

Assessment of Employment Land

Strategic employment sites north of Crawley





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1. Introduction

- 1.1. Crawley Borough Council (CBC) is reviewing its Local Plan (the Crawley Borough Council Local Plan: Crawley 2030, adopted in 2015 - CBLP). The draft for consultation under Regulation 19 was released in January 2020: the Draft Crawley Borough Local Plan 2020-2035 (DCBLP).
- 1.2. The DCBLP provides a policy framework to guide development within the Borough up to 2035, including policies to control the nature of, and provide for additional development at, the Council's ten Main Employment Areas (MEAs) of Manor Royal, Crawley Town Centre, Gatwick Airport, Three Bridges Corridor, Maidenbower Business Park, Tilgate Forest Business Park, Lowfield Heath, Bradfield Stadium and K2 Crawley and The Hawth. Collectively, these MEAs have capacity to deliver about 12 ha of new employment space over the Plan period. Based on the forecast of future labour supply (from uncapped housing requirements), the Borough has a need for at least 113 ha of new employment land, or at least 101 ha when account is taken of the current land supply. The Council's Employment Land Trajectory (ELT) contains a list of 24 sites that have the potential to provide for about 155 ha of land over and above the 12 ha short term land supply. Some of these sites may not be deliverable and many are small; below 5 ha.
- 1.3. It has long been the intention that much of Crawley's long term economic and employment needs should be from strategic employment land given the Borough's location at the 'Heart of the Gatwick Diamond' and the 'engine of growth' in the Coast to Capital Local Enterprise Partnership (LEP) area. The adopted CBLP identified the need for one or more Strategic Employment Locations to address the long-standing shortfall in economic infrastructure, rather than solely a collection of smaller employment sites as extensions to MEAs. The CBLP identified an Area of Search for SELs under Policy EC1, covering the area safeguarded for a second runway at Gatwick. With the safeguarding removed from the DCBLP, the revised Policy EC1 and new Policy SD3 identifies all of the previously safeguarded land for the North Crawley Area Action Plan (AAP) – this covers about 619 ha to the north of Crawley, generally south and east of the Airport.
- 1.4. This Assessment is relevant in the event that the Examination of the DCBLP requires consideration of strategic employment sites and their allocation within the DCBLP itself rather than as part of later work in an AAP. The ELT identifies five larger sites, two of which qualify as 'strategic' within the AAP area – three of the sites fall below the minimum site threshold of 20 ha, but have been included in order to provide a comprehensive review of the strategic or near-strategic opportunities to the north of Crawley. All five sites have therefore been subject to a comparative evaluation to assess their relative merits and identify which has the strongest attributes.
- 1.5. The assessment includes the Gatwick Green site, an area of land shown in **Figure 1**, extending to about 59 ha. This site is largely owned by the TWG (80%): areas in which the TWG do not have an interest are subject to ongoing discussions between TWG and landowners. These discussions have resulted in a number of landowners agreeing to bring their land forward for development in the event the overall site is allocated.

- 1.6. The site comprises an area of mixed land uses dominated by low quality pasture mainly grazed by horses and divided into a number of fields by mature hedgerows. Small areas of tree cover occur in the central and north western parts of the site. Clusters of residential and some rural-commercial properties occur along Fernhill Road and Donkey Lane, with some frontage development to Balcombe Road and Peeks Brook Lane.

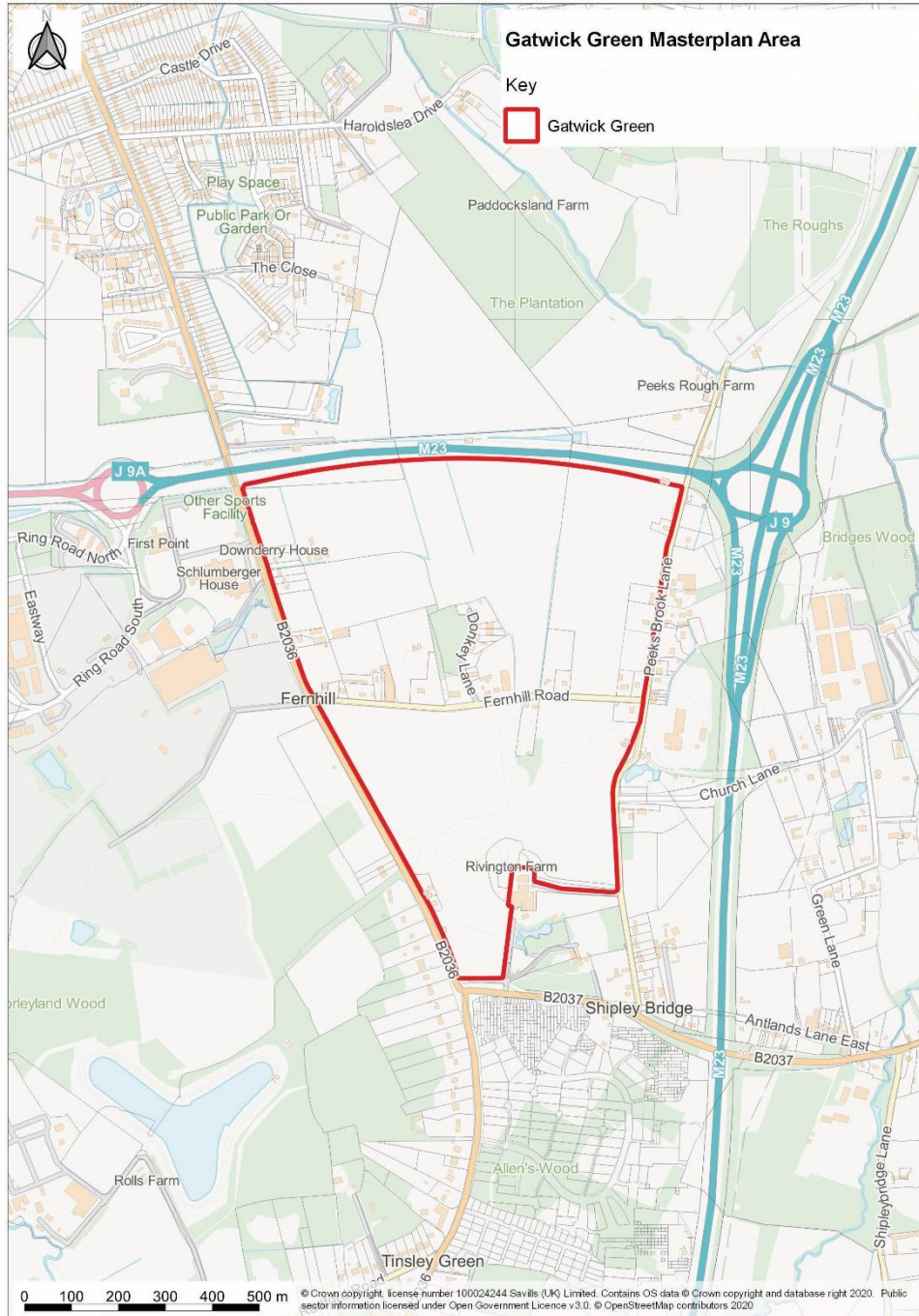


Figure 1 – Land at Gatwick Green

2. Methodology

- 2.1. This report provides an assessment of potential alternative sites for a strategic employment allocation in the Crawley and Gatwick area. The consideration and evaluation of reasonable site options is an important part of the plan-making process and is necessary in order to demonstrate that the plan is justifiable and represents the most appropriate strategy in accordance with the tests of soundness contained in the NPPF (para 35).
- 2.2. In order to provide an objective assessment process, a criteria-based matrix has been used as the basis to evaluate potential employment sites. The Assessment Criteria are set out in Section 3 of this report, along with an explanation of the rationale behind each criterion.
- 2.3. The Assessment Criteria reflect the factors that determine a site's suitability for strategic employment development and have been drawn up taking into account overarching planning policy guidance, including Planning Practice Guidance on Housing and Economic Land Availability Assessments, local planning policies including the adopted Crawley Borough Council Local Plan 2015, the DCBLP, the North West Sussex Economic Growth Assessment 2020 and the Coast to Capital Local Industrial Strategy. The Assessment Criteria have been devised taking account of the following considerations:
- Strategic policy considerations
 - Accessibility
 - Sustainability
 - Market requirements and perceptions
 - Site availability and deliverability
 - Environmental constraints and designations
- 2.4. Each of the potential strategic locations, as described in Section 4 of this report, has been assessed against the individual appraisal criteria. The assessment has been undertaken qualitatively, using the following simple scoring system:
- Excellent ✓✓
 - Good ✓
 - Fair ~
 - Poor ✘
 - Very poor ✘✘

3. Assessment Criteria

- 3.1. Planning Practice Guidance (PPG) states that the assessment of land availability is an important source of evidence to inform plan-making and decision-taking. The role of an availability assessment is to provide information on a range of sites which are available to meet housing or employment needs, but it is for the development plan to determine which of those sites are most suitable to meet those requirements. The assessment of the options for employment land forms part of the plan-making process and seeks to confirm which sites are likely to respond well to the expectations of occupiers and property developers and also meet strategic policy and sustainability criteria.
- 3.2. PPG requires Local Planning Authorities to *'identify all sites and broad locations in order to provide a complete audit of available land'* (paragraph 008). It also states that *'Plan-makers will need to assess the suitability, availability and achievability of sites, including whether the site is economically viable. This will provide information on which a judgement can be made as to whether a site can be considered deliverable within the next five years, or developable over a longer period'* (paragraph 017).
- 3.3. The assessment of strategic sites identified in the ELT will inform the overall site identification work of CBC under the approach set out in PPG. This report therefore provides an objective assessment of five of the larger employment sites identified in the ELT – including Gatwick Green – so as to identify the relative merits of the site and which represent the most appropriate in policy, market, sustainability and deliverability terms.
- 3.4. The Assessment Criteria used to assess the sites are listed below. They have been devised having had regard to the approach set out in PPG (paragraphs 015 and 018) – Housing and Economic Land Availability Assessments, taking account of relevant national planning policy and the market perceptions and demand and policy considerations that are relevant to the DCBLP area.
- 3.5. The PPG states at paragraphs 015 and 018 that the following information should be considered when assessing sites including the suitability of sites / broad locations for development:

- Site size, boundaries, and location;
- Current land use and character;
- Land uses and character of surrounding area;
- Physical constraints (e.g. access, contamination, steep slopes, flood risk, natural features of significance, location of infrastructure/utilities);
- Potential environmental constraints;
- Consistency with the development plan's policies;
- Proximity to services and other infrastructure, such as public transport;
- Where relevant, development progress (e.g. ground works completed, number of units started, number of units completed);
- Initial assessment of whether the site is suitable for a particular type of use or as part of a mixed-use development;
- National policy;
- Appropriateness and likely market attractiveness for the type of development proposed;
- Contribution to regeneration priority areas; and
- Potential impacts including the effect upon landscapes including landscape features, nature and heritage conservation.

3.6. Using best practice and in light of the above, the following Assessment Criteria have been used to assess each site.

Strategic Policy Considerations

3.7. The ability of each site to contribute to the strategic aims of the C2C LEP area, the Gatwick Diamond and the DCBLP, with particular regard to sustainable economic growth. Sites are assessed with regard to their ability to sustain and enhance the pivotal role played by Crawley / Gatwick in the sub-regional and wider economy and contribute to strong economic development in the area and wider region. The key strategic economic and planning policies:

- **Gatwick Diamond Local Strategic Statement (LSS)¹** – requires that in the short and medium term, the primary focus for new business development will be the areas around Crawley and Gatwick.
- **Coast to Capital Strategic Economic Plan (SEP)²** – identifies Gatwick Airport as the driver of, and location for, economic growth given its place at the geographical and economic heart of the region.
- **Coast to Capital Local Industrial Strategy (LIS) evidence base** – 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: the opportunity comprises about 150 ha of land in the safeguarded area, with land east of the Airport representing a key opportunity^{3 4}.
- **West Sussex Economic Growth Plan (EGP)⁵** – maximise the opportunities from Gatwick by creating and supporting higher value employment in a wide zone of opportunity around the Airport.

3.8. The size of the site and its ability to accommodate a strategic allocation was also taken into account. For this, a strategic site has been identified as a site of at least 20 ha.

3.9. The Coast to Capital Local Industrial Strategy (LIS) identifies the Gatwick 360 area as an opportunity to function as a regional economic hub, and the LIS identifies the paucity of high-quality employment land and the potential for a strategic employment opportunity near to Crawley/Gatwick.

Accessibility

3.10. Key considerations include ease of access to the strategic road network (an important determining factor for employment land irrespective of the business sector); proximity to existing public transport links (Fastway, local bus services, mainline rail); potential future connectivity with and proximity to Gatwick Airport, and potential to enhance connections between Crawley, Gatwick and Horley. These factors were all considered in the assessment of the relative merits of each site in terms of its accessibility as a key attribute for strategic employment land.

¹ Gatwick Diamond Local Strategic Statement, Gatwick Diamond local authorities [excluding Tandridge DC], March 2012

² Gatwick 360° The Coast to Capital Strategic Economic Plan 2018-2030, Coast to Capital LEP, 2018

³ Coast to Capital Commercial Property Study, Hatch Regeneris, December 2019

⁴ Coast to Capital Local Industrial Strategy, Draft Economic Profile, Hatch Regeneris, September 2019

⁵ West Sussex County Council Economic Growth Plan 2018-2023, WSCC, May 2018

Physical & Environmental Constraints

- 3.11. Each location has been assessed in terms of environmental factors that influence the extent to which the site may be suitable for development. Areas that are unconstrained have been assessed as 'excellent', while, conversely, those that are affected by national designations (e.g. Green Belt, SSSI, AONB) would be considered to be 'very poor'. Whilst natural and physical constraints such as archaeology and ecology will not change, it is acknowledged that man-made policy factors can and do change through successive development plans. Whilst airport safeguarding has not been taken into account insofar as this has been removed for the DCBLP, the assessment has taken account of the safeguarding corridor for the Crawley Western Link Road (CWLR) under Policy ST4 of the DCBLP.
- 3.12. For the purpose of this appraisal, publicly available desk-based information such as through Magic Maps, has been used to inform the assessments. No survey work or consultation has been undertaken at this stage.

Previously Developed Land

- 3.13. The National Planning Policy Framework (NPPF) (2019) requires local planning authorities to make the most efficient use of land, including prioritising previously developed land which is suitable for re-use (para 117). Locations that would involve the development of greenfield land score poorly, while options that would involve the partial or entire redevelopment of brownfield land would register scores of 'good' and 'excellent' respectively. It is acknowledged that this is somewhat simplistic because brownfield sites with poor access can be less sustainable overall than greenfield sites with good accessibility and locational characteristics.
- 3.14. Proximity of the site to Gatwick Airport means that there is established market profile as a main employment area, sustainable connects and high profile location.

Site availability and deliverability for employment use

- 3.15. Since 2003, Crawley Borough Council has been required by government policy to safeguard land between the town of Crawley and Gatwick Airport to accommodate the possible construction of an additional runway and associated facilities. However, national policy for Aviation has now evolved with the Government's decision to support the expansion of Heathrow Airport and, currently, there is no national evidence of need for further runway provision beyond Heathrow. The DCBLP has therefore removed the safeguarding area and related policy, replacing it with the designation of the former safeguarded area (as adjusted) for an Area Action Plan (AAP) following adoption of the DCBLP. The North Crawley Area Action Plan will address whether there is any evidence to justify the safeguarding of any land to meet the legitimate future needs of the Airport. Accordingly, the sites have been assessed on the basis that they are no longer affected by the safeguarding area.

- 3.16. The availability of each site will therefore be assessed taking into account its current use, physical condition and land ownership / assembly issues where these are known. The assessment provides a commentary on the likelihood of strategic employment development coming forward within the period of the DCBLP to 2035. The assessment has been undertaken qualitatively, taking account of the combination of these factors.

4. Site Assessment

- 4.1. The following sites have been identified in the Crawley area as potential locations for a strategic employment sites. The findings of the assessment are set out in the site assessment matrix in **Table 4.1** below. The following paragraphs provide a brief description of each site, a summary of the key issues identified in the assessment and consideration of the overall suitability of the site for strategic employment development.
- 4.2. The sites assessed were chosen following the publication of the Employment Land Trajectory (December 2019) and have been identified as potential options for employment development alongside land at Gatwick Green. It is recognised that in order to meet the current and future employment needs of the Crawley Borough Council area, it is likely that a combination of these sites may need to be brought forward.

Land at Gatwick Green (ELT Ref 13)

- 4.3. Land at Gatwick Green is a site of c 59 ha sustainably located with excellent links to strategic transport networks and Gatwick Airport. Proximity to the Airport, mainline rail and the M23 provide excellent transport connections, with high potential for improved sustainable connectivity. The site is safeguarded for the second runway (landside non-operational facilities) in the adopted CBLP. It is located within the AAP area in the DCBLP, which will address future employment and other needs, and allocate land for those purposes. Its strategic size means it is available for one single large user and ancillary businesses as required to meet the employment needs of Crawley and the sub-region. Its topography provides land suitable for the provision of large employment uses. It is not at risk of flooding and assessments have been carried out in regard to biodiversity, heritage, noise and air quality and landscape value from which the site has been assessed as excellent in these metrics. While the site is in proximity to listed assets, it provides the opportunity for good design to allow this to be sensitively incorporated into any proposal. In comparison to any of the other sites, it offers the opportunity for excellent strategic access and therefore a desirable location for new employment use of all types, of a size which can provide an innovation hub and employment centre as required. The site is being promoted for employment development by Savills on behalf of the Wilky Group: it is available and deliverable within the Local Plan timeframe to 2035.

Land at Jersey Farm (ELT Refs 16 and 17)

- 4.4. Land at Jersey Farm is a site of c 11 ha and is also located within the AAP area in the DCBLP. Most of the site is safeguarded for the second runway (8.77 ha – airside operational facilities) in the adopted CBLP. It is located within the AAP area in the DCBLP, which will address future employment and other needs, and allocate land for those purposes. Adjacent to the Manor Royal allocated employment site, access to existing and proposed infrastructure and transport links is good, but the site is not as close as others to strategic links of “A” roads and the motorway nor public transport facilities. A small area of the site on the northern boundary may be affected by flood risk. It is not connected to the M23 motorway and is not large enough to be considered a strategic site. There are no heritage considerations at this location and the topography would allow for large employment uses. However, the site is not large enough to be considered strategic and therefore will not meet identified employment needs alone, necessitating further allocations which could potentially be unsustainable. Reference has been made to the presence of any ecological designations, but further information is needed in regard to biodiversity and ecology on the site. The site is significantly impacted by the Indicative Search Corridor for a Western Link Road under Policy ST4 of the DCBLP, which introduces some uncertainty as to the extent of the developable area and its deliverability. The site is being promoted through the DCBLP by Vail Williams on behalf of Ardmore: deliverability and availability remain to be confirmed.

Land at Little Dell Farm (ELT Refs 18, 19 and 20)

- 4.5. Land at Little Dell Farm comprises a site of c 6.2 ha. Most of the site is safeguarded for the second runway (airside operational facilities) in the adopted CBLP. It is located within the AAP area in the DCBLP, which will address future employment and other needs, and allocate land for those purposes. There is good connectivity to “A” roads and the site is adjacent to the Manor Royal employment site. However, it is not connected to the M23 motorway and is not large enough to be considered a strategic site. The flat topography would allow for large employment uses. Reference has been made to the presence of any ecological designations, but further information is needed in regard to the biodiversity and ecology values of the site. The site is significantly impacted by the Indicative Search Corridor for a Western Link Road under Policy ST4 of the DCBLP, which introduces some uncertainty as to the extent of the developable area and its deliverability. The site is being promoted through the DCBLP by Vail Williams on behalf of Willmott and Ohm and Hill: deliverability and availability remain to be confirmed.

Hydehurst Lane (ELT Ref 15)

- 4.6. Adjacent to Manor Royal, this site comprises about 18 ha and benefits from good connectivity to the A23, public transport and existing employment uses. Most of the site is located within the Gatwick Airport safeguarding area in the adopted CBLP (airside operational facilities). It is located within the AAP area in the DCBLP, which will address future employment and other needs, and allocate land for those purposes. Part of the site falls within an area of flood risk and it is in proximity to some ancient and semi-natural woodland. It is not connected to the M23 motorway and is not large enough to be considered a strategic site. Reference has been made to the presence of any ecological designations, but further information is needed in regard to the biodiversity and ecology values of the site. The site is being promoted through the DCBLP by Quod on behalf of Aberdeen Standard Investments and The Barker Trust: deliverability and availability remain to be confirmed. As previously undeveloped land, landscaping and good design will need to be considered in any future development.

Land at Rowley Farm (ELT Ref 14)

4.7. Located at the northern boundary of Manor Royal and western boundary of City Place, land at Rowley Farm comprises a site of about 52 ha (35 ha net developable) and has good access to strategic routes and existing public transport infrastructure. It is located in the area safeguarded for airport expansion in the adopted CBLP (airside operational facilities). It is located within the AAP area in the DCBLP, which will address future employment and other needs, and allocate land for those purposes. It is of a strategic size which can contribute to provision of future infrastructure provision and meeting employment needs through provision of employment space adjacent to existing uses, although topography of the site may be less favourable than others. Reference has been made to the presence of some areas of flood risk, heritage assets and ecological designations, but further information is needed in regard to biodiversity and ecology on the site. Landscaping and good design will need to be considered in any development. The site is being promoted through the DCBLP by Homes England: deliverability and availability remain to be confirmed.

4.8. Table 4.1 below sets out the results of the comparative assessment of the five sites.

Table 4.1 – Comparative assessment of the five strategic sites

		Land at Gatwick Green	Land at Jersey Farm	Land at Little Dell Farm	Land north and south of Hydehurst lane	Land at Rowley Farm
Theme	Criterion					
Strategic Policy Considerations	Contribution to strategic policy objectives	✓✓	~	~	✓	✓
	Ability to accommodate a single large user	✓✓	~	~	✓✓	✓✓
	Strategic Site > 20 ha	✓✓	x	x	x	✓✓
Accessibility	Ease of access to the strategic road network	✓✓	✓	✓✓	✓✓	✓✓
	Proximity to existing public transport links	✓✓	~	✓✓	✓✓	✓✓
	Potential future connectivity	✓✓	✓	✓	✓	✓
	Proximity to Gatwick Airport	✓✓	✓	✓	✓	✓
Physical and Environmental Constraints	Flood risk and drainage	✓✓	✓	✓✓	✓	✓
	Landscape	✓✓	✓	✓	✓	✓
	Built & cultural heritage	✓	✓✓	✓	✓✓	✓
	Safeguarding for CWLR	✓✓	x	xx	✓✓	✓✓

		Land at Gatwick Green	Land at Jersey Farm	Land at Little Dell Farm	Land north and south of Hydehurst lane	Land at Rowley Farm
Previously Developed Land	Site status - PDL	x	x	x	x	x
	Relationship to existing employment sites	✓	✓	✓	✓	✓
Site availability and deliverability	Site availability and ability to deliver within the period of the DCBLP	✓✓	✓	✓	✓	✓

5. Conclusions

- 5.1. The results of the assessment are summarised above. The sites that have the greatest potential to meet strategic policy objectives and are considered as being most suitable for strategic employment development are Gatwick Green, which offers a prime location to exploit high levels of accessibility by rail, road and air, and Rowley Farm, with strong connections to existing employment facilities and infrastructure at Manor Royal. Of these, Gatwick Green offers greater benefits against the assessment criteria, but both sites could deliver quality employment development at a strategic scale.
- 5.2. All the sites considered would need further assessment in terms of biodiversity, landscape and physical and environmental constraints, and be subject to good design and mitigation proposals as part of future development.
- 5.3. Land at Gatwick Green offers a sustainable, well-located site which would provide a high-profile location for future employers of all use classes. There is therefore an opportunity to provide a high-quality employment development at Gatwick Green and its strategic size means that employment need can be located in a sustainable manner alongside innovative and area-based transport infrastructure provision. While other sites exist in the locality, land at Gatwick Green is available, deliverable and sustainable and has been subject to investigations with regard to sustainable infrastructure options.
- 5.4. The Crawley / Gatwick sub-region requires the delivery of a wide range of employment opportunities and sites. Extensions to the Manor Royal area to provide better quality industrial and office employment provision would therefore complement rather than compete with Gatwick Green, which is needed to deliver opportunities in new generation logistics, office and hotel development at the very high end of the employment spectrum to attract companies that may not otherwise chose to locate in the sub-region.

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