APPENDIX 1

TABLE 1

An examination of consultations submitted by GAL to Crawley Borough Council relating to additional on-airport car parking, along with applications seeking permission for either new car parking or variations of conditions relating to existing on-airport hotels, following adoption of the Crawley Borough Local Plan 2015-2030.

Crawley BC Ref. No.	Proposed Development	Information to Support Demonstrable Need, along with LPA's Reasoned Justification
Crawley BC Ref. No. CR/2017/0523/CON	Proposed Development Consultation from GAL for the construction of a single decked car park over the existing surface car park at Zones F & G in the South Terminal Long Stay Car Park to provide additional Passenger car parking CONSULTATION	Information to Support Demonstrable Need, along with LPA's Reasoned Justification A five page document accompanied this consultation application with the following planning considerations found under the sub-title "permitted development": "The proposed development is an operational development to be used in connection with the provision of services and facilities at Gatwick Airport. It will be carried out by GAL and take place on operational land. The proposed works have been subject to EIA screening which has confirmed the development is not EIA development. The development is therefore permitted development in accordance with the provisions of Schedule 2 Part 8 Class F of the Town & Country Planning (General Permitted Development) (England) Order 2015." Under the sub-title "Principal of Development" It was said "Although development plan policies have no weight for permitted development it is relevant to note that the development complies with the principles of Policy GAT1 and GAT3 of the Crawley Local Plan in that it will support the development of facilities which contribute to the safe and efficient operation of the airport and provide on-airport parking to meet increased passenger parking demand." The basis for recommending no objection on the application is found at paragraphs 5.6 and 5.7 of the Case Officer's delegated report viz:- "5.6 The proposal provides additional on-airport parking for passengers. Policy GAT3 recognises that while the aim should be to increase the modal share of passengers. Policy GAT3 recognises that while the aim should be to increase the modal share of passengers arriving by public transport, long stay car parking still plays an important role and should be managed in a sustainable way by requiring new parking to be located on-airport thereby minimising the number and length of passenger car journeys. 5.7 Additional parking must also be justified by a demonstrable need in the context of proposals for achieving a sustainable approach to surface transport access to the airport. I

CR/2018/0935/CON	Consultation from GAL for a robotic car park pilot project CONSULTATION	A five page document accompanied this consultation application, with the same planning considerations found under the sub-title "Permitted Development" as was the case with Application No. CR/2017/0523/CON. Viz: "Although development plan policies have no weight for permitted development it is relevant to note that the development plan policies have no weight for permitted development it is relevant to note that the development opties with the principles of Policy GAT1 and GAT3 of the Crawley Local Plan in that it will support the development of facilities which contribute to the safe and efficient operation of the airport and provide on-airport parking to meet increased passenger parking demand." It was then stated under the same heading:- "Specifically in relation to Policy GAT – airport related parking – the development is within the airport boundary. The trial, if successful, will help inform future plans on the optimum way to meet parking provision for passengers in the most sustainable way in accordance with GAL's Surface Access Strategy objectives, including targets to manage supply of parking consistent with achieving passenger mode share targets." The Case Officer's delegated report reveals no objection was raised, adding at paragraphs 5.7 and 5.8:- "5.7 Additional parking must also be justified by demonstrable need in the context of proposals for achieving a sustainable approach to surface transport access to the airport. This proposal would result in an overall net increase of 100 spaces for a three month period which is only a small increase in the total number of on-airport parking spaces and is not considered to have any significant impact on the longer term surface transport strategies for the airport. The trial should inform future plans in this regard and it is not considered this conflict with planning policy GAT3. 5.8 In relation to GAT1, it is accepted that the proposal would contribute to the safe and efficient operation of the airport within the airport boundary, is having the effect of in
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CR/2018/0337/OUT	Erection of multi storey hotel car park OUTLINE [All matters were required to be considered at the outline stage, except for landscaping]	The 2018 application was accompanied by a Transport Statement, having been submitted by AH5 Ltd c/o Arora Management Services Ltd. It was stated in the Case Officer's report to the Council's Planning Committee meeting held on 27 th August 2019 that the proposal sought 831 new parking spaces to be used by hotel guests for long stay parking and also for conferences at the Hilton (South Terminal) Hotel. The overall capacity of the hotel was stated to be 874 spaces. It was said that guests at the hotel who wished to book accommodation and parking had the following choices to make through the Hilton website. They could use (i) the Euro Car Park adjacent to the hotel; (ii) valet or long stay parking on-airport; or (iii) valet parking booked through Ace Meet and Greet, a third party operator and parked off-airport.
		GAL provided representations on this application, commenting:
		"5.9 GAL do wish to clarify that the application is for car parking for Hilton Hotel guests only. It should not be regarded as part of GAL's supply of airport parking to meet the needs of passengers using the airport. GAL is to meet their own demand for airport parking on its own land. GAL has plans in place to continue to meet incremental increased parking demand arising from projected passenger growth over the next 5 years."
		5.10 The GAL representation goes on to state: We do acknowledge that the provision of additional parking at the Hilton for its guests may avoid the need for hotel guests flying from Gatwick to drive their cars to the long-stay airport car parks or to utilise the MSCP 1 or 2, and thus may free up spaces and indirectly contribute to the overall parking capacity at the airport."
		The Case Officer's report went on to state in paragraphs 5.15 and 5.16:-
	· · ·	"5.15/5.16 The development would therefore assist in making the best use of the existing runway in accordance with Government policy and the emerging Local Plan Policy GAT1 and it is therefore considered that this, in addition to its compliance with Policy GAT3, should be weighed positively against the conflict with the current GAT1 policy."
		It was further stated that the car parking spaces would meet the Council's adopted car parking standards of 1 space per bedroom, before going on to add:
		"5.22 For this proposal the use of the hotel by guests would almost exclusively be to stay one night and leave their car for the duration of their holiday. The standard relates to hotel use where the customer would stay longer than one night and therefore there would be a lower demand for spaces. It is therefore conceivable that demand for parking from Hilton Hotel users could be higher than the number of spaces proposed. As is happening currently, however, demand can be accommodated on other parking sites, although with the erection of this car park, this is likely to be lower than is currently the case."

		In its conclusions on Application No. CR/2018/0337/ALT, paragraph 6.2 states:
		"6.2 The construction of the proposed development will accord with GAT1 which supports the safe and efficient operation of Gatwick as a single runway two terminal airport, and as the location of parking is on-airport and there is a demonstrable need for the parking in the context of proposals to improve public transport access to the airport. The proposal is therefore in accordance with Policy GAT3."
CR/2020/0575/NCC	Variation/removal of Condition Nos. 3 and 9 pursuant to Application No. CR/2018/0337/OUT for the erection of a multi storey hotel car park SECTION 73 APPLICATION	This application sought a reduction of 20 car parking spaces compared with the proposals granted outline planning permission under Ref. No. CR/2018/0337/OUT from 831 to 911 spaces, with a total of 854 spaces including the existing undercroft parking. It was considered the reduction in 20 spaces would still provide more than adequate provision for parking and comply with the Council's car parking standards. The submitted Transport Statement referred to the proposal contributing towards the reduction in vehicle trips to the airport by reducing the kiss-and-fly mode.
		The contents of paragraph 5.11 of the Case Officer's Report to the Council's Planning Committee meeting held on 12 January 2021 considered this point, stating:
		"5.11 The previous officer report concluded that whilst a reduction in kiss-and-fly as a result of the proposal was not clearly evidenced by the applicant, the contribution to parking capacity on-airport as passenger numbers increase provides the option of parking adjacent to the hotel/terminal rather than using kiss-and-fly or less sustainable locations off-airport. It is therefore considered in this regard that the proposal could help to discourage kiss-and-fly."
		The same report went on to add :
		"5.13 It should be noted under the current circumstances with the COVID 19 Pandemic, with one of the terminals shut, there is not currently such a demand for parking. However, this is anticipated to be a temporary decline which is expected [to] begin to return to normal levels in 2021."

CR/2019/0802/FUL	Erection of extension to existing hotel to provide an additional net 231 bedrooms and associated back of house and support accommodation FULL	The application was accompanied by separate Planning and Transport Statements. The Planning Statement prepared by Vantage Town Planning, unlike earlier proposals for additional car parking provisions at the Hilton (South Terminal) Hotel, made no reference to Policy GAT3, save to confirm that the hotel had no dedicated on-site parking. The Transport Statement, referred to the location of main car parking areas both on and off-airport, where it was said passengers could rely on long-stay car parks using frequent shuttle bus services to access the terminal.
		The Case Officer's Report on Application No. CR/2019/0802/FUL was presented to the Council's Planning Committee meeting on 10 February 2020, at which time paragraphs 5.20 to 5.22 considered " <i>Parking and Access Considerations</i> ", viz:
		"5.20 No changes are proposed to the existing vehicle access or servicing arrangements for the existing hotel. The existing hotel does not have any designated car or cycle parking. All car parking for staff and guests will be expected to be accommodated within the existing general supply of staff and passenger parking available at the airport. The site is a highly accessible station just a short walk from Gatwick Station, coach station, and the bus stops including the regular Fastway bus service. The main purpose of the development will be to provide overnight accommodation for passengers flying to and from the airport.
		5.21 The proposal would not meet the Council's adopted parking standards. WSCC Highways have raised no objection and commented that as stated in the supporting Transport Statement, the expectation is that the significant majority, if not all guests using the hotel would be in association with Gatwick Airport. The hotel would effectively be ancillary to the Airport. On this understanding, the additional hotel rooms would be providing for trips that would occur irrespective of the current application. This assumption is accepted and therefore the proposed development is considered acceptable in this regard.
		5.22 WSCC Highways have not recommended any conditions. However, it is considered appropriate to condition a Travel Plan to be provided in order to encourage the use of sustainable transport by passengers and staff, and to minimise the demand for car parking. This was a condition imposed when the original BLOC hotel use was granted permission."

CR/2019/0878/CON	Consultation from GAL for the construction of a multi-storey car park (MSCP7) at the North Terminal CONSULTATION	GAL produced an 8-page supporting statement for what was permitted development in accordance with Schedule 2 Part 8 Class F of the Town & Country Planning (General Permitted Development) (England) Order 2015 (As Amended). It was stated under the heading "Background":
		"The proposed MSCP7 development delivers proposals set out in Gatwick's Car Parking Strategy which sets out GAL's forecasts and investment plans for providing additional on-airport passenger car parking. This planned investment aligns with adopted Crawley Local Plan Policy GAT 3 (Gatwick Airport related parking) approach for new airport related parking to be provided on-airport – on airport parking being considered as the most sustainable location – alongside action being taken to reduce unauthorised off- airport parking operations, of which there are currently some 6,800 spaces.
		The Gatwick Airport Surface Access Strategy (May 2018) and Gatwick Airport Interim Car Parking Strategy (April 2017) specifically identify projects that GAL are intending to bring forward to deliver increased on-airport parking capacity over the next five years including 1800 spaces to be delivered in Phase 1 of a new MSCP (MSCP7) in North Terminal and a further 1200 spaces in Phase 2 of MSCP 7. The proposed 3,000 MSCP7 spaces in the Gatwick Airport Surface Access Strategies were based on initial high-level concept layout, which have been refined during the detailed design process and as a result of optimisation of the available space and the grid of the car parking system, the proposed MSCP7 development has a total of 3,200 spaces."
		The proposed development is to take place on the site of an existing surface car park used by staff and known as Staff Car Park M comprising approximately 1.4ha on land at the North Terminal with a capacity of 450 spaces. The proposed MSCP7 development was not to accommodate any future parking spaces allocated to staff, with the existing 450 staff car parking spaces being re-allocated to other staff car parks including W, B, H and Z.
		In the same way as Application Nos CR/2017/0523 and CR/2018/0935/CON, GAL had the following comments to make under the sub-title " <i>Permitted Development</i> " forming part of the heading " <i>Overview of Planning Considerations</i> ":
		"The proposed development is operational development comprising the construction of MSCP7. It will be carried out by GAL and take place on operational land on the site of existing Staff Car Park M. The proposed works have been subject to EIA screening which has confirmed that the development is not EIA development.
		The development is therefore permitted development in accordance with the provisions of Schedule 2 P art 8 Class F of the Town & Country Planning (General Permitted Development) (England) Order 2015. Although development plan policies have no weight for permitted development, GAL has had regard to national and local plan policy as it planned this

	development, in accordance with commitments in GAL's Section 106 Agreement, with CBC and West Sussex County Council (WSCC)." It was further added under the sub-title "Principle of the Development": "The proposed MSCP7 development complies with the principle of CBC Local Plan Policies GAT1 and GAT3 in that it will support the development of facilities which contribute to the safe and efficient operation of the airport, and provide on-airport parking to meet increased passenger parking demand. The proposed development will intensify the current use of the site for parking and is consistent with other airport related uses adjacent to it."

CR/2020/0707/NCC	Application seeking the removal of Condition No. 3 pursuant to Application No. CR/2010/0692/FUL relating to a change of use to a hotel along with the addition of two further floors and alteration to external appearance. SECTION 73 APPLICATION	This application was submitted on behalf of Gatwick Propco and Sankara Hotels Gatwick Ltd, the owners of the Gatwick by Hilton Hotel and GAL. It was accompanied by a Planning Statement from Vantage Town Planning which sought the continuation of the use of the land without complying with Condition No. 3 on Application No. CR/2010/0692/FUL which read as follows:
		"3. The hotel shall not be occupied until the parking spaces shown on the submitted plans have been provided and constructed. The areas of land so provided shall not thereafter be used for any purposes other than the parking of customers vehicles."
		The reason for the imposition of the condition was:
		"To ensure that adequate and satisfactory provision is made for the accommodation of vehicles clear of the highways in accordance with Policy GD3 of the Crawley Borough Local Plan 2000."
		The Planning Statement referred to the fact that 60 standard car parking spaces and four blue badge spaces used in connection with the Hampton by Hilton Hotel were provided on what was known as Staff Car Park M. It was pointed out the decision to redevelop Car Park M with a new multi-storey car park (MSCP7) would mean that the hotel's car park would no longer exist, although it was indicated "I can advise that on completion of the planned MSCP7, it is intended that 60 of its parking spaces will be made available for parking in connection with the hotel."
		As part of the justification for the proposed development the accompanying Planning Statement stated:
		"1. The hotel is a highly accessible location at Gatwick Airport, it is extremely well served by a range of public transport options. As noted, many hotel guests already use public transport.
		2. For those guests who drive and wish to park there are some 40,000 public car parking spaces within the Gatwick Airport boundary, as well as over 20,000 spaces provided by off-airport operators. Many hotel guests who require parking currently use these spaces. Even the cars of guests who make use of the Hampton by Hilton spaces tend to only occupy spaces for short periods of time for convenience purposes (e.g. dropping off luggage), before parking elsewhere in either GAL or third-party operated car parks.
	-	3. These existing car parks products include North Terminal, MSCPs 5 and 6, which are in close proximity to the hotel (c. 2100 spaces including blue badge spaces, cycle and motor cycle parking, and where short stay and valet parking products are based, as well as the various long stay car park offerings on and off airport (which also include blue badge spaces). In due course, hotel guests would also have access to the planned c.3200 space MSCP7 – a car park which is proposed to be used as a mid-stay product (typically 3-8 days) and which would be particularly convenient for guests of the Hampton by

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 Hilton Hotel because of a direct pedestrian link via the existing link bridge into the hotel and again the provision of blue badge spaces. 4. The Hampton by Hilton Hotel would not be alone in not having any designated parking - the 245-bedroom BLOC hotel at the South Terminal (permitted in 2012) has no parking, nor has any parking been required as part of a recent (2019) permission for its extension. The 46-room "Yotel" at South Terminal similarly has no car parking. 5. Like the BLOC hotel and Yotel, the Hampton by Hilton does not offer conference or meeting facilities. 6. Referring to the reason for the condition "To ensure that adequate and satisfactory provision is
 made for the accommodation of vehicles clear of the highways": (i) the location of the Hampton by Hilton, well within the airport boundary and within the North Terminal Campus, means there is little/no risk of over-flow parking occurring either on the highway or in residential areas, causing inconvenience or harm to amenities of local residents; (ii) there is therefore no risk of parking on public (or airport) roads creating a highway safety issue."