Crawley Borough Council Written Response to Inspector's Matters, Issues and Questions:
4.14(a) - Is the provision of policy GAT3 which restricts additional or replacement airport-related parking to within the airport boundary justified and consistent with NPPF?
13 March 2015

15.1 CBC consider the CBLP Policy GAT3 to be a sound policy. The provision of long term car parking at airports is a complex issue which needs to be considered within the context of the overall surface access strategy for passengers travelling to and from an airport. There has been a long standing objective, endorsed in many places including the 2003 Airports White Paper to increase the use of public transport by those travelling to airports.

15.2 The preparation of the Airport Surface Access Strategies (ASAS) to achieve this objective has been supported in government legislation and guidance over the past 15 years including in the Aviation Policy Framework (March 2013 LP122). Gatwick Airport Limited (GAL) have had a target to achieve 40% of passengers travelling to the airport by public transport with a throughput of 40mppa since the first S106 agreement to manage the environmental impact of the airport which was signed between CBC, WSCC and GAL in 2001. This target has been reflected in the revised 2008 legal agreement (LP123) and surface access strategies which have been prepared by the airport operator. The public transport target has in fact been achieved with the current throughput of 38 mppa. The 2008 Development at Gatwick Airport SPD (LP124) and the Gatwick Airport Master Plan 2012 (LP125) also supports the provision of any additional car parking on airport. The latest version of the ASAS in 2012 retained the target of 40% at 40mppa and included a stretch target of 45% once the 40% at 40mppa has been achieved.

15.3 The provision of attractive public transport options to travel to the airport and the management of car parking both play an important role in achieving this objective. Gatwick Airport already has a high level of accessibility by public transport and the ASAS sets out a variety of ways in which this can be further improved. It is also recognised that as passenger throughput continues to grow within the one runway configuration, that there will need to be some increase in parking provision to cater for residual demand whilst remaining commensurate with the public transport target. This should therefore lead to a gradual decrease in the passenger/parking space ratio. The provision of significant numbers of additional car park spaces would seriously undermine the strategy of increasing passengers arriving by public transport.

15.4 The 2012 ASAS states that GAL's key objective for car parking is to accommodate all additional airport related car parking on-airport. This could be achieved by a mixture of decking, multi storey construction on existing parking areas as well as the use of block parking. On-airport locations are considered to be the most sustainable as they are close to the terminal buildings, meaning that transfers from the car parks are short and can make use of existing shuttle services. Where passengers are using a valet parking/meet and greet service, again the transfer of the vehicle to an on-airport parking area is short and the driver can make use of airport transfer services if required, if they need to return to the terminal to meet another passenger. There has been a proliferation in recent years of off airport meet and greet services whereby the passenger drops off and picks up their vehicle at the terminal and the operator drives it to the parking area. If these sites are off airport, then there are additional and longer trips involved which are less sustainable.

15.5   It should also be noted that all on airport car parks contribute to the Passenger Transport Levy which provides a fund to promote public transport and sustainable transport modes accessing the airport.

15.6   It is acknowledged that there are a number of well established businesses with planning permission that provide long term parking for airport passengers in off airport locations. Therefore, a range of parking providers already exists, giving choice to passengers. Based on the 2014 Gatwick Parking Survey 38% of authorised spaces were off airport.

15.7   It is also considered that Policy GAT3 is consistent with the NPPF. Overall, the framework promotes the use of sustainable transport and states that the transport system needs to be balanced in favour of sustainable transport modes (para 29). With regards to advice on airports the NPPF states in para 33 that "Plans should take account of this Framework as well as the principles set out in the relevant national policy statements and the Government Framework for UK Aviation." The Aviation Policy Framework emphasises the role of airport transport forums and airport surface access strategies and the need to increase the proportion of journeys made to the airport by public transport (paras 4.16 to 4.23).

15.8   It should also be noted that other airports and local authorities seek to manage car parking to help maximise the number of airport passengers using public transport. The adopted Uttlesford Local Plan 2005 contains policy T3 (see Appendix 1) which states that proposals for car parking associated with Stansted Airport will be refused beyond the airport boundary. This approach was supported by the Local Plan Inspector in paras 9.7.1 – 9.7.5 of his report (Appendix 2) which states in para 9.7.4 that "As adequate space exists within the airport boundary for passengers to park their cars, I find no need for a flexible approach which would invite applications for car parking compounds outside the airport". The Inspector also notes that the restrictive policy is not unique to Uttlesford.

15.9   This Policy is being carried forward into the new Uttlesford Local Plan. The 2014 pre-submission consultation version of the plan included policy TA2 (see Appendix 3) which stated that airport car parking would only by allowed within the airport boundary. The policies and reasoned justification highlight the importance of managing car parking as part of the surface access strategies for the airport. No objections were received to the policy and no questions were raised by the Inspector about the policy at the examination.

15.10   Not only are on-airport locations considered to be the most sustainable in terms of the overall transport strategy, the length of journeys made and the suitability of the road infrastructure but they are also considered to be the best location for a number of other reasons. Sites within the airport boundary will be near to other airport uses. It is considered that airport parking is not an appropriate use in areas of countryside due to the visual impact of areas of parked cars and the suitability of roads for an increased number of vehicle movements. Similar arguments would also apply to sites in residential areas.

15.11   With regards to sites in employment areas which have been promoted for off-airport parking, the EGA (LP062 and LP062b) has demonstrated that there is a considerable need in the borough for business land for B-use class development and given the scarcity of land and potential sites the council cannot currently meet even the baseline requirement.   It is, therefore, essential that those sites that are within Manor Royal are protected for B class uses and not used for off-airport parking (see Matter 4; Issue 1).

APPENDIX 1

ADOPTED UTTLESFORD LOCAL PLAN 2005

Airport Parking

9.6. Adequate space exists inside the boundary of Stansted Airport for air passengers to park their cars if they have driven to the airport. It is important that the character of the villages and countryside around Stansted and residential amenities are not damaged by car parking compounds. The scale and management of car parking needs to be carefully controlled in order to maximise the percentage of non transfer air passengers using public transport to get to or from the airport. This would not be practicable if the provision of car parking became fragmented and included off airport sites. It would undermine the airport surface access strategy agreed by the multi agency airport area transport forum. It will also be important to ensure that the scale of car parking associated with hotels, bed and breakfast accommodation and the like does not exceed vehicle parking standards for the same reason. There are market pressures to use spare capacity to accommodate air passengers' cars whilst they are not in residence at these establishments.

Policy T3 - Car Parking Associated with Development at Stansted Airport

Proposals for car parking associated with any use at Stansted Airport will be refused beyond the Airport boundaries, as defined in the Stansted Airport Inset Map.

APPENDIX 2 – UTTLESFORD LOCAL PLAN 2005 – INSPECTORS REPORT

Inspector's Reasoning and Conclusions

9.7.1   The objector considers that the proposed policy is without substantive basis or justification. I do not share this view. Structure Plan Policy BIW7 makes it clear that all direct and associated airport activities are to be located on the airport site and the local plan policy reflects this. The extensive airport site is large enough "to consume its own smoke" by ensuring that all direct and associated airport activities take place within the airport (thus protecting the adjoining open countryside from development) and that commercial or industrial development not so related are not permitted within the airport.

9.7.2   Other policies of the Local Plan encourage commercial and industrial development in appropriate locations throughout the district and some of these, as the York report states, are closely linked to the airport. This is inevitable as most firms moving into existing commercial or industrial premises, either in the district or outside, would need no planning permission to do so. Those I saw from my site visits did not have the kind of impact on the countryside that car parking compounds would have.

9.7.3   It would be naïve to presume that the multi-storey car park, or other buildings and activities at the airport would not have some visual impact on the countryside but this is inevitable from a major airport. This does not alter the fact that such development is contained and that those living outside the airport know that their countryside will be protected from commercial and industrial intrusion. There is fly parking outside of the airport at Bishops Stortford and Stansted but this is not because of limited car parking capacity at the airport. It is because people are avoiding car parking charges to the detriment of the amenities enjoyed by local residents. (36.1)

9.7.4   The policy could be positively worded as suggested by the objector but I do not feel strongly that it needs to be. If it is, the Council's wording should be also retained to make it clear that the countryside around the airport will be protected from the impact of parking compounds. As adequate space exists within the airport boundary for passengers to park their cars I find no need for a flexible approach which would invite applications for car parking compounds outside the airport. It is not a question of land ownership but of effective land use. Existing Policy T4 is similarly worded and has been supported on appeal to avoid an airport-related car parking use spilling out from the defined limits of the airport. This restrictive policy is not unique to Uttlesford. (119.42)

9.7.5   As vehicle parking standards are related to a range of different forms of development I do not consider the General Chapter is an inappropriate place for them. I accept that to include them in the Transport Chapter instead would also be a logical approach. I do not consider that the provision of car parking at the airport has any particular relationship with general parking standards such that they need to be together in Chapter 9. (222.8)

RECOMMENDATION

Make no modification to the Plan in response to these objections

APPENDIX 3

Uttlesford Local Plan – Pre-Submission Consultation 2014

Airport Parking
16.8 There is enough land allocated within the boundary of Stansted Airport for air passengers who have driven to the airport to park their cars and to protect residential amenity and the character of the villages and countryside around Stansted from the impact of on street airport parking and the presence of car parking compounds. The
Council will continue to work with the airport operator and others to manage car parking within the airport and to maximise the percentage of air passengers using public transport to get to or from the airport. This would not be practical if the provision of car parking
became fragmented and included off airport sites and it would undermine the airport surface access strategy agreed by the multi agency airport area transport forum. Currently a levy from airport parking helps fund the initiatives of the Airport Surface Access Strategy. Any further on-airport parking developments including bespoke car parks and those related to hotels will be subject to a similar levy. It will also be important to make sure that the scale of parking associated with new hotels, bed and breakfast accommodation etc does not exceed vehicle parking standards for the same reason of not undermining the surface access strategy.

Policy TA2 - Car Parking Associated with Stansted Airport
Proposals for car parking associated with any use at Stansted Airport will only be allowed within the airport boundary as defined on the policies map. Appropriate mechanisms will be sought to make sure that all on airport car parking is integrated into and contributes to funding of the airport surface access strategy.