to passenger terminals and therefore inherently reduce distances travelled by airport passengers arriving by car

ii) On airport parking reduces emissions and impacts on residential amenity; iii) On-airport parking provision contributes towards a Public Transport Levy which is used to promote and enhance walking, cycling and public transport

iii) On airport parking is consistent with GAL’s Public Transport Commitments

‘On- airport’ is also directly aligned with the objectives set out in the National Planning Policy Framework for managing patterns of growth and transport so as to limit the need to travel, reduce congestion and emissions, avoid and
mitigating adverse effects of traffic and promote sustainable modes of transport.

The policy is clear and justified, effective and consistent with national policy. Section 38(6) of the Planning and Compulsory Purchase Act 2004 does not preclude applications for ‘off airport’ being granted if special circumstances can be demonstrated.

National Policy Context

1. It is understood that the draft Local Plan will be assessed against the 2012 NPPF.

2. The policy TP51 is consistent with the NPPF. The NPPF promotes that policies and development proposals should seek to make full possible use of public transport, walking and cycling, and focus development in locations which are or can be made sustainable. Promoting sustainable travel is one of its key objectives, which includes the encouraging that policies support a pattern of development which facilitates the use of sustainable modes of transport. The NPPF also promotes that Local Authorities should work with neighbouring authorities and transport providers to develop strategies to support sustainable development and the uptake of sustainable forms of transport.

3. NPPF 2012 includes the following as one of its 12 Core Planning Principles:

   “To actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable. (Para 17)

4. ‘Promoting Sustainable Travel’ is one of its 13 key themes which includes the following policies:

   a. “Encouragement should be given to solutions which support reductions in greenhouse gases emissions and reduce congestion. In preparing Local Plans, local planning authorities should therefore support a pattern of development which, where reasonable to do so, facilitates the use of sustainable modes of transport.” (Para 30)

   b. “Local Authorities should work with neighbouring authorities and transport providers to develop strategies for the provision of viable
infrastructure necessary to support sustainable development, including … transport investment necessary to support strategies for the growth of … airports.” (Para 31).

c. Plans and decisions should ensure developments that generate significant movement are located where the need to travel will be minimised and the use of sustainable transport modes can be maximised (Para 34).

5. Travel Plans are identified as a key tool to promote sustainable transport modes (para 35).

Aviation Policy Framework (2013)

6. Para 5.11 of the APF states:
   “… proposals for airport development must be accompanied by clear surface access proposals which demonstrate how the airport will ensure easy and reliable access for passengers, increase the use of public transport by passengers to access the airport, and minimise congestion and other local impacts.” (our emphasis)

7. The APF also recommends that airports should prepare and agree Airport Surface Access Strategies with their Airport Transport Forums and that these should include how car parking is managed (Appendix B).

Current Provision of Airport Related Passenger Parking

8. There are currently some 60,000 authorised on and off airport parking spaces related to Gatwick’ operations.

9. Some 39,000 of these spaces are provided and managed by GAL within the airport boundary. Some 21,000 are run by independent companies and are located off-airport. According to most recent annual monitoring on behalf of local authorities there are also some 5,000 spaces within unauthorised off airport car parks.

10. Overall therefore, there are a mix of companies offering car parking and GAL has a current share of authorised car parking capacity of c.65%.

11. The 4 main types of parking product offered by GAL on airport are:
   a. Long Stay (Self-Park)
   b. Long Stay (Block-Park)
   c. Valet Parking; and
   d. Parking in ‘Short-Stay’ Multi storey Car Parks

12. The off airport car parking operations tend to operate in two ways:
i) **Meet and Greet Services:** Passengers drive to the airport terminal forecourts where they are met by operatives who arrange for their cars to be driven to off-airport sites. Cars are then driven back to the airport on the passenger’s return.

ii) **Self Park:** Passengers drive directly to the off-airport site and are then transported, usually by minibus, to and from the airport.

### Gatwick’s Airport Surface Access Strategy and Car Parking Strategy


14. Approved by the Airport Transport Forum, they provide the formally agreed strategy and vision for Gatwick’s transport connectivity, including how airport passenger and staff car parking requirements will be met and managed.

15. GAL’s latest Airport Surface Access Strategy (ASAS) was updated and agreed in 2018.

16. The 2018 ASAS recognises that passengers have various alternative means of accessing the airport. Whilst sustainable modes are encouraged, promoted and supported, it recognises that for many passengers driving to the airport will be the preferred option and that parking must be provided to meet demand.

17. The ASAS contains a higher passenger public transport mode share target of 48% by 2022 than the previous 2012 ASAS (which contained a stretch target of 45%). It also sets out GAL’s plans for providing additional parking and managing car parking demand as the airport grows.

18. The Car Parking Strategy demonstrates that the predicted future growth of passengers at Gatwick Airport and the 48% public transport mode share target can be achieved through infrastructure improvements and car parking provision on-airport. It further demonstrates that the future demand for car parking can be accommodated entirely within the airport site.

19. In several recent appeals against refusal of applications for off airport car parks in Crawley and Tandridge inspectors have accepted that GAL is able to meet all forecast future demand for parking on airport 1.

20. Through a S.106 agreement with Crawley Borough and West Sussex County Councils, all passenger and staff car parking at the airport

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1 Appeals APP/Q3820/W/17/3182041 and APP/M3645/C/16/3166210.
contributes to a levy (the ‘public transport levy’). The GAL public transport levy during 2018 raised in excess of £1.2 million. The levy on spaces and staff passes increases each year and goes towards supporting sustainable transport initiatives in the ASAS.

Benefits of On-Airport Parking at Gatwick

21. Provision of additional airport related parking for Gatwick passengers on airport has a number of advantages over its provision in off airport locations. The advantage can be summarised as follows:

i) **On airport sites are more accessible from the strategic road network, are closer to passenger terminals and therefore inherently reduce distances travelled by airport passengers arriving by car**

22. Gatwick Airport is directly connected to the M23 at Junction 9, which has a Spur Road (M23 Spur - Airport Way) which connects directly to the welcome roundabouts at South and North Terminals. Nearly all on airport car parks are served from the airport’s internal road network which is connected to the welcome roundabouts.

23. As described earlier there are a number of different types of car park products provided at the airport, but the feature they all have in common is that these car parks are close to the terminals. For example:

a. Short-stay parking is provided in five existing multi storey car parks that are immediately adjacent to the two terminals. Passengers park their cars and can walk to the terminals.

b. Long-stay self-park car parks are close to both terminals - passengers can park their cars and then take a short shuttle bus journey to reach the terminal and return on the shuttle bus when they need to collect their car.

c. In the case of long-stay valet parking, passengers leave their cars in designated zones in the multi storey car parks and their cars are then driven by car park operatives to storage areas close to the long-stay self-park areas and returned to the designated zones in time for collection.

24. Similar products are provided in a number of existing off airport car parks, but in virtually all cases they are more remote from the airport, have less direct access to the strategic road network and involve longer journeys. This means that passengers who choose to park in an off-airport self-park product tend to have to drive further to reach the site and their shuttle bus journeys to and from the airport are longer.
Similarly, in the case of passengers who opt for an off-airport valet park product their cars are driven from on airport drop off points to sites that are further away from the airport than the on airport options and also have longer return journeys.

25. These sites increase both the number and length of car journeys, often use lower class roads (in some cases country lanes or through residential areas), sometimes through residential areas and are often more convoluted.

26. It is difficult to conceive of any sites in the district of Tandridge that would have the same direct access proximity to the strategic network or lead to journey lengths to match on airport car parks.

**ii) On airport parking reduces emissions and impacts on residential amenity**

26. By reason of the shorter journeys associated with on airport car parks, their access to the strategic network and reduced number of journeys, ‘on airport’ minimises emissions, pollution, and noise. In addition, off airport can be unneighbourly – with cars being driven 24 hours per day along country lanes and through residential areas.

**iii) On-airport parking provision contributes towards a Public Transport Levy which is used to promote and enhance walking, cycling and public transport**

27. As noted earlier there is long term arrangement in place whereby GAL provides an annual public transport levy which is based on the number of on airport car parks spaces. This is used to fund sustainable transport initiatives under the direct of the Airport Transport Forum.

28. Existing off airport car park operators are not subject to these provisions.

**iv) On airport parking is consistent with the GAL Public Transport Commitments**

29. GAL’s surface access and car parking strategies are subject to scrutiny by its Airport Transport Forum, and the targets are subject to annual performance review by members of the Forum.

30. None of the off-airport operators are incentivised or committed to public transport / travel plan objectives.
31. Furthermore, the highly seasonal nature of demand and the need to recover the fixed operational and set up costs of establishing off airport operations to meet peak demand (which occurs for about 4 – 8 weeks per year), means that outside the peak demand periods operators reduce the cost of parking as a means to stimulate demand. For off-airport operators, absent the ASAS incentives that GAL is committed to, this stimulates additional road traffic contrary to objectives to promote public transport.

32. The neighbouring authority of Reigate & Bansted are imminently due to adopt the new DMP for the borough. The Policy TAP2 Airport Parking in the Reigate & Bansted Submission Plan was wholly supported by the Planning Inspector following the recent Examination in Public. Policy TAP2 has therefore very recently been subject to the rigors of the plan review processes and was found to be justified by the Inspector. The Policy TAP2 follows entirely the same approach as is proposed in Policy TLP51 of the TDC draft Plan.

33. These conclusions are also consistent with the Inspector who examined a similarly worded policy in the Crawley Local Plan examination in 2015 who stated:

87. ‘In response to sustainable transport objectives, the Airport Surface Access Strategy (ASAS) for Gatwick seeks to deliver 40% access by public transport modes once the airport reaches 40mppa, with a target stretching to 45% once 40% has been achieved. Nevertheless, the demand for car parking will rise as passenger numbers increase. Currently about 38% of all authorised parking spaces are provided outside the airport. Policy GAT3 requires all new airport parking to be provided within the airport boundary, on the basis that this is the most sustainable location. The airport’s car parking strategy indicates that the necessary increase in spaces can be provided on-site by a range of measures, including block parking and decking over existing car parks. I appreciate that decked parking is an expensive way to provide long-stay parking, but there is no evidence that the options in the ASAS are not viable. I acknowledge the risk that higher charges for on-airport parking will increase ‘kiss and fly journeys, which are the least sustainable option, but tackling this is part of the airport’s strategy.

88. I accept that there will be some instances where off-airport parking results in shorter overall journeys by private vehicles. However, and in the absence of cogent evidence to the contrary, there is obvious logic to the argument that car parks close to the terminals will minimise the length of car journeys for most people, and that on-airport provision is
therefore a more sustainable option. This is particularly the case with the growth in ‘meet and greet’ services where the extra trip to the parking location invariably extends the car journey length. There may be occasions where sustainability arguments justify a temporary airport parking use, such as on the safeguarded land at City Place, but exceptions such as these do not negate the validity of the policy. Furthermore, given the scarcity of land in Crawley and the available capacity at the airport, there is a strong argument that the priority for land which becomes available outside the airport should be a more productive use such as housing or employment. Overall I conclude that policy GAT3 is sound.

(Extracts from Inspector’s Report on the Examination into Crawley Borough Local Plan 2015-2030, 2nd November 2015)

Crawley Borough Council now are currently consulting on the Crawley Local Plan (Regulation 18) early engagement document ‘Crawley 2035’. The emerging draft Local Plan again promotes Policy GAT3 for all new airport related car parking to be permitted within the airport boundary as the most sustainable approach to accessing the airport.

Arguments for allowing Off-Airport Parking

34. Proponents of off-airport Gatwick parking argue that allowing provision off airport would increase consumer choice and enhance competition into the market. They also argue that GAL is unable to meet future demand on airport.

35. As noted above there is already substantial consumer choice and competition in the market through the current mix of on and off-airport parking. Gatwick also has plans in place to meet growth in demand – its Car Parking Strategy and 5 year Capital Plan include provision for up to an addition 9,500 spaces over the period to 2023. Capacity would be brought on stream to meet demand. More parking could be provided if necessary on airport.
The arguments made by proponents of off-airport parking have been considered in previous local plan examinations (such as Crawley Local Plan & Reigate & Bansted) and in a number of appeals including within Tandridge and its directly the neighbouring authorities. In all recent appeal cases they have been firmly rejected. Copies of the three most recent appeal decisions – Land adjacent to Lowfield Heath Service Station, Crawley (APP/Q3820/W/17/3173443), Spiritwood, Tandridge (APP/M3645/C/16/3166210), Gas Holder Site, Crawley (APP/Q3820/W/17/318204) and are appended to this submission.

36. In the latter case the Inspector concluded:

18. There is no indication that GAL is unable to meet future parking need...

19. In addition, GAL is promoting sustainable modes of travel to the airport so as to meet its public transport mode share target as set out in the recently published Airport Surface Access Strategy... This is tied into a planning agreement entered into by GAL which makes provision for the payment of a public transport levy, to be used to improve public transport links to the airport.

20. To sum up, there is no evidence to suggest that there is an unmet need that must be met by allowing off-airport parking. I conclude … that the scheme would conflict with … Policy GAT3 of the Local Plan.

30. Balanced against these [beneficial] factors is the clear conflict with the adopted development plan, in particular Policy GAT3, which requires all new airport parking to be within the airport boundary, on the basis that this is the most sustainable location. The scheme would conflict with… Policy GAT3 of the Local Plan, and its wider sustainability objectives. It is not within the airport boundary but is ‘off-site’. There is no cogent evidence before me to support the view that there is any unmet need for off-airport parking, so the proposal cannot be said to be justified by a demonstrable need.

37. In the latter case the Inspector concluded:

68. … the Appellant…expressed the view in his proof of evidence that, whilst the nature of the operation was unsustainable, it was not less
unsustainable than parking at Gatwick airport. Indeed, he considered that it provided a more sustainable option than much of the official Gatwick parking opportunities.

69. However, during cross-examination, he amended that aspect of his proof of evidence and accepted that, in the light of the words of the Inspector at the Crawley Borough Council Local Plan Examination, off-airport parking is in fact less sustainable than on-site airport parking.

74. … the Appellant … alluded to a need for off-airport parking based upon his own personal experience of operating such a business. However, no empirical evidence was submitted in support.

75. In contrast, the evidence of GAL provides details of the methodology used to develop parking capacity plans, off-airport parking capacity changes since 2010/11, passenger numbers and mode share, the relationship between parking supply and demand 2010-2016, the car parking strategy for the next 5 years and proposed car parking capacity developments. GAL confirms that its existing parking provision and its planned investments together with the existing level of authorised off-airport parking would ensure sufficient airport related car parking is provided in the future to meet forecast demand. GAL’s plans include sufficient capacity to also absorb all current unauthorised off airport parking at the airport.

84. As regards the claimed need to meet the long-term parking requirements of Gatwick Airport… There is no substantial evidence before me to support the view that there is any unmet need for off airport parking that the appeal site could meet.

Conclusions

38. GAL strongly supports the proposed Policy TLP51.

39. GAL considers it to be justified, effective and consistent with National Planning Policy and National Aviation Policy, and supports the overarching objectives for achievement of sustainable development. This policy reflects the ASAS and Car Parking Strategy for Gatwick – Strategies that have been drawn up purposely to promote the most sustainable access to the airport in discussion with key stakeholders.
40. It would complement and support the airport related car parking policies in the development plans adopted and being prepared by neighbouring local planning authorities and thereby provide a consistent and holistic approach to controlling area wide airport parking that recognises that

i) the airport is the most sustainable parking location to reduce lengths of journeys and the number of trips by those who drive,

ii) that the control of parking supply is fundamental to delivering Gatwick Airport’s mode share targets and

iii) that there is adequate capacity to meet future parking needs on airport

41. The wording of the policy is appropriately clear and unambiguous. The need for the policy is evidenced and it serves a clear purpose in that it promotes the most sustainable approach to future airport related parking development.

Appendices
Copies of three relevant recent appeal decisions are appended (Attachment 1):

1. Gas Holder Site, Crawley (APP/Q3820/W/17/3182041)
2. Spiritwood, Tandridge (APP/M3645/C/16/3166210)
3. Land adjacent to Lowfield Heath Service Station, Crawley, West Sussex (APP/Q3820/W/17/3173443) (attached)

If you have any queries or would like to discuss the comments made by GAL in further detail, please do not hesitate to contact me.

Yours sincerely

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Spatial Planning Manager
Gatwick Airport Ltd.