



Appeal Decisions

Inquiry Held on 20 - 23 November 2018

Site visit made on 26 November 2018

by Katie Peerless DipArch RIBA

an Inspector appointed by the Secretary of State for Communities and Local Government

Decision date: 9 January 2019

Appeal A: APP/Q3820/C/17/3175231

Southways Business Park, London Road, Lowfield Heath, Crawley, Surrey, RH10 9TG

- The appeal is made under section 174 of the Town and Country Planning Act 1990 as amended by the Planning and Compensation Act 1991.
 - The appeal is made by Ace Airport Parking Ltd against an enforcement notice issued by Crawley Borough Council.
 - The enforcement notice, numbered ENF/2016/0170 was issued on 19 April 2017.
 - The breach of planning control as alleged in the notice is the carrying out of operational development namely the laying of areas of hardstanding and the creation of bunds.
 - The requirements of the notice are: 1. Remove from the land all roadways constructed on the site, together with those areas of hardstanding shown as 'Hardstanding 1' and 'Hardstanding 2' on the plans attached to the enforcement notice; 2. Remove from the land the bunds in the positions identified as 'Bund A' and 'Bund B' on the plans attached to the enforcement notice; 3. Restore the land to the condition it was in at the 9th January 2013, in particular laying topsoil and turfing, or seeding with grass those areas of the site marked as 'Hardstanding 1' and 'Hardstanding 2' on the plans attached to the enforcement notice.
 - The period for compliance with the requirements is three months for requirement 1 and six months for requirements 2 and 3.
 - The appeal is proceeding on the grounds set out in section 174(2)(a), (d) and (f) of the Town and Country Planning Act 1990 as amended.
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Appeal B: APP/Q3820/C/17/3175232

Southways Business Park, London Road, Lowfield Heath, Crawley, Surrey, RH10 9TG

- The appeal is made under section 174 of the Town and Country Planning Act 1990 as amended by the Planning and Compensation Act 1991.
 - The appeal is made by Ace Airport Parking Ltd against an enforcement notice issued by Crawley Borough Council.
 - The enforcement notice, numbered ENF/2016/0170 was issued on 19 April 2017.
 - The breach of planning control as alleged in the notice is the material change of use of the Land to Airport Parking (Use sui generis) together with Operational; Development undertaken to facilitate the unauthorised use comprising the stationing of portacabins and the erection of other temporary buildings providing toilet and storage facilities, as shown on the area marked on the plan attached to the enforcement notices.
 - The requirements of the notice are: 1. Cease the use of the land for any new or further Airport Car Parking; 2. Remove all airport related vehicles from the land; 3. Remove from the land all portacabins and other temporary buildings stationed and erected on the land to facilitate the unauthorised use.
 - The period for compliance with the requirements is three months for requirement 1 and six months for requirements 2 and 3.
 - The appeal is proceeding on the grounds set out in section 174(2)(a), (d), (f) and (g) of the Town and Country Planning Act 1990 as amended.
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Appeal C: APP/Q3820/W/16/3164808

Southways Business Park, London Road, Lowfield Heath, Crawley, Surrey, RH10 9TG

- The appeal is made under section 78 of the Town and Country Planning Act 1990 against a refusal to grant planning permission.
 - The appeal is made by Ace Airport Parking Ltd against the decision of Crawley Borough Council.
 - The application Ref CR/2016/0170/FUL dated 20 February 2016 was refused by notice dated 9 November 2016.
 - The development proposed is: continued use of site for airport parking together with retention of associated office building for a temporary period of 3 years, to include extended parking area in lieu of off airport parking site permitted at Site E2, Crawley Business Quarter, Northgate under CR/2014/0080/FUL.
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Decisions

Appeal A: APP/Q3820/C/17/3175231

1. It is directed that the enforcement notice be varied by the deletion of the reference to roadways in the requirements. Subject to this variation, the appeal is dismissed, the enforcement notice is upheld and planning permission is refused on the application deemed to have been made under section 177(5) of the 1990 Act as amended.

Appeal B: APP/Q3820/C/17/3175232

2. The appeal is dismissed and the enforcement notice is upheld. Planning permission is refused on the application deemed to have been made under section 177(5) of the 1990 Act as amended.

Appeal C: APP/Q3820/W/16/3164808

3. The appeal is dismissed.

Application for costs

4. At the Inquiry, an application for costs was made by Crawley Borough Council against Ace Airport Parking Ltd. This application is the subject of a separate Decision.

Planning history

5. Part of the site included within the enforcement notice was granted planning permission in 2013¹ for airport parking for 442 cars for a temporary period of 3 years. This permission has expired but the car parking has continued and covers a wider area than originally approved.
6. There is also an extant planning permission for an office development on the site granted in 2008² with reserved matters approval granted in 2011³. A certificate of lawfulness⁴ was granted in 2013 confirming that this permission had been commenced.
7. The areas of the site beyond the boundary of the 2013 planning permission are subject to an extant enforcement notice issued in 1993 prohibiting the use of the land for airport parking.

¹ Ref: CR/2013/0094/FUL (the 2013 permission)

² Ref: CR/2008/0446/OUT

³ Ref: CR2011/0033/ARM (the office permission)

⁴ Ref: CR/2013/0008/192 (the 2013 LDC)

Procedural matters

8. The Council confirmed at the Inquiry that reason for refusal 3 for Appeal C related only to the increase in the number of parked cars from 442 (granted on the 2013 permission) to 1000, for which temporary permission planning permission is now sought. The Council also agree that, if a suitable condition could be drafted and were to be imposed on any planning permission, the highway safety reason for refusal could be satisfied.
9. Gatwick Airport Limited (GAL) was granted Rule 6 (6) status at the Inquiry and gave evidence supporting the Council.
10. Prior to the Inquiry, the appellants confirmed that they were not pursuing the appeals originally made on grounds (c) and (e).
11. At the Inquiry, the appellants also confirmed that through all 3 appeals they are seeking planning permission for parking up to 1000 cars on the site for a temporary period of up to 3 years, as applied for through the application that is the subject of Appeal C.
12. The Council has confirmed that the third reason for refusal for Appeal C could be dealt with by way of a suitable condition.

Main Issues

13. I therefore consider the main issues in these cases are:
 - (i) whether the use of the site achieves the sustainable transport objectives sought through national and local planning policy and, if not, whether there are material considerations that indicate there should be a departure from these policies;
 - (ii) the effect of the development on the character and appearance of the surrounding area;
 - (iii) the impact of the development on flood risk in the surrounding area.

In appeal A on ground (d): whether the alleged breaches of planning control are immune from enforcement action through the passage of time and, if not,

In appeals A and B on ground (f): whether the requirements of the notices exceed what is necessary to remedy the breaches of planning control.

Site and surroundings

14. The appeal site has an area of some 2.7Ha and is located on land between Gatwick Airport and the town of Crawley. It lies within land safeguarded for a possible new runway at Gatwick Airport under Crawley Borough Local Plan 2015 -2030 (LP) policy GAT2 and the Upper Mole Farmlands Rural Fringe. This latter designation comes under the remit of policy CH9 which deals with development outside the built-up areas.
15. It is accessed off the A23 dual carriageway trunk road, almost opposite the Gatwick Manor hotel and has fields to the north, west and south. The site previously contained buildings, now all demolished, although some areas of hardstanding from the former use still remain. Another site managed by the appellants' group of companies (Maple Manor Parking) lies to the north east on the opposite side of the road.

16. An earth bund runs across the site from east to west, with a central break which can allow vehicles through to the northern part of the land. There are other bunds along parts of the north and west boundaries and along the north side of the entrance drive which are included in the enforcement notice that is the subject of Appeal A.
17. Presently, the cars are brought to the site from the airport, the appellants' valeting service at Maple Manor Parking or one of the appellants' other parking sites. They are then taken back to the airport to meet their owners on their return.

Reasons

Appeal A - ground (d)

18. The appellants have confirmed that this appeal relates only to the bunds on the perimeter of the site and the areas of hardstanding that are additional to those remaining after the demolition of the buildings that were previously on the site.
19. There is a dispute about the relative date by which the works would have needed to have been carried out in order to now be immune from enforcement action. The enforcement notices are dated 19 April 2017 but the requirements refer to a need to return the land to the condition it was in on 9 January 2013.
20. This is explained by the Council as being because the notice was issued under the 'second bite' provision and 9 January 2017 was the date on which the original notice was issued. A period of 4 years prior to this would give 9 January 2013 as the date by which the works would have had to have been carried out to acquire the 4 years needed for immunity from enforcement action.
21. The appellants submit that the date should be changed to reflect the revised date of issue but, although the Council appeared to have originally conceded the point, in closing submissions their Counsel made clear that he disagreed with this stance and that the correct legal position on a 'second bite' notice is that the original date of issue is the date from which the 4 year period is calculated.
22. As I understand it, the second bite provision does not reset the clock in terms of the date that enforcement action is deemed to have commenced, provided a second notice has been issued within 4 years of the first. This is the case here and I therefore consider that date from which the 4 year period runs is 9 January 2013.
23. The appellants nevertheless claim that the bunds and hardstanding were laid before this date and refer to a letter from a contractor⁵ who carried out work on the site commencing in December 2012. This document notes that the works were completed within 12 weeks and included the deposition of spoil along the north and west boundaries, site clearance and the widening of the access road, which also involved moving the spoil from this work to the hedge line on the side of the access road⁶. There is no mention of laying hardstanding on the areas indicated on the enforcement notice plan.

⁵ ID8

⁶ Although the document refers to this being the 'eastern side' of the access road, the road runs from east to west and the area would actually therefore be the south side, which is where bund B is located.

24. The Council refers to the responses to a Planning Contravention Notice (PVC) completed by the property managers of the site in October 2016 which states, in answer to question 1(b), that the expansion of the car parking onto the wider site and the 'related physical operations' occurred after 8 July 2013, which is given as the date at which parking permitted by the 2012 temporary permission commenced. The appellants interpret the 'related physical operations' as being the 'ancillary portable buildings' referred to in question 1(a). However, it seems to me that, as the expansion of the car parking outside the permitted areas did not, according to the PCN, commence until after the relevant date, it cannot be assumed that the hardstanding to facilitate this was necessarily in place before that.
25. Although the bunds are mentioned in the contractor's list of works there is also nothing to confirm that they were in place by the relevant date. If works did not begin until December and took about 12 weeks, it seems unlikely that they were substantially complete by early January.
26. The appellants also submit that there were previously areas of hardstanding present on the area marked as Hardstanding 1 on the enforcement notice plan. However, I consider that the aerial photographs submitted do not confirm this and, rather, the photographs taken as a whole indicate that there was no hardstanding present at the relevant date.
27. For an appeal to succeed on ground (d) it is for the appellants to provide evidence, which needs to be sufficiently precise and unambiguous, to demonstrate, on the balance of probabilities, that the works had taken place by the relevant date. I consider that the letter from the contractor is not sufficiently precise about the date when the bunds were completed or when the hardstanding was laid in the areas enforced against. It does not even confirm that the hardstanding was included in the works that commenced in December 2013. The appeal on ground (d) consequently fails.

Appeals A & B - ground (a) and Appeal C

Transport objectives

28. LP policy GAT3 requires '*all additional or replacement airport parking to be located within the airport boundary*'. It also notes that all new proposals must be justified by '*a demonstrable need in the context of achieving a sustainable approach to surface transport access to the airport*'. This policy was the subject of much scrutiny at the Local Plan Inquiry and in subsequent legal challenges brought by the appellants, which failed. The policy is therefore up-to-date and compliant with the National Planning Policy Framework (the Framework).
29. The appellants do not dispute that the appeal development breaches the first limb of this policy. Nevertheless, they claim that there is still an issue relating to how the appeal proposal relates to the 'need test' set out in its second limb and submit that the development meets that test. The Council and GAL maintain however that, having failed the first limb of the policy, there is no requirement to consider the second, which is the approach taken in a recent Decision⁷ into a planning appeal brought by the appellant on another site in the Borough. This Decision has not been challenged through the courts.

⁷ Ref: APP/Q3820/W/17/3182041 – the 'Gas Holder' appeal

30. A straightforward reading of the wording of GAT3 reveals no contemplation in the policy, or its reasoned justification, of any situation where additional or replacement airport parking could be located off-airport. GAT3 was the policy in place when the 2013 permission expired and the current situation on the whole appeal site became unlawful.
31. This was also the case when the 2016 application was refused and when the 2017 enforcement notices were issued. Therefore, the parking on the site that was previously authorised was no longer lawful at any of these times. Similarly, the areas of parking that now extend beyond the boundary of the 2013 permission have always been in breach of the 1993 enforcement notice. This indicates to me that all of the parking provision for which planning permission is now sought should be considered as '*additional or replacement*'. Any replacement needed for this parking is now required, through GAT3, to be located on-airport. The policy also confirms that, if there is shown to be a need, it must be met on-airport.
32. It is a requirement that planning permissions are determined in accordance with the current Development Plan, unless material considerations indicate otherwise and therefore, for the appeals to succeed, it would need to be demonstrated that there are such material considerations which would outweigh the presumption in favour of a decision the accords with the development plan.
33. The appellants make the case that there is a need for sustainable additional parking off-airport and that the proposal would help to meet that need. They raise this, and other matters, which they claim are material considerations in favour of the proposal that are sufficient to outweigh the policy conflict.
34. Therefore, I turn firstly to consider whether there is, in fact, an identified need for the appeal site at present. GAL confirmed, and it was not disputed at the Inquiry, that there is no current shortage of parking spaces on-airport. The appellants maintain that this is because of GAL's restrictive pricing policies and the current availability of both authorised and unauthorised spaces off-airport, which provide customers with a wider variety of choice. They also consider that there is a qualitative need for the type of services that Ace Airport Parking offers and that, whilst there may not be a shortage of available space on-airport, there is nevertheless a need for the type of affordable 'meet and greet' product it offers that cannot be met on-airport.
35. It seems to me that the aims and objectives of GAT3 are clear. GAL is charged with, and committed to, reducing the numbers of passengers arriving at the airport by private car and ensuring that, for passengers who have no other option, parking is provided in the most sustainable location possible. In order to achieve this, the policy envisages that when temporary permissions for off-airport parking expire, or unauthorised sites are closed down, any shortfall this creates will be met by additional provision on-airport.
36. In order to demonstrate that there is a need for the appeal site to remain as off-site parking for a further 3 years, the appellants challenge the findings of the latest airport parking survey carried out by the Council in September 2018 and submit that the on-airport parking available is not necessarily what customers require in terms of service and price.

37. The survey is able only to give a snapshot of the available parking on a particular day or days. It is normally carried out on one of the busiest days of the year, in September, but some counts were carried out in the week before and after the main survey. Nevertheless, it provides a basis from which to assess whether there is any current pressure on parking availability.
38. There was much discussion at the Inquiry on the results and accuracy of the survey. There were anomalies found in the figures put forward by both sides but I was presented with no evidence to show that anyone looking for an airport parking space, either on or off airport, has been unable to obtain one. I acknowledge that, on-airport, last-minute prices might be considerably greater than if the customer had booked well in advance and that some on-airport products might not always be available, but this does not suggest to me that there is any current need for spaces that would justify the retention of the appeal site.
39. The modal split percentage between passengers arriving at the airport by public transport, as opposed to by private car, has increased in recent years and, even allowing for the increase in passenger numbers overall, this has resulted in a decrease in the utilisation percentage of long stay parking on-airport. Also, the percentage of passengers being dropped off and collected at the airport by private car or taxi has not increased, as might be expected if parking spaces were proving difficult to obtain or were prohibitively expensive due to high demand.
40. The Council's figures show about 6500 unauthorised spaces at the time of the survey and a total vacant authorised capacity of about 14,200. After adjustments for a buffer of 12% on-airport to take account of the need to have flexibility, a vacant capacity of about 9950 spaces would be available. Even assuming that all the unauthorised spaces could be immediately closed down, this would still leave a spare capacity of about 3450 spaces.
41. The appellants originally submitted a spreadsheet to the Inquiry⁸ claiming that there was, in fact, a shortfall of about 9900 spaces but after a detailed consideration of the figures it was agreed that, even if this figure was correct (which was not accepted by the Council) there would still be an available capacity of about 4500 spaces (which includes an 'off-airport' buffer that the Council consider is not necessary). In the appellants' scenario, this number of unauthorised spaces would therefore have to be closed down to create a shortfall.
42. From the evidence given at the Inquiry, there seems to be no likelihood that these spaces could be closed down within the 3 year life of the planning permission sought through these appeals in any event. To support this finding, it is clear that the Council has no intention, or even ability, to enforce against the majority of the hotel 'stay and fly' parking spaces that the appellants claim are unauthorised, as these are either considered ancillary to the hotel use or are immune from enforcement action through the passage of time. The fact that the parking at the hotel run by the appellants is not deemed to be ancillary by the Council is because it is subject to a planning condition specifically stating this, which is not the case in the other examples cited.

⁸ ID10

43. Similarly, the on-street parking that passengers and some companies use as airport spaces is legal and not currently able to be enforced against. To do so would require parking restrictions, such as controlled parking zones, to be introduced and the Council confirmed that it has no intention of doing this or the resources to enable it to do so. Therefore, even in the worst case scenario there would still be parking space availability and the appellants have not, to my mind, successfully demonstrated that there is a need for the appeal proposal.
44. Even if a need were to arise in the near future, GAL has identified sites on-airport that would allow it to increase capacity by about 7800 spaces, which would adequately cover the projected future need which has been assessed at just over 5100 spaces by 2022. I heard no evidence that indicated that GAL would not be able to bring forward its future projects as and when needed, which was also the conclusion drawn by the Local Plan Inspector and the Inspector in the Gas Holder appeal.
45. In support of the proposal the appellants raise the fact that the business employs a significant number of local people who, they say, would be likely to lose their jobs should the appeal site have to close. I have every sympathy for the employees who were not, apparently, told that the site has been operating without the benefit of planning permission since June 2016 and I also agree that the provision of jobs is a benefit in favour of the proposal. However, I am not persuaded that the appellants would be unable to restructure their business to allow at least some of their employees to transfer to their other sites or that additional opportunities for employment would not arise on authorised sites as the business on the appeal site transfers away and this consequently reduces the amount of weight I accord to this factor.
46. The appellants also submit that the location of the site is as sustainable as some of the existing on-airport car parks which require vehicles to leave the airport and use public roads to access them. This may be so but at the Inquiry it was confirmed that the vehicles using the appeal site do not necessarily make a journey directly to and from the airport as the site can be used as a hub from where the vehicles can also be taken on to another site for storage. This could significantly lengthen their journeys and negate the benefits of the site's location close to the airport. In any event, in the absence of an identified need for the parking spaces at appeal site, this consideration does not add to the factors weighing against the conflict with GAT3.

Countryside impact

47. The Council has also refused the planning applications subject of appeal C and the ground (a) appeals against the enforcement notices on the grounds that the development would cause harm to the character and appearance of the surroundings, considering that the additional parking areas outside those that had the temporary permission conflict with LP policy CH9. This seeks to control development outside the built-up area by ensuring, among other things, that development is not prominent in the landscape.
48. The site is, as noted above, largely surrounded by green fields and, whilst only glimpsed in passing from the A23, it can be seen from a nearby public bridleway. The perimeter bunds serve to shield some views of the vehicles but they are nevertheless man-made structures that are not typical of the surrounding countryside.

49. Although the site is close to the airport and the built up areas of Crawley, it is nevertheless sited within the green gap that policy CH9 seeks to maintain. Whilst the gap is narrow at this point, this, in my view, only makes the need to keep a clear definition between the developed areas more important.
50. However, my attention was drawn to an extant planning permission for an office development that has not been brought forward as yet because of the safeguarding of the site for a possible additional runway. This scheme would be likely to have a greater impact on the openness of the area than the proposed airport parking. It seems to me that, because this scheme is unlikely to be built out, refusal of the appeal scheme will make it possible to maintain and enhance the green gap unless and until the safeguarding of the site is removed.
51. Overall, the site does have a small, but nevertheless noticeable, urbanising impact on the Upper Mole Farmlands Rural Fringe. It has been suggested that a landscaping scheme could mitigate this impact but, in my view, this would be unlikely to achieve the desired impact within the timescale of a 3 year temporary permission. There is consequently some support from CH9 for refusal of the scheme, which further adds to the weight against it.
52. The appellants consider that the proposal would allow the beneficial use of land that has previously been developed and which would otherwise remain vacant, given that the office development is unlikely to come forward in the near future. However, without the development, the site would make a greater contribution to the green space between Gatwick and Crawley, thus contributing to achieving the objectives of LP policy CH9.
53. Planning permission is also sought under the appeals on ground (a) for the areas of hardstanding and bunds. As these are works that are directly related to the on-site parking operation and have extended the development into the previously undeveloped areas of the site, there is no justification for their retention in the absence of planning permission for the parking use.

Flood Risk

54. There was no flood risk assessment submitted with the application, contrary to the requirements of LP policy ENV8, and one has not been submitted to accompany the appeals. There has been no reason given for this other than that the appellants maintain that the site has no history of flooding and that, in any event, the areas where new hardstanding has been laid are sufficiently permeable to prevent any increase in flood risk elsewhere.
55. If this was the only reason for refusal, I consider that the matter might have been able to be satisfactorily dealt with through a resubmission that included a flood risk assessment, or possibly a condition. However, this is no longer relevant as I have found, for other reasons that there are other matters that weigh against the scheme.

Planning balance

56. Although there would be economic benefits associated with the appeal proposal, for the reasons set out above, I am not persuaded that these, or the additional variety of parking options that the appeal site would provide to airport customers, are sufficient to outweigh the harm resulting from the sustainability and environmental conflicts with LP policies identified above. Therefore the appeals on ground (a) and Appeal C do not succeed.

Other matters

57. GAL raise the fact that the site is in the area safeguarded for a new runway, even though this was not given as a reason for refusal by Crawley Borough Council. Although there is no prospect of the building of a runway commencing within the life of a 3 year permission they note that it may be that the site would be needed for pre-construction investigative work.
58. However, this would also have been the case when the first permission was granted and I consider it unlikely that any necessary investigative work involving the appeal site would be prevented through the grant of a temporary permission. Whether or not permission for parking was granted, there remains the extant permission for the office development and access to the site would need to be obtained from the owners before any work relating to a runway began in any event. Consequently, I consider that there was no need to include this factor in the reasons for refusal.

Ground (f)

59. The requirements of enforcement notice A require the removal of 'all roadways' although roadways are not mentioned in the allegations and there are none identified on the plan attached to the notice as requiring removal. The roadway leading into the site has clearly been present for many years and I saw no other roadways that could be considered to be unauthorised. Therefore, the requirements to remove 'all roadways' exceed what is necessary to remedy the breach of planning control and I will consequently delete this wording. The appeal on ground (f) succeeds to this extent.

Conclusions

Appeal A: APP/Q3820/C/17/3175231

60. For the reasons given above I conclude that the appeal should not succeed. I shall uphold the enforcement notice with a variation and refuse to grant planning permission on the deemed application.

Appeal B: APP/Q3820/C/17/3175232

61. For the reasons given above I conclude that the appeal should be dismissed.

Appeal C: APP/Q3820/W/16/3164808

62. For the reasons given above I conclude that the appeal should be dismissed.

Katie Peerless

Inspector

APPEARANCES

FOR THE APPELLANT:

Stephen Whale	Of Counsel instructed by Simkins LLP
He called	
Steve Kiss	Appellant
Phil Rowe BA (Hons) BTP	PROwe Planning

FOR THE LOCAL PLANNING AUTHORITY:

David Forsdick QC	Of Counsel instructed by Borough Solicitor, Crawley Borough Council
He called	
Marc Robinson BSc (Hons) Dip TP MRTPI	Principal Planning Officer, Crawley Borough Council
Tom Nott BA (Hons) Dip TP MRTPI	Crawley Borough Council

FOR THE RULE 6 PARTY:

Neil King QC	Of Counsel instructed by Robert Herga, Gatwick Airport Ltd.
He called	
Tim Norwood BA (Hons) MA MRTPI	Chief Planning Officer, Gatwick Airport Ltd.
Gary Wallace BSc (Hons) MSc	Head of Car Parks and Commercial Products, Gatwick Airport Ltd.

INQUIRY DOCUMENTS

- 1 List of draft conditions
- 2 2018 Gatwick Parking Survey
- 3 Letter from GAL dated 29 October 2018
- 4 Table – Lead time profile of Gatwick parking products
- 5 Mr Whale’s opening submissions
- 6 Mr Forsdick’s opening submissions
- 7 Mr King’s opening submissions
- 8 Original emails from Mr Babidge re site works
- 9 Colour version of plan 21 from CD8/24
- 10 Table on parking space availability produced by appellants
- 11 Bundle of documents on parking capacity produced by Mr Kiss
- 12 Email trail re Wakehams Green parking numbers
- 13 Statement of Common Ground
- 14 Letter to Maple Manor Parking from Crawley Borough Council
dated 1/10/2018
- 15 Photographs of parking in field next to Premier Travel Inn
- 16 Extract from 2018 parking survey
- 17 2007 CLEUD application documents
- 18 Letter to Crawley Borough Council from Maple Manor Parking Ltd
date 5/10/2018

- 19 Costs decision from appeal APP/Q3820/W/17/3182041
- 20 Notes of Mr King's closing submissions for Gatwick Airport Ltd.
- 21 Notes of Mr Forsdick's closing submissions for Crawley Borough Council
- 22 Notes of Mr King's closing submissions for Ace Airport Parking Ltd.