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Dear Sallie and Elizabeth,

**Response on Behalf of UK Commercial Property Finance Holdings Ltd for Crawley Borough Council Local Plan Review 2035 Regulation 19 Consultation**

We are writing this letter on behalf of our client UK Commercial Property Finance Holdings Limited, in response to the Crawley Borough Council (CBC) Regulation 19 Submission draft Local Plan Review 2035 specifically relating to matters which impact on the site at Unit 2 and Unit 3, Charlwood Road, Gatwick Gate.

The attached plans identify the site boundaries for Unit 2 and Unit 3, Gatwick Gate. The two units sit adjacent to one another and are located within the existing airport safeguarded land but outside the southern boundary of Gatwick Airport.

Our response will reflect the context of the above site and specifically, will comment on the following key proposals in the CBC Submission draft Local Plan 2035:

- North Crawley Area Action Plan
- Main Employment Area designation

In addition, we note the proposed change to the existing Airport Boundary in the immediate area of our client's site therefore, we have provided some commentary on polices relating to the Gatwick Airport boundary as shown on the Local Plan Map.

We will also provide some commentary on matters of character, landscaping and development form due to the sites location outside of the built up boundary and within an identified long distance view splay. Our detailed comments are as follows:

**Policy SD3: North Crawley Area Action Plan**

This policy provides clarification on the Council's position to challenge National Government and lift current safeguarding, proposing to designate the land south and east of Gatwick Airport and north of Crawley, for the preparation of an Area Action Plan.

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We note in paragraph 3.21 of the reasoned justification for this policy that the proposal for an Area Action Plan will provide continued opportunity to meet growth need for Gatwick Airport, whilst also enabling the delivery of other development in the Borough. Especially, identified employment need within the District.

In regard to policy SD3, our client supports in principle the proposal for an Area Action Plan. This will present a greater opportunity for employment related development, in accordance with other Local Plan policies on economic growth. Current restrictions in relation to the existing safeguarding policy significantly limits development on our client's site and redevelopment and intensification opportunities for economic growth in the wider area.

Whilst we acknowledge that paragraph 3.22 states that current protections of the previous safeguarding policy will remain until the AAP is adopted, we would appreciate further clarity on the proposed timescale for its delivery, which we understand is due to commence three months from the adoption of the Local Plan. We await the emerging Local Development Scheme (LDS).

#### **Chapter Four: Character, Landscape and Development Form**

We note the changes to this chapter which now combines issues of 'character and design' and 'landscaping and landscape character' succinctly within one chapter.

We recognise the requirements of policy **CL2: Principles of Good Urban Design** in particular criteria a) which requires development proposals to *"take account of long distance vistas, landmarks, views into and out of adjoining areas, gateways to and between particular areas, and focal points.*

We note the requirements set out in **Policy CL3: Local Character and the Form of New Development** for new development to provide supporting documentation which demonstrates how proposals meet the five components of existing rural and urban structure. However, we are concerned that the degree of work involved in this is significant, especially for minor alterations and smaller scale development.

We also note that our client's site is within a long distance view splay as identified on the Local Plan Map and therefore, **Policy CL7: Important and Valued Views** remains relevant for any future proposal to the site and surrounding area.

On behalf of our client, we seek further clarification on what this policy would mean for any redevelopment within the Main Employment Area and its relationship with the AAP process, in terms of what would be considered acceptable and how this will be assessed.

We acknowledge that our client's site is outside of the Built-Up Area boundary, as identified on the Local Plan Map and policy **CL8: Development Outside the Built-Up Area**. We support criteria set out within this policy, specifically criteria i) which seeks to ensure development is grouped within existing buildings to minimise visual impact.

We also acknowledge that our client's site is located on the northern edge of the Upper Mole Farmland Rural Fringe and therefore, must give consideration to impact on this landscape character area.



We note that there is a requirement in policy CL8 for development within the proposed AAP area to comply with both the criteria in policy SD3 and the criteria of policy CL8 and acknowledge in paragraph 4.78, the interim position for development coming forward ahead of the AAP adoption. We assume that the AAP will address in more detail, the Landscape Character Assessment to be brought forward as the AAP evolves.

### **Chapter Nine: Economic Growth**

Firstly, we acknowledge the changed structure of this chapter which has been amended from the Regulation 18 draft Local Plan. We consider the amended structure to read logically in terms of the evolution of policies through the chapter.

On behalf of our client, we support the statement in paragraph 9.6 that the focus for all Main Employment Areas is to: *protect and build upon the economic role and function of these locations, having regard to their individual form and character, to make effective use of these locations for sustainable economic growth.*

We recognise that in the Northern West Sussex Area EGA (January 2020) it is identified that in a constrained land supply scenario, there is a need for 33ha of business land in the Borough over the plan period.

We also support, in principle, the text in paragraph 9.10 in relation to a potential Strategic Employment Location (SEL) to the north of Manor Royal and south and/or east of the Airport. However, as referred to above in terms of an AAP, we seek further clarification on what this would look like and the timescale for delivery.

Our client's site is located within the boundary for a Main Employment Area and therefore is protected to '*remain a focus for sustainable economic growth*', in accordance with policy **EC1: Sustainable Economic Growth**. Our client supports this policy, specifically, the support to redevelop and intensify Main Employment Areas, as the most sustainable opportunity for contributing to the Borough's unmet need for B-class business land.

In addition, our client supports policy **EC2 'Economic Growth in Main Employment Areas'** which supports the provision of employment-generating development in designated Main Employment Areas. Specifically, we support the strategy for retaining policy protection for employment land/floorspace within these Main Employment Areas.

### **Chapter Ten: Gatwick Airport**

We acknowledge that our client's site is located outside of the Gatwick Airport boundary however, it is within existing airport safeguarding land which is protected against development which would be incompatible with future airport growth.

However, paragraph 10.7 states that findings in the government's draft Aviation Strategy (2018) forecast that aviation demand up to 2030 can be met by the expansion of Heathrow Airport. It goes on to states that, whilst there may be further demand beyond 2030, the government is not at a point of deciding on long-term need.

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We also note in paragraph 10.10 that the Gatwick Airport Master Plan (July 2019) states that they are not currently pursuing plans for an additional runway to the south of airport albeit, there remains a possibility that this could change in the future.

Therefore, we support the Council's decision to remove policy GAT2: Safeguarded Land from the Local Plan and include this land within the preparation of the North Crawley AAP. This will provide greater flexibility and opportunity for meeting the Borough's development need in addition to the future development need of Gatwick airport.

On behalf of our client, we support the clarification in policy **GAT1: Development of the Airport with a Single Runway** which supports sustainable growth of Gatwick Airport within the airport boundary as set out on the Local Plan Map.

We also support policy **GAT3: Employment Uses at Gatwick** with regard to the prevention of non-airport related commercial floorspace within the airport boundary which would have an unacceptable impact on the role and function of Main Employment Areas.

#### **Conclusion**

We are grateful for the opportunity to comment on the Regulation 19 Consultation and would seek further to engage directly with the Council in regard to the key matters regarding the AAP proposal, Main Employment Areas and wider economic growth and landscape policies.

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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**Appendix 1: Site Location**



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