



Crawley 2035

Ref No:

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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:	<input type="text"/>	<input type="text" value="Mr"/>
First name:	<input type="text"/>	<input type="text" value="Philip"/>
Surname:	<input type="text"/>	<input type="text" value="Murphy"/>
Organisation:	<input type="text"/>	<input type="text" value="Quod"/>
Address line 1:	<input type="text"/>	<input type="text" value="Ingeni Building"/>

Address line 2:	<input type="text"/>	17 Broadwick Street
Town/city:	<input type="text"/>	London
Postcode:	<input type="text"/>	W1F 0DE
Telephone:	<input type="text"/>	<input type="text"/>
Email:	<input type="text"/>	philip.murphy@quod.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 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 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.

Please see representations letter attached.

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 representations letter

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:

We have fundamental concerns with the Draft Local Plan. We contest the soundness of the Draft Local Plan and therefore wish to participate at the examination hearings.

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



Date

02/03/2020

Our ref: Q100290
Your ref:
Email: philip.murphy@quod.com
Date: 2 March 2020



Forward Plans
Strategic Planning
Town Hall
The Boulevard
Crawley
RH10 1UZ

Dear Madams or Sirs

DRAFT CRAWLEY BOROUGH LOCAL PLAN REVIEW - REGULATION 19 DRAFT SUBMISSION LOCAL PLAN

1 Introduction

I write on behalf of my client, Aberdeen Standard Investments, in partnership with the Barker Trust (jointly referred to as the “Landowners”), to submit representations to the Regulation 19 Draft Crawley Borough Local Plan (hereafter the “Draft Local Plan”).

The Landowners are promoting a c.18ha parcel of land immediately north of Hydehurst Lane (hereafter referred to as the “Site” and identified in a plan at **Document 1**) for employment uses to assist in meeting the substantial evidenced employment need forecast within the Borough. Redevelopment of the Site would deliver a logical and coordinated extension to the Manor Royal Business District which is identified in the Draft Local Plan (and its supporting evidence base) to be the key business location for Crawley at the heart of the Gatwick Diamond. The Site is available and deliverable, and is not subject to any technical or environmental constraints – full details have previously been provided as part of submissions made to the Call for Sites process.

These representations are structured to initially provide an executive summary and overall vision for the redevelopment of the Site, before setting out the Landowners’ specific comments and objections to the Draft Local Plan.

2 Executive Summary and Vision

The Draft Local Plan explains that Crawley is firmly established as one of the key economic drivers in the South East – situated at the heart of the Gatwick Diamond and central to the economic focus of the Coast to Coast Local Enterprise Partnership.

The Draft Local Plan seeks to protect and enhance Crawley’s role as key economic driver, recognising that there is a significant requirement for additional land to accommodate employment and business needs. The ability for Crawley to meet its substantial employment needs has in the past been geographically constrained, in large part by the safeguarding area around Gatwick Airport.



However, there is no longer any case to safeguard land around Gatwick Airport, to the extent current shown, as the Government has selected the Heathrow Northwest Runway to accommodate the additional runway capacity in the South East. The recent Court of Appeal decision will require the Government to re-consult on the Airports National Policy Statement to have regard to the 2016 Paris Agreement on Climate Change, but that does not change the Government's preference for additional runway capacity at Heathrow compared to other options.

There is no evidence of a need for further runway capacity in the South East beyond that to be accommodated at Heathrow. Furthermore, Gatwick Airport has confirmed in their 2019 Masterplan that they are no longer pursuing an additional wide-spaced runway (the purpose behind the previous safeguarding) and are instead preparing a Development Consent Order ("DCO") application to make best use of the existing runway and standby runway.

There is, therefore, no robust evidence (as required by paragraph 104 the National Planning Policy Framework (2019) ("NPPF") and the Draft Aviation Strategy) for retaining the safeguarding designation to the extent currently drawn in the adopted Local Plan.

In the absence of a geographic restriction imposed by safeguarding the Draft Local Plan should seek to accommodate the full employment need of c113ha as identified in its published evidence base. Such an approach is required by the NPPF, which dedicates that Local Plans be 'positively prepared' by meeting 'as a minimum' an area's objectively assessed needs.

Therefore, in the context of the published evidence base, national policy and up to date circumstances, the Local Plan will be unsound if it seeks to plan for anything less than full employment needs – Policy EC1 should be updated accordingly.

The Council intend to defer identification of the most appropriate locations to accommodate employment growth to the North Crawley Area Action Plan ("NCAAP"). It is our view that, in line with the NPPF, the opportunity exists for the Draft Local Plan to allocate sufficient sites now to ensure it delivers the strategic priorities of the area (i.e. enabling Crawley's role as an economic driver), rather than defer those decisions to a later point.

Notwithstanding this, if the NCAAP is to proceed, the context of the development plan document as set out in Policy SD3 needs to more clearly reflect the evidence base and current circumstances.

As stated in Paragraph 3.18 of the Draft Local Plan there is no evidence to retain the safeguarding around Gatwick Airport. The Government supports expansion at Heathrow Airport and the draft Aviation Strategy offers no support for safeguarding, instead referring back to Paragraph 104 of the NPPF which requires 'robust evidence' – which for the reasons outlined above does not exist. Therefore, the NCAAP should focus on how the boundary of Gatwick Airport may need to be slightly altered to support their 2019 Masterplan aspiration to maximise use of the existing runway and standby runway, and not the wider safeguarding associated with a wide spaced runway option which has no basis or policy support.

This would enable the NCAAP to achieve both any necessary small scale safeguarding (if necessary) associated with the use of the standby runway, and importantly enable the Council to plan for the full economic needs of the plan period.

The land promoted by the Landowners is one of, if not the, most appropriate location north of Manor Royal to accommodate employment floorspace. The Site is situated approximately 0.6 miles to the south of Gatwick Airport and directly to the north of Manor Royal. The Site extends to c.18ha and comprises greenfield land, the majority of which is used for agricultural purposes and is broadly divided into 4 fields, separated by vegetated boundaries.

The Site has the potential to be redeveloped for employment purposes (indicatively c.65,000sqm to 74,000sqm) as a coordinated and planned expansion of Crawley's most important employment location for business floorspace within the Borough. The Site is sustainably located immediately adjacent to the A23 which provides access into Crawley, Gatwick Airport and the M23. The Site would be accessed via an existing high-grade road (Hydehurst Lane) which currently serves units within Manor Royal. No on-site constraints to the development of the Site have been identified which cannot be resolved.

In summary, as detailed in the Call for Site submission information, the Site is an available and deliverable employment site which will assist in meeting the substantial evidenced need which exists in the Borough.

3 Representations to the Draft Local Plan

Gatwick Airport Safeguarding and North Crawley AAP

The NPPF states that planning policies should “*identify and protect, where there is robust evidence, sites and routes which could be critical in developing infrastructure to widen transport choice and realise opportunities for large scale development*” (paragraph 101, our emphasis).

The Draft Local Plan states that since 2003, Crawley Borough Council (“CBC”) has been required by Government policy to safeguard land from development in order to accommodate the possible construction of an additional wide spaced runway and associated facilities. This has placed significant constraint on the ability of Crawley to meet its development needs.

However, in line with our representations to the Regulation 18 Draft Local Plan, it is noted that the Council accept that ‘robust evidence’ does not exist to maintain the safeguarding for a second runway and draft Policy GAT2 (Safeguarded Land) has been deleted.

Paragraph 3.20 of the Draft Local Plan states:

“The council does not consider there is, at this time, robust evidence to justify the continued safeguarding of land for a further runway at Gatwick, and in light of the other significant needs arising which this land could support, commits to commencing work on an AAP to determine the most appropriate use of this land for future development needs rather than just protecting an extensive area for one use.” (our emphasis)

There is no evidenced need or policy case for the safeguarding of a second wide spaced runway at Gatwick Airport. Furthermore, Gatwick Airport has itself confirmed in their 2019 Masterplan that they are no longer pursuing an additional wide-spaced runway (the purpose behind the previous safeguarding) and are instead pursuing a DCO application to make optimum use of the existing runway as well as the standby runway.

As a result of the removal of Draft GAT2, Draft Policy SD3 identifies that land to the north of Crawley and south and east of Gatwick Airport (which includes the Site) is to be subject to the preparation of the NCAAP. Paragraphs 3.21 and 3.22 state:

“The commitment to producing an AAP for this area presents opportunities to support the growth of airport if this can be justified with robust evidence of need, as well as delivering other requirements. The AAP approach, rather than identifying allocations in this Local Plan, is considered to be pragmatic. It allows for the principle of lifting safeguarding to be considered first, through this Local Plan, and then allows greater time for the growth needs of the Airport to be demonstrated by the airport operator and any future protection of some or all of the land for airport purposes to be justified alongside other development needs as part of the work on the AAP.”

On this basis, this Local Plan still needs to apply the same protections of the previous safeguarding policy to the area identified in the Gatwick Airport Masterplan 2019 until the AAP is finally adopted. This recognises that, if there is evidenced need for a future southern runway at Gatwick, this is the only location it could be delivered. Therefore, the amended previously safeguarded area identified on the Local Plan Map will be protected against incompatible development which would add constraints, add costs, or increase the complexity of the development of an additional runway. The Airport Operator will continue to be consulted on all applications within this area. Also, as the work on the AAP may still conclude there is a need to safeguard land for a potential southern runway, it is important to ensure that, until the AAP is adopted, noise sensitive development is not located in an area which could become unacceptably noisy in the future due to air traffic movements from a southern runway.” (Our emphasis).

My client welcomes the deletion of Draft Policy GAT 2.

In line with the NPPF the Council should identify strategic site allocations to meet identified need as part of the Draft Local Plan thereby removing the need to introduce a further planning policy document.

Notwithstanding this, the Council have clearly stated that robust evidence does not exist to maintain the safeguarding for a second runway. On this basis there is no evidence or policy rationale to require the NCAAP to consider if further evidence has materialised for safeguarding for a second runway in the future.

The NPPF requires all policies to be evidence based and as no evidence exists for safeguarding (as accepted by the Council) the NCAAP should not even contemplate safeguarding for a second runway. The fact that it does means that Draft Policy SD3 as currently drafted is not justified in accordance with Paragraph 35 of the NPPF and is therefore unsound.

The only potential safeguarding the NCAAP should consider is additional land associated with the optimum use of the existing runway and the standby runways. The NCAAP and Draft Policy SD3 should focus on assessing the locations for the Borough economic, housing, community and infrastructure needs.

Previously Non-Safeguarded Land

The Draft NCAAP boundary covers areas of land which previously fell outside of the safeguarded area. Draft Policy SD3 states that until the AAP is adopted, only minor extensions to existing buildings will be permitted in the previously safeguarded area which has been amended to correspond to the Gatwick Airport Masterplan 2019. Draft Policy SD3 continues to state that minor extensions to Manor Royal will be permitted on the land outside the amended safeguarded area if they do not prejudice future comprehensive development within the NCAAP area.

My client objects to the areas of previously non-safeguarded land being included within the Draft NCAAP boundary. The Draft Local Plan is clear that there is no robust evidence to support the safeguarded area and as such Draft Policy GAT 2 has been deleted. Therefore, the Council are being inconsistent as on one hand they are stating there is no evidence for safeguarding for a second runway and on the other utilising the 2019 Masterplan boundary. There is no justification to have a boundary correlating to a wider safeguarded area when the safeguarding has been removed. Furthermore, Gatwick Airport are not actively progressing a second runway as identified in their 2019 Masterplan.

As currently drafted, the draft policy is not justified and contrary to the provisions of the NPPF. The draft policy could be updated so that the all land north of Manor Royal is within the NCAAP boundary but specifically state that small scale extensions north of Manor Royal may be considered in advance of the NCAAP if they can be demonstrated not to prejudice the wider NCAAP area. We consider this further in the next section.

Sustainable Economic Growth

The NPPF requires planning policies to help create the conditions in which businesses can invest, expand and adapt with significant weight to be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development (paragraph 80).

Paragraph 81 explains that planning policies should:

“a) set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth, having regard to Local Industrial Strategies and other local policies for economic development and regeneration;

b) set criteria, or identify strategic sites, for local and inward investment to match the strategy and to meet anticipated needs over the plan period;

c) seek to address potential barriers to investment, such as inadequate infrastructure, services or housing, or a poor environment; and

d) be flexible enough to accommodate needs not anticipated in the plan, allow for new and flexible working practices (such as live-work accommodation), and to enable a rapid response to changes in economic circumstances”.

The Northern West Sussex Economic Growth Assessment Update (“EGA”) (January 2020) sets out three specific employment growth forecasts that are considered through the Draft Local Plan.

The first of these is the ‘Baseline Labour Demand’ - projections of employment growth in the main Class B sectors (labour demand) derived from economic forecasts – provides a land requirement of -1.1ha.

The second is the ‘Past Development Rates’ – consideration of past trends in completions of employment space - this provides a requirement for 33ha of business land (143,990sqm), which is planned for through draft Policy EC1. Between 2011 and 2018 Crawley experienced gross annual completions of 15,100sqm per annum which forms the basis of this scenario. The majority of development has occurred in Manor Royal in recent years.

The third is the ‘Baseline Labour Supply’ - estimates of future growth of local labour supply based on demographic assumptions i.e. the housing target of 752 dwelling per annum – provides a forecast of 113ha business land (476,200sqm), which Policy EC1 commits to investigate further through the NCAAP.

The EGA recommends the Council consider accommodating the Past Development Rates requirement as a minimum and states that there could also be scope to plan to accommodate the higher level of economic growth associated with the Baseline Labour Supply.

As such, Draft Policy EC1 identifies that there is need for *“a total of 33 hectares (143,990sqm floorspace) new B-class business land in the borough. Opportunities for approximately 12ha (63,279sqm) are identified within the borough, resulting in an outstanding requirement of 21 hectares additional land (80,711sqm) for B-Class business uses over the Plan period to 2035.”* Adopting a low growth rationale based on previous development rates due to a historically constrained land supply is clearly planning for the bare minimum forecast need.

As identified in the Economic Case for Redevelopment enclosed at **Document 2**, the Draft Local Plan commits to delivering just over a third of the land that needs to be delivered to continue its past growth trajectory (c.12ha of the 33ha) and delivering less than 10% of its maximum potential demand based on labour supply projections. The Draft Local Plan fails to meet the requirements of the NPPF as it is not effective nor justified. The minimum level identified (33ha) is so substantially below the amount required to meet the Baseline Labour Supply scenario (113ha), that it may put at risk the future economic prosperity of Crawley, undermine the strength of the area as an employment hub and create unsustainable travel patterns.

The Sustainability Appraisal (SA) sets out the risks of failing to adopt a robust approach to employment land provision. The text below refers to a “do nothing” scenario, where no specific local employment land policy is in place and the NPPF is the default position:

“Without a locally specific strategy in place, the economic growth requirements of the borough and the wider sub-region cannot be pro-actively planned for or accommodated. This is particularly the case given Crawley’s constrained land supply, which necessitates a clear strategic vision and policy approach through the Local Plan in order to balance the conflicting needs of housing and employment provision, and plan positively to meet Crawley’s business land needs. Absence of a clear policy approach directing employment growth to the most appropriate locations for sustainable economic growth creates uncertainty as to how employment and housing needs will be accommodated. Without a clear local vision that places Crawley at the centre of the economic growth for the wider area, there is a risk that Crawley’s key economic function will be eroded, potentially impacting negatively upon the growth within Crawley and the wider Gatwick Diamond.” (Our emphasis)

Paragraph 9.23 of the Draft Local Plan states that should the NCAAP “confirm that less land is required for the future growth of the airport, resulting in a less constrained land supply position, the AAP will revisit the Baseline Labour Supply scenario (113ha business land requirement) to update and if necessary revise the business land requirement”.

The SA states that the proposed NCAAP solution would “allow for a continuation of Crawley’s supply-led approach in the early part of the Plan period, protecting the designated main employment areas for economic growth and supporting their intensification, whilst considering the scope for small scale extensions of Manor Royal to provide additional business-led employment land.” It continues state that the NCAAP will allow “a full assessment of the scope to accommodate the higher level of business growth”.

However, given the scale of the gap between what is proposed to be secured in the Draft Local Plan and the Baseline Labour Supply this approach leaves too much uncertainty about future provision. This uncertainty and risk of under-provision brings with it the precise risks that have been articulated by the SA with respect to a scenario that fails to pro-actively plan for growth in accordance with the NPPF.

In failing to secure even the bare minimum employment land need set out in its EGA the Draft Local Plan fails to meet the requirements of the NPPF. It fails to adequately account for the economic opportunities and risks facing the Borough; fails to plan for its full economic potential; and therefore fails to positively and proactively plan for sustainable economic growth. If the Council do not prepare the plan in a more positive manner this will result in an unsound plan.

To ensure the plan is proactive and is effective the ‘Baseline Labour Supply’ forecast of 113ha business land, which Policy EC1 commits to investigate further through the NCAAP, should be assessed as part of the Local Plan Review.

The Employment Land Trajectory identifies that only 11.53ha of employment floorspace (62,394sqm) can be provided within the Borough – which results in unmet need of 81,596sqm based on Draft Policy EC1 and 413,806sqm in the Baseline Labour Supply scenario. The importance of sustainable economic growth at is at the core of the NPPF, with planning policies helping to build a strong and competitive economy by ensuring

that the right type of land is readily available in the right areas to support innovation and improved productivity.

The delay in allowing growth south of Gatwick Airport is negatively impact upon growth prospects. The continued protection of this land does not accord requirements of the NPPF to reallocate land with no reasonable prospect of use under its current allocation via the revised Local Plan process for another use.

Paragraph 9.14 of the Draft Local Plan states that given its connectivity to Gatwick Airport, Manor Royal and existing transport links, land identified for the NCAAP represents the most appropriate location in which to explore opportunities to help accommodate Crawley's outstanding business land needs.

Manor Royal is a major contributor to the Crawley and West Sussex Economies and is central to the future economic prosperity of the Borough. The Draft Local Plan states that, *"Manor Royal will be seen as a premier business park, attracting sustained business investment that will deliver high value employment and higher levels of productivity and economic growth."* The continuing constraint on its growth and the uncertainty about how and when this constraint will be removed poses a significant threat to the sustainable growth of this employment area and the Borough's wider economy.

As detailed in the Economic Case for Redevelopment, the Site's scale sets it apart as it provides the opportunity to attract larger occupiers to the area, in addition to allowing existing operators with significant growth potential to stay in the area. Crawley currently only offers a handful of units larger than 100,000sqft. The scale of the Site also allows the opportunity to effectively masterplan and phase development to provide a range of unit sizes and typologies which could then satisfy a range of business needs and be responsive over time.

The Site is sustainably located immediately adjacent to the A23 which provides immediate access into Crawley, Gatwick Airport and the M23. The Site is surrounded by a network of footways, which are relatively wide and often set back from the carriageway by a grass verge. Bus stops are located within walking distance of the Site along the A23 and Fleming Way and provide access to several routes, including Gatwick Airport, which provides interchange opportunities with bus and rail modes. The Site would be accessed via an existing high-grade road (Hydehurst Lane) which is owned by the Landowners and currently serves units within Manor Royal.

As identified in the Call for Sites submission no on-site constraints to redevelopment have been identified which cannot be resolved. For example, a public right of way crosses the Site which could either be diverted or incorporated within the development options for the Site. Also, a number of existing utilities are present on Site, including overhead electricity transmission cables, which could either be avoided or diverted. Existing attenuation storage areas on Site would either be retained as part of the development or relocated elsewhere.

The Site represents a natural and logical extension to the adjoining the Manor Royal complementing its established role as the premier location for business floorspace within the Borough. The Site is the most

appropriate location north of Manor Royal to meet part of the Borough's significant unmet employment need.

As such, the Site should be released for development as part of the Draft Local Plan to meet some of the unmet employment need as an extension to Manor Royal. The Site should be removed from the Draft Policy SD3 policy boundary and included within the Manor Royal boundary under Draft Policy EC1 and the draft policy text amended accordingly.

This will assist in ensuring that Draft Local Plan has been proactively prepared and helps create the conditions in which businesses can invest, expand and adapt in and objectively assessed need can be met in accordance with the NPPF. In addition to assisting the Council in meeting its employment need, the redevelopment of the Site also has a number of economic benefits which are detailed in Section 5 of the Economic Case for Redevelopment.

Notwithstanding our position, should the Council continue to identify the Site as being within the boundary of the NCAAP our client will work with the Council to realise the redevelopment of the Site (subject to the amends detailed above with regards to Gatwick Airport and small scale extensions north of Manor Royal). However, it is our firm belief that the Council should, in order to meet its own development and policy aspirations as well as the requirements of the NPPF to proactively and positively plan for growth, release the Site for employment redevelopment as part of the Draft Local Plan. The Site has the potential to bring forward employment land at the scale, type and location that should place it as a high priority site for development and this should be reflected in the Draft Local Plan.

Western Relief Road

Draft Policy ST4 continues to provide for the safeguarding for a search corridor for a Crawley Western Link Road linking the A264 with the A23. Paragraph 16.27 states that the identification of the alignment for a Western Link Road will form part of the work on the NCAAP (Policy SD3).

We welcome the amended location of the Indicative Search Corridor Western Relief Road. As detailed in the previous section the Site is the most sensible location north of Manor Royal to provide much needed employment floorspace. As such, there needs to be a recognition that the new road does not compromise this important site and its location should be dealt with as part of the Draft Local Plan.

4 Conclusions

We welcome the deletion of Draft Policy GAT 2, however Gatwick Airport should not be offered greater time to demonstrate their growth needs through the NCAAP – the robust evidence needs to be provided as part of the Local Plan review. Draft Policy SD3 needs to be updated according.

There is a significant need for employment land in Crawley and as currently drafted the Draft Local Plan is unsound. The Site is the most appropriate location north of Manor Royal to meet the identified need and as such should be included within the Manor Royal allocation rather than the NCAAP. Draft Policy SD3 and Draft Policy EC1 should be updated according. Notwithstanding this if the Council continue to identify the Site as

being within the boundary of the NCAAP the amends proposed with regards to Gatwick Airport and small scale extensions north of Manor Royal need to be made.

We welcome the amended location of the Indicative Search Corridor Western Relief Road however its location should be dealt with as part of the Local Plan review process.

Yours faithfully

A handwritten signature in black ink, appearing to read "Philip Murphy".

Philip Murphy
Director

DOCUMENT 1

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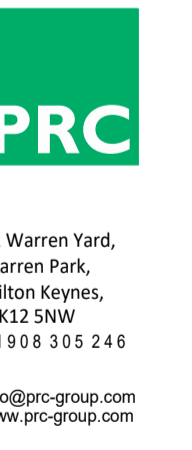
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Client:
APIF
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Project:
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CRAWLEY

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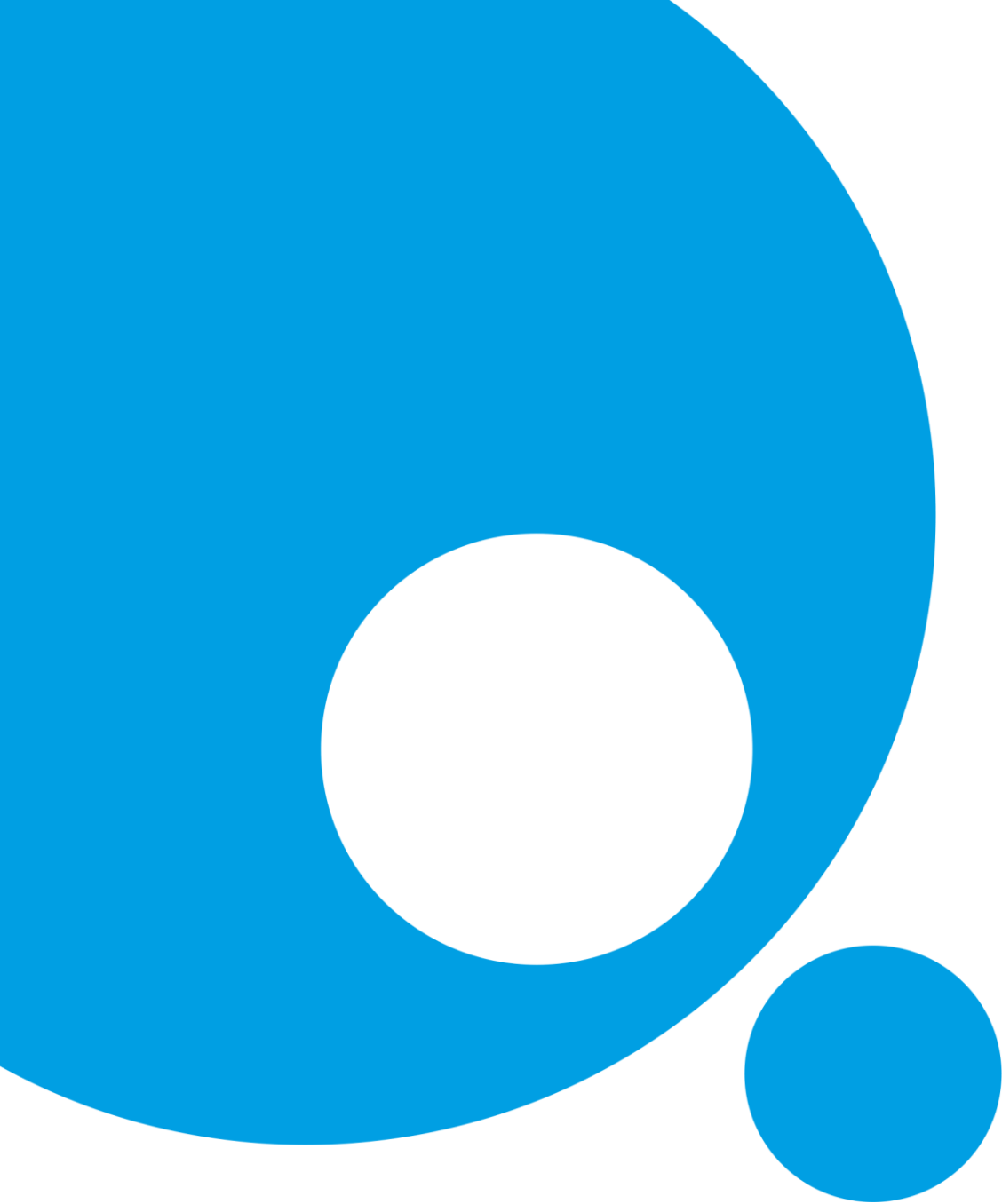
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Issue Status:
Construction Preliminary
Information Approval
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Planning
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Offices
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DOCUMENT 2



BARKER TRUST LAND, CRAWLEY

ECONOMIC CASE FOR REDEVELOPMENT

2 MARCH 2020

Quod
17 Broadwick Street, London, W1F 0DE

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1 Introduction

- 1.1 The National Planning Policy Framework requires planning policies and decisions to create the conditions in which businesses can invest, expand and adapt. As such, planning policies should “*set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth*”¹. In drafting its revised Local Plan, Crawley Borough Council (CBC) must follow these requirements and should take the opportunity to plan for growth. It should take advantage of its excellent labour and locational advantages and, in order to meet its aspirations for sustainability, it should remove the barrier of what the borough itself terms an “*uncertain business land supply position*”².
- 1.2 The Draft Local Plan commits to delivering just over a third of the land that needs to be delivered to continue its past growth trajectory and delivering less than 10% of its maximum potential demand based on labour supply projections³. The Local Plan fails to support development on land safeguarded for Gatwick’s expansion, even though it acknowledges that this will not now come forward. In delaying this decision to a further Area Action Plan and in failing to secure even the bare minimum employment land need set out in its Economic Growth Assessment, CBC’s Draft Local Plan fails to meet the requirements of the NPPF. It fails to adequately account for the economic opportunities and risks facing the borough, fails to plan for its full economic potential and therefore fails to positively and proactively plan for sustainable economic growth.
- 1.3 It also risks losing out on significant benefits of sites such as the Barker Trust Land (“The Site”) coming forward, including employment, GVA, business rates and construction expenditure. The Landowner’s aspirations for the Site include up to 800,000 sqft of B1a, B1c, B2 and/or B8 floorspace.
- 1.4 Delaying the allocation of adequate employment land until after the Local Plan process will foster market uncertainty. Firms seeking to grow, or improve the quality of their property, will have reduced options and will start to look elsewhere.
- 1.5 This Report sets out Crawley’s economic context and potential and how the inclusion of sites such as the Barker Trust Land in the Local Plan will deliver local and strategic economic benefits and will be essential to meeting local need and planning policy aspirations.
- 1.6 The Report is structured as follows:
- **Crawley Today:** sets the economic context for the Barker Trust Land (The Site) and Crawley, highlighting the potential for growth, as well as the risks the borough faces from failing to plan adequately for the future.
 - **Proposed Development:** sets out the potential for redevelopment at the Site
 - **The Benefits of Development:** sets out how delivery of the Site will bring about economic benefits including jobs, business rates and locally generated Gross Value Added (GVA).
 - **Conclusions.**

¹ MHCLG, 2019. National Planning Policy Framework Paragraphs 80-81

² Crawley Borough Council, 2020. Crawley 2035: Draft Crawley Borough Local Plan 2020 – 2035

³ Lichfields, 2020. Northern West Sussex EGA Update : Final Report, Table 10.5

2 Crawley today

Overview

- 2.1 Crawley has a strong economic track record. Jobs within the borough have increased by 30% over the last 20 years⁴. The borough has access to a highly skilled labour force within its travel to work area, excellent local, national and international travel links and is one of the most productive areas of the country⁵.
- 2.2 Crawley has benefited significantly from Gatwick Airport but the airport does not exert as much of an influence over the local commercial property market as it once did⁶. Crawley has successfully diversified its commercial base, driven by firms seeking more affordable rents outside London and by its prime location for internet retailers and domestic logistics including Amazon, DPD and DHL⁷. Crawley has recently witnessed substantial rental growth, which provides a barometer of occupational demand⁸.
- 2.3 Although the borough has many strategic strengths, there are some signs of economic weakness, and in the absence of a proactive plan for growth, these may become a threat to long term prosperity. There is a highly constrained employment land supply in the borough – a large proportion of the most suitable land is currently safeguarded for the expansion of Gatwick Airport. According to real estate advisors, DTRE, very few parcels of new land are being opened up for employment uses. Meanwhile the trend of losing employment land to permitted development and housing elsewhere, particularly in metropolitan areas such as Croydon, is expected to continue to exert pressure on those existing holdings in the wider South East – providing a continued opportunity for growth in Crawley⁹.
- 2.4 Crawley is one of the only cities in the South East to have experienced a decline in productivity between 2015 and 2018 – a time when productivity in Reading, London and Milton Keynes, for example, increased by more than £7,000 of additional GVA per year per worker¹⁰. While Crawley is well connected to a highly skilled workforce, the skills within the borough itself are below the national average and well behind other cities in the South East¹¹. At the same time, Crawley has an ageing stock of business space that will not meet the needs of its growing, modernising tenants (such as Amazon) without more investment. The majority of Crawley’s stock is more than 20 years old¹².
- 2.5 The Capital to Coast Strategic Economic Plan¹³ has set out its 2030 vision to be that:

[its] major urban centres – Brighton & Hove, Croydon and Crawley – will be ranked alongside the most productive places in the UK. Our successful towns will be on a path to greater prosperity, reversing the

⁴ Lichfields, 2020. Northern West Sussex EGA Update: Final Report, p.13

⁵ Centre for Cities, 2016. Economic Outlook 2016

⁶ Lichfields, 2020. Northern West Sussex EGA Update: Final Report, Paragraph 7.9

⁷ DTRE, 2020. Market Report.

⁸ DTRE, 2020. Market Report.

⁹ DTRE, 2020. Market Report.

¹⁰ Centre for Cities, Cities Data Tool, 2019

¹¹ ONS, 2019. Annual Population Survey 2018

¹² DTRE, 2020. Market Report.

¹³ Capital to Coast Local Enterprise Partnership, 2018. Strategic Economic Plan. p. 17

creeping trend of becoming dormitory towns for London, and building the facilities for growing businesses which bring high quality jobs to local people.

- 2.6 The evidence shows that positive and proactive planning, particularly in the delivery of employment floorspace, will be critical to achieving this aim and avoid falling productivity because of employment stock that fails to meet modern needs.

The Site

- 2.7 The Site is situated on Hydehurst Lane in Northgate ward. Part of the Site is currently safeguarded for the potential expansion of Gatwick Airport. This safeguarding is proposed to be reviewed through a forthcoming Area Action Plan, but is not being reviewed as part of the current Local Plan process.
- 2.8 The Site is bounded by the Manor Royal Industrial Estate to the south, which is one of the South East's leading mixed employment hubs and the largest business park in the "Gatwick Diamond"¹⁴. The area to the south of the Site is predominantly employment and hotel space. Overall, 29% of Crawley's employment is located in Manor Royal (28,000 jobs)¹⁵.
- 2.9 The Site has excellent national and international transport links via Gatwick Airport, the A23 and the M23, and Thameslink rail services.
- 2.10 It is well positioned to meet the main locational criteria of most Crawley occupiers. It is 4km and 5km from the South and North passenger terminals respectively and 7.4km from the Cargo Terminal. It has easy access to the motorway network with both Junction 9 and 10 of M23 within 6km. Access routes to the motorway are via main roads and through predominantly commercial areas with limited sensitivity from neighbouring uses such as residential¹⁶. If allocated, it has the potential to be the nearest new employment land to the airport.
- 2.11 Rail access via Three Bridges, Gatwick and Crawley railway stations offers direct links to Central London and Brighton taking less than an hour in each direction, as well as access to areas such as Luton and Reading. Public transport links within Crawley are also good with commuter use higher than in any other area of West Sussex.
- 2.12 The Site is within easy walking distance of local amenities, in particular County Oak Retail Park, just 500m from the Site. This will be attractive to modern occupiers who are highly conscious of staff wellbeing and being able to offer local shops and services close to work.
- 2.13 Manor Royal's 240 hectares include headquarters for Virgin Atlantic, CGG, Thales, Varian Medical Systems, Elekta, Vent-Axia, and Doosan Babcock Energy. The 2014 Northern West Sussex Economic Growth Assessment¹⁷ suggested that the Site was much better than alternative local redevelopment options. The 2020 update to this Assessment emphasises the importance of Manor Royal in terms of quality of offer and concentration of business including large corporate occupiers. However, it also has constraints including a shortage of B2 Use Class space (with supply not meeting demand), and very few

¹⁴ The Gatwick Diamond, the cluster of towns in East Surrey and West Sussex surrounding Gatwick airport, has a combined economy of £24 billion and 368,000 jobs (Capital to Coast Local Enterprise Partnership, 2018. Strategic Economic Plan. p. 10)

¹⁵ Lichfields, 2020. Northern West Sussex EGA Update : Final Report, para 3.27

¹⁶ DTRE, 2020. Market Report.

¹⁷ NLP, 2014. Northern West Sussex Economic Growth Assessment

new options for either very large (more than 100,000 sqft) or very small-scale industrial stock (less than 10,000 sq ft).

- 2.14 Manor Royal has been a focus of investment in recent years, including speculative investment indicating developer confidence. The Draft Local Plan states that, *“Manor Royal will continue to be the focus for business-led economic growth, and will be protected and promoted for B-Class and business-supporting uses, particularly through the re-use and intensification of existing sites¹⁸.”* However, having largely exhausted current supply, without a comprehensive plan for growth in place, the current land supply constraint *“raises questions regarding where the next strategic development opportunity will come from.¹⁹”*

Economic context

- 2.15 Crawley sits among the most productive and innovative regions in the UK, benefitting from high concentrations of economic activity and access to a highly skilled workforce. It has high workplace wages (in the top 10 of UK cities) and a very high ratio of private to public sector jobs (the highest in the UK). However, its relative level of productivity has fallen in recent years – from 9th most productive City in 2015, and above the national average, to 19th and below the national average in 2018²⁰ indicating that it is not keeping up with productivity gains elsewhere.
- 2.16 In its Draft Local Plan, Crawley recognises its strength and its regional role stating,
- “Crawley/Gatwick is the leading economic driver in the Gatwick Diamond, forming the economic heart of the Coast to Capital Local Enterprise Partnership area. The Local Plan seeks to protect and enhance Crawley’s role as a key economic driver. There is a strong demand from businesses wishing to locate in Crawley borough, and a significant requirement for additional land to accommodate B-Class business needs²¹.”*
- 2.17 According to the 2018 Business Register and Employment Survey (BRES), the largest sector in Crawley is transport and storage, accounting for 24% of total employment in the borough. Business administration, accounting for 18% of total employment in Crawley, is the next largest sector. Education and health sectors are underrepresented at about 10% of all employment (compared to 22% across the South East).
- 2.18 Between 2015 to 2018 the manufacturing sector grew by 56% against a backdrop of steady employment growth in the sector nationally. Manufacturing is concentrated mostly in computers and electronics. Construction (+50%), Business administration & support services (+31%) and Public administration & defence (+13%) also experienced growth.
- 2.19 The long-term trend of Crawley’s employment growth is set out in the chart from Lichfields/Oxford Economics below (Figure 1)²². This shows resilience through the 2008 recession and a very strong recovery thereafter. Growth has tailed off in the last two years.

¹⁸ Crawley Borough Council, 2020. Crawley 2035: Draft Crawley Borough Local Plan 2020 – 2035 para 9.12

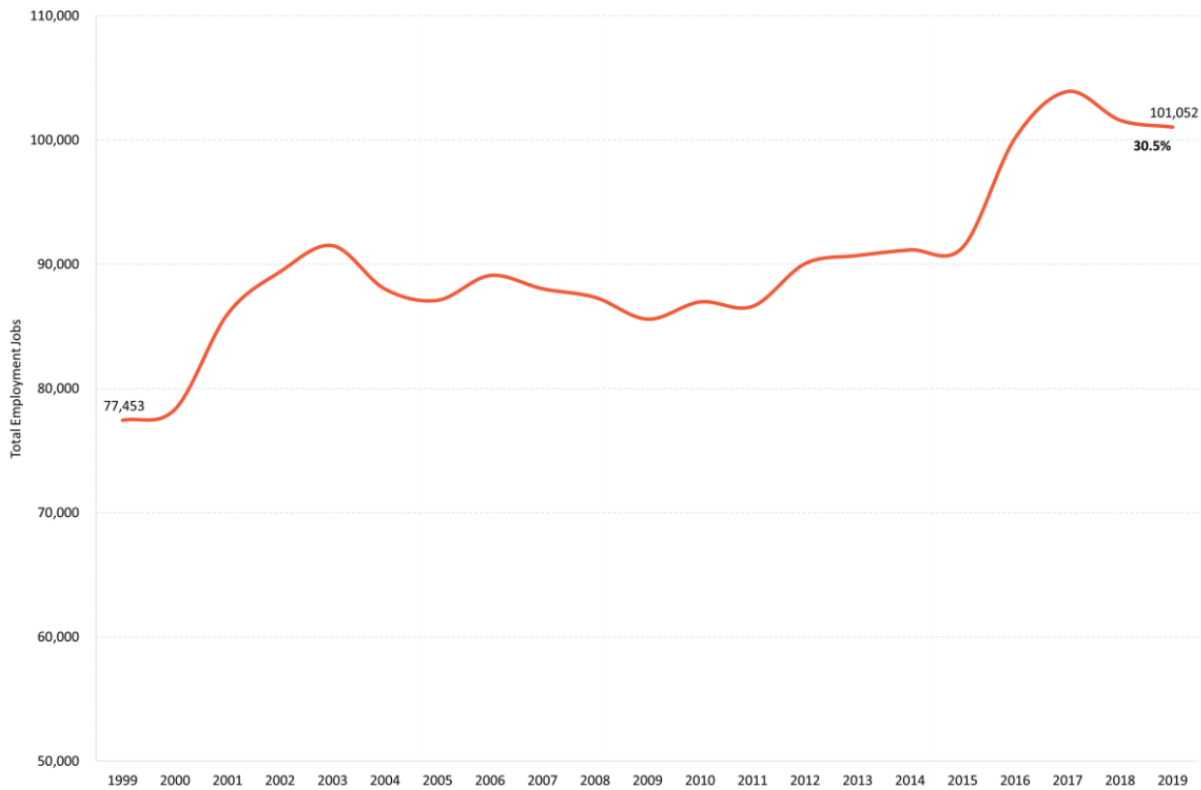
¹⁹ Lichfields, 2020. Northern West Sussex EGA Update : Final Report, pg 103

²⁰ Centre for Cities, 2020. Cities Data Tool

²¹ Crawley Borough Council, 2020. Crawley 2035: Draft Crawley Borough Local Plan 2020 – 2035 para 9.11

²² Lichfields, 2020. Northern West Sussex EGA Update : Final Report, Figure 3.3

Figure 1: Crawley Total Employment Jobs (1999-2019) taken from The North Western Sussex EGA



Source: Oxford Economics (2018) / Lichfields analysis

Labour Market

- 2.20 Crawley has a large, highly skilled and well-connected labour catchment area. Its travel to work area (TTWA) includes 600,000 people. A total of 43% of working aged (16-64) residents have Level 4 qualifications or above (degree or equivalent) – the average across the TTWAs in the UK is 34%. Managers, directors, senior officials or in professional occupations²³ account for 36% of working aged residents in the TTWA.
- 2.21 However, the Coast to Capital Local Enterprise Partnership identifies Crawley itself is an area with a relative weakness in skills²⁴. At the last Census, 22% of Crawley residents had a degree or equivalent qualification, compared to 30% across the South East.
- 2.22 Crawley and North West Sussex have very high self-containment rates at 65% and 60% respectively²⁵ (compared to 47% in Berkshire, for example)²⁶, while 40% of all employees in Crawley also live in the borough²⁷. Given the economic pull of London, this shows the potential of the Crawley economy and the potential for growth to benefit local residents. For example, the train links between London and Crawley, Royal Tunbridge Wells or Guildford are broadly similar but the propensity for workers to

²³ Annual Population Survey, 2019.

²⁴ Coast to Capital LEP, 2018. Strategic Economic Plan 2018-2030

²⁵ Proportion of working residents that work in the same area

²⁶ Lichfields, 2020. Northern West Sussex EGA Update: Final Report, para 3.33

²⁷ Census 2011. WU01UK - Location of usual residence and place of work by sex

travel to London is substantially lower in Crawley – at only 9% of workers, compared to 16% from Guildford and 19% from Tunbridge Wells²⁸. This means that growth here has the potential to benefit Crawley and Sussex residents. Median wages for both workers and residents are higher than the South East and national averages.

Role of Gatwick

- 2.23 Gatwick Airport is an integral component of national infrastructure, playing a major role in influencing the character of Crawley and the local area. There are 24,000 on-airport jobs and the airport also supports a substantial number through the wider aviation sector – and indirectly through companies that supply and serve the airport. Crawley does benefit from businesses servicing Gatwick Airport, notably Virgin Atlantic, Gate Gourmet (airline catering) and flight simulator occupiers such as Oxford Aviation Academy and CAE. Some spin-off demand will be generated by Gatwick’s continued growth. Expansion of Manor Royal, which is the closest employment hub to the airport is the prime location to ensure this potential is realised.
- 2.24 However, the role of Gatwick in driving demand for local business space is less important than it once was. This is acknowledged in the Economic Growth Assessment, as well as reported in local market analysis. Gatwick will continue to grow without an additional runway and Crawley should ensure the maximum benefit of the Gatwick’s growth is realised and retained locally. But demand for employment space in Crawley is expected to be driven by growth in the logistics and industrial occupiers requiring modern floorspace, size and design specifications and who want to be in Crawley for its excellent labour market, clusters and road connections, rather than specifically for Gatwick. Market analysis reports that Crawley is not as dependant on the airport for growth and demand as locations such as Heathrow²⁹. The Sustainability Appraisal of the Local Plan highlights that, *“The economic structure of the town is moving from one dominated by large scale airport related business to one where professional services are becoming increasingly strong³⁰.”*
- 2.25 At the same time, the Airport is no longer actively pursuing plans for an additional runway, although its current Masterplan is proposing significant growth through the use of its existing runway³¹. As such, the council does not consider there is robust evidence to justify the continued safeguarding of land for a further runway³².
- 2.26 In cases such as these, the NPPF states that planning policies and decisions need to reflect changes in the demand for land. Planning policies:

“[...] should be informed by regular reviews of both the land allocated for development in plans, and of land availability.

“Where the local planning authority considers there to be no reasonable prospect of an application coming forward for the use allocated in a plan:

²⁸ Census 2011. WU01UK - Location of usual residence and place of work by sex

²⁹ DTRE, 2020. Market Report.

³⁰ Crawley Borough Council, 2020. Sustainability Appraisal / Strategic Environmental Assessment p.5

³¹ Crawley Borough Council, 2020. Crawley 2035: Draft Crawley Borough Local Plan 2020 – 2035 para 3.18

³² Ibid.

*“a) they should, as part of plan updates, **reallocate the land for a more deliverable use that can help to address identified needs** (or, if appropriate, deallocate a site which is undeveloped); and*

b) in the interim, prior to updating the plan, applications for alternative uses on the land should be supported, where the proposed use would contribute to meeting an unmet need for development in the area” [Emphasis added.]³³

2.27 As such, the delay in allowing growth south of the airport is hitting growth prospects by protecting for longer land that will not come forward for another runway in the foreseeable future and putting a cap on the ability of Manor Royal to respond to any demand than may be generated as a result of either the airport’s planned growth. The failure to commit to the alternative use of this land is against the requirements of the NPPF to reallocate land with no reasonable prospect of use under its current allocation via the revised Local Plan process.

Role of employment land growth in Local Government Finance

2.28 Local authorities will currently retain 50% of the growth of business rates between 2013/14 and 2020/21³⁴. Crawley currently has a net business rates revenue for the financial year 2020-2021 of £5.3m. This makes up 38% of its General Fund Budget over the year.

2.29 The Government is currently trialling policies to allow Local Authorities to retain growth in business rates. Business Rates already play a key role in local government funding in Crawley. The wider roll out of business rates retention policies will both incentivise and increase the importance of local business floorspace growth and having a strong and growing business rates revenue – at both a Crawley and West Sussex level. Development will generate a significant amount of business rates – more detail on this set out in Section 4 of this Report.

³³ MHCLG, 2019. National Planning Policy Framework Paragraph 120.

³⁴ Less or including top-slicing, tariffs, top-ups, levies, safety nets and tier splits.

3 Planning for Growth

3.1 The economic vision for Crawley in its Draft Local Plan is to:

“Continue to be an economic leader meeting the needs of significant employers who are important to the overall prosperity of the region. A business environment that supports and encourages new and established businesses to grow and flourish will be developed, and supporting necessary infrastructure, including telecommunications, will be enhanced³⁵.”

“Crawley will be a modern, vibrant, healthy and sustainable town that stands proud of its achievements and uses its strengths to reach its potential³⁶.”

3.2 In policy EC1: The Council has committed to ensuring that all suitable opportunities within the borough are fully explored to allow existing and new businesses to grow and prosper by:

- Building upon and protecting the established role of Manor Royal as the key business location for Crawley.
- Ensuring that the town’s Main Employment Areas are the focus for sustainable economic growth.

3.3 This is further reiterated in policy EC3 which states that further development of the Manor Royal estate is prioritised by Crawley.

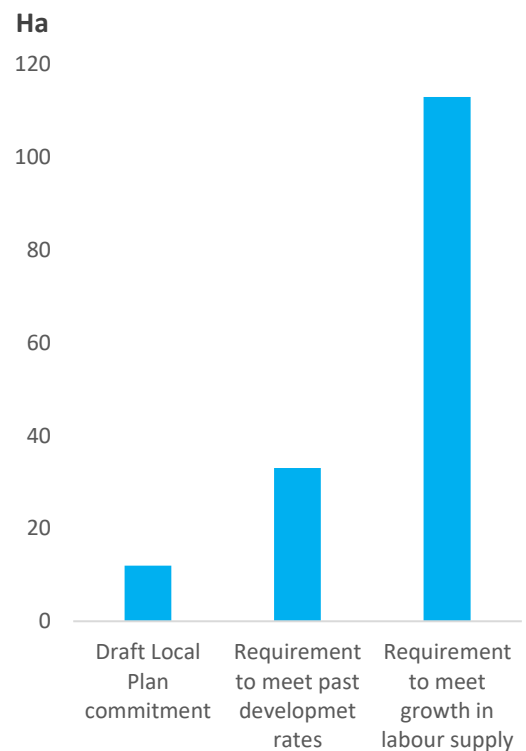
3.4 Despite these firm commitments, the Draft Local Plan secures only a third of the employment land needed to meet its “past development rates” growth scenario and only 10% of the land that could be required to meet demand associated with the potential growth of its labour supply³⁷. The chart to the right shows the extent of the disparity between what Crawley has committed to in its Draft Local Plan and what requirements have been identified in its Economic Growth Assessment.

3.5 The Economic Growth Assessment (EGA) identifies three growth scenarios:

- Baseline Job Growth
- Past Development
- Baseline Labour Supply.

3.6 The lowest of these is the *Baseline Job Growth Scenario*, which indicated a net loss in employment land requirement over the Plan Period to 2016. The EGA identifies that the baseline job growth scenario *“does not appear to provide a robust scenario for positively planning for future employment space*

Committed employment land vs need



³⁵ Lichfields, 2020. Northern West Sussex EGA Update : Final Report, p.17

³⁶ Lichfields, 2020. Northern West Sussex EGA Update : Final Report, p.17

³⁷ Lichfields, 2020. Northern West Sussex EGA Update : Final Report, Table 10.5

needs. It falls significantly below past job growth performance in Crawley and does not align with the more qualitative market intelligence captured in terms of drivers of demand³⁸.” Therefore this scenario is discounted by Litchfields and CBC.

3.7 The past development rates scenario identifies the need for a total of 33ha of new B-class employment land in the borough. Past delivery rates have already been constrained by the safeguarding of land for Gatwick – and projecting these delivery rates forward is “baking in” this constraint and falsely limiting both future need and future potential, especially when safeguarded land for Gatwick is released.

3.8 The EGA presents an alternative scenario which is based on the potential growth of labour supply in the North West Sussex, provided the borough meets its housing needs. Although Crawley is constrained in terms of available housing land too, and cannot meet its housing needs within its own boundaries, the local plan commits to meeting its needs in neighbouring boroughs through the duty to co-operate³⁹. Balancing growth in population with growth in jobs is part of a strategy for growth to remain sustainable, to retain the economic benefits of growth in the borough and to reduce the negative impacts of increases in commuting. The Local Plan, its Sustainability Appraisal and the NPPF require consideration of sustainable travel patterns as part of the strategy for growth⁴⁰.

3.9 The EGA concludes that,

*“The growth scenarios considered above indicate that projected population growth could be the most significant driver of economic growth in Crawley over the plan period, and that the market has demonstrated that appetite exists to deliver new employment floorspace (if sufficient space is made available). For this reason, it is recommended that the Council consider planning to accommodate the past take-up based requirement as a minimum, to enable historically strong levels of employment development to continue in the Borough over the new plan period. There could also be scope to plan to accommodate the higher level of economic growth associated with the baseline labour supply scenario [...]” [emphasis added]*⁴¹

3.10 The Draft Local Plan has identified areas for 12ha of employment land. There is an outstanding requirement of 21ha of additional land for B-Class business uses over the Plan period to 2036. The Draft Local Plan fails to even secure the bare minimum employment land requirement set out in its Economic Growth Assessment⁴² and demonstrably fails to meet its identified needs.

3.11 The importance of sustainable economic growth is at the core of the NPPF. Planning policies should help to build a strong and competitive economy by ensuring that the right type of land is readily available in the right areas to support innovation and improved productivity⁴³.

3.12 The NPPF also emphasizes the importance of creating conditions in which businesses can invest and thrive, allowing respective areas to build on strengths and counter weaknesses, stating that any

³⁸ Lichfields, 2020. Northern West Sussex EGA Update : Final Report, para 10.19

³⁹ Crawley Borough Council, 2020. Crawley 2035: Draft Crawley Borough Local Plan 2020 – 2035 para 1.23-1.29

⁴⁰ MHCLG, 2019. National Planning Policy Framework, Para 102-103; CBC, 2020. Draft Local Plan 2020-2035 chapter ST1; CBC, 2020. Sustainability Appraisal / Strategic Environmental Assessment Draft Report For The Submission Local Plan, p116

⁴¹ Ibid.

⁴² Lichfields, 2020. Northern West Sussex EGA Update : Final Report, Table 10.5

⁴³ MHCLG, 2019. National Planning Policy Framework. Section 6.

planning policy should present a clear economic vision which encourages growth and takes local industrial strategies, and economic development and regeneration policy into account.

- 3.13 Manor Royal is a major contributor to the Crawley and West Sussex Economies, employing more people than on-airport jobs at Gatwick (c 28,000 vs 24,000⁴⁴). It is central to the future economic prosperity of the borough – and this is heavily emphasized in both the Economic Growth Assessment and the Draft Local Plan. The Local Plan states that, “*Manor Royal will be seen as a premier business park, attracting sustained business investment that will deliver high value employment and higher levels of productivity and economic growth*”⁴⁵. The continuing constraint on its growth and the uncertainty about how and when this constraint will be removed poses a significant threat to the sustainable growth of this employment area and the borough economy.
- 3.14 The 2018-2031 Mid Sussex Economic Development Strategy also reiterates the need for the Crawley/Gatwick area to be the main focus for economic development, due to the current concentration of demand and the strength of the area as a business location, which would largely contribute to strategic employment growth⁴⁶.
- 3.15 The Council’s commitments in its Draft Local Plan do not live up to the emphasis that has been placed on Manor Royal at a local and strategic level, nor the importance of proactively planning for growth and economic sustainability that the NPPF requires.

⁴⁴ Lichfields, 2020. Northern West Sussex EGA Update : Final Report, para 3.27

⁴⁵ Crawley Borough Council, 2020. Crawley 2035: Draft Crawley Borough Local Plan 2020 – 2035, Crawley Vision page 17

⁴⁶ Mid Sussex Borough Council 2018. Mid Sussex Economic Development Strategy 2018-2031. p.11

4 Opportunity at the Site

4.1 The Landowner's aspirations for the Site are for between 700,000 sqft and 800,000 sqft of B1a, B1c, B2 and/or B8 uses. Market Analysts DTRE have prepared an assessment of the potential market and demand for development on this scale at this location, especially for large scale, modern properties. They report that Crawley and wider South London/M25 is suffering from a shortage of employment land. The Site provides the opportunity to release a significant single land holding (both in scale and type).

Potential Scale

4.2 The nearest available sites that could accommodate a single facility in excess of 100,000 sq ft are as follows (with distances from Crawley): -

- Prologis Park Beddington, Croydon - 23 miles
- Prologis Park, Weybridge - 32 miles
- Panattoni Park, Aylesford - 40 miles
- Nowhurst Business Park, Horsham - 10 miles

4.3 With the exception of Horsham, these opportunities will serve alternative markets – so there are no other current sites of this scale available in the right location to meet needs in Crawley and its catchment. The location and connectivity of the Horsham site is relatively poor in comparison – almost 10 miles from the M23.

4.4 The Site's scale sets it apart. It provides the opportunity to attract larger occupiers to the area and to allow existing operators with significant growth potential to stay in the area – in particular the booming growth industries of online retailing logistics. Crawley currently only offers a handful of units larger than 100,000 sq ft. The scale of the land holding will provide the town with a viable option to attract a larger Regional Distribution Centre (RDC) that can serve the Southern M25/ Home Counties/ South London area. This would represent a new offer for the borough, one that makes the most of its assets and location.

4.5 The scale of the Site also allows the opportunity to effectively masterplan and phase development to provide a range of unit sizes and typologies which could then satisfy a range of business needs and be responsive over time. There is the option for a mixture of speculative and built-to-suit solutions that may require bespoke elements. For example, DPD, Amazon and DHL all ideally require low-site density facilities that provide additional yard and car/van parking provisions. Larger facilities (alongside the potential for smaller units as well) will complement the existing Crawley stock.

Development type

4.6 Crawley has a strong presence of existing warehouse and industrial occupiers that will, over time, generate demand for occupation as they expand or require more modern facilities. DTRE reports that the majority of Crawley accommodation is 20 or 30 years old. Modern day operations have changed, and most businesses require improved, more efficient facilities that are able to accommodate the needs of modern logistics or manufacturing operations. Unit design therefore continues to evolve to accommodate occupiers' requirements and, especially if the market is focussed on logistics (which is experiencing very rapid levels of change and innovation), investment is continually required to keep the property offer up to standard.

- 4.7 The improvements in unit design and specification primarily relate to better yard and circulation areas, increased eave height and improved loading doors provisions. Increased height and cubic capacity are particularly pertinent. More occupiers are looking for properties that can accommodate either high level racking systems or mezzanine floors, ensuring the units are as cost effective as possible⁴⁷. Warehouse and logistics operations now often require an innovative mix of office, administrative and customer services space alongside more traditional warehousing space which can have a big impact on design requirements and specification⁴⁸.
- 4.8 Demand for warehouse accommodation is strong in Crawley, driven by excellent communication links and businesses need to service the immediate area and wider Southern Home Counties and South London. Demand is being driven by the changes in retail patterns and the continued move towards internet retailing, with the design and scale requirements associated with it. DTRE considers the Site would be very well suited to the warehouse and industrial market and would be of significant interest to business looking to locate in the area as well as existing companies looking to upgrade their accommodation.

⁴⁷ DTRE, 2020. Market Report.

⁴⁸ Prologis, 2015. Distribution Warehouses Deliver More Jobs

5 Economic Benefits of the Development

Direct Jobs

- 5.1 The Site could accommodate between 700,000 to 800,000 sqft of flexible B class floorspace. This could be delivered as office, light industrial or industrial manufacturing floorspace as well as storage & distribution functions, reflecting B1a/B1c/B2/B8 Use Classes.
- 5.2 Based on minimum and maximum employment densities as defined by the Homes and Communities Employment Densities Guide (2015), the Site could potentially support 840 jobs to 5,000 jobs.
- 5.3 This range is down to the flexibility in the level of floorspace that could come forward and the way the floorspace is occupied. The B class uses that could come forward at the Site vary in how they are occupied by employees based on the activity taking place. Offices are much more densely occupied (an average of 12 sqm NIA per employee) than other B class uses. Storage and distribution uses, however, dedicate a large proportion of space to storing materials with employees taking on more active roles across the site (an average of 77 sqm GEA per employee). Light industrial uses have a wide range, that falls between the two.
- 5.4 The range of jobs presented reflects a minimum and maximum scenario. The minimum scenario is based on the proposed 700,000 sqft being entirely occupied by B8 uses. The maximum arises from the larger proposed floorspace (800,000 sqft) being entirely occupied by B1a uses. It is most likely that any development delivered here would have a mix of these B class uses and therefore a full B1a or B8 scenario may be unlikely, however the full range is considered here for robustness.
- 5.5 A full breakdown of the employment accommodated by each use class for the two floorspaces proposed is outlined in the table below. Bolded figures reflect the minimum and maximum scenarios as outlined above.

Use Class	Jobs accommodated across 700,000 sqft	Jobs accommodated across 800,000 sqft
B1a	4,375	5,000 (maximum scenario)
B1c	1,115	1,275
B2	1,715	1,960
B8	845 (minimum scenario)	965

Making the most of existing infrastructure

- 5.6 The Site is already highly accessible by car and by public transport, with a high rate of employees using buses to access Manor Royal. Continued expansion here makes the best use of existing infrastructure and planned investment. In September 2017, Crawley was granted a substantial Local Growth Investment by the Coast to Capital Local Enterprise Partnership. This is to deliver:

“Sustainable transport infrastructure and highway upgrades planned to boost overall transport capacity and enable a significant shift from car usage to bus, rail, cycling and walking alternatives. In

addition, connectivity enhancements at the major railway station of Crawley, Three Bridges and Gatwick will greatly facilitate commuter access to Manor Royal and the town centre via sustainable transport connections.

“Crawley town centre and Manor Royal will be transformed to upgrade the quality of both the living and business environment to attract higher quality new jobs and homes. It will also be a catalyst for significant new Grade A commercial office space in the town centre’s ‘Eastern Gateway’ and for a new business and jobs growth hub⁴⁹”.

- 5.7 Maximising growth potential at Manor Royal will maximise the return on investment of these initiatives – and continued limits on the growth of Manor Royal will mean that the full potential of this investment will be a missed opportunity.

Gross Value Added

- 5.8 Employees would also generate economic output or gross value added (GVA). GVA is the value generated in the economy by economic activity – e.g. industrial activity.
- 5.9 GVA associated with B class jobs is based on GVA per workforce job estimates by region. The range of employees estimated to be accommodated on-site could make an economic contribution in terms of GVA of £43.5 million to £258.2 million per year (depending on how the floorspace is occupied)⁵⁰.

Business Rates

- 5.10 As set out above, payment of business rates provides critical revenue to the Crawley every year. Business rates are a tax on non-domestic properties. Rates are levied on business properties based on their rateable value and the national multiplier. The amount payable may then be subject to several reliefs or exemptions. Crawley retains a proportion of its Business Rates – with the remainder going to West Sussex County Council and central Government. Business rates retention policies will allow this revenue to be used for strategic expenditure, such as 5G and broadband connectivity.
- 5.11 Rateable values, which form the basis of Business Rates payable, vary by property use and location. A detailed analysis of the average rateable values for industrial and warehouse floorspace as well as office floorspace has been used to estimate the potential rateable value of the proposed B class floorspace.
- 5.12 Business Rates for the Site could be between £25 million and £60 million annually depending on how the floorspace is occupied.

Construction Activity

- 5.13 The development of the Site would generate employment within the construction sector. The Construction Industry Training Board (CITB) Labour Forecasting Tool⁵¹ provides an estimate of how many person-days would be generated as a result of the construction cost and projected duration by

⁴⁹ Coast to Capital LEP, 2017. <https://www.coast2capital.org.uk/media-centre/press-releases/coast-to-capital-agrees-14-64-million-for-significant-crawley-regeneration-programme.html> accessed 24.02.20

⁵⁰ Calculated based on GLA Economics GVA per Workforce by Region 1997-2015 (2017) – GVA per head in relevant occupations in the South East

⁵¹ Construction Industry Training Board (CITB). Labour Forecasting Tool (Accessed online by subscription: www.labourforecastingtool.com)

assessing the output of each occupation and trade within the construction sector. This figure has been used to estimate the quantum of construction employment (Full Time-Equivalent [FTE] jobs) generated by the development of the Site.

- 5.14 Given the flexibility of the proposed uses on-site the level of construction workforce appears as a range. This is due to the type of buildings required for the various uses proposed which would require a different workforce and construction programme to deliver.
- 5.15 It is estimated that there would be an average of 140 FTE to 570 FTE roles within the sector over the duration of an estimated construction period of 18 months to 24 months.

Capitalising on economic opportunities

- 5.16 As set out above, The Manor Royal Industrial Estate is recognised as one of the South East's leading mixed activity employment hubs and is the largest business park in the Gatwick Diamond area.
- 5.17 DTRE reports that, since 2001, London has reduced its stock of employment land by more than 1,310 hectares of industrial land, mostly for housing redevelopment. A significant proportion of employment land is projected to be redeveloped in Croydon and rental pressures are also pushing demand outwards. Given the direct transport links with Crawley, this is expected to have an impact on the local market with increased demand coming from South London.
- 5.18 It is also anticipated that some of the key local tenants (Amazon, DHL) will be seeking to expand locally within the Plan Period. CBC is not currently putting in place the planning policies that will ensure this growth and opportunity is captured locally.
- 5.19 Release of this Site will allow Crawley to diversify and modernise its offer, keep rents competitive by expanding supply and maintain its strong performance in current thriving sectors such as retail logistics, manufacturing and aviation.

6 Conclusion

- 6.1 Crawley Borough Council has committed to sustainable economic growth and prosperity for its residents and its businesses but its Draft Local Plan fails to secure the amount of employment land that its evidence base indicates will be required to achieve this.
- 6.2 In constraining its employment land commitments and in delaying the release of the Gatwick safeguarded land, the borough is creating uncertainty in the local market for employment which is likely to affect both the prices of existing stock and the investor confidence in planning for new sites.
- 6.3 Crawley has a strong economic foundation and its own evidence base as well as market intelligence demonstrates it has substantial potential for continued expansion into key growth sectors such as retailing logistics, as well as to capture continued growth associated with Gatwick. However, its stock is ageing and size ranges (including very large and very small sites) are currently limited compared to demand. Large sites (or more than 100,000 sqft) in particular are not currently available to meet potential needs.
- 6.4 Crawley should, in order to meet its own aspirations as well as the requirements of National planning policy, be proactively and positively planning for growth. Releasing land from safeguarding when it has no reasonable prospect of it being delivered as part of Gatwick's growth is an important step to meeting the borough's growth needs – and it should not be delayed. The Site has the potential to bring forward employment land at the scale, type and location that should place it as a high priority site for development and this should be reflected in the Local Plan.

Appendix 1:DTRE Market Report

PHASE II, BARKER TRUST LAND, HYDEHURST LANE, CRAWLEY

Prepared on behalf of Aberdeen Standard
By Dowley Turner Real Estate LLP

18 February 2020

Private and Confidential



1. Market Overview

1.1. National

Despite the absence of any clarity on the UK's future trading relationships with the EU and elsewhere the occupier market continued to perform well throughout 2019. Take-up reached c.29m sq ft and whilst it was down c.10% on 2018, it was the third best year ever recorded.

The most active occupiers in 2019 were third-party logistics providers (3PLs), who accounted for nearly 9m sq ft of take-up, c.30% of the market. This is no surprise as nervous retailers find it easier to commit to pallet positions in the short term versus a direct lease.

H2 2019 witnessed some significant larger voids removed from the supply statistics, notably: -

- Centric341, Andover (341,000 sq ft) let to Westcoast Holdings
- M6DC, Cannock (375,000 sq ft) let to Super Smart Services
- Unit 1, Imperial Park, Coventry (340,000 sq ft) let to US toy retailer Funko
- Thurrock 162, West Thurrock (162,000 sq ft) let to London City Bonds

Nearly 9.5m sq ft of speculative space was delivered into the market in 2019 and a further 4.3m sq ft is set to complete before the end of February 2020. Of that 4.3m sq ft, there are three 500,000-plus sq ft units; IM Properties at Hinckley (532,500 sq ft), Prologis at DIRFT (535,000 sq ft) and Panattoni at EMDC Castle Donnington (525,000 sq ft). Already in 2020, we have seen the letting of Haydock 525, a speculatively developed 525,000 sq ft warehouse let to Kellogg's and also The Range acquiring the former Poundland unit, Wakefield, c.546,000 sq ft. In addition to those transactions several large-scale buildings have been placed under offer. Amazon are under offer at Nottingham 550, 550,000 sq ft and Hinckley 532, 532,000 sq ft. They are looking closely at Bedford 405, 405,000 sq ft and therefore they could account for another c.1.5m sq ft of take-up in Q1 '20. Also, Mountpark Bardon have exchanged with Countryside for a pre-let of c.300,000 sq ft and IM Properties are under offer at Appleby Magna to fund JLR's 2.97m sq ft campus scheme, which will significantly boost 2020 take-up figures.

As a result of the wave of speculative development hitting the market in 2019, supply has increased over 12% since the end of 2018. Whilst the level of anticipated development has slowed for 2020, compared to 2018 and 2019, the increased level of supply is, in the short-term, likely to result in a slowing of rental growth. The East Midlands has the most notable increase in supply, however areas such as Greater London and the South East still have significant supply constraints.

The market has witnessed an upturn in sentiment following the result of the General Election. The clarity provided has enabled occupiers to more accurately business plan. As a result, we have witnessed business activating requirements which has seen enquiry levels and inspection numbers increase, which should translate into an increase in take-up.

1.2. Crawley

According to Co-Star figures the Crawley industrial / warehouse market has accommodation totalling approximately 6.9m sq ft.

Average take-up during 2012-2018 was 289,000 sq ft per annum, or 72,250 sq ft per quarter. These figures are off the backdrop of the area having no available land holdings that can accommodate facilities in excess of 75,000 sq ft. Since then St Modwen Park, Gatwick, a 10-acre site and the first opportunity that has been able to satisfy larger scale facilities, has already secured a 100,000 sq ft warehouse pre-let with Gatwick Airport.

There have been other notable transactions on speculatively developed accommodation in Crawley, as follows: -

- Unit 3, Space Gatwick - A new build 37,400 sq ft unit has recently been let to Amazon, to be utilised as a last mile delivery facility. This represents a new operation for the area. In addition, Unit 2, c.47,400 sq ft unit is also under offer. This would see the scheme full occupied.
- Unit 5, North Gatwick Gate - A new build c.50,000 sq ft was let on practical completion to Brymac. They were already based in Crawley and have expanded and upgraded their accommodation.
- Unit 1 Centron – New build, semi-detached unit was let to MEL Components in the Summer, at a rent reflecting £13.75 psf, exc.

Demand for Crawley warehouse accommodation is generated by several sources: -

- Communication links, M23 and M25
- Access and ability to service southern Home Counties and South London
- Critical mass of existing businesses
- Gatwick Airport

Increased demand is being witnessed from occupiers currently based within Greater London. Since 2001 London has lost more than 1,310 hectares (3,237 acres) of industrial land, mostly for housing redevelopment. The loss was most significant during the period 2010-2015, when c.40% occurred. In 2015 the southern sub-region had 1,202 ha of industrial land, however since 2006, the South of London region, inc Croydon, has lost 7% of its industrial land. The southern region, on current trends is forecasted to lose another 23 hectares (57 acres) by 2041. A significant proportion is due to be lost from Croydon Borough and given the direct transport links with Crawley this is likely to have an impact on the local market. We anticipate the market will continue to witness increased demand from businesses currently based in South London due to the loss of employment land and accommodation.

Additional demand from South London is being generated by the increase in occupational costs, in particular rents. New build accommodation in Croydon is attracting rents of c.£16 psf, exc, consequently Crawley has been viewed as a more cost-effective location.

We anticipate the trend of losing employment land, particularly in metropolitan areas, will continue to exert pressure on those existing holdings. Very few parcels of 'new' land are being opened up for employment uses. Most new schemes represent a redevelopment / upgrade of older, tired, obsolete employment stock, no longer suitable for modern occupiers' requirements. The consequence is these have minimal impact on the total supply of accommodation. We consider being able to promote 'new' land such as the subject site will assist in redressing the loss of employment land and release some of pressure on the supply of existing land and buildings.

Internet retailing is and will continue to have significant impact on the Crawley market, as it has with other similar towns. More occupiers, both end users and third-party logistics / parcel delivery companies, require 'last touch' facilities in close proximity to their customer base. Crawley is already witnessing demand for such facilities. Amazon, DHL and DPD have taken 'traditional' in the units in Crawley but all require bespoke facilities of c.50,000 – 100,000 sq ft, in the next few years.

Crawley has a strong presence of existing warehouse / industrial occupiers that will, over time, generate demand. This demand can be created by either a need to up or down-size, or because they require to upgrade / modernise their facilities. The majority of Crawley accommodation is over 20 / 30 years old. Modern day operations have changed, and most businesses require improved, more efficient facilities. Unit design has therefore evolved to accommodate occupiers' requirements. The improvements in unit design / specification primarily relate to better yard / circulation areas, increased eaves height and improved loading doors provisions. Increased eaves heights and a unit's cubic capacity is particularly pertinent given the increase in occupational costs. More occupiers are looking towards properties that can accommodate either high level racking systems or mezzanine floors, improving units' cost effectiveness.

Crawley benefits from businesses servicing Gatwick Airport, notably Virgin Atlantic, Gate Gourmet (airline catering) and flight simulator occupiers such as Oxford Aviation Academy and CAE. Whilst Gatwick Airport is the UK's second busiest airport, handling over 46m passengers last year, in relation to cargo volumes it only the UK's 4th busiest, behind Heathrow, East Midlands and Stansted airports. Many of the cargo / freight operators base themselves at Heathrow and trunk goods to Gatwick via the road network. Crawley therefore isn't a dependant on the airport as locations such as Heathrow.

At the end of H1 '19, vacancy only reflected 309,000 sq ft, which represents approx. 4.5% of all stock and approximately 1 year's supply.

The following schemes completed in H2 '19: -

- North Gatwick Gateway – Consists of 5 units, totalling 168,700 sq ft. One unit of c.50,000 sq ft has already been let, therefore available units' range in size from 20,600 – 41,500 sq ft, total c.120,000 sq ft and are available on new FRI leases, quoting £13.75 psf, exc.
- Gatwick 33 – The detached, new build unit extends to c.33,250 sq ft and is situated in close proximity to the subject site. The unit benefits from frontage on to the A23, London Road and consequently they are targeting occupiers that will benefit from the visibility. Quoting rent £15 psf, exc.

In addition to those completions highlighted at St Modwen Park Gatwick the business plan is to speculatively develop a unit of c.83,000 sq ft which will be ready for occupation in Q4 '20. We anticipate this will attract strong occupier interest as the market has been starved of available units in excess of 75,000 sq ft. We are aware they are in discussions with several parties including DHL.

The Crawley market witnessed several schemes achieving practical completion during 2018 / 19 and the majority provided units from 20,000 – 50,000 sq ft. In the short term this did create a slight over-supply of accommodation.

Crawley has recently witnessed substantial rental growth, which provides a barometer of occupational demand. In 2016 Baker & Stonehouse acquired Gatwick 55 a new building detached warehouse / industrial unit of 55,000 sq ft and paid a rent of £10.50 psf, exc. Baker & Stonehouse relocated from south London. In December '19 Brymac acquired 50,000 sq ft at North Gatwick Gateway at £13.75 psf, exc, which demonstrates a c.30% increase over approximately 3 years.

The spike in rents, together with the supply levels, may have contributed a slightly longer than expect letting void at Space, Gatwick. Local occupiers haven't previously witnessed the current rental levels and it has taken an extended period of time for these to be accepted as the market level / norm by the Crawley based occupiers. This is however changing as demonstrated by Brymec and MEL Components both committing to new build units at rents of c.£13.75 psf, exc.

2. Subject Site

2.1 Scale

The Crawley and wider South London / M25 is suffering from a shortage of employment land. The subject site provides an opportunity to release a significant single holding that could create c.600,000 – 700,000 sq ft of new accommodation and also include larger scale facilities. The nearest sites that can accommodate a single facility in excess of 100,000 sq ft is as follows: -

Prologis Park Beddington, Croydon	-	23 miles
Prologis Park, Weybridge	-	32 miles
Panattoni Park, Aylesford	-	40 miles
Nowhurst Business Park, Horsham	-	10 miles

With the exception of Horsham, these opportunities are situated in different markets and will be servicing alternative areas. The location of the Horsham site is inferior. It's position is somewhat remote, it is almost 10 miles from the M23 and the distance from Gatwick means it is unlikely to support an airport related operation.

The site's scale has significance. It provides the opportunity to attract larger occupiers to the area. Crawley only currently support a handful of units larger than 100,000 sq ft. The scale of the land holding will provide the town a viable option to attract a larger RDC (Regional Distribution Centre) that can service the Southern M25, Home Counties and south London. These would represent new operations to the town and would generate new employment. The site's scale allows the opportunity to be effectively master planned, ensuring the site will provide units which are being demanded by a range of business sizes and types. Being able to accommodate larger facilities will complement the existing Crawley stock.

Given the overall size of the Crawley market and the average take-up figures we expect the subject site will be developed in phases. We anticipate the scheme will initially provide an element of speculatively development, the remainder will be promoted for larger, build to suit facilities that may require bespoke elements. For example, DPD, Amazon and DHL all ideally require low-site density facilities that provide additional yard and car / van parking provisions. Further phases of speculative development will be shaped by the initial successes achieved on a speculative or pre-let basis.

2.2 Location / Situation

The site is situated on the edge of Crawley's main employment zone, Manor Royal Business Park. The Park is home to the majority of the town's warehouse / industrial properties and subsequently businesses. Notable occupiers include Royal Mail (regional sorting hub), Tesco (home delivery facility), Thales, Virgin Atlantic and Caterham.

The site's is well positioned to meet the main locational criteria for the majority of Crawley occupiers. It benefits from close proximity to Gatwick Airport, c.2.5 and c.3.2miles from the South and North passenger terminals and c.4.6miles from the Cargo Terminal. It also has easy access to the motorway network with the M23 at junctions 10 and 9, being within 2.8 and 4.6 miles respectively. It would be the nearest employment land released to the airport. Access routes to the motorway is via main roads and commercial areas.

The site is within easy walking distance of local amenities, in particular County Oak Retail Park, which is approximately 0.6 miles from the site. This will be attractive to occupiers who are conscious of staff wellbeing and being able to offer amenity within close proximity.

3. Requirements

We are currently aware of the following active industrial / warehouse requirements in the Crawley market: -

- DHL Trade Team – 100,000 sq ft - Requirement with a large yard area for external storage
- DHL Express – 50-100,000 sq ft – Parcel delivery depot
- Amazon – 100,0000 sq ft – Last mile delivery depot
- Creative Technology – 100,000 sq ft - New HQ facility. Based in Horsham, want to remain in the area.
- Hermes – 30-70,000 sq ft - Low site density parcel delivery company.
- Nyetimber – 80-150,000 sq ft - Drinks' distribution facility.
- DPD – 60,000 sq ft - Low site density parcel delivery facility. Have two current requirements, one for Crawley and a south London / M25 area which they are struggling to satisfy.
- Arco Aero – c.100-150,000 sq ft - Based north of Gatwick, looking to rationalise operation and upgrade into more suitable premises.
- Restore – 80-100,000 sq ft - Based in 4 units in Redhill, want to relocate operation into a single facility.
- Trenchard Aviation – 50,000 sq ft - Have facilities in Crawley and Worthing and looking to house in a single facility.

The is not an exhaustive list, but it does demonstrate c.1m sq ft of demand. It focuses on larger scale requirements where build to suit solutions maybe considered.

4. Conclusion

The warehouse / industrial market is suffering from a shortfall in available land. This is particularly acute in the south London / M25 area as well as well-connected locations in the Southern Home Counties.

Demand for warehouse accommodation is strong in Crawley, driven by excellent communication links and businesses need to service the immediate area and wider Southern Home Counties and South London. Demand is also being driven by the changes in retail patterns and the continued move towards internet retailing. Crawley also has the added benefit of being the major employment hub on the Southern M25, complimented by the existence of Gatwick Airport which has created a critical mass of occupiers.

The site has excellent characteristics to be brought forward as an employment scheme, being situated on the edge of Manor Royal Business Park and benefiting from excellent links to the motorway network and Gatwick Airport. The scale of opportunity will also provide an opportunity to create larger scale unit that will complement the existing Crawley stock.

We consider the site would be very well received by warehouse / industrial market and would be of significant interest to businesses looking to locate in the area, as well as existing companies looking to upgrade their current accommodation.