



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:	Ms		Mr
First name:	Sally		Simon
Surname:	Fish		Fife
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Town/city: Leatherhead

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BH21 1PB

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Email: Sally.Fish@Wilky.co.uk

sfife@savills.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: Employment Land Trajectory

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), which has a long-standing interest in the promotion of strategic employment land within the Crawley Borough Council (CBC) area: a proposal known as Gatwick Green. It relates to the Local Plan Employment Land Trajectory (ELT) forming part of the evidence base to 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.

- 1.8 Policy SD3 removes formal safeguarding and replaces it with restrictive controls over development within the AAP area until an AAP is adopted. Representations on behalf of the TWG set out how the restrictive controls are unsound and should be replaced with the more reasonable controls that applied under Policy GAT2 in the adopted CBLP.

Key Considerations for the ELT

- 1.9 Gatwick Green represents a regionally and nationally significant opportunity for high quality mixed-use economic growth that will solve Crawley Borough's growing deficit of employment land as identified in its employment land evidence base.
- 1.10 This representation will provide evidence to demonstrate that Gatwick Green can be delivered over the period of the DCBLP. It will therefore address the five considerations identified by Crawley Borough Council in its Regulation 18 consultation with TWG on the ELT:
- Suitability of the site for employment development.
 - Availability or likely availability of the site for employment development.
 - The economic viability of delivering employment on the site.
 - The amount of employment development which can be delivered on the site.
 - The likely time-frame for any employment delivery projected for the site.
- 1.11 In the context of the urgent need to plan and provide for the unmet and long-standing employment and economic needs of the Borough and the removal of safeguarding, evidence is put forward to demonstrate that Gatwick Green is deliverable and could be brought forward for development in the short term insofar as it meets the requirements noted above.

2.0 Policy tests

Suitability

- 2.1 Gatwick Green is a highly suitable site for strategic employment. In view of its close proximity and accessibility to Gatwick Airport, it is well suited to bringing forward a high-quality business hub to optimise the potential of this strategic location at the confluence of several national transport infrastructure networks – Gatwick Airport, London-Brighton Mainline Rail, the Gatwick Express service, the M23 motorway and the Crawley-Gatwick-Horley Fastway bus service. A review of employment land requirements and market demand by Savills on behalf of TWG sets out the evidence in relation economic needs and market demand: **Appendix 2**. The review identifies that there is a need for about 70 ha (173 acres) of land for strategic employment in the

Crawley/Gatwick area based on an unconstrained assessment of need. This should be the level of requirement to plan for until an AAP is adopted, not the 33 ha in Policy EC1. Over the DCBLP period to 2035, the need is significantly higher and identified in the Council's Economic Growth Assessment (EGA) at 113 ha (279 acres) to meet the labour supply of the area: this is considered to be a minimum without taking account of market and wider economic considerations. Gatwick Green represents a strategic opportunity in a prime location to meet these immediate and longer term needs.

- 2.2 In relation to sites in the AAP area, Savills has undertaken an evaluation of the larger employment sites contained in the ELT against nine assessment criteria – the report is contained at **Appendix 3**. The assessment concludes that Gatwick Green and land at Rowley Farm represent the most suitable sites in the AAP area, alongside other sites with 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 Crawley/Gatwick and within the LEP and Gatwick Diamond areas. No other land near the Airport benefits from this level of accessibility, which in turn offers the potential for significant levels of sustainable access and modal shift to more sustainable means of transport.
- 2.3 The site is not affected by any significant environmental, physical or heritage constraints and could be developed within the current / future aircraft noise environment and aerodrome safeguarding requirements relating to the Airport. A number of evidence based 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 the inclusion of a range of sustainability and mitigation measures to address either policy requirements or site-specific circumstances. The reports cover transport, flood risk, surface water drainage, foul drainage and sewage treatment, water supply, utilities, air quality, noise, ground conditions, renewable energy, landscape & visual, heritage, and ecology & hedgerows. These are attached as appendices to TWG's representations on Policy EC1.
- 2.4 The evidence base reports are appended to the representation on behalf of TWG on Policy EC1 and comprise:
- Transport Strategy
 - Environmental and Utilities Preliminary Assessment
 - Updated Preliminary Ecological Appraisal (PEA)
 - Hedgerow Regulations Assessment
 - Landscape Character and Visual Appraisal
 - Heritage Constraints Appraisal

2.5 The site is also complementary to Gatwick Airport's growth plans in its Master Plan 2019, including the DCO for the use of the standby runway. Overall, the site is considered to be highly suitable for strategic employment, supported by evidence from Savills review of employment land requirements.

Availability

2.6 The plan at **Appendix 1** shows the extent of the Gatwick Green opportunity (59 ha) and the land owned by TWG. Wilky controls most of the land (80%) and continues to undertake significant engagement with other landowners to reach understandings that, in the event Gatwick Green is allocated, these remaining land areas would be brought forward for development in a timely and efficient manner such that the whole allocation could be developed in a comprehensive and phased way including enabling infrastructure. The benefits of TWG's substantial ownership should not be underestimated and will significantly aid the delivery of Gatwick Green.

Site capacity

2.7 A Development Framework Plan (DFP) has been prepared to assess the high-level capacity of the site and demonstrate its ability to incorporate a range of sustainability and environmental requirements arising out of national and local planning policy and other statutory requirements (**Appendix 4**). The DFP has assessed the land and floorspace potential of the site of 59 ha to provide 265,000 sqm (2.85 M sq ft) of mixed employment floorspace in use classes B8, B1, B2 and C1, including ancillary uses within use classes A1 - A4 and D1.

2.8 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 B8, B1(c), B2, industrial, warehousing, distribution and logistics.
- About 52,500 sqm GEA of B1 office / R&D.
- About 52,500 sqm GEA of C1 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.

- 2.9 The emerging DFP 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 uses reflect the whole 59 ha site – the alternative 47 ha site is suitable and viable, so represents an equally deliverable and strategic opportunity based on a similar mix of uses.
- 2.10 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
- 2.11 Whilst the site will be a focus for B8 and B2 class floorspace, it has the benefit given its highly accessible location, of being attractive to a mix of non-B class employment uses such as education and training. This will help the site to come forward more quickly given its wider appeal to a number of different sectors and investors (delivery partners). It will also enable the site to deliver a greater variety of jobs to help transform and rebalance the economy and benefit the local community.

Viability

- 2.12 A high-level assessment of the site's viability based on a revised development concept has been undertaken. The assessment is based on a development capacity of up to 265,000 sqm (2.85 M sq ft) of mixed employment floorspace and related uses in use classes B8, B1, B2 and C1, including ancillary uses within use classes A1 - A4 and D1. The assessment has also taken account of the likely floorspace absorption rate based on the Savills demand assessment and an estimate of costs related to providing sustainable transport infrastructure to serve the development. A copy of the viability assessment by Savills attached at **Appendix 5**.
- 2.13 The assessment concludes that based on the assumptions noted in Table 3, the Gatwick Green proposal generates a Residual Land Value (RLV) of c £72.5 million, or over £1.2 million per gross hectare. At this level, the land value is significantly higher than the site's Existing Use Value (EUV - c £22,500 per gross hectare). This is over 50 times lower than the estimated RLV generated by the Gatwick Green proposals. Even if the higher 'Greenfield' Benchmark Land Value (BLV) is applied, this would still leave significant head room to help fund wider strategic infrastructure and community benefits. The assessment is a cautious one; for example, the RLV could be higher if the site was phased into smaller parcels with more regular capital receipts being achieved as each parcel is sold or developed.
- 2.14 Based on these inputs, the likely Gross Development Value (GDV) of the proposal has been estimated based on local comparable analysis. Taking account of likely development costs (including site access), the Gatwick Green project would generate a Residual Land Value (RLV) significantly above the site's existing use value in agricultural use. The RLV is also significantly

higher than a Greenfield Benchmark Land Value which includes a significant land owner's premium. This positive viability profile will enable Gatwick Green, along with contributions from other major developments, such as Gatwick Airport's proposed Development Consent Order for planned use of its emergency runway for passenger flights, to provide the necessary infrastructure to support the new development. This critical infrastructure will also benefit the wider area and could link up with other major development and infrastructure opportunities.

- 2.15 The future success of Gatwick Green is supported by the success of the nearby Manor Royal employment area. It is the largest employment area in the region by some margin and provides a critical source of Grade A employment floorspace. Gatwick Green will share the same attributes, so making it attractive and deliverable to the market, arguably even more so given that it will be clustered around the primary gateway into Gatwick Airport, and lies directly adjacent to the mainline train station and the M23. Gatwick Green will also be complementary to Manor Royal, offering high quality next-generation logistics and industrial opportunities alongside grade-A office floorspace and a mix of quality and budget hotels to serve the growing needs associated with the Airport and sub-regional economy. Under these circumstances, Manor Royal's role as a prime industrial and office campus will remain and indeed will be supported by Gatwick Green.

Delivery timeframe

- 2.16 Gatwick Green could be developed as a mixed-use proposal that achieves a higher density and a better site optimisation than other locations; an appropriate build out rate; parcelled up and phasing to de-risk delivery; benefit from agglomeration, and deliver wider economic benefits. On this basis, it is considered that the market could support a build out over 7 to 10 years finishing around 2035. 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.

Appendices submitted by email dated 2/3/20

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.**

3.0 Revised ELR entry

- 3.1 Based on the evidence in this representation, a revised entry to the Employment Land Trajectory (ELT) has been prepared, as set out below. If Gatwick Green is to be considered for allocation, then the ELT should be updated to reflect its changed status.

Employment Land Trajectory Information	Savills Assessment on behalf of the Wilky Group
Site Name	Gatwick Green
Site Area	58.7 ha
Land Owner/Contact	The Wilky Group
Comments	The site is located within the Safeguarded Land for a second runway at Gatwick Airport in the adopted CBLP (2015). However, in that national aviation and airports policy contains no proposal for a second runway at Gatwick and relies on maximising the use of existing runway infrastructure, there is no longer a case or any robust evidence to safeguard land at Gatwick. The site is therefore no longer constrained by airport safeguarding, so in principle is available to be allocated for strategic employment in accordance with the strong need identified in the Council's North West Sussex Economic Growth Assessment (EGA, 2019). The site is situated within the North East Crawley Rural Fringe landscape character area and a Biodiversity Opportunity Area (Gatwick Wood Biodiversity Opportunity Area): proposals will therefore need to comply with the objectives within policies LC5, GI1, GI2 and GI3. A suite of site investigation and surveys by consultants on behalf of the promoter indicate that the site could accommodate employment and related development in a manner consistent with the objectives of these policies and that proposals could bring about a net gain in biodiversity at the site or in the local area. The site was actively promoted through the Local Plan 2015 process and discussed at Examination in Public, with supporting information suggesting that approx 60,500sqm could be dedicated to business use and approx 49,000sqm for supporting uses. This capacity has been re-assessed by the promoter, which shows that the site's capacity as up to 265,000 sqm (2.85 M sq ft) of employment and related floorspace.
Timeframe	Years 6 – 15 (2025 – 2035)

Suitable?	Yes
Available?	Yes
Achievable?	Yes

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. The ELT is an important part of the evidence base relating to the selection of employment sites and will be critical to the Hearings in relation to strategic employment land 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 the Employment Land Trajectory insofar as it is an important part of the evidence base 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



