

CRAWLEY LOCAL PLAN 2024 – 2040 EXAMINATION

## Matter 5 Gatwick Airport

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### ISSUE 2

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

November 2023

1. Our response to Matter 4 is submitted on behalf of our client, WT Lamb Properties (hereafter WT Lamb), the Dye Family and Elliott Metals/the Simmonds Family.
2. We are generally supportive of the emerging Local Plan. However, in respect of Matter 4: Economic Growth our representations can be summarised as follows:
  - 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 50ha;
  - 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 hearing in respect of Issue 2.

### ISSUE 2: WHETHER THE APPROACH TO SAFEGUARDED LAND AT POLICY GAT2 IS SOUNDLY BASED.

**Question 5.17: Is there the robust evidence, as required by NPPF paragraph 106, to support the extent of safeguarded land under Policy GAT2?**

4. No. 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.
5. It is important to draw a distinction between the two different areas involved, namely the land to the south of the airport and land to the east of Balcombe Road which is proposed by GAL to form a largescale surface car park.
6. Our representations are concerned with the land to the east of Balcombe Road wherein our clients control around 8.8ha of land that they propose forms part of the Gatwick Green allocation in order to meet the minimum requirement of 50ha of employment land during the plan period from EC4. Therefore our response focusses of land to the east of Balcombe Road and whether that would ever be required to provide large scale areas of surface car parking that GAL anticipate.

What level of parking would be required?

7. At the time the wider master plan was prepared (in the early 2010's) it was undertaken on the basis of two wide spaced runways that would accommodate 79 mppa per annum and be accompanied by between 87,200 to 106,550 passenger car parking spaces (the former being based on the aspiration for a 60% public transport approach). Whilst it is recognised that there may have been an increase to 95 mppa the modelling that was undertaken by Arup in response to the Airport Commission did not include these figures. An extract from the evidence presented by GAL at that time is below.

Parking requirements have been estimated based on different mode share assumptions, corresponding with a current mode share up to a 60% public transport mode share. Gatwick's target is 60%, based on R2 ASAS initiatives for sustainable surface access and improvements to bus and rail connectivity and service provision, as discussed in Chapters 6 and 7.

Table 9.3 and Table 9.4 show the estimated number of passenger (short and long stay) and staff car parking supply current mode share and 60% public transport mode share scenarios compared to the existing provision. The tables include both on-airport and off-airport parking.

**Table 9.3: Forecast parking spaces (2040, current mode share)**

Scenario	Year	MPPA	No of Staff	Number of parking spaces		
				Short-stay	Long-stay	Staff
Existing	2012	35	21,000	5,000	46,300	10,000
Option 0	2025	45	24,000	6,500	59,700	11,400
Option 3	2040	79	33,700	10,300	96,250	14,700

**Table 9.4: Forecast parking spaces (2040, 60% PT mode share)**

Scenario	Year	MPPA	No of Staff	Number of parking spaces		
				Short-stay	Long-stay	Staff
Existing	2012	35	21,000	5,000	46,300	10,000
Option 0	2025	45	24,000	5,700	52,700	10,100
Option 3	2040	79	33,700	8,500	78,700	12,100

The target for achieving a 60% public transport mode share will reduce the car parking requirement by the following amount for Option 3 in 2040, compared with maintaining the current mode share for public transport:

- Additional 1800 short-stay spaces;
- Additional 17,550 long-stay spaces; and
- Additional 2,600 staff spaces.

Figure 1: extract from GAL evidence to the Airports Commission (Appendix A6)

8. Please note for clarification the Arup figures in Figure 1 confirm a reduction of car parking spaces with the 60% modal shift of (rather than additional spaces as inferred in the Arup figures):
- A reduction of 1800 short stay spaces;
  - A reduction of 17550 long stay spaces; and
  - A reduction of 2,600 staff spaces.
9. In the intervening years there have been significant changes such that the current northern runway proposal is for 80.2mppa with 74,467 car parking spaces. All of which are accommodated on site or in existing off site spaces, which confirms a significant modal shift towards public transport.

10. Clearly therefore if the second southern runway proposals were to accommodate 79mppa then all future parking needs would remain the same and with proper and detailed master planning there seems no reason that additional land would be required outside of the current boundary. Further, based on the same ratio of parking spaces to passengers (1076), 95 mppa would require an additional c.14,000 car parking spaces to a total of approximately 88,000 spaces.
11. There are clear inconsistencies in the evidence that has been prepared and presented by GAL which have varied from the southern runway expansion, the northern runway application and the response to the Deposit version of the plan in 2021. This makes it difficult to ascertain a clear position in terms of what the level of parking associated with a new second runway would be and how it may be accommodated.
12. In this regard, it is not robust and cannot be relied upon to blight the delivery of much needed employment land. It is noted:
- The 2021 submission by GAL indicates that land to the east of the railway would need to provide approximately 95,000 parking spaces (within the Arup appendix submitted at the deposit stage), however, in 2014 Arup evidence submitted as part of evidence submitted to the Airports Commission (Appendix A6 Surface Access) (figure 1 on the previous page), indicates that the levels of passenger car parking required were 87,200 for passengers assuming the targeted modal split (with 60% public transport).
  - Arup note that this figure (87,200) includes off site car parking as well as on site which total around 21,000.
  - Furthermore, no analysis is presented regarding how more modern methods of parking management would reduce the land take as has been the case with the northern runway proposal. Indeed, there has been no updated analysis of the level of car parking that could be robustly provided within the existing boundaries and in existing facilities, from viewing the various plans, it is likely that in line with existing arrangements this could be up to 40,000 spaces not taking account of efficiencies that could be made including form robotic stacking, decking or additional multistorey car parks that could be factored in.
  - The GAL 2021 submission does not indicate that 35ha of the area could be lost and replaced with decking (as is set out in Appendix A5: Operational Efficiency of the GAL Second Runway submission).
13. It is therefore clear that a far lower number of car parking spaces might be required, in fact this could be between 20,000 and 30,000. This would require a far lower land take than has been suggested which would decrease further with the use of more efficient means of parking. However, this has not been considered rather the default position from GAL is that the entire area to the east of Balcombe Road should be low density surface car parking. This is clearly not an efficient use of limited land given the inconsistencies in the evidence base and supports the position of the Council.
14. It is considered that the loss of the allocation of safeguarded land can be accommodated in any future master plan for a second runway should one ever be required.
- Parking to passenger ratio's
15. To provide a comparison of how circumstances in respect of parking have changed we have compared the various ratio's of parking to passengers. For ease of comparison:
- Current airport arrangement (2019) – 46.6mppa with 67,897 car parking spaces (ratio of 1 space per 686 passengers);
  - Southern Runway proposal – 95mppa with 106,550 car parking spaces (ratio of 1 space per 891 passengers); and
  - Current northern runway proposal – 80.2mppa with 74,467 car parking spaces (ratio of 1 space per 1077 passenger).
16. It is clear from these figures that Gatwick Airport have actively demonstrated in their current northern runway proposals that a much greater parking efficiency can occur based around a much more

sustainable ratio of parking and far more efficient use of existing on site car parking. Indeed, based on a continuation of the current parking to passenger ratio (in the northern runway scheme) should a southern runway ever proceed, then it would not be a sustainable approach to accompany it with significant amounts of car parking to the east of Balcombe Road at the cost of the economy. Rather a continuation of the trend towards non car based traffic would be a sustainable approach.

Capacity of a second runway

- 17. It is clear that absent the northern runway proposals, a second southern runway would have had a significant impact on increasing the capacity of the airport to accommodate air traffic movement. Indeed, this could have been from around 45mppa up to between 79mppa to 95mppa which would have doubled capacity. However, the northern runway is anticipated to increase capacity to over 80mppa, it is therefore apparent that any southern runway would not provide the uplift that would have been originally envisaged. Such strategic considerations would therefore need to be made by the Airports Commission indeed, the benefits that a second southern runway would have bought to capacity are now significantly less and investment at other locations may be a more appropriate way forward.
- 18. In this regard, the Airport Commission are clear in Aviation 2050: The Future of UK Aviation (draft) that a decision will need to be made post 2030 whether additional capacity at Airports is required (extract below at figure 2). Clearly the northern runway proposals will provide significant additional capacity if approved which would logically contribute towards meeting future needs. It is logical therefore to look at other sustainable locations (i.e regional airports) away from the South.

3.13 The government will need to consider whether there is a need for further runways. Based on the current evidence, the government believes that any new framework for growth could accommodate additional runways beyond 2030 if a needs case is proven and suitable conditions are met in respect of sustainability. As part of this, the government proposes to:

- **ask the National Infrastructure Commission (NIC) to include airport capacity in future national infrastructure assessments to determine whether there is a needs case for further runways**

3.14 If a need is identified, the government has options for how to reach a decision on location, subject to the grant of the necessary planning permission or development consent. This could be through a NIC sector study; an independent commission (like the Airports Commission); or an aviation NPS to either set out the criteria any development consent application would need to meet, or by naming airport(s). At this stage the government's preferred approach is an NPS to set out the criteria but not name specific airports, so leaving it to industry to determine whether and when to bring forward applications.

Figure 2 Extract from Aviation 2050 The Future of UK Aviation (draft)

- 19. Given the above, the old master plan for a southern runway at Gatwick was very much produced under different circumstances that have now changed. 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.

**Question 5.18: The Gatwick Airport Masterplan 2019 states that the airport is no longer actively pursuing a scenario for plans for an additional southern runway, but a future possibility remains to build and operate one. Is a precautionary approach to safeguarding justified given the current lack of certainty on a potential future second wide-spaced runway?**

20. It is unarguable that there is no alternative location for a third runway (in addition to the northern runway proposals). However, as noted circumstances have significantly changed at Gatwick (with the northern runway proposals which if approved will massively increase the capacity of the airport to accommodate air traffic movements. For the reasons noted in response to 5.17 above, we would question whether circumstances would ever arise where Gatwick required an additional runway at the expense of capacity elsewhere.

**Question 5.19: Is the 2019 Gatwick Airport Masterplan the core of the robust evidence that supports maintaining the safeguarded land designation, in the terms sought by NPPF paragraph 106?**

21. No. Please refer to our response to 5.17.

**Question 5.20: Do the Airports National Policy Statement (APNS) and the 2020 Supreme Court decision in respect of Heathrow provide a level of evidence to indicate that safeguarding is no longer required for Gatwick?**

22. It is clearly the case that circumstances have changed and the favoured approach is Heathrow. We also refer to the changing circumstances at Gatwick noted at para 13 herein whereby the base circumstances are likely to change significantly with the northern runway application such that significant capacity would be provided and Gatwick would comprise a significant element of nationwide capacity under the northern runway approach.

**Question 5.21: Would plan review be the appropriate mechanism to consider the necessity for continued safeguarding? What would be the likely trigger in relation to Gatwick and safeguarded land to prompt a plan review? Is the outcome of the National Infrastructure Commission work on airport capacity the source that would potentially provide the necessary certainty?**

23. The evidence already exists to demonstrate that there is a need for a much higher amount of net developable area. This is set out in detail in our response to EC1 and we do not repeat it here, we consider that given the evidence it is highly inappropriate to discount this at this stage and not plan properly for it, this is contrary to the fundamental requirements of NPPF with regards to positively planning for the future of an area. Indeed, this will provide certainty across the plan period.

**Question 5.23: Is the approach to safeguarded land east of Balcombe Road justified? If the principle of not safeguarding land shown for surface car parking in Gatwick Master Plan is acceptable for the Gatwick Green proposal in Policy EC4 is a more consistent approach required for plan soundness with regards to any residual safeguarded land east of Balcombe Road?**

24. For the reasons set out in response to question 5.17 we are of the view that the approach to safeguarding is not justified and that a more consistent approach is required towards the master planning of the area to meet identified employment land needs in the first instance.

25. There are substantive matters to be considered in respect of EC1, we suggest that an appropriate response would be to plan for the outstanding evidence based minimum level of employment land (50ha) and ensure a comprehensive approach to Gatwick Green.

26. The current approach towards the area east of Balcombe Road is set out in our response to questions and in our representations previously submitted. Aside from the need to meet employment needs, the significant issue is in respect of the proper and comprehensive planning of the area. We note that the

Wilky Group submitted a plan (figure 3 over) in their Deposit representations showing how Gatwick Green and Surface Car parking could work together in the future if a second southern runway was ever considered.

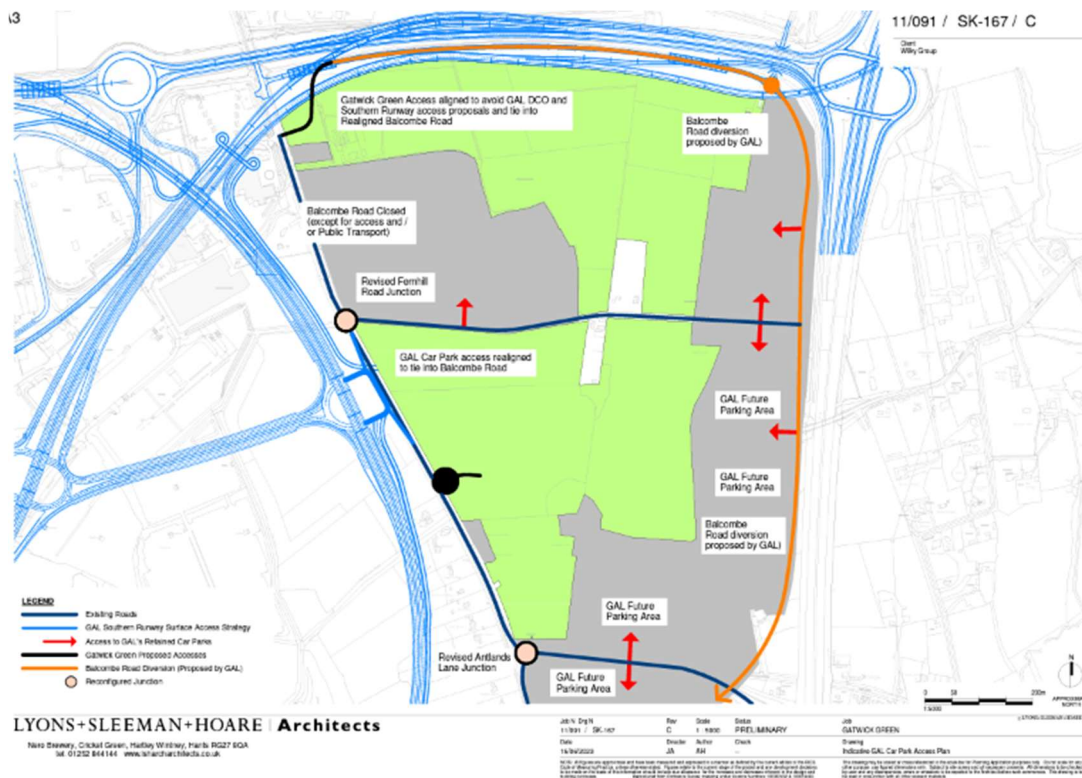


Figure 3: The Wilky Group Plan

27. This plan demonstrates the problems with the approach that is currently taken to planning and of attempting to fit everything together on an incremental basis. It is noted:

- Around 4ha to 5ha of Gatwick green would be lost in the north resulting in more elongated development plots which mitigate against a good practice master planning approach to Gatwick Green. This is further eroded by the large buffers that are indicated to be required along with ecological enhancements and surface water attenuation features;
- A joined up approach would be needed to rationalise the significant and convoluted infrastructure that is shown on the plan as well as demonstrate that it would be technically safe and achievable;
- A comprehensive approach to landscaping, ecology and drainage would be more difficult to provide. These are important aspects of the Gatwick Green policy approach and are significantly impacted by the approach shown;
- Gatwick Green, a prestigious employment site, would be interspersed with large areas of car parking and inevitably conflicts between large scale freight movements and holiday makers looking to park their cars; and
- Notwithstanding our views on safeguarding, the inclusion of our clients land (north of Fernhill Road) would allow for a more comprehensive approach to provision of the minimum 50ha of employment land.

**Question 5.24: Is Gatwick Green justified in the context that the Gatwick Airport Master Plan 2019 envisages surface car parking in this location? If Gatwick Green is found sound, and having regard to the Airport Surface Access Strategy, the 2022 Section 106**

**agreement, and the DCO proposals, would there be any significant adverse impacts for accessibility to Gatwick Airport?**

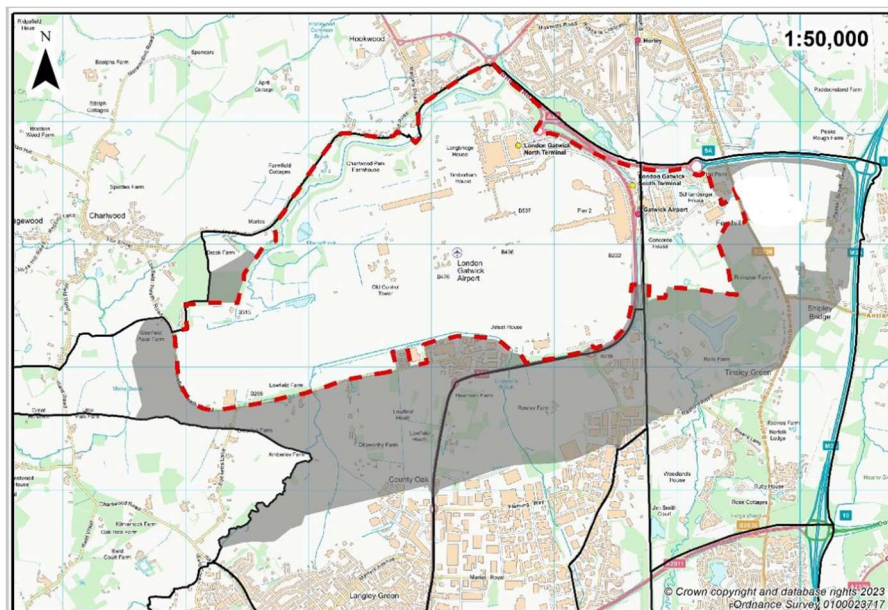
- 28. Please refer to our response to 5.17 which sets out the out of date and insufficient evidence in regard to car parking to the east of Balcombe Road in general.
- 29. With regards to the current approach at Gatwick airport technical work undertaken confirms that they would be compatible and detailed elements would be capable of being considered and dealt with through a planning application at Gatwick Green.

**Question 5.26: Is it justified that Gatwick Green is the only site capable of meeting the Borough's employment land needs without prejudicing the future delivery of a southern runway?**

- 30. This is a matter for the Council, however, we would draw attention to the significant increase in employment land that is required and it ought to be noted that the current approach towards meeting demand is from incremental redevelopment of existing employment floorspace as evidenced by a range of recent applications providing logistics and warehousing. In our view this underscores the need for a comprehensive approach towards future land use planning and responding accordingly to market signals.

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

- 31. For the reasons set out within our representations and herein, 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.
- 32. 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 all of the land to the east of Balcombe Road.



**LRM Planning**

November 2023