



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
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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: Policy EC1

Other:

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

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

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

1.0 Introduction

Background

- 1.1 This representation is submitted on behalf of The Wilky Group (TWG or Wilky), which has a long-standing interest in the promotion of strategic employment land within the Crawley Borough Council (CBC) area. It relates to Chapter 9, Economic Growth, and specifically Policy EC1, Sustainable Economic Growth in the draft Crawley Borough Local Plan, 2020 (DCBLP).
- 1.2 TWG owns about 63.3 ha (149 acres) of land east of Gatwick Airport and north and south of the M23 spur road between Junctions 9 and 9a. The land south of the M23 spur road is being promoted by TWG as a strategic employment opportunity known as Gatwick Green (the Site).

The Site is identified on the plan at **Appendix 1**, which shows the extent of the Gatwick Green opportunity, comprising about 59 ha (146 acres). TWG owns about 47 ha (116 acres) of land within the Gatwick Green opportunity; about 80% of the Site – the extent of land owned by Wilky is shown on the plan at **Appendix 1**.

- 1.3 Wilky and Aberdeen Standard Investments are discussing how they can work together in respect of Wilky's strategic landholding adjacent to Gatwick Airport to bring forward an integrated mixed-use development and co-ordinated infrastructure solution.

Executive Summary

- 1.4 TWG has submitted substantive representations on the DCBLP in relation to its land interests east of Gatwick Airport and Balcombe Road to the north of Crawley (59 ha). Its case is primarily concerned with the approach in the DCBLP to safeguarding land for future growth of the airport, the proposal to designate the formerly safeguarded land for the North Crawley AAP and the short and long term approach to identifying land for strategic employment contained in Policies EC1 (Sustainable Economic Growth) and SD3 (North Crawley AAP).
- 1.5 TWG considers that there is no legal or national policy basis to safeguard land for a second runway at Gatwick and consequently the unmet planning and socio-economic needs of the Borough can be accommodated through the identification of land. Runway capacity has been provided for at Heathrow to meet forecast demand, alongside the expansion of other airports based on their existing runway infrastructure. National policy on aviation and airports therefore no longer requires any safeguarding at Gatwick, so TWG fully supports the removal of blanket safeguarding in the DCBLP.
- 1.6 The NPPF requires Local planning Authorities to place significant weight on supporting sustainable economic growth by, *inter alia*, identifying strategic sites for inward investment to accommodate business needs and wider opportunities. Regional and sub-regional economic policy support focusing growth at Crawley/Gatwick in recognition of the area's current role and future potential. Importantly, the evidence base for the Local Industrial Strategy, which planning policy should reflect, supports the identification of major economic development adjacent to Gatwick, identifying land east of the Airport in this regard.
- 1.7 TWG supports the policy to identify land for strategic employment and other needs via an AAP for north Crawley, but has put forward evidence that the unmet economic needs of the Borough are higher than noted in policy. In recognition of this and having regard to the removal of blanket safeguarding, evidence has been put forward to support the identification of Gatwick Green for strategic employment to meet the long-standing and urgent unmet needs of the area. Gatwick Green is immediately available to address the short term shortfall of employment land.

Policy EC1

- 1.8 Policy EC1 of the DCBLP sets out the Council's approach to planning for sustainable economic growth by acknowledging Crawley's key role in the Gatwick Diamond; the short term requirement for 33 ha of land for B-class uses against a supply of 12 ha; identifying Manor Royal as the key business location in Crawley; identifying the Main Employment Areas for economic growth and redevelopment for employment; supporting small-scale extensions to Manor Royal; working with neighbouring authorities to accommodate Crawley's unmet business land needs, and addressing further employment growth including the scope for Strategic Employment Locations (SELs) through the North Crawley Area Action Plan (AAP) under Policy SD3.
- 1.9 TWG broadly supports Policy SD3 and the designation of the North Crawley AAP area as a means to address the proper planning and socio-economic needs of Crawley alongside any legitimate and robust long terms needs of the Airport. It is considered that this approach has a number of advantages, although it would result in some negative aspects arising from the further delay in resolving the long standing economic and community needs of the Borough. The decision to defer these matters to a separate AAP does not mean that the key policy on economic growth in the DCBLP (EC1) should be based on a narrow and unsound assessment of the Borough's economic needs to 2035. Rather, Policy EC1 must identify the full extent of those economic requirements and the means by which they are to be addressed. Policy EC1 falls short of these requirements – consequently, it is considered that in relation to this matter, the policy is not sound against the tests of soundness set out at paragraph 35 of the National Planning Policy Framework (NPPF).
- 1.10 The issue of when and by what means land should be allocated for strategic employment is a matter that was addressed by the previous Local Plan Inspector, who recommended an early review of the current Plan to address employment need: TWG supports the AAP approach, but also recognises that it has some negative consequences, so on this basis, the evidence in support of the allocation of Gatwick Green is presented as part of this representation. The evidence will also be relevant in the event that the approach proposed by SD3 is not followed and the issue of whether to continue safeguarding or alternatively allocate land for other uses becomes relevant as part of the Examination.
- 1.11 This representation therefore sets out the evidence in support of the above position, with reference to existing regional and sub-regional policy and studies and a review of the Council's North West Sussex Economic Growth Assessment (EGA¹). Evidence is also put forward to demonstrate that the regional/sub-regional demand for strategic employment floorspace and economic infrastructure is far greater than identified in the Council's geographically-limited EGA.
- 1.12 The representation will therefore outline the significant and acknowledged demand for employment floorspace in the Crawley/Gatwick area at the 'Heart of the Gatwick Diamond', and the variable quality of existing building/land stock to meet the identified demand. The case is also

¹ North West Sussex EGA Update, Final Report, Lichfields for Crawley BC, January 2020

made for such provision to be in the form of high-quality and flexible employment development for B8/B1/B2//C1 and related uses in a high density masterplanned business quarter that is connected by multiple modes of sustainable transport on land east of Gatwick Airport known as Gatwick Green.

- 1.13 National planning policy and guidance requires that CBC must plan positively to address its economic needs and that this is critical to achieving a Local Plan that is sound. The representation will set out why Policy EC1 is not considered to be sound with regard to the requirement for employment land such that it is not in accordance with the four soundness tests contained in the NPPF (para 35).

2.0 National policy & guidance on economic development

- 2.1 The NPPF (February 2019) notes that local planning authorities should place significant weight on supporting economic growth and productivity taking account of local business needs and wider opportunities for development. Policies should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future. In particular, areas with high levels of productivity should be allowed to capitalise on their potential so that Britain can be a global leader in innovation: driving productivity improvements is the core vision contained in the Government's Industrial Strategy². The NPPF goes on to require planning policies to proactively and positively encourage sustainable economic growth with regard to Local Industrial Strategies (LISs); identify strategic sites for inward investment; address any barriers to investment, and incorporate flexibility to accommodate needs not articulated in the plan. Also highlighted is the need to plan for storage and distribution uses and take account of their specific locational requirements (paras 80-82).
- 2.2 Government guidance on providing for economic development needs is set out in Planning Practice Guidance (PPG - 025 Ref IDs: 2a-025-20190220 to 2a-032-20190722). To ensure robust evidence on business needs, local authorities should liaise closely with the business community and take account of Local Industrial Strategies (LISs). Councils should take a 'best fit' Functional Economic Market Area (FEMA) and then assess the existing employment land stock; the pattern of land supply and loss; evidence of market demand from local data, market intelligence, surveys of business needs, discussions with developers / agents and evidence from business forums; wider market signals on growth, diversification and innovation, and any evidence of market failure. Above all, this requires close liaison with the business community to understand current and future requirements.
- 2.3 In relation to market signals, PPG states that Councils need to look at current and robust data on labour demand (jobs/employment forecasts), labour supply (demographically derived forecasts of the economically active population, i.e. future employees); the trends in take-up of employment

² Industrial Strategy: Building a Britain fit for the future, HM Government, 2017

land; future property market requirements, and consultation with relevant organisations and study business trends, models and employment statistics, taking account of longer term economic cycles. This work will reveal any quantitative or qualitative mismatches in demand and supply and which market segments are under or over-supplied. Council's should look at a range of robust data to understand the requirements for office, general business and distribution space and which market segments are over/under supplied.

- 2.4 PPG contains specific guidance on the needs of the logistics sector given its role in the efficient supply of goods, and therefore economic productivity which is a key part of the UK Industrial Strategy. It goes on to note that strategic logistics facilities need significant amounts of land with access to strategic transport networks and that where a need exists, Councils should collaborate with infrastructure providers and other interested parties to identify the scale of need. Likewise, Councils need to understand the needs of specialist or new sectors including through clustering of certain industries to support collaboration, innovation, productivity and sustainability.
- 2.5 Overall therefore, the NPPF and PPG require that plan-making authorities must address their economic needs in their local plans, which requires an overriding strategy on how and where those needs are to be met. This is critical to achieving a Plan that is sound in accordance with the tests in the NPPF (para 35). The adopted CBLP contains an Area of Search for Strategic Employment Locations (SELS) south and east of Gatwick, an area that now proposed for the North Crawley AAP. TWG's separate representations on safeguarding (Chapter 10) note that there is no longer any national aviation policy requiring land to be safeguarded at Gatwick. In this context, CBC must prioritise planning to meet the urgent and critical need for strategic employment land and other uses in order to address the pressing and immediate economic needs of the area and its residents.
- 2.6 In the context of the above policy and guidance, it is considered that the Council's overall approach to identifying future economic needs based on the North West Sussex Economic Growth Assessment (EGA) falls short of what is required. The geography of the EGA is limited to North West Sussex, when national policy and guidance and all the regional and sub-regional studies emphasise the need for a wider assessment covering the Crawley/Gatwick sub-area traversing parts of north West Sussex and south east Surrey. Evidence in this representation also points to an under-assessment of future land and floorspace needs that is at variance with the ambitious economic objectives for the Crawley/Gatwick area and with the findings of Savills' economic market analysis undertaken for TWG. This representation sets out the extent of these concerns that need to be addressed if the EGA is to form a sound basis for informing the DCBLP.

3.0 Regional Policy and Infrastructure

- 3.1 An assessment of the demand for employment land and floorspace in the wider Crawley/Gatwick area requires a clear understanding of the regional and sub-regional economic and infrastructure

policy context. These policies all point directly to the rationale for, and potential of, concentrating a significant level of economic activity in the wider Crawley/Gatwick area, taking advantage of its existing strengths and potential to build on these through sustainable economic growth. This policy cannot be realised without significant provision of integrated economic infrastructure: employment land, community transport, highways, transport interconnections, broadband, education, housing and leisure.

3.2 A review of the relevant regional and sub-regional studies and policy documents is contained at **Appendix 2**. The core strategies and policy recommendations in these documents are summaries below.

- **The Gatwick Diamond Initiative : Local Strategic Statement (LSS, 2012³)** – This states that the primary focus for new business development will be in the areas around Gatwick, combined with transport investment in the Crawley/Gatwick regional hub. The Gatwick Diamond authorities have committed to work together to deliver the objectives of the LSS – joint working between the West Sussex and Surrey members has been limited in this regard.
- **Coast to Capital Strategic Economic Plan (SEP, 2018⁴)** – This identifies Gatwick Airport as the driver of, and location for, economic growth given its place at the geographical and economic heart of the region. The Airport is the beating heart of business in the region and *“central to our plans to unlock future productivity and prosperity for our area as a whole”*. Delivering priorities at Crawley/Gatwick will therefore require land for growth and development linked to private-public investment in infrastructure. Business parks at Horsham, Burgess Hill and Horley will not be sufficient to meet future needs and in terms of capacity are significantly behind many other parts of the South East.
- **Coast to Capital Local Industrial Strategy (LIS)** – The LEP has released a suite of evidence base documents, two of which (the Commercial Property Study (CPS) and the Daft Economic Profile (DEP))^{5 6} contains a number of key findings and recommendations (Savills emphasis):
 - There is demand for office and industrial space across the region and vacancy rates are low – addressing barriers to new development could enable growth and diversification in the business base (DEP, page 104, (4)).
 - The region suffers from a lack of high-quality office and industrial space, which reduces its ability to expand and attract higher value business, which in turn may be holding back the economy (DEP, page 105, (6)).

³ Gatwick Diamond Local Strategic Statement, Gatwick Diamond Local Authorities [excluding Tandridge DC], March 2012

⁴ Gatwick 360° The Coast to Capital Strategic Economic Plan 2018-2030, Coast to Capital LEP, 2018

⁵ Coast to Capital Commercial Property Study, Hatch Regeneris, December 2019

⁶ Coast to Capital Local Industrial Strategy, Draft Economic Profile, Hatch Regeneris, September 2019

- The limited clusters of business activity in the region have not been acknowledged and there has been little to no development of business parks or clusters over the last thirty years – this lack of critical mass of related activities limits the benefits of agglomeration (DEP, page 104, (6)).
- R&D development in the regional has occurred in an ad hoc way leading to a relatively low amount of external public or private investment (DEP, page 104, (7)).
- Other areas (e.g. Thames Valley and Manchester) extract more value and investment from their international airports and supply chains (DEP, page 104, (8)).
- The forecast demand for office space around Crawley/Gatwick is around 1.1 M to 3.2 M sq ft to 2050 (CPS, para 7.42) and for industrial/warehousing space between 118,000 sq ft and 254,000 sq ft annually (CPS, para 7.55).
- The biggest challenge facing the Gatwick Diamond is the lack of land for development, restricting the ability of large occupiers to find appropriate space (CPS, para 7.50).
- Demand is strong for industrial space, especially for 'last mile delivery' warehousing – evidence suggests that Crawley and Gatwick with their excellent transport links are well placed to meet this demand, which is outweighing supply (CPS, para 7.54).
- Of the land safeguarded for the second runway at Gatwick, sites comprising c 150 ha represent an excellent opportunity for employment development with potential for public transport connections – this could meet demand for commercial space (CPS, para 7.51).
- Gatwick Airport represents a significant driver for development going forward – land east of the Airport would be well-positioned to capture a significant proportion of this demand given its location close to the Airport (CPS, para 7.55).
- The opportunity for a wider Airport City concept around Crawley/Gatwick has been identified to capitalise on the area's proximity to the Airport, Manor Royal and Crawley town centre (CPS, para 10.7).

Recommendation 3 of the CPS is to actively support and drive forward the Gatwick Airport City Aspirations, noting that this initiative represents the biggest opportunity to increase the quantum and quality of commercial space in the region, whilst diversifying the property offer to drive agglomeration, economic growth and productivity (para 10.7). The CPS goes on to suggest some actions or interventions to help facilitate development, including providing resources to support the opportunity; options for an Enterprise Zone; a Development Corporation, and public funding for infrastructure and discussions with Government to garner support (para 10.9). Paragraph 10.10 of the CPS concludes that these ambitions should feature prominently in the Local Industrial Strategy (LIS) alongside discussions with Government to signal to local authorities, stakeholders and decision-makers that this key project could transform the prosperity of the region and should be supported.

- **West Sussex Economic Growth Plan (2018⁷)** - The EGP identifies five priority themes, the second of which is to maximise the opportunities from Gatwick by creating and supporting higher value employment in a wide zone of opportunity around the Airport.
- **Gatwick's Economic Contribution Through Trade and Investment (2018⁸)** – Acknowledges the importance of the Airport in facilitating international trade and investment and attracting clusters of high-value industries within the Gatwick Diamond area including sectors that depend upon cargo and passenger services.
- **Gatwick Growth Board Connectivity Study (2017⁹)** – This identifies a range of major improvements to the transport network in the Gatwick area to serve the ongoing expansion of the Airport and by implication could also serve wider economic growth from major employment development.
- **TfSE Economic Connectivity Review (2018¹⁰)** – Proposes focusing transport investment at economic hubs, industrial clusters, international gateways and regional growth centres.

3.3 A common theme amongst these studies / strategies is a spatial strategy that includes a focus on growth and transport investment in the Crawley/Gatwick area, recognising the potential to take advantage of close proximity to the Airport (the UK's second largest) and land within the safeguarded area for the second runway that could be utilised for this purpose.

3.4 At a sub-regional level, the focus from all past and the current studies is that the Gatwick/Crawley area at the 'Heart of the Gatwick Diamond' represents a major strength in the regional economy, but one that is underperforming and underutilised in terms of its potential to raise the economic value of the area to a level similar to that in East Surrey or Berkshire. The regional and sub-regional/County studies all single out the Crawley/Gatwick area for major growth and strategic mixed-use employment development and transport infrastructure investment.

3.5 Of significance, the evidence base for the LIS identifies major benefits of the Airport City opportunity near Gatwick Airport, noting that about 150 ha of land in this area could be brought forward for this purpose with the land east of the Airport being well placed to capture a significant proportion of the future demand in this strategic and regionally-important location. The evidence base acknowledges the need to lift the safeguarding area for the second runway to realise this potential – the opportunity can now be considered with the removal of safeguarding from the DCBLP.

⁷ West Sussex County Council Economic Growth Plan 2018-2023, WSCC, May 2018

⁸ Gatwick's Economic Contribution Through Trade and Investment, Oxford Economics for GAL, June 2018

⁹ Gatwick Growth Board Connectivity Study, Arup for GAL, July 2017

¹⁰ Economic Connectivity Review, Final Report, TfSE, July 2018

3.6 The NPPF notes that planning policies should 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 (para 81). On this basis, the regional economic evidence combined with the clear direction in the LIS evidence base, provides a sound basis for bringing forward a policy framework to facilitate the Gatwick Green opportunity alongside other land, infrastructure and transport investment.

4.0 Crawley's employment land requirement and supply

4.1 CBC has revised its 2014 Economic Growth Assessment (EGA, 2020¹¹) for the North West Sussex Functional Economic Area (FEMA); pursuant to a joint approach with Horsham and Mid Sussex District Councils under the Duty to Cooperate (DtC). The report was based on a geographic area defined by the travel-to-work area and related housing market area to provide a detailed analysis of Crawley's forecast job growth, and corresponding business-led economic land supply and floorspace needs over the next 15 years. The EGA report has informed policies on the economy in the DCBLP. CBC state that it provides a detailed analysis of Crawley's forecast job growth, and corresponding business-led economic land supply and floorspace needs over the next 15 years.

4.2 The EGA has assessed the future growth scenarios and floorspace requirements using three methodologies:

- Forecasting based on baseline job growth
- Past development rates continuing
- Baseline labour supply (linked to household growth)

4.3 These projections / forecasts generate land requirements for B-class uses over the period 2019 to 2036 of -1.1 ha (baseline job growth – labour demand), 33 ha (past development (take-up) rates) and 113 ha (baseline labour supply – based on the Standard Method to assess housing need). The baseline job growth requirement is not recommended as a basis for policy given that it is not optimistic about future job creation. The EGA concludes 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. The EGA therefore recommends 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. It goes on to recommended that there could be scope to plan to accommodate the higher level of economic growth associated with the baseline labour supply scenario in an unconstrained employment land supply position, subject to the lifting of the safeguarding constraint affecting 613 ha of land south and east of the Airport.

¹¹ Northern West Sussex EGA Update, Final Report, Lichfields on behalf of Crawley Borough Council, Horsham District Council, Mid Sussex District Council, January 2020

4.4 Savills has undertaken a review of the EGA (**Appendix 3**) which comes to the following conclusions with regard to the EGA projections / forecasts:

- The minimum employment land requirement in the EGA of 33 ha is inadequate to support the future economic growth in Crawley as it is based on historic constrained rates of delivery.
- An analysis of the property market area concludes that the DCBLP should plan of a minimum of 70 ha to reflect market demand over the near term.
- Taking account of the current land supply of 12 ha, the DCBLP should be planning to accommodate about 58 ha of employment land.
- The forecast of need derived from purely demographic forecasts is stated in the EGA as c 113 ha: market signals and other factors could indicate a need for a higher requirement: so this is the minimum amount of land that needs to be planned for in the DCBLP / North Crawley AAP.

4.5 **Table 4.1** summarises these considerations by showing the different employment land requirements set out in the EGA and contained in the assessment by Savills in **Appendix 3**.

Table 4.1 – Comparison of employment land requirements

Use	EGA Baseline Job Growth land requirement	EGA Past Development Rates land requirement	EGA Baseline Labour Supply land requirement	Savills Baseline Jobs Growth land requirement	Savills Baseline Labour supply land requirement
B use class (gross)	-1.1 ha	33 ha	113 ha	70.2 ha	> 113 ha
B use class (net)	-13.1 ha	21 ha	101 ha	58 ha	> 101 ha

4.6 In summary, the review by Savills considers that there is a need to plan for about 70 ha of employment land in Policy EC1 to reflect a forecast of unconstrained need and at least 113 ha of land over the DCBLP period: these levels of development need to be planned for through the DCBLP and/or the North Crawley AAP.

4.7 The assessment concludes that proximity to the Airport is an important ingredient in optimising the level of economic benefits to support the economic growth of the region. It concludes that Gatwick Green is ideally placed to deliver these benefits and is available, deliverable and viable.

4.8 Of the land within the North Crawley AAP area, only the land at Gatwick Green has the high level of accessibility and potential for quality connectivity that a highly sustainable employment-led mixed-use urban quarter requires.

Crawley's employment land supply

- 4.9 The shortfall in Crawley's employment land supply has increased from 35 ha in the adopted CBLP to c 101 ha in the DCBLP. Against employment land requirements of between 70 ha (Savills revised) and at least 113 ha, Crawley has a very small supply of employment land of only 12 ha. The supply is wholly reliant on the re-use and intensification of existing employment sites to create net gains in floorspace. There is significant uncertainty around the deliverability and quality of the future supply of new floorspace, which in any event will not provide large sites for major new occupiers, warehouse and distribution uses, or corporate occupiers.
- 4.10 In terms of supply, Manor Royal is somewhat constrained in growing its footprint and has some qualitative drawbacks; the scope to expand Manor Royal is also limited. A recent study by Styles Harold Williams (SHW¹²) shows that whilst there is estimated to be potential for up to 4.7M sq ft of additional business floorspace in the Gatwick Diamond area, only one site is located at Crawley/Gatwick, being the Horley Business Park (HBP) between Horley and Gatwick. The Regulation 18 DCBLP referenced the HBP as a source of supply to meet Crawley's unmet needs. Policy HOR9 from Reigate and Banstead's Development Management Plan¹³ (DMP) is reproduced at **Appendix 4** – this shows that the site is 31 ha and is proposed for up to 200,000 sqm of predominantly B1 floorspace and up to 10,500 sqm of related community uses. Whilst no longer referenced in the DCBLP as a source of floorspace to help meet Crawley's unmet needs, it is nevertheless worth recording the shortcomings of the HBP in this regard. A plan showing the HBP in relation to the site is included at **Appendix 5**.
- 4.11 The supply of land in RBBC without the HBP allocation is only just sufficient to meet locally generated employment land needs. RBBC relies heavily on the intensification and redevelopment of small sites (71%), which are an inherently unpredictable source of supply. The only large opportunity is at Salfords north of Horley (22,500 sqm). Furthermore, the SHW report states that HPB is 70 ha, but the allocation is for only 31 ha with, based on TWG's review, a net developable area only 18 ha and a correspondingly reduced capacity of c 72,000 sq m (c 775,008 sq ft), which suggests that the site is not strictly strategic. If the smaller sites fail to materialise, RBBC would need to increasingly rely on the HBP to meet its locally generated employment needs which would further undermine the "strategic" nature of the allocation. In summary, there is a clear risk that the HBP, intended to be a strategic employment site, will in part be taken up by locally generated economic demand and provide only limited land for sub-regional needs.
- 4.12 The Council is therefore relying to a large extent on inherently uncertain sources of land/floorspace supply that would fall significantly short of the requirement to meet the long term needs of the Borough / wider sub-region. There is therefore significant risk that the Borough's economy could under-perform; that the sub-region / region could see its major economic driver lose ground relative to other regions, and that the proper planning and socio-economic needs of the population would remain unfulfilled.

¹² Potential Business Parks within the Gatwick Diamond Area, prepared by SHW for the Gatwick Diamond Initiative, October 2018

¹³ Reigate and Banstead Local Plan Development Management Plan (Adopted September 2019)

- 4.13 A greater concern should be that the pipeline of land to meet short term needs over the next five years is very limited, amounting to only 12 ha. This is a reduction from the 23 ha available when the CBLP was adopted in 2015. Crawley therefore has an employment land supply crisis that has been left unresolved since about 2013.
- 4.14 The available land supply to meet the unmet needs associated with Crawley/Gatwick is therefore limited in both qualitative and quantitative terms, and there remains a need for one or more Strategic Employment Locations (SELs) within the Council's AoS. Collectively, the studies suggest a significant need for strategic employment land near to Crawley/Gatwick – of the land within the Area of Search (AoS), the land at Gatwick Green represents a premier location with high levels of accessibility and potential for quality connectivity as a highly sustainable employment-led mixed-use urban quarter. Gatwick Green therefore represents the most sustainable and high-profile market-facing option.

CBC's policy response

- 4.15 The Council has put forward a policy response in the DCBLP to enable the unmet employment needs of the Borough and the sub-region to be addressed - this comprises the removal of blanket safeguarding for the second runway at Gatwick and the designation of the North Crawley Area Action Plan under Policy SD3 (and referenced in Policy EC1) to make provision for meeting the economic, infrastructure and community needs of the Borough. The AAP would also address any long term land requirements related to planned expansion proposals for the Airport.
- 4.16 In the interim period until an AAP is adopted, Policy EC1 makes provision for limited sources of land and floorspace supply to meet the short term unmet needs of the Borough, which the EGA identifies as c 21 ha. Policy EC1 therefore relies on a combination of protection measures and a range of uncertain and unreliable sources of floorspace supply. The key elements of Policy EC1 are:
- Protect Manor Royal as the key business location for Crawley at the heart of the Gatwick Diamond.
 - Protect the Main Employment Areas.
 - Encourage the redevelopment of the Main Employment Areas.
 - Support minor extensions to Manor Royal.
 - Provide for 12 ha of employment land to meet economic needs.
 - An outstanding requirement of 21 ha of land (81,596 sqm) for B-class uses up to 2035.
 - The need to work with neighbouring authorities to assess the scope to accommodate Crawley's outstanding business land needs in appropriate and outstanding locations that are accessible to Crawley.

- The potential for further employment growth in Crawley, including the scope for Strategic Employment Location(s), will be determined through the North Crawley AAP.

- 4.17 Given the commitment to undertake an AAP to address the unmet needs of Crawley, Policy EC1 relies heavily on the limited sources of employment land and floorspace related to the existing Main Employment Areas. The DCBLP adopts the land requirement of 33 ha based on past development rates which it acknowledges is a constraints-led approach (DCBLP paras 9.9 and 9.20). The unconstrained land requirement of 113 ha is identified in the DCBLP (para 9.9) as forming the basis of the AAP (para 9.10): this will review the potential of the 619 ha AAP area to accommodate strategic employment land - areas north of Manor Royal and east of Gatwick are identified in this regard.
- 4.18 Whilst it is acknowledged that the key to unlocking additional land supply is the AAP, the DCBLP should identify and adopt an unconstrained assessment of future employment needs as the basis for its economic strategy, which should be reflected in Policy EC1 and be consistent with Policy SD3's proposed removal of blanket safeguarding. This would be consistent with the advice in the NPPF that requires LPAs to proactively and positively encourage sustainable economic growth. This approach would be consistent with that used in the adopted CBLP (2015), where a shortfall of 35 ha was identified in the adopted Policy EC1. The DCBLP should therefore reference the unconstrained land requirement of at least 70 ha to address needs in the near term and at least 113 ha to address needs to 2035, acknowledging that much of this would be addressed by the AAP. This would reflect the unconstrained and objectively assessed needs of the Borough and form a robust strategic basis for the AAP.
- 4.19 The policy identifies an approach to addressing the urgent unmet needs of the Borough via an AAP. This approach is supported, though it does have some negative aspects related to the ongoing delay in addressing the Borough's unmet needs. Insofar as the NPPF requires LPAs to plan positively for sustainable economic growth, allocate strategic sites to meet anticipated needs and address the infrastructure needs to accompany strategic sites (NPPF para 81), the option to bring forward strategic land through the DCBLP should be considered. It is on this basis that evidence has been included in TWG's representations to demonstrate that Gatwick Green is suitable, available, achievable, deliverable and viable.
- 4.20 Evidence on behalf of TWG contained in separate representations on Chapter 10 sets out in detail support for the removal of blanket safeguarding from the DCBLP. With safeguarding removed from the Plan, the potential to identify Strategic Employment Locations in the DCBLP represents an option that would avoid the negative consequences of the AAP approach identified in this representation.
- 4.21 Overall, the proposal to advance an AAP for North Crawley as referenced in Policy EC1 is supported. However, based on the above, it is considered that Policy EC1 is not sound

specifically in relation to the fact it is based on a constraints-led assessment of the employment and land requirements of the Borough. It is therefore considered to be unsound against the tests of soundness in the NPPF (para 35) in that it is not positive, has not been justified, would not be effective in delivering growth in the economy, and is inconsistent with national policy. Additionally, the approach of the Policy is inconsistent with draft Policy SD3.

- 4.22 Notwithstanding concerns over the employment land requirement in Policy EC1, the approach by the Council to advance an AAP represents a step forward and is supported. However, given the urgent and critical need to redress the long-standing shortfall in economic infrastructure, evidence is presented in support of an allocation at Gatwick Green.

5.0 Gatwick Green

- 5.1 TWG has undertaken a review of the EGA incorporating a market analysis focusing on the scale and nature of the demand potential at and around Gatwick Airport (**Appendix 3**). The review concludes that there is a short term need for about 70 ha of employment land – taking account of the available supply, the level of unmet need is about 58 ha (143 acres). The opportunity can be delivered by Gatwick Green, a mixed-use employment opportunity on about 59 ha (146 acres) in a highly sustainable location.
- 5.2 Gatwick Green is a proposed integrated mixed-use development and co-ordinated infrastructure solution which currently forms part of the land that is identified for an AAP under Policy SD3 of the DCBLP. Whilst still at an early stage, it is anticipated that the development could comprise the following:
- About 160,000 sqm GEA of B1(c), B2 industry and B8, warehousing, distribution and logistics.
 - About 52,500 sqm GEA of B1 office / R&D.
 - About 52,500 sqm GEA of hotel use.
 - Supporting education uses for apprenticeships & staff training.
 - An integrated amenity centre including ancillary shopping, leisure, dining and community uses.
 - High quality open space with mobility interchange hub.
 - Sustainable mobility at the heart of the masterplan design, with dedicated public transport, pedestrian and cycle infrastructure.
 - Ancillary car parking with Electric Vehicle Charging facilities.
- 5.3 A copy of the Development Framework Plan (DFP) is included at **Appendix 6**: this comprises two plans showing (1) a concept for the whole Site and (2) a concept for the land owned by TWG, which comprise about 47 ha or 80% of the whole Site. The above land use budget reflects the whole 59 ha site – the alternative 47 ha site is suitable and viable, so represents an equally

deliverable and strategic opportunity.

- 5.4 Gatwick Green represents a strategic opportunity to bring forward a highly sustainable mixed-use employment area, offering a unique opportunity to deliver significant benefits to all three of the key components of sustainability:

Economic – Significant economic benefit - these and other benefits will ensure north east West Sussex and the Gatwick/Crawley/Horley area can be elevated in terms of its economic and employment profile to form a regional economic hub of national and international significance at a major global air transport gateway.

Social – Significant qualitative and quantitative social benefits including for example a significant increase in jobs of at least 6,500; the diversification of local job opportunities; an increase in higher-value / professional/managerial jobs to increase opportunities for promotion, help retain employees and reduce current levels of out-commuting; increased apprenticeships jointly aligned with local colleges; redress long term unemployment; provide enhanced job security through a stronger economy; enhance average earnings to help reduce deprivation and child poverty, and strengthen links with further and tertiary education institutions in the region to help raise skills levels.

Environmental – Significant environmental benefits including for example the social value of reductions in CO₂ emissions from zero carbon energy, building design and transport solutions; the incorporation of green infrastructure into the masterplan with added habitat value through enhanced connectivity and habitat enrichment; habitat creation designed into the development; a net gain in biodiversity through a package of measures including biodiversity offsetting; opportunities for environmental research and education, and improved urban air quality from clean transport solutions.

- 5.5 Gatwick Green therefore represents a unique and unrivalled opportunity due to the following attributes:

- Delivers a **socially-sustainable mixed-use employment location** that facilitates knowledge-transfer and a healthier working environment.
- Delivers **higher-value employment opportunities** to redress out-commuting and offer chances for career progression in an area overly dependent on skilled and semi-skilled work at Gatwick.
- Diversifies the economy around Gatwick by **transforming and rebalancing** the local and sub-regional economy.
- Delivers **smart growth and additionality**.
- Provides **enhanced apprenticeship and training** opportunities aligned with the objectives of local colleges.

- **Adjacency** to Gatwick Airport, which is critical to attracting sectors that need near-airport locations.
- **High visibility** from the M23 and access to rail infrastructure.
- **Strong** commercial floorspace **demand**.
- Ability to attract **regional and national organisations** across a range of sectors.
- The **absence of any alternative opportunity** with the same connectivity and high profile.
- Meets the current **unmet economic needs and future demand profile**.
- Injects significant additional **long term expenditure** into the local economy.
- Adds a **significant amount to the regional GVA** and local authority revenue.
- Redresses the **shortage of high-grade employment floorspace** in an optimum location.
- Delivers **significant sustainable transport infrastructure** to enhance accessibility, reduce emissions and improve air quality in an area of intense economic activity.
- **Complementarity** with Gatwick Airport's growth plans in its Master Plan 2019, including the DCO for the use of the standby runway.
- **Complementarity** with Manor Royal and Crawley town centre.

5.6 It is of significance that other European airports are developing complimentary economic hubs or zones in their hinterland – e.g. Manchester, Luton, Birmingham, Frankfurt, Schiphol, Zurich and Munich. In terms of deliverability, the Gatwick Green site is free of any statutory national environmental designations and benefits from a strategic and highly sustainable location, with the ability to connect with national transport networks (airport, mainline rail and SRN) and be served by and expand local sustainable transport networks (Fastway, local bus services, cycle ways and footpaths).

5.7 A number of evidence base documents have been prepared to support the allocation of Gatwick Green for strategic employment. These update previous work from 2009 and conclude that there are no significant impediments to the site's development, subject to including a range of sustainability and mitigation measures to address either policy requirements or site-specific circumstances. The reports are appended to this representation as follows:

Transport Strategy	Appendix 7
Environmental and Utilities Preliminary Assessment	Appendix 8
Updated Preliminary Ecological Appraisal (PEA)	Appendix 9
Hedgerow Regulations Assessment	Appendix 10
Landscape Character and Visual Appraisal	Appendix 11
Heritage Constraints Appraisal	Appendix 12

5.8 The negative consequence of not meeting the short, medium and long term economic and social needs of the Borough's current and future population are significant. These consequences are outlined in Table 5.1 below alongside the benefits offered by Gatwick Green.

Table 5.1 – Assessment of key socio-economic issues and solutions

Socio-economic issues	Provisions in the DCBLP	What Gatwick Green offers
Unmet demand for c 111 ha of employment land	Providing for about 12 ha of employment land	About 59 ha of land available for a mixed-use employment development in a highly connected location.
Lack of high quality grade A floorspace	The employment land proposed is unlikely to provide the quality of floorspace needed at scale.	Provides a strategic opportunity that has the locational attributes to attract high quality employment uses from a range of sectors.
The need for one or more Strategic Employment Locations (SELs)	No SELs provided	Offers a SEL located in the adopted Area of Search for such.
Redressing unsustainable level of out commuting	Limited provision of employment land will not reverse the increasing trend towards out-commuting.	A major increase in higher quality jobs to capture out-commuters to London.
Poor prospects for employment/job progression	Limited provision of employment land will not provide sufficient higher quality jobs.	High quality occupiers attracted to Gatwick Green will provide jobs to enable job/career progression and higher earnings.
Productivity behind competing economic areas in the South East	Limited provision of employment land with little potential for strategic B8 uses, will offer no real improvement in productivity.	The high level of connectivity combined with the ability to accommodate strategic B8 uses will offer significant productivity gains.
Lack of sustainable transport networks and alternative modes around the Airport	The land provided for the CBLP is not of a scale or location that could contribute to or provide significant enhancements to sustainable transport infrastructure.	The scale of Gatwick Green and its critical mass offers the opportunity for significant investment in sustainable transport infrastructure and services.

5.9 This representation outlines a range of socio-economic benefits that Gatwick Green offers. The precise mix of employment uses will need to be refined, but the current concept is based on 60% B2 industry and B8 warehousing and distribution. Whilst not traditionally seen as offering the

same level of socio-economic benefits as grade A offices (of which the Site would be 20%), research¹⁴ demonstrates that high quality B8 / industrial uses can deliver the following benefits:

- Logistics is a crucial element of industrial real estate and an essential component of UK infrastructure, supporting supply chains across the country and providing large numbers of high quality jobs to local people.
- Successful communities need to include a mix of uses that make sustainable places where people can live, work, and enjoy leisure time.
- Industrial development forms part this mix by offering a range of employment opportunities, including highly skilled, well paid jobs to those living within the local area.
- As well as supplying local employment, infrastructure and training, the logistics sector's economic productivity makes a huge contribution to UK plc and supports businesses and people up and down the country through the timely delivery of goods and services.
- Provides a comparatively lower percentage of part-time jobs and higher wages when compared with the national average.

5.10 The research also concludes that the logistics sector has very specific locational and land requirements that must be taken into account by LPAs in making their local plans. Gatwick Green offers a unique opportunity to advance a development that closely matches the optimum site profile for logistics.

6.0 Sustainability and options for employment land

6.1 The SEA contains a sustainability appraisal of the AAP area (Policies EC1 and SD3) against nine sustainability assessment criteria. This concludes that the AAP area is assessed as offering possible significant positive impacts against 1 criteria, possible positive impacts against 6 criteria and 1 possible negative impact. The assessment concludes as follows:

“...land identified for the AAP represents the most sustainable location for strategic employment growth in Crawley. It is a large area of land take, and some areas within the broad identified area will be more sustainable than others – this will be assessed further through the work on the AAP. It would enable highly sustainable, high quality new development to complement and deliver linkages with the existing residential and business communities.”

6.2 The findings of the SEA are supported. There is one possible negative impact related to the potential for negative impacts against the criterion to “Conserve/ Enhance Biodiversity and Landscape” – whilst there may be some negative effects from development, it is considered that the need to provide mitigation and/or compensation, especially under the net biodiversity gain policy in the NPPF (and soon to be mandated in the Environment Bill) will ensure that effects relating to this criterion would be neutral to positive.

¹⁴ DELIVERING THE GOODS, The economic impact of the UK logistics sector, Turley for British Property Federation, December 2015 and What Warehousing Where?, Understanding the Relationship between Homes and Warehouses to Enable Positive Planning, Turley for British Property Federation, March 2019

- 6.3 Savills has undertaken a high-level sustainability assessment of the Gatwick Green site using the same methodology as adopted in the Council's SEA. The Gatwick Green SEA is contained at **Appendix 13** to this representation. It demonstrates that the site has a sustainability profile that is more positive than that for the whole AAP area: this provides clear evidence that the Gatwick Green site is a highly accessible location and can be developed in a very sustainable manner consistent with national planning and environmental policy.
- 6.4 In relation to alternative sites in the AAP area, Savills has undertaken an evaluation of the larger employment sites contained in the Employment Land Trajectory against nine assessment criteria – the report is contained at **Appendix 14**. The assessment concludes that Gatwick Green and the land at Rowley Farm represent the most suitable sites in the AAP area, with other sites having relative merits. Of the two strategic sites, Gatwick Green offers some advantages in relation to its contribution towards meeting strategic policy objectives, its closer proximity to the Airport, its potential for greater connectivity and in its availability and ability to deliver within the period of the DCBLP. This is a high-level assessment, but it does illustrate that Gatwick Green represents the prime site within the AAP area to deliver early employment development that will best serve the strategic planning and economic policies relating to the Crawley/Gatwick area within the of the LEP and Gatwick Diamond. The assessment also shows that Gatwick Green has a stronger sustainability profile compared to other sites within the AAP area.

Appendices sent by email on 2/3/10

- 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.**

7.0 Policy EC1 - Soundness

- 7.1 In summary, it is concluded that whilst Policy EC1 is positive in relation to its overall employment strategy, the extent of available short term employment land supply and its reference to the proposed AAP under Policy SD3, it is not considered to be sound in relation to the constraints-led basis of the employment land requirement of 33 ha. The basis for Policy being not sound is therefore limited to this issue and based upon the following findings in relation to the employment land requirement:
1. Policy EC1 has not adopted a proactive and positive approach to planning for economic growth as required by the NPPF.
 2. Policy EC1 has under-assessed the employment land needs of the Crawley/Gatwick area for the near term, which based on a reassessment by Savills offers a more realistic assessment of demand of c 70 ha in line with PPG.
- 7.2 It is therefore considered that the DCBLP is not sound in relation to its policies on employment and the economy because (1) it does not identify the full extent of the need for employment land so has not therefore been positively prepared, and (2) it is not consistent with national policy, which requires that LPAs proactively encourage sustainable economic growth with regard to the Local Industrial Strategy (NPPF, paras 80-82) - the regional economic evidence combined with the clear direction in the LIS evidence base, provides a sound basis for bringing forward the Gatwick Green opportunity alongside other land, infrastructure and transport investment.
- 7.3 To make Policy EC1 and the Reasoned Justification sound, it should state that there is a need for a total of 70 ha (173 acres) of new B-class business land in the Borough to address needs in the interim period until an AAP is adopted. Taking account of the land supply of 12 ha, Policy EC1 should also state that there is an outstanding requirement of 58 ha of employment land. Further, the requirement of 113 ha based on the forecast labour supply referenced at paragraphs 9.13, 9.18 and 9.19 of the DCBLP, should be revised to a "at least 113 ha" with reference added to state that this is a minimum requirement and could be higher one account is taken of policy and market considerations and further improvements in the current low level of local labour retention.
- 7.4 In view of the significant level of unmet employment land, evidence is attached to this representation that supports a Strategic Employment Location (SEL) at Gatwick Green between Balcombe Road and the M23, a site largely controlled by TWG and deliverable within the Plan period. Evidence put forward by TWG shows that Gatwick Green is available now to meet the short term net shortfall in employment land of c 58 ha.

7.5 On the basis of the evidence in this representation and separate representations by TWG on safeguarding (Chapter 10), and the Employment Land Trajectory, **the land at Gatwick Green should be considered for strategic employment** within use classes B8, B2, B1, and C1, including ancillary uses within use classes A1 - A4 and D1.

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:

This representation is important to the Wilky Group's overall representations in the relation to airport safeguarding, employment land requirements and its evidence in support of the identification of the Gatwick Green site for strategic employment purposes. Policy EC1 is an important policy that provides the framework for economic growth, the employment land requirement and the sources of future employment land; it is therefore critical to the Hearings in relation to employment land, strategic sites and the Gatwick Green site being put forward by Wilky Group. On this basis, the Wilky Group considers that it is critical that it is able to participate in the Hearing on Policy EC1 insofar as it is an important policy in connection with its interests at Gatwick Green.

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



