

## York Aviation Paper

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### ISSUE 2

Response on behalf of WT Lamb Properties Ltd, the Dye Family and Elliott Metals/the Simmonds Family.

December 2023

1. Our response to the York Aviation Paper is submitted on behalf of our clients, WT Lamb Properties (hereafter WT Lamb), the Dye Family and Elliott Metals/the Simmonds Family.
2. Following the hearing sessions held during November 2023, it is clear that:
  - The current estimation of required employment land is significantly below the true level required and cannot be considered to be sound. In line with national planning policy and the plan-led system, the outstanding employment requirement should be increased from 13.73 ha to between 50ha and 70ha;
  - A comprehensive and proper plan led approach towards Gatwick Green should be taken rather than the incremental and piecemeal approach currently proposed. Our clients land should be included within the allocation in this regard; and
  - A consistent approach to safeguarding to the east of Balcombe Road should be taken rather than blighting piecemeal parcels that could meet a pressing employment land requirement as opposed to forming sporadic car parking.
3. Please note we intend to give oral evidence at the additional session in respect of the residual matters associated with Matter 5 issue 2 on 11<sup>th</sup> January 2023.

### YORK AVIATION PAPER

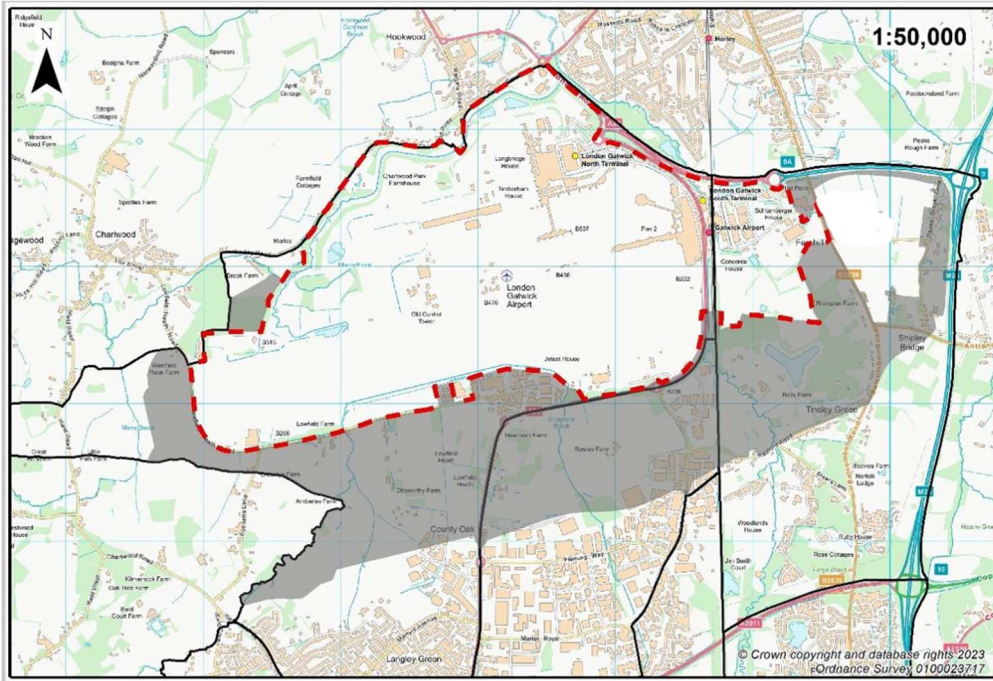
4. In our hearing statement in respect of Matter 5 Issue 2, we note that NPPF Para 106 (c) requires that robust evidence is provided when safeguarding such routes. In this regard there is no up to date evidence that justifies the full extent of land that is proposed to be safeguarded. In this regard, the York Aviation paper sets out the clear issues in respect of land to the East of Balcombe Road that complement our own submission and that of Gatwick Green Limited which when considered together provide significant evidence that parking in this area has not been considered comprehensively and such a large area of land should not be sterilised for car parking given the overarching employment demand.
5. We note:
  - The Arup evidence submitted to the Airports commission in 2014 indicates that based on a 60% modal split, there would be a requirement of 78,700 car parking spaces (including 19,000 off site spaces albeit we note that the level of off site spaces varies itself between documents). This would result in a residual of 59,700 spaces;
  - The airport master plan from 2014 included no detailed information on how parking would be provided other than it appears to be surface car parking yet it is included within the 2019 airport master plan. Gatwick have demonstrated the efficiencies that can be made through the highly efficient methods that Gatwick have since developed. Indeed, within the current Airport

boundaries the Northern Runway proposals demonstrate it is possible to accommodate over 53,000 car parking spaces within the existing airport boundary, equating to over 72,000 spaces when considering off site spaces;

- Table 1.2 presented in the York Aviation Paper on car parking densities, clearly provides a significant number of scenarios for the provision of car parking. Given the level of parking that could be provided within the current boundaries in the highly unlikely event that an additional 30,000 spaces were required, if these were provided efficiently in multi storey car parks then this could equate to 15 to 25ha depending upon circulation space and associated infrastructure;
- The 2014 master plan shows 4 multi storey car parks shown on site that could accommodate at least 9,000 spaces and there a significant amount of additional land (without land to the east of Balcombe Road) that based on current usage and additional efficiencies would accommodate between 50,000 and 80,000 car parking spaces (it is noted that there are already approximately 46,000 spaces within the current boundary including 19,000 spaces between the railway line and Balcombe Road). With offsite spaces, this would be well in excess of 110,000 car parking spaces. This is based on the York Aviation densities and demonstrates the approach that could be taken; and
- Gatwick's own submission for the Second Runway proposal in 2014 confirms that 35ha could be lost for employment land and replaced with decking elsewhere (as is set out in Appendix A5: Operational Efficiency of the GAL Second Runway submission). It clearly follows that it is already established that there is not robust evidence for safeguarding the land to the East of Balcombe Road and that through detailed planning based on up to date modal split and parking methodologies a far more efficient approach to car parking could be taken.

## **CONCLUSION AND REQUIRED CHANGES TO THE PLAN TO MAKE IT SOUND**

6. Given the above, the old master plan for a southern runway at Gatwick was very much produced under different circumstances that have now changed. We reiterate our view that it cannot be relied upon for forming the basis for safeguarded land. Indeed, the position has changed significantly in a wide range of areas from the new approach taken by Gatwick (with the northern runway), more efficient means of car parking and the significant shift towards sustainable forms of travel to and from the airport. As such, it is appropriate to allow the proper planning of the area for meeting employment needs that are current and evidenced.
7. For the reasons set out within our representations, previous hearing statement and summarised above, the current approach to safeguarding is not based on robust evidence as required by the NPPF and Crawley must provide additional employment land in order to meet the minimum requirement of 50ha as set out in our response to matter 4.
8. Accordingly, in order to provide a comprehensive approach to the delivery of the full level of employment land need, our clients land holdings should be included in the Gatwick Green allocation and accordingly, the area for safeguarding should be redrawn either as below or alternatively to remove our clients land at Fernlands alongside the remainder of the Gatwick Green allocation as shown over.



**LRM Planning  
December 2023**