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Dear Sir/Madam,

**CAP1364: Consultation on issues affecting passengers' access to UK airports: A review of surface access at UK airports**

GATCOM welcomes the opportunity to comment on the CAA's review of issues affecting passengers' access to UK airports. The Committee has considered questions set out in the consultation document insofar as they relate to Gatwick Airport and offer the following comments:

**General Comment**

Improving surface access is an integral part of the sustainable growth of airports. Effective, efficient and resilient surface access to airports benefits not just passengers but also the regional economy, local communities and helps to manage the airport's overall environmental impact. The contribution Gatwick Airport makes to the national and regional economy cannot be underestimated and it is important that the CAA recognises that Gatwick is an integrated transport hub of strategic significance not just for users of the airport but a hub that is also used by the local population and the wider South East region.

It is important therefore that the CAA in concluding its review takes into account the other obligations of Gatwick Airport Limited in delivering its surface access commitments (developed in consultation with a wide range of key stakeholders) and the desire to encourage a greater modal shift away from reliance on the use of private cars to the use of public transport. In particular, a number of measures have been put in place at Gatwick to actively encourage the use of public transport by passengers and staff to help achieve the challenging stretch target of 45% public transport mode share. GATCOM therefore urges the CAA to take this into account and avoid putting forward any recommendations that would hinder or detract Gatwick Airport Limited from achieving this sustainable development transport modal split target.

One of the roles of GATCOM is to consider the impacts of the airport's operation on surface access associated with the airport. GATCOM acts as a critical friend to Gatwick Airport Limited and regularly provides feedback and puts forward suggestions on surface access provision including the use of the airport's forecourts. GATCOM's Passenger Advisory Group (PAG) also has an important role in monitoring and assessing facilities from a passenger's perspective. This includes reviewing the information given on the airport's website, car parking facilities and charging structure, accessibility, passenger drop-off and pick up facilities and bus, coach, taxi and rail provision.

**BY EMAIL**

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Our members have considered the CAA's review findings and GATCOM's specific comments are as follows:

### **Response to Questions (h) to (m)**

#### **h) Have we identified the key issues on market structure within the scope of this review?**

The CAA's review is thorough and addresses a wide range of issues affecting the passenger's experience in accessing UK airports. However, as mentioned above in the general comments the CAA must take into account Gatwick Airport Limited's commitments and obligations, which it has given to the wider communities around the airport, in relation to achieving the challenging modal split target of 45% of passengers and staff accessing the airport by public transport modes. As part of this Gatwick Airport Limited puts in place a range of measures that incentivise passengers to use public transport. A careful balance therefore needs to be struck between the charging structure for car parking on airport to ensure that prices are set at a level which do not result in passengers that do not have access to suitable public transport choices from parking cars in the residential areas around the airport or using the airport's forecourts in an inappropriate way.

Local residents often express grave concern about indiscriminate and long term parking by airport passengers in local residential roads. Whilst it is accepted that this problem does not fall within the scope of the CAA's review there needs to be some acknowledgement and consideration of the issues by local residents in the CAA's conclusions.

The local community also consider Gatwick Station as their local railway station and therefore the needs of passengers wishing to access the railway station rather than the airport must be taken into account.

In addition to this, the review needs to take into account the 24 hours operation of the airport and that over that period the demand for and the availability of transport modes varies considerably. There appears to be no discussion on this in the consultation document or the fact that not all transport options are available 24 hours per day. As such this raises questions as to the extent to which this influences choice of airport and selection of timing of flights and is perhaps an area for further research as well as on how information is presented.

#### **i) Have you any views and/or evidence on the market position of airport operators in the provision of airport services used to access the airport?**

No comment.

#### **j) Have you any evidence or views on how well informed consumers are of their airport surface access options and on what is important to passengers in accessing an airport? Is this an area that merits further research?**

Access to information is of key importance for passengers in respect of their surface access options. Effective, efficient and resilient access to the airport is a priority in order for passengers to arrive in plenty of time ahead of flight departures. The return journey, whilst important, is less of a priority but having seamless, efficient high quality facilities to transfer between air, road and rail is highly desirable.

Gatwick Airport Limited offers onward travel facilities in both its terminals to arriving passengers and the airport's website also offers a comprehensive, although selective, range of options. Whilst GATCOM acknowledges that that the review highlights that there is an argument that airport web sites should offer comprehensive information on all providers of taxi services, parking, transport, accommodation service, it is questioned whether this is practical and a reasonable expectation. GATCOM's PAG regularly reviews with Gatwick Airport Limited the information provided on the airport's website as public transport and other car parking offerings are continually updated so it is essential that the way in which information is presented and the navigation of the website is reviewed for improvement. Identifying ways by which access to a comprehensive set of surface access options is available, including a comparison website, may however be an area that merits further research.

What is important is that the information provided on the airport website provides clarity. For example, at Gatwick our PAG feels there is a lack of clarity that the Gatwick Express is a premium service. This is an issue that is being addressed by the PAG with Gatwick Airport Limited and also the train operating company. The train company provides roving ticket sellers on the airport's concourse to help ease queuing at the ticket desks and ATMs at the railway station. The train company itself does not always offer a choice of rail fares.

As regards the provision of information, it is felt that improvements in the availability of information on bus service connectivity to the South Terminal could be made.

**k) Have we identified the key issues related to the distribution of airport car parking? Do you have any views on what, if anything, would improve outcomes to consumers?**

It is important that Gatwick Airport provides a range of car parking options for passengers and other users of the airport. As mentioned in the response to question (h) above, a careful balance needs to be struck between the charging structure for car parking on-airport to ensure that prices are set at a level that incentivises passengers to use public transport to access the airport whilst at the same time do not result in passengers that do not have access to suitable public transport choices from parking cars in the residential areas around the airport or using the airport's forecourts in an inappropriate way.

The CAA also needs to be aware of the various legal obligations set out in the Section 106 agreement between Gatwick Airport Limited, Crawley Borough Council and West Sussex County Council which has targets relating to staff travel and to the number of airport-related road trips. The agreement also requires Gatwick Airport Limited to actively work together with transport providers and local authority partners to influence passenger and staff journey choices. For example the agreement requires a levy on the total number of spaces in public car parks and the funds accrued from levy are used for public transport initiatives agreed between the parties to the agreement. It is of vital importance that the CAA does not recommend any measures that would alter any locally agreed arrangements.

GATCOM fully supports the Gatwick Approved Operators Scheme which has been established by Gatwick Airport Limited in partnership with the local authorities and the car park operators association. GATCOM is pleased that the CAA has highlighted this important scheme as best practice as it helps to protect the interests of not only passengers by booking with a reputable company but also local communities by ensuring that operators are using permitted sites to park vehicles. GATCOM is fully aware however that there are still a number of rogue operators not signed up to the scheme who do not provide secure parking for their customers. GATCOM continues to work with Gatwick Airport Limited on ensuring that the airport website actively encourages passengers to use approved operators.

**l) Have you any views and/or evidence on how the information set that passengers have, when choosing between airport surface access products, could be improved for consumers?**

GATCOM agrees with the CAA that continuing to provide a free option for drop-off/pick up in some form, even if it is not equally convenient as the paid option, should be a minimum standard for airport operators to meet. At Gatwick, there will always be times when it is not possible for passengers to use public transport to access the airport due to the airport's relatively rural location and public transport options are not available 24 hours. It is important therefore that there continues to be a free drop-off facility for passengers arriving by private car/taxi. This must be within walking distance of the terminal so that passengers can access the airport terminal facilities e.g. bag drop and check-in as quickly as possible. It would be unacceptable to only offer free drop-off in a car park away from the terminal which would require passengers to use a bus to the terminal.

Passenger pick-up is however a different matter and GATCOM understands the reasons why airports wish drivers to use the airport car parks in order to ease forecourt congestion. At Gatwick, GATCOM has ensured that free options for passenger pick up are available albeit in the long term car park. Passengers also have the option to pay to use the short term car parks at

Gatwick for express pick up. The car park charging structure was adapted to enable express pick up at a relatively small cost.

GATCOM also endorses the provision of free of charge drop-off and pick-up facilities for passengers with reduced mobility.

**m) Have you any views on our proposed way forward and, in particular, the development of good practice principles by airport operators?**

Ensuring that consumers are able to access a full range of options for assessing what is the most convenient and financially acceptable way for them to travel to the airport is of great importance. It is recognised that the airport will want to promote those modes/services which they earn revenue funding from. However, consumers need to be aware that there are alternative options, and the onus does lie with the consumer in many respects to undertake the appropriate research to ensure they are getting the best value for their journey - in terms of convenience and cost. The suggestion that further research be undertaken by the CAA on surface access to feed into this process is supported.

GATCOM trusts its comments will be fully considered as part of the Review.

Yours faithfully,



Assistant Secretary