



# 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](mailto: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](http://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](http://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	
First name:	Sally	
Surname:	Fish	
Organisation:	Wilky Group	
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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:	ST1	Other:	
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### 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 checked="" type="checkbox"/> | No | <input 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. It relates to Chapter 17 Sustainable Transport in the Draft Crawley Borough Local Plan, 2020 (DCBLP) and specifically Policy ST1 Development and Requirements for Sustainable Transport.

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).

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.

## 2.0 Sustainable Transport and Infrastructure

2.1 Policy ST1 sets out the requirements for development in relation to sustainable transport. TWG welcomes the transport Sustainability Objectives together with the policies set out in the Sustainable Transport chapter of the DCBLP. It is recognised that the policies attempt to balance the aspirations for growth and new development with the need to minimise carbon emissions and the impact of travel on climate change and air quality. Crawley has a

record of delivering genuine improvements in public transport through Fastway, which has helped achieve a shift from car to bus travel. It is also clear that recent sustainable transport measures proposed and under development as part of the Coast to Capital Growth Fund are an extension of a local commitment to innovation in transport. This includes significant investment in hydrogen powered buses with zero emissions.

2.2 The response to the questions posed in the Sustainable Transport chapter, submitted on behalf of TWG are therefore directed at clarifying the means of delivering the policies and facilitating growth whilst minimising its impact on the environment. Policy ST1 and the Key Issues identified in para 17.5 cover the aspirations of CBC to deliver a vibrant economy, at the same time recognising the urgent need to improve transport networks and address climate change. TWG believes that the Government's Industrial Strategy, including its focus on reducing Greenhouse Emissions alongside improving productivity, and the publication of the Future of Mobility: Urban Strategy (March 2019), provides a useful and constructive context for Crawley's Sustainable Transport policies.

2.3 In committing to new development east of Gatwick Airport, TWG has considered the part that new employment will play in reducing the level of car-borne journeys and the means by which residents and those working in Crawley, travel around the area. This has generated a set of principles and infrastructure concepts which partially address the consultation questions and promotes a vision for Crawley, linking growth with improvements to sustainable transport which, so far as possible, achieve carbon neutral travel. These principles are:

- To provide a range of high-quality employment opportunities that widen and deepen the skill base of residents in Crawley and its immediate neighbours. This will reduce levels of "out-commuting" and therefore the length of trips. Shorter journeys are made more easily by active modes, walking and cycling and potentially, personal electric transport.
- To link new and existing residential development with employment opportunities through infrastructure and transport services that cater for carbon neutral modes of travel, potentially reducing reliance on the private car and in line with the concept of Mobility as a Service, (MAAS).
- To ensure a consistent approach to the delivery of new transport services and infrastructure across borough/county boundaries and to work in partnership with relevant agencies such as the Coast to Capital LEP and Transport for the South East (TfSE).
- To achieve a high level of integration between carbon-neutral modes by providing strategically located and high quality interchange facilities (the concept of super-hubs is already established in Crawley).
- To plan development and sustainable transport comprehensively with new employment and residential locations linked, to avoid "piecemeal" growth which focusses on the exclusive needs of individual sites and occupiers.
- To encourage new development that has the scale and value necessary to deliver investment in innovative and carbon neutral transport services and infrastructure.

- To establish a multi-modal, comprehensive and flexible Sustainable Transport Strategy which is phased in line with new development. It is recognised that this will include some limited new road links to address gaps in the highway network and provide alternative route choices. These should not be primarily aimed at expanding capacity for private car use, but would assist in providing flexible transport corridors, including priority for low emission vehicles, e.g. hydrogen buses operating on the Fastway network and high occupancy electric transit. Critical to delivering the transport infrastructure will be a clear funding strategy based on a borough-wide model that pools available public funding with developer contributions through the CIL or a comprehensive approach to securing planning obligations.

2.4 TWG has sought, in discussion with existing transport and network providers, to “operationalise” the principles set out above and thereby to demonstrate that new employment at Gatwick Green would significantly contribute to the simultaneous delivery of growth and a reduction in carbon emissions. The following are examples of measures to address the ways in which transport in Crawley could be different in 2035:

1. A transit service which is consistent and complementary with existing bus routes operated by zero emission vehicles and capable of conversion to a more sophisticated Guideway system and/or light tramway.
2. Dedicated infrastructure along newly identified routes which would function as a Flexible Transport Corridor, (FTC) linking development sites with existing interchanges and destinations. These routes would encompass the latest thinking in terms of flexible movement using e-bikes, e-scooters (subject to legislation), and “personal transport” solutions, which will form the basis of movement. Such carbon neutral / low-carbon solutions would help to mitigate the causes of climate change and improve urban air quality, currently a key national objective.
3. High quality and strategically located transport interchanges with a focus on sustainable modes. The concept of “super-hubs” is consistent with this aspiration.
4. New road infrastructure to accommodate all travel modes and to bypass existing congestion hotspots. The principle is to plug gaps rather than significantly expand capacity.
5. New pedestrian and cycle links utilising existing routes where possible with an emphasis on safety and the protection of vulnerable road users. These may form part of 2 above.

2.5 It is important to stress that TWG believes these measures form part of an integrated “whole” with new development contributing to the delivery of the linked network of sustainable travel opportunities. In this regard and in the context of Policy ST1, the DCBLP is broadly consistent with national planning policy requirements, is justified and appropriate. However, in its current form, the policy would benefit from a clearer statement that sustainable growth means growth that delivers a significant shift towards efficient carbon neutral transport arrangements. The policy could therefore more clearly state that growth (residential, retail and employment) must be accompanied by major investment in alternative transport networks and methods.

2.6 A comprehensive, employment and residential development strategy, aligned with an

integrated approach to travel will play an important part in delivering Local Plan policies. An explicit policy which sets out to encourage development which addresses the challenge of climate change, through contribution to a clear and defined sustainable transport strategy, will serve to strengthen the Plan. This could build on both committed and proposed investment in Crawley, but crucially should see new development as an opportunity to deliver innovative transport solutions and exploit the emerging technologies designed to minimise greenhouse gasses. The environmental impacts of traditional modes of transport is likely to mean major changes on how people travel in the near future. In the context of the UK policy to end its contribution to global warming by 2050, major shifts in transport modes and networks will be needed to comply with this commitment.

2.7 In meeting the aspirations of the DCBLP, TWG believes that Gatwick Green is a good example of new development that would achieve economic growth and help to shape a transport system fit for purpose and designed for future generations. Gatwick Green is strategically located at the confluence of several major transport networks, so is uniquely placed in view of its scale and location to deliver modal shift and significant components of the wider sustainable Transport Strategy.

2.8 The absence in the DCBLP of a Strategic Employment Location (SEL) and identified housing allocations within/outwith Crawley Borough means there is a risk that the opportunity to achieve highly sustainable transport and travel will not be fully realised. It is crucial the DCBLP contains a key policy on sustainable transport that reflects the need to shift transport towards a net zero carbon outcome over the Plan period. This will include measure to achieve a significant shift from travel by private car, especially for trips of less than 5 miles. Such measures need to be aligned with the proposed development sites in the Local Plan.

### 3.0 Conclusions

3.1 This representation sets out a clear manifesto for the range of sustainable transport initiatives and infrastructure that should be part of Crawley's future transport vision, enabled and delivered through well planned growth and development, integrated and aligned with public funding. This vision can only be fully achieved through planning effectively for employment growth east of Gatwick – a strategic opportunity known as Gatwick Green – and residential development within and sustainably located adjacent to the Borough. To achieve these objectives, TWG has put forward the need for a multi-modal, comprehensive and flexible Sustainable Transport Strategy, which is phased in line with new development. The soundness of the DCBLP will depend on such a Strategy coming forward alongside any growth proposed. It will, of its nature, need to be a joint strategy with the authorities neighbouring Crawley to ensure funding is secured, apportioned and directed in line with mutually agreed priorities.

*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.**

3.2 In order to address the above points, it is considered that Policy ST1 would benefit from some minor changes to clarify its purpose and objectives:

- A clearer statement that sustainable growth means growth that delivers a significant shift towards efficient carbon neutral transport arrangements.
- More clearly state that growth (residential, retail and employment) must be accompanied by major investment in alternative transport networks and methods.

*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 - on this basis, the Wilky Group consider that it is critical that it is able to participate in the Hearing on Policy ST1 insofar as it is an important policy for any strategic site.

*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](http://www.crawley.gov.uk/crawley2035)

**Signature**

**Date**

Ms. Sally Fish completed on

02/03/2020