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Dear Sallie and Elizabeth,

**Response to Crawley Borough Council Regulation 19 Local Plan Review 2035 for land at Nexus Parcel Three on behalf of Surrey County Council.**

We are writing on behalf of our clients Surrey County Council (SCC) in regard to their site and development opportunities at Nexus Parcel 3, 2-3 Gatwick Road, Crawley.

We would like to make the following Local Plan representations particularly in regard to Economic Growth policies in the emerging Local Plan, as proposed under the Local Plan Consultation Regulation 19. These comments build on our representations to the Regulation 18 stage, in our letter dated 16<sup>th</sup> September 2019.

Our representations are based on how this would impact on the future opportunity and delivery of any future development on Parcel Three.

As you are aware, Parcel Three currently remains undeveloped although Surrey County Council are actively looking to bring forward development on this site within the short term.

**Chapter 9: Economic Growth**

Firstly, further to representations to the Regulation 18 stage, we welcome the restructuring of this Chapter and the evolution of the policies as you read through the chapter.

Our client wishes to provide support for the recognition in paragraph 9.6 that Manor Royal is the focus for business led economic growth in the Borough and that the Main Employment Areas will be required to make effective use of the land within them. This is consistent with the effective use of land by SCC across Parcels One and Two at Nexus, Gatwick Road.

We also note that the importance of employment land is further evidenced by the Lichfield's Economic Growth Assessment (EGA) for the Northern West Sussex Area (January 2020). This document shows that in a constrained land supply scenario, there is a need for 33ha of business land over the plan period, with a 21 ha deficit and 12 ha identified in the Employment Land Trajectory (ELT).

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We note that our site is contained within the Employment Land Trajectory as being available within years 1-5 and we can confirm that this is the case.

Our specific comments on the policies themselves are as follows:

**Policy EC1: Sustainable Economic Growth**

On behalf of our clients SCC, we support the continued acknowledgement that Crawley has a key role as a key economic driver in the Gatwick Diamond, and that the current 21 ha deficit in a constrained land supply position. We also note that our site forms part of the 12 ha identified in the ELT.

We support criteria i) which seeks to build upon and protect the established role of Manor Royal as a key business location, and criteria ii) that ensures the Main Employment Areas are protected in order to remain the focus for sustainable economic growth.

**Policy EC2: Economic Growth in Main Employment Areas**

We support this policy which reiterates the commitment to retaining economic growth and supporting the economic function of the main employment areas, such as Manor Royal.

**Policy EC3: Manor Royal**

We support this policy which looks to encourage development that is compatible with the economic function of the area and permit any B-uses, or non B uses that are of a scale and function that supports the economic function of Manor Royal.

We also acknowledge the continued Public Realm Improvement contributions and commitment to a high quality design and landscaping in line with the adopted Manor Royal Supplementary Planning Document.

**Chapter Fifteen: Sustainable Design & Construction**

**Policy SDC1: Sustainable Design & Construction**

We note the continued commitment for non-domestic buildings as BREAAAM excellent for water and energy categories as per our adjacent developments on Parcel One and Two.

We also acknowledge that development will need to take the appropriate measures to meet objectives set out in the Energy Hierarchy and Cooling Hierarchy in order to mitigate against and adapt to, the impacts of climate change.

**Policy SDC2 District Energy Networks**

We note the continued commitment for development proposals within a priority area for District Energy Networks that involve the creation of over 1000sqm of internal floorspace, to include an Energy Strategy that is in accordance with the hierarchy set out in this policy.

We also note that in paragraph 15.33 that Manor Royal is identified as an area where development of District Heating schemes should be actively encouraged, to meet high demand for heating / cooling process and space heating. Again, this is consistent with our approach across Parcels One and Two. We also support the

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opportunity to explore potential for the generation and supply of local low/zero carbon energy technologies, as part of the Re-Energise Manor Royal project milestone for 2020.

### **Policy SDC3 Tackling Water Stress**

We acknowledge that the South East of England is an area of serious water stress and that Crawley must ensure that development in the Borough requires stringent water conservation measures, as a result of this. We note the continued commitment for non-residential buildings to meet the 'minimum standards' for BREEAM Excellent for the Water Category, as delivered across Parcels One and Two.

We also acknowledge that the policy will support any tighter national standards which supersede the existing Building Regulations 'optional' requirement for 110 litre/person/day, if these come forward during the Local Plan period.

### **Conclusions**

As with our representations to Regulation 18, on behalf of Surrey County Council, we are grateful for the opportunity to comment on the Regulation 19 Submission Draft Local Plan and will seek further to engage directly with the Council in regard to the key matters effecting general economic policies and our site Nexus Parcel Three.

I hope this clarifies our position but should have any further questions please do not hesitate to contact me.

Yours sincerely

A handwritten signature in black ink, appearing to read 'S Holloway'.

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