



**Horsham  
District  
Council**



# **GATWICK AIRPORT NORTHERN RUNWAY PROJECT**

PLANNING INSPECTORATE'S REFERENCE: TR020005

## **LEGAL PARTNERSHIP AUTHORITIES**

### **ISSUE SPECIFIC HEARING 8:**

## **POST-HEARING SUBMISSION ON AGENDA ITEM 4: CAR PARKING**

**DEADLINE 6: WEDNESDAY 26 JUNE 2024**

Crawley Borough Council (GATW-AFP107)

Horsham District Council (20044739)

Mid Sussex District Council (20044737)

West Sussex County Council (20044715)

Reigate and Banstead Borough Council (20044474)

Surrey County Council (20044665)

East Sussex County Council (20044514)

Tandridge District Council (GATW-S57419)

## ISSUE SPECIFIC HEARING 8 (“ISH8”)

### AGENDA ITEM 4: CAR PARKING

#### POST HEARING SUBMISSIONS INCLUDING WRITTEN SUMMARY OF THE LEGAL PARTNERSHIP AUTHORITIES’ ORAL CASE

**Note:** The Legal Partnership Authorities are comprised of the following host and neighbouring Authorities who are jointly represented by Michael Bedford KC and Sharpe Pritchard LLP for the purposes of the Examination:

- Crawley Borough Council
- Horsham District Council
- Mid Sussex District Council
- West Sussex County Council
- Reigate and Banstead Borough Council
- Surrey County Council
- East Sussex County Council; and
- Tandridge District Council.

In these submissions, the Legal Partnership Authorities may be referred to as the “*Legal Partnership Authorities*”, the “*Authorities*”, the “*Joint Local Authorities*” (“*JLAs*”) or the “*Councils*”. Please note that Mole Valley District Council are also part of the Legal Partnership Authorities for some parts of the Examination (namely, those aspects relating to legal agreements entered into between the Applicant and any of the Legal Partnership Authorities).

#### **Purpose of this Submission**

The purpose of these post-hearing submissions is to provide a written summary of the Legal Partnership Authorities’ positions on the agenda Item specified above. This includes both a summary of the Legal Partnership Authorities oral representations on this agenda item and, in some cases, further comments on the oral representations made by the Applicant at the hearing. Whilst the structure of these submissions follows the order of the agenda items, they do not include all of the Legal Partnership Authorities’ concerns in relation to each Agenda Item as not all of these positions were rehearsed orally at ISH8 due to the need to keep oral representations succinct. The Legal Partnership Authorities would also be happy to provide answers in writing to any specific further questions which the Examining Authority (“ExA”) may have.

**Attendance:** ISH8 was attended by Michael Bedford KC and Dr Lois Lane for the Legal Partnership Authorities, instructed by Emyr Thomas and Alastair Lewis of Sharpe Pritchard LLP. The hearing was attended by various other representatives from the Legal Partnership Authorities, some of whom made oral representations as identified in the post-hearing submissions below.

No.	ExA's question / Agenda Item	Summary of Oral Representations at ISH8 and Further Post-Hearing Submissions
<b>Car Parking</b>		
4.1	<p>Discussion about parking numbers as set out in the Car Parking Strategy [REP1- 051] and the Applicant's response to our Rule 17 letter about car parking [REP4- 019].</p>	<p><b>Justification for Net Increase of 1100 Additional Spaces.</b></p> <p>The Authorities have raised concerns in previous submissions regarding the lack of adequate justification for the provision of a net increase of 1100 additional spaces by 2040 with the development in place. The Authorities intended to develop this point under agenda item 4.1 by highlighting some of the discrepancies in Table 1 of the Applicant's Rule 17 response on car parking <a href="#">[REP4-019]</a>. Following the Applicant's confirmation that some figures in Table 1 are incorrect – without specific details on which ones – the Authorities note that it will not be productive to reference specific figures until they receive a revised version of Table 1 at Deadline 6. The Authorities therefore reserve their comments on these figures until the provision of further information.</p> <p>The Authorities would nonetheless note that when considering the ratios suggested by the Applicant between peak demand and available spaces – whether 87.5% or 85% in the figures – the Authorities maintain that the provision of 1100 additional spaces lacks sound justification.</p> <p><b>Treatment of Non-Gatwick Operated Parking Spaces</b></p> <p>The Authorities observe that – if it is now clarified that, for the purposes of the mode share targets all of those spaces and trips to them are included and count as car journeys against the Applicant - then the Authorities' preference for presenting those spaces in certain figures is less critical, provided that the controls achieve their intended purpose. The Applicant should clarify in its documents that its definition of 'on-airport' and 'off-airport', as taken for the purposes of the DCO, differs to that applied in Crawley Local Plan Policy GAT3. This is required to avoid the introduction of unnecessary ambiguity and to ensure continued effective application of Policy GAT3.</p> <p><b>Off-Airport Parking Contribution</b></p> <p>There are ongoing discussions with the Applicant about the adequacy of the Draft DCO Section 106 Agreement contribution to support control over off-airport parking, particularly regarding enforcement.</p>

		<p>The Authorities have been seeking to progress negotiations with the Applicant on the basis that the level of any such contribution needs to be realistic for the control to be effective. While the Authorities do not expect the ExA to be interested in the precise details of these negotiations, it is essential to note that the current position proposed by the Applicant is unsatisfactory.</p> <p>The Authorities would note that they are open to a review mechanism in an improved proposal, allowing for adjustments if a post is not required or not needed for the full duration. In relation to this contribution, the Authorities have also raised issues regarding the costs of making periodic Traffic Regulation Orders to manage off-airport parking. These costs are not adequately reflected in the Applicant’s current proposals.</p> <p>Furthermore, within Surrey, where parking is managed as a civil enforcement matter, further discussion with the Applicant is necessary to ensure adequate addressing of these issues. Although dialogue is ongoing, a common position has not yet been reached and the Authorities would emphasise the importance of both on-airport and off-airport controls to ensure that the surface access commitments can be achieved.</p>
<p><b>4.2</b></p>	<p>Comparison of parking supply at London Heathrow and London Gatwick airports</p>	<p>The Authorities did not make oral submissions on this item at ISH8 and do not consider it necessary to comment on this agenda item in this post-hearing submission.</p>