



Crawley 2035

Ref No:

Office use only

Crawley Submission draft Local Plan Representation

Please return your completed representation form to Crawley Borough Council
by 5pm on 2 March 2020.

Representations can be made via this form and emailed to forward.planning@crawley.gov.uk or sent via post to: Local Plan Consultation, Strategic Planning, Crawley Borough Council, Town Hall, The Boulevard, Crawley, RH10 1UZ. Alternatively, representations can be made online using the [eform](#) which allows attachments of documents.

This form has two parts:

PART A – Personal details

By law, representations cannot be made anonymously. All representations will be published alongside your name, company name (if applicable), and your client's name/company (if applicable). The Council will use the information you submit to assist with formulating planning policy.

Further information about Data Protection Rights in line with the provisions of the General Data Protection Regulations and Data Protection Act 2018, for example, how to contact the Data Protection Officer, how long information is held or how we process your personal information can be found at www.crawley.gov.uk/privacy. Specific reference to the Local Plan and planning policy related public consultation can be found on: www.crawley.gov.uk/pw/web/PUB351893

PART B – Your representation

Please fill in a separate sheet for each representation you wish to make. You may submit multiple "PART B" sections with a single "PART A" completed.

PART A – Personal details

Please ensure that you complete all fields in 1. If a planning agent is appointed, please enter the Title, Name and Organisation in 1, and complete the full contact details of the agent in 2.

	1. Personal details	2. Agent's details
Title:	Mr	Mr
First name:		Jamie
Surname:	Barnes	Alderson
Organisation:	Caravan and Motorhome Club	Rapleys LLP
Address line 1:		33 Jermyn Street

Address line 2:	<input type="text"/>	<input type="text"/>
Town/city:	<input type="text"/>	London
Postcode:	<input type="text"/>	SW1Y 6DN
Telephone:	<input type="text"/>	<input type="text"/>
Email:	<input type="text"/>	Jamie.alderson@rapleys.com

PART B – Your representation

3. Please tick the document that you would like to make a representation on:

- Crawley submission Local Plan
- Crawley submission Local Plan Map
- Crawley submission Sustainability Appraisal
- Habitats Regulation Assessment Screening Report

4. Which part of the Local Plan does this representation relate to?

Paragraph: Policy: Other:

5. Do you consider the Local Plan to be: *(Please tick)*

- | | | |
|---|---|--|
| 5.1. Legally compliant? | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> |
| 5.2. Sound? | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |
| 5.3. Compliant with the duty to co-operate? | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> |

6. Please give details explaining your response to 5.1, 5.2, or 5.3 below. Please be as clear as possible.

The Plan is not justified or consistent with national policy with regards to its policy regarding visitor accommodation. Please see attached rep for further detail

If required, please continue your response on an additional piece of paper and securely attach it to this response

- 7. Please set out what modification(s) you consider necessary to resolve the issues you have identified above. You need to state why this modification will make the Local Plan legally compliant or sound. It would be helpful if you are able to suggest how the wording of any policy or text should be revised. Please be as clear as possible. Any non-compliance with the duty to co-operate is incapable of modification at examination.**

Please see attached representation for recommended main modification.

If required, please continue your response on an additional piece of paper and securely attach it to this response

*Your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further representations. **After this stage, further submissions will only be at the request of the Inspector, based on the matters and issues s/he identifies for examination.***

8. **If your representation is seeking a modification, do you consider it necessary to participate in the public examination hearings?** *(Please tick)*

No, I do not wish to participate in the examination hearings

Yes, I wish to participate in the examination hearings

9. **If you wish to participate in the public examination hearings, please outline why you consider this to be necessary:**

The Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the public examination.

If you would like to make a representation on another policy or part of the Local Plan then please complete a separate PART B section of the form or securely attach an additional piece of paper. Copies of the representation form can also be downloaded from the council's website at: www.crawley.gov.uk/crawley2035

Signature

J.Alderson

Date

4 March 2020

JDA/0202116

02 March 2020

Strategic Planning
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LONDON
BIRMINGHAM
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HUNTINGDON
MANCHESTER

Dear Sir/Madam

Re: Representation to Crawley Borough Council Local Plan 2020 – 2035 Regulation 19 Consultation on behalf of the Caravan and Motorhome Club.

Introduction

This letter contains our representation to Crawley Borough Council's Regulation 19 Consultation on the Local Plan 2020 – 2035. This representation relates specifically to Strategic Policy EC6: Visitor Accommodation.

The Caravan and Motorhome Club (the 'Club') has a well performing site in the Crawley Borough; Gatwick Caravan Club Site (the 'site'). A brief commentary on the site and its surroundings is below.

Site and Surroundings

Gatwick Caravan Club Site is located to the south of Gatwick Airport, to the north of the town of Crawley. The site is accessed to the north by Charlwood Road. Charlwood Road meets London Road to the east, which provides access into Crawley town. On the Regulation 19 Policies Map, the site is located within the Upper Mole Farmlands Rural Fringe (Policy CL8) and the area covered by the North Crawley Area Action Plan (Policies SD6, CL8, EC1, H1 and ST4).

The area within the Club's ownership extends to circa 5.7ha and provides a total of 25 pitches, 18 of which are all-weather. The site also includes The Glade Tent Field, a reception block, a warden office, an assistant warden block, a toilet block, servicing points and internal tarmac roads. To the west of the site there are two caravan storage areas. The site is not only well set back from the road to the north, but it is also well screened by vegetation around the boundary of the site.

Proposed Improvements

With regards to this site, the Club would like to extend the site to increase its offering. This extension could include additional touring pitches, lodges or camping pods. These are generally small scale, permanent or semi-permanent structures of varying sizes, typically containing a bedroom as well as some cooking facilities and/or bathroom facilities depending on their size. The provision of this type of accommodation ensures that the Club can continue to meet the evolving needs of its members. On this basis, the below policy changes in the Proposed Submission Local Plan are sought.

Proposed Submission Crawley Borough Local Plan 2020 – 2035

The Club does not support the approach that is being taken through Strategic Policy EC6: Visitor Accommodation – which reads as follows:

Hotel and visitor accommodation will be supported in the Town Centre. Where hotel development is proposed outside of the Town Centre, it will be necessary to demonstrate, through the use of the sequential test, that no sequentially preferable sites are available.

Where hotel and visitor accommodation is proposed in Manor Royal Main Employment Area, this will be permitted where it is demonstrated that the development will cater specifically for the business needs of Manor Royal, including through the provision of business support facilities and staff amenities as per the requirements of Local Plan Policy EC3 (Manor Royal).

Where new hotel and visitor accommodation is located outside of the Gatwick Airport Boundary (in off-airport locations), parking provision shall be solely for the use of staff and guests in residence of the development and shall not be block parked or used by for any other purpose, including as off-airport car parking.

The policy does not provide the support required for the Club to achieve its aims for its site in the borough of Crawley. The policy seeks to restrict the development of new visitor accommodation to town centre locations and where visitor accommodation is proposed outside of the town centre it must satisfy a sequential assessment.

Given the nature of the visitor accommodation offered by the Club, and the needs of its clients, it would be entirely unsuitable for caravan and campsite development to be in a town centre location and in turn fall under the broad brush of this policy.

As published, the Local Plan does not contain a specific policy for caravan and campsites. In turn, the Club requests that the Council recognises the economic benefits that the Club helps to provide to the wider area by bringing visitors to the region. Policy should specifically include caravan parks and outline that, in principle, the extension and/or diversification of existing sites would be supported. Moreover, it would be beneficial for such a policy to ensure that tourism offerings are safeguarded and capable of being enhanced.

It is important to state that paragraph 83, point c) of the National Planning Policy Framework calls for planning policies to enable sustainable rural tourism and leisure developments which respect the character of the countryside. It is in this spirit that the above-mentioned policy should be drafted.

Conclusion

The Club would welcome the Council developing a policy that is specifically focused to address the protection, extension and diversification of caravan and camp sites within the borough of Crawley. It is essential that the emerging plan recognises the importance of supporting growth in the visitor economy in areas beyond the designated town centres.

Emerging policy must be sufficiently flexible to allow for businesses to adapt to changing economic trends, and changes in the demands of their customers. Flexibility is key for the Club to ensure that its site remains economically viable and can continue to support the local economy, local employment and the tourism industry.

The Club requires emerging policy to offer reassurance that it will be able to continue to develop and further diversify its offer. The Club wishes to ensure that the diversification and expansion of Gatwick Caravan Club Site will be permitted.

We request that the contents of this representation be fully taken into account as the Council takes the emerging Local Plan Forward.

Please send all future correspondence to the address below.

Yours sincerely,

Jamie Alderson
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Planner
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