



# Crawley

Local Plan

Ref No:

Office use only

## Crawley Submission draft Local Plan Representation

Please return your completed representation form to Crawley Borough Council  
by 5pm on 17 February 2021.

Representations can be made via this form and emailed to [strategic.planning@crawley.gov.uk](mailto:strategic.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 [here](#).

### 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:	Mrs
First name:	Suzanne
Surname:	Holloway
Organisation:	Vail Williams
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Address line 2:	<input type="text"/>	6-8 London Road
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Telephone:	<input type="text"/>	<input type="text"/>
Email:	<input type="text"/>	sholloway@vailwilliams.com

## PART B – Your representation

### 3. Please tick the document that you would like to make a representation on:

- Crawley submission Local Plan
- Crawley submission Local Plan Map
- Crawley submission Sustainability Appraisal
- Habitats Regulation Assessment Screening Report

### 4. Which part of the Local Plan does this representation relate to?

Paragraph:  Policy:  Other:

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

- |   |   |  |
|---|---|--|
| 5.1. Legally compliant?                     | Yes <input 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.

We object to Soundness of the Local Plan in regard to the Crawley Western Relief Road (Policy ST4), Gatwick safeguarding (Policy GAT2), the proposed Strategic Employment Allocation known as Gatwick green (Policy EC4) and alterations to the BUAB (Policy CL8).

Please see our attached letter for further detail.

*If required, please continue your response on an additional piece of paper and securely attach it to this response*

- 7. Please set out what modification(s) you consider necessary to resolve the issues you have identified above. You need to state why this modification will make the Local Plan legally compliant or sound. It would be helpful if you are able to suggest how the wording of any policy or text should be revised. Please be as clear as possible. Any non-compliance with the duty to co-operate is incapable of modification at examination.**

Please see our attached letter.

*If required, please continue your response on an additional piece of paper and securely attach it to this response*

*Your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further representations. **After this stage, further submissions will only be at the request of the Inspector, based on the matters and issues s/he identifies for examination.***

**8. If your representation is seeking a modification, do you consider it necessary to participate in the public examination hearings? (Please tick)**

No, I do not wish to participate in the examination hearings

Yes, I wish to participate in the examination hearings

**9. If you wish to participate in the public examination hearings, please outline why you consider this to be necessary:**

Please see our attached letter.

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

**Signature**

Suzanne Holloway

**Date**

23/03/2021



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Dear Elizabeth & Sallie

**Holding response on behalf of the Ardmore Land Consortium on Land adjacent to Jersey Farm for Crawley Borough Council Local Plan Review 2035 Reg 19(2) Representations**

We are writing on behalf of our clients Ardmore Ltd and the consortium which includes 4 adjacent landowners, in regard to their land adjacent to Jersey Farm to the North of Crawley and adjacent to Manor Royal.

As per our previous submissions to your Regulation 19(1) stage in 2019, and our earlier submission to your Regulation 18 stage and Employment Land Trajectory, we believe our site is suitable for economic development and can contribute to the land supply for Crawley.

As with our previous representations, we are promoting our Masterplan that covers nine sites and five landowners which all wish to act as signatories to this letter. We are appointed by them under the lead member of the consortium, Ardmore Ltd.

To confirm, we have re-attached an ownership plan and can confirm that the landowners for each land parcel are as follows:

Site no.	Land ownership	Site address	Site area
1	Ardmore	Land at Jersey Farm (A)	0.59ha
2	Ardmore	Land at Jersey Farm (B)	2.18ha
3	Ardmore	Land at Jersey Farm (C)	8.77ha
4	Willmott	Land at Little Dell Farm (A)	3.98ha
5	Ohm and Hill	Land at Little Dell Farm (B)	1.94ha
6	Ardmore	Land at Little Dell Farm (C)	0.26ha
7	Maxwell	Land at Poles Lane (A)	1.43ha
8	Rixon and Crook	Land at Poles Lane (B)	0.68ha
9	Ardmore	Land at Spikemead Farm	3.67ha
		<b>Total</b>	<b>23.5ha</b>

This letter acts as a holding representation to provide you with our comments and response to the Crawley Submission draft Local Plan Regulation 19(2), and its associated evidence base and Topic Paper 5: Employment

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Need and Land Supply. We have submitted this early, as an interim representation, so we can initiate early discussions with you, however we anticipate that we may seek to make further representations on the outstanding Viability Study and Transport Modelling studies once these are made available and ahead of the consultation deadline.

As part of this representation we are sharing with you our indicative masterplan to provide a vision and context for the quantum of development that we consider to be achievable within this land ownership. This includes an indicative location for the proposed Crawley Western Relief Road (CWRR) running East to West across our client's land parcels, and parallel to the Northern edge of Manor Royal, with access to the main London Road as considered by our Transport Consultants, Mayer Brown.

From this we have been able to demonstrate a range of floorspace between 36,600sqm (to south only of our indicative relief road) up to 53,000sqm of floorspace (both north and south of the relief road) that may be achievable. We believe this shows an optimisation of land for B2/B8 business use development adjoining Manor Royal, whilst also accommodating sufficient space for a relief road should this remain a requirement as part of the emerging Local Plan and supporting evidence base.

As per our previous representations, our main areas of comment will understandably therefore be relating to the changes in the Regulation 19(2) January 2020 version. This is in regard to how the proposed changes will impact on the context of our site, its setting and landscape character, of the land North of Manor Royal, as well as the countryside policies.

We are also making further representations on the Indicative Search Corridor for the CWRR, Gatwick Safeguarding and Economic Growth policies. We will also provide comment on the changes since the removal of the Area of Search for the Area Action Plan.

We have not however repeated any of our previous comments in relation to more general design or sustainability policies and therefore, would request that this letter is read in conjunction with our previous representations.

Our detailed comments on the Regulation 19 January 2020 version are below, but please note that given our previous comments to Reg 19, especially with regard to the AAP proposed, we also now provide commentary in regard to the new inclusion of a Local Plan Review trigger should national aviation strategy be amended. Our comments therefore focus on the retention of Gatwick safeguarding, but also in the scenario where an inspector considers an amended safeguarded scenario is more appropriate

### **Topic Paper 5: Employment needs and Land Supply**

As part of your evidence base we have consider the Lichfield reports and the resultant Topic Paper 5 in relation to economic land supply. Whilst most of our policy comments below, covers directly our concerns as set out in your emerging policies, we note that the revised Topic Paper confirms that the ELAA for years 1-5 and the ELT state that there is a supply of 17.56 ha of land supply against a requirement of 38.7ha (5.9ha office and 32.8ha industrial - resulting in an outstanding 24.1ha).

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Using new updated Lichfields scenarios and the allocation on the 24.1 ha Gatwick Green for predominantly B8 uses (years 6-10) the plan indicates it can meet its land supply requirements. We would however note that this assumes a baseline job Growth scenario rather than Past take up rates, and we believe that the future of supply may need to address a return to more normal market conditions than the September 2020 update report implies, requiring even more land in Crawley as a regional hub for development, even when considering other regional provision at HDC, RBBC and MSDC.

Our representation also now looks at how we believe that our 24 ha site could be more suited to the provision of employment land supply, in a more sustainable location and specific commentary on the proposed Reg 19 (2) local plan policies.

### **Specific Policy representations:**

#### **Policies CL8: Development Outside of the Built Up Area Boundary**

Policy CL8 relates to Development Outside the Built Up Area boundary (BUAB) and paragraph 4.62 states that the Crawley Borough Council Landscape Character Assessment has been used to set the criteria based policy that requires proposals to respect the character and role of the different landscape areas.

(Please note we believe that the Proposals Map states that built up area boundaries policy CL8 and EC13 are relevant in this area in regard to small scale economic development, however the text in 4.62 current states this relates to policy EC12 (which now on neighbourhood centres).

As per our previous representations, our wider 24 ha masterplan site is identified in the Upper Mole Farmlands Rural Fringe as identified on the Proposals Map.

Policy CL8 states that proposals should mitigate visual and noise intrusion and that this area outside the BUAB has an important role in maintaining the separation of Gatwick Airport from Crawley, as well as providing valuable recreation links from the northern neighbourhoods of Crawley into the countryside.

Whilst we appreciate that the Landscape Character Assessment and Policy CL8 provide a criteria based policy for which development and proposals must be individually assessed, we believe that our potential Masterplan development could meet those criteria, utilising existing land forms to the south and east as context, grouping buildings together and reflecting a development that can successfully transition from Manor Royal to the countryside.

Our illustrative Masterplan could also enhance access into the currently private land, increasing valuable recreational links both for Manor Royal and Langley Green, and specifically the provision and network of walks from Cherry Lane.

We therefore believe that our proposals, especially when considered against the identification of the proposed corridor of search of the CWRR in Policy ST4, could realign the boundary of the BUAB to encompass the new road and facilitate a new successful extension to Manor Royal that achieves economic development in a sustainable location, which respects its setting and context.

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As you are aware, we already have consent for building 1 as shown on the attached masterplan. This was granted consent in 2020 and the relevant conditions have been discharged in 2020 in order to facilitate implementation.

We also note that para 4.64 aims to ensure that the rural fringe does not become more suburban in nature and that the presumption in favour of sustainable development will be the over-arching principle. However, we believe that an urban extension into the current countryside, by extending the built up area boundary beyond the boundary for our approved site, or future up to the proposed CWRR, could allow commercial development to be properly planned, to ensure that the contribution of the rural landscape and setting for Crawley is enhanced and not lost in regard to visual, spatial, and environmental aspects as part of the landscape setting and strategy for our masterplan.

We believe that your inclusion of the search corridor already indicates change in use for this area of land in regard to travel patterns and form, and whilst a precise boundary is not yet identified, this should form part of the new BUAB to facilitate much needed development.

We appreciate that in the Plan's current form, any formal planning submission would need to demonstrate a Landscape Visual Impact Assessment as well as consideration for how the development is consistent with emerging policy CL8 criteria.

In regard to the specific BUAB line, previous versions of the Local Plan have supported small scale extensions to Manor Royal and in particular the 2015 Adopted Local Plan and the Employment Land Trajectory identified that our application under CR/2015/ 0435/FUL (and then amended under CR/2019/0696/FUL) for a new B8 warehouse building at Jersey Farm, was included as part of the economic land supply. However, the boundary identified on the Reg 19 January 2021 draft Local Plan map still does not reflect our 2019 consent and therefore we would request that the boundary is at least realigned to be consistent with the planning application and alters the Built Up Area Boundary accordingly.

Whilst we appreciate that the January 2021 version of the Local Plan Review has retained Gatwick safeguarding, we believe it's important that should safeguarding be lifted at any point or the boundaries be amended by GAL or any Local Plan Inspector or central government, that our comments on the potential for a masterplan in this countryside area are provided as part of our representation.

The next section considers our response to the retention of safeguarding in this January 2021 version, especially given that this was removed in the previous Regulation 19 version.

### **Safeguarding**

As you are aware our clients previously supported the further clarification in Policy SD3 in regard to the Gatwick Airport, and the proposed Area Action Plan. Whilst we appreciate that the 2021 Regulation 19 version removes this designation as a result of legal advice given to the Borough Council, we are understandably disappointed that safeguarding which has historically blighted on our client's land for so long, will appear to be continuing to do so. without any clarity from central government on any further evidence or timeline in regards to the need for this land to facilitate an additional runway at Gatwick.

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This is despite confirmation from Gatwick Airport Limited (GAL) that they wish to pursue the emergency runway as a second runway within the current airport boundary. We therefore are very disappointed that this Local Plan has been required to reflect safeguarding, and especially to the extent that is shown on the Local Plan Proposals Map. We would query whether there is indeed sufficient evidence to demonstrate that the whole of this land, even larger and altered from the Adopted Local Plan, should be safeguarded for the whole plan period up to 2037 without further evidence, and to this extent in regard to the new boundary. It is not clear how a larger area can be justified further blighting the Borough's ability to provide much needed economic land supply within its own boundaries.

However, we agree that if this is required due to national policy, then we agree with paragraph 10.17 of the emerging Local Plan, that confirms that para 10.8 of the Government's Aviation Strategy 'Aviation 2050' published in December 2018, does not provide any certainty in government policy that land at Gatwick is no longer required to be safeguarded. We therefore appreciate the position that Crawley is in, with regards to being consistent with national policy but welcome the caveat that should any national aviation policy on safeguarding provide certainty that the safeguarding is no longer required, this will trigger a new Local Plan Review.

We understand that under policy GAT2, the airport operator GAL will continue to be consulted on for all planning applications within the safeguarded area. However, we again query how the Indicative Search Corridor for the CWRR under ST4, is itself consistent with GAT2 when no further information is available to justify the position of this corridor, and that this appears to promote an infrastructure led development which may not be consistent with policies GAT2 or CL8.

In regard to safeguarding, we also query paragraph 10.21 of the January 2021 Local Plan which begins to remove land within the safeguarded boundary for other development, including Land East of Balcombe Rd where the Local Plan allocates a new Strategic Employment Location (SEL), on the grounds that Gatwick has identified it as being used for a large area of surface car parking, and this is therefore inefficient use of land.

There appears to be inconsistencies in the Jan 2020 Local Plan as currently drafted in regard to safeguarding in the plan and paragraph 9.8 states that the SEL "Gatwick Green" will require the safeguarded boundary to be amended accordingly. We will respond to policies EC1 and EC4 separately, with the search corridor under ST4 and the SEL under EC4.

#### **Economic Growth: Policies EC1 EC3 and EC4**

As the Council are aware, our clients have historically been promoting Jersey Farm as a potential extension to Manor Royal, through a number of Core Strategies, Local Plans and other planning framework consultations with Crawley Borough Council over the last 20+ years. The site sits on the boundary with Manor Royal and even has direct existing access from County Oak Way, with large scale development to the East and North immediately abutting our site. The site also forms part of the Council ELAA.

The principle of our site being available and deliverable was established in regard to the consented development in 2015 and 2019. We are now looking to implement this decision Spring 2021, and the building is being actively marketed.

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The Council themselves have also historically acknowledged that there are significant land supply issues and this is still acknowledged in paragraphs 10.21 9.7 which confirm that Crawley requires 38.7 ha of new employment land over the Plan period to 2036.

Para 9.7 also recognises that the scope to accommodate identified employment needs in Crawley is severely constrained by the requirement to safeguard land in the North of the Borough for the possible runway at Gatwick Airport. We support this paragraph that also identifies the risk that if Crawley's own employment needs cannot be met within the borough, investment may indeed be lost for Crawley or the sub region entirely. Therefore, we wholeheartedly, agree that there is a need for *"a robust strategy which plans to positively meet Crawley's employment needs, supporting the wider Gatwick Diamond and Coastal to Capital areas"*.

However, paragraph 9.8 states that the Local Plan strategy focuses on *"the protection and intensification of the Borough's existing main employment areas and the identification of new employment land. Manor Royal will remain the economic heart of the Gatwick Diamond and is protected and promoted for business led economic growth that builds upon its established function and role as the Gatwick Diamonds leading business destination"*. The Plan also acknowledges that appropriate extensions to Manor Royal located outside of the Gatwick safeguarding area will be supported, however it then goes on to say that *"to accommodate Crawley's significant requirements for industrial and warehouse land, a Strategic Employment Location is allocated at Gatwick Green with the safeguarded land boundary amended accordingly"*.

We believe that the SEL allocation away from Manor Royal, with the loss of countryside and its significant policy constraints and infrastructure issues, is at odds with the Council's aims to ensure Crawley's main employment areas will remain the focus for employment uses. Indeed, the ST4 allocation may not be able to ensure that the Main Employment Area's economic function is not undermined, as this introduces a site that is disconnected and away from Manor Royal itself.

Paragraph 9.13 confirms that there is a need for a B8 led SEL with an outstanding need of 24.1 ha of employment land, and we agree that this should be a plan led requirement to ensure that the site is suitable and appropriate to meet business needs. Para 9.14 continues by stating *"to supplement the employment land supply position and deliver new floor space at Manor Royal, small extensions to Manor Royal outside of the safeguarded land will be supported where this would contribute positively to business led economic growth."*

However, we would argue that the Council is being forced to consider less sustainable locations without significant evidence that safeguarding cannot be amended accordingly, especially on the periphery of Manor Royal and in particular, in the area where they are already identifying a need for alternative development that would override safeguarding, such as the Cawley western link road. We therefore believe further consideration of alternative strategies are needed especially relating to criteria (v) that looks to provide 24.1 hectares of new industrial land over the Plan period to 2036, by allocating the SEL at Gatwick Green, and how this may complement the established role of Manor Royal as required in paragraph 9.23.

Whilst we recognise the extensive policy criteria requirements that would need to be met for the allocated site at Gatwick Green, as set out in policy EC4, we would argue that given that the safeguarded boundary has to be amended in order for this to come forward, the Council is not correct that in paragraph 9.15 this is *"the only*

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*location in Crawley that is capable of providing the required quantum of industrial land and floor space without prejudicing the possible future delivery of the southern runway on the safeguarded land”.*

In addition, we would argue that the comments in paragraph 9.2 regarding an urban extension to Crawley, suggest that this is most likely to be provided on the western boundaries of the town, hence the need to provide the western link Relief Road.

We would suggest therefore, that such an urban extension could increase the requirements for employment needs, especially to the west of the town, and that these could be more appropriately met in a more sustainable location on our site, as this would enable better connectivity and sustainable transport movements on the edge of the Manor Royal Business District (MRBD). Our site is better located in a closest to the western Borough boundary with Horsham and could be supported by the necessary infrastructure to the west of the Borough.

We note and welcome that para 9.22 provides additional clarity that following any implementation of new extensions to Manor Royal should form part of the Manor Royal main employment area, and therefore this supports our justification for the Built Up Area Boundary and Manor Royal Main Employment Area boundaries to include our new development as consented.

In regard to policy EC3, relating to Manor Royal, we agree that the business district is instrumental to the success of the wider Gatwick diamond and that development at Manor Royal should contribute positively to the overall setting and environment of the main employment area in accordance with the Manor Royal Design Guide SPD. Again, we believe that our masterplan has the merit of a successful transition between existing buildings on Manor Royal and the aspirations of a high quality environment especially in the area around the potential new western relief link road.

In regard to policy EC4 on the SEL, this states that 24.1 hectares of new industrial land must be provided as a minimum, predominantly for B8 storage and distribution use. However, policy EC1 has required 24.1 hectares to be provided across the whole Local Plan, and therefore it is unclear how any additional potential industrial land or developments would be viewed across the rest of the town if Gatwick Green were not able to satisfy all of the requirements of Policy EC4 or be implemented.

We agree that the provision should be predominately industrial/ B8 but there is concern how any additional mix may undermine rather than complement MRBD given its separate location. The policy also recognises the need for a comprehensive mobility strategy and improvements to public transport facilities links and infrastructure, which all requires a robust transport assessment required. Again, we believe this allocation is for a disconnected site from the Main Employment Area of Manor Royal but also further away from those potential employees that reside in the neighbourhoods around it.

Policy EC4 also recognises that particular regard should be had to the location of the site in regard to the North East Crawley Rural Fringe Landscape Character Area, recognising that design is critical to how this SEL will sit within the countryside location. Again, we would argue this may be more easily achieved in a site adjacent to existing development at Manor Royal.

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In summary, we believe our proposal could allow an area on the periphery of the safeguarding area to be removed from safeguarding without undermining the future delivery of safeguarding. The safeguarding boundary could be amended accordingly as the Council are suggesting they would do so with EC4. We believe our sites affords established continuity between the potential Crawley western relief road to relieve access and transport issues across the North and West of the Borough and would meet the 24.1 ha requirement whilst providing and enhancing the main employment area of Manor Royal in a more sustainable manner.

This is because the location of our site on the northern boundary of the established main employment area, provides a sustainable extension to Manor Royal as the economic heart of the town. Indeed, previous Local Plan Inspectors have encouraged extensions to Manor Royal to provide essential employment needs and have rejected proposals for a SEL at Land East of Balcombe Road.

In our view if the whole area is to be safeguarded for future needs then this should be consistent across the Borough, or the Council and GAL should openly review land take requirements in line with the principles within the NPPF regarding sustainable development in sustainable locations, releasing areas where development can support the economic activity of the town, Manor Royal and Gatwick Airport alike.

We therefore would like to engage further with the Council in regard to further assessments on more sustainable alternative locations to be considered for the SEL under EC1.

Whilst we appreciate that any aviation policy changes will trigger a new Local Plan review on both the principle of safeguarding and the extent of safeguarding, this would only occur after the release of the land under policy EC1 Land East of Balcombe Rd.

As per our meetings with the Council as part of both of the Regulation 19 consultation, we wish to continue to engage as a viable alternative location to land East of Balcombe Road, and have included indicative Masterplans to enable the council to understand how such development could be provided on the Jersey Farm site.

#### **ST4 safeguarding of a search corridor for a Crawley western link road**

Policy ST4 identifies the search corridor for the CWRR, linking the A284 with the A23. This states that this corridor will be safeguarded from development that would be incompatible with the future delivery of the link road. It also states that the design and route of the western link road must take account of its impact and bus priority measures.

As explained in regard to our response to policy CL8, we currently have a planning application that is able to be implemented. This development is shown within the area identified for the Indicative Search Corridor for the CWRR. We therefore still seek reassurance that our permitted application would be a material consideration under this policy and policy ST4 should any future any minor alterations be required.

However, as with our Regulation 19(1) representations, we are concerned that the extent of the search corridor is so significant and that this in effect safeguards the land at Jersey farm with no clear indication of when or how a proposed western relief road would be provided.

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In order to ascertain how development of the western relief road may impact on the masterplan, we have undertaken 2 masterplan options to demonstrate how the land could provide significant economic floor space on the 24 hectare site whilst still enabling the principles and objectives of the western link road in relieving congestion on the existing internal roads in Crawley. We appreciate that in paragraph 17.21 modelling has been undertaken in association with Horsham District Council in regard to their Local Plan Review process, but as we are aware this has currently been delayed. It also states that in 17.22 the corridor will be led and identified by HDC.

We would therefore seek clarity on how the Crawley's Local Plan can allocate such a significant search corridor without clarity as to the precise location of any road and therefore any alternative revisions in regard to the built up area boundary in Crawley.

Whilst we are aware that further major development is being promoted to the West of Crawley through the Horsham District Council Local Plan Review and we appreciate that cumulative impacts of all of the developments in the area will exacerbate existing capacity issues on roads within Crawley, it is still not yet clear whether it is indeed appropriate at this time to safeguard the whole of the potential corridor of land within Crawley for a full western relief road and at this time it is not possible to identify the route corridor within Horsham District to the West.

The latest draft Local Plan therefore further blights land that could be released for development in the latter period of the Plan should an alignment route be agreed.

We welcome paragraph 17.28 that confirms that the current search corridor is located at the southern edge of land safeguarded for potential runway at Gatwick and that the Council is seeking to engage with Gatwick Airport about the detailed alignment of the route.

However further certainty is required as this is land owned by the consortium, and we would have expected confirmation of Gatwick's land take requirements and detailed alignment of the corridor to be provided before such a significant search corridor and Gatwick safeguarding (or both) is adopted within any Local Plan.

We therefore reiterate our concerns that this safeguarding will significantly affect our client's land as it is shown as part of the current arbitrary corridor to deliver any western relief road, without what appears to be any further justification to the current timeline for delivery, need, route, or scale for this major highway's development.

Given CBC's own transport modelling is also not yet finalised we would suggest that this allocation and safeguarding is premature.

We therefore continue to raise objections to both the policy ST4 in its current form and the Proposals Map allocation as well as the principle of safeguarding land for a relief road, and we consider this policy and extent of the Indicative Search Corridor to be premature.

### **Conclusions**

We are grateful for this further opportunity to comment on the Regulation 19(2) consultation and would seek further to engage directly with the Council in regard to the key matters regarding the SEL at EC4, the Crawley Western Relief Road STP and general economic policies EC1-4.

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We would also like to request a follow up meeting with the Council on the week commencing 29<sup>th</sup> March, ahead of the consultation deadline (currently tabled for 31<sup>st</sup> March) to discuss our masterplan proposals which we have shared with you as part of this holding representation.

We note however that there are outstanding transport and viability studies which are due to be published as part of the on-going public consultation period and therefore we will seek to make further representation on these studies ahead of the consultation deadline.

In particular we would like to review and comment on the transport modelling and junction capacities in both scenarios with and without the proposed CWRR, and in regard to the proposed options, location, extend of the proposed relief road and how this will impact on our client's land which lies within the Indicative Search Corridor.

Should have any further questions please do not hesitate to contact me.

Yours sincerely

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