

Ref: SH/KJ/P16-2975
Date: 30th June 2021



Vail Williams LLP
Unit 4 Peveril Court
6-8 London Road
Crawley
West Sussex
RH10 8JE

Tel 01293 612600
vailwilliams.com

Forward Planning Manager
Crawley Borough Council
Town Hall
The Boulevard
CRAWLEY
West Sussex
RH10 1UZ

Dear Sallie and Elizabeth,

Updated response on behalf of the Ardmere/Windsor Land Consortium on land adjacent to Jersey Farm for Crawley Borough Council Local Plan Review 2035 Reg 19 Local Representations- June 2020

We are writing on behalf of our clients Windsor Developments/Ardmore Ltd and the consortium of other landowners, in regard to land to the North of Crawley and adjacent to Manor Royal.

As per our previous submissions to your Regulation 18 & Reg 19 stages on behalf of the consortium of landowners, we would like to make additional representations based on our assessment of the Transport Study released by Stantec on your behalf that now forms part of your evidence base.

However, you will be aware that further to our meeting and further discussions with Stantec and WSCC, we are still looking to develop further some of our transport modelling. We therefore confirm that our letter acts as a further holding representation, and confirm that we will be looking to submit supplementing additional information as a result of our ongoing transport work as a further response.

These representations build on those already submitted and continue to question if the Councils approach to allocating a SEL at Gatwick Green, over other more sustainable SEL locations is appropriate. Our suite of representations and supporting documents aim to show how we believe the removal or adjustment to safeguarding is more appropriate, allowing much needed employment floorspace as a natural extension to Manor Royal. This also ensures alignment with any new relief or link road required to the north of the Main Employment Area, ensuring the most sustainable urban extensions are allocated.

Please accept this letter, our forms and our supporting Promotion Statement Document as our June 2021 representation. Other information on transport will follow, as agreed.

Previous representations summary:

In summary, as per our reps dated March 2021 we are disappointed that your Area Action Plan has been removed as a mechanism to consider the potential for new strategic employment locations and question if this is a robust, sound and justified approach.

Listen Care



Innovate Lead



We do not agree that there is a robust evidence base that supports the continued retention of the safeguarding area within the plan period to 2037 to endorse this approach. We believe that the Aviation Strategy 2050 and the NPPF (para 104) intends for LPAs to inform their own approach. It cites that the NPPF requires LPAs to “c) identify and protect, where there is robust evidence, sites and routes which could be critical in developing infrastructure to widen transport choice and realise opportunities for large scale development”. The Aviation Strategy states that this is “sufficient guidance for local authorities to consider the future needs of airports and their associated surface access requirements, when developing local plans”.

We do not believe there is a justifiable case to demonstrate that safeguarding at Gatwick is supported by robust evidence, especially given that Heathrow is the governments choice for additional runway capacity. In addition, locally we believe the allocation of an SEL in EC4 and CWRR in the safeguarded area is not applying consistency in its approach to safeguarding for future growth.

When coupled with the GAL intentions to deliver additional capacity and a second runway through the redevelopment of the emergency runway, under a DCO at Gatwick providing capacity until 2032, beyond the plan period, we believe the safeguarding policy is outdated and is not robust.

As you are aware para 35 of the NPPF seeks to ensure LPAs’ Local Plans are effective and do not defer on strategic matters and have looked at all “reasonable alternatives” and we believe our proposals are a more sustainable location and opportunity for the provision of a much need Strategic Employment Location. Para 35 also seeks to ensure that you have “positively prepared the Plan” and we believe that the allocation of Gatwick Green as the required SEL does not allocate employment development where it is appropriate to do so, and our alternative location, when considered in the round against employment policies and CBCs own aspiration of the Crawley Western Relief Road, that Jersey Farm affords a more sustainable and deliverable strategic employment led development.

Our proposals also more effectively align with section 9 of the NPPF in regard to promoting sustainable transport and this letter, as well as our supporting Promotion Statement demonstrates how we believe that our proximity to existing neighbourhoods and employment provision within Manor Royal align with the most sustainable approach to delivering economic growth in the town over the emerging period to 2037.

This aligns with paras 102-105 of the NPPF by delivering enhanced connectivity with new and existing employment and residential developments, building on the local LCWIP. Jersey Farm Project Team are already interacting at an early stage with WSCC and key sustainable transport infrastructure providers & stakeholders including Metrobus and MRBG. We are also demonstrating an appropriate mix of uses, hereby reducing the number and length of journeys. This more closely supports “Building a Strong Competitive Economy” and “Making Effective use of land”, and “Promoting Sustainable Transport”, as required by the NPPF.

Section 6 of the NPPF “Building a Strong, Competitive Economy” also seeks to ensure that planning polices create conditions so business can invest, expand and adapt, and our illustrative Masterplan allows over 52,000sqm of new employment floorspace to be provided, extending the Borough’s Main Employment Area. The Local Plan seeks to provide a clear economic vision but currently presents a disjointed geographical disconnect between the existing Manor Royal and the proposed Gatwick Green in a far less sustainable location.

Listen Care



Innovate Lead



The criteria-based approach of Policy EC4 for Gatwick Green indicates the significant extent of policy constraints associated with that site including ensuring that there are no “*severe residual impact on the local and strategic road network*”, and “*that there is an appropriate landscape buffer, and public open space, to reinforce the distinctive identity of Gatwick Green Strategic Employment Location, and its separation from Gatwick Airport, and Horley*”. In addition, the policy seeks to ensure that it is “*demonstrated how the Strategic Employment Location will address Crawley’s identified need for industrial focused business floorspace, and how its offer will be complementary to the mixed-use business function of Manor Royal*”. We believe that many of these issues and concerns are not constraints for Jersey Farm or if any such issues do exist, that they can easily be mitigated, as shown in the illustrative Masterplan and Promotion Statement that supports this representation.

Para 82 of the NPPF seeks to ensure that locational requirements of different economic sectors, and provision of clusters/networks are achieved in highly sustainable locations – our site allows an extension to Manor Royal and identifies an important synergy with the proposed highways link and how it aligns with the ST4- CWRR which further supports our unique location to provide an opportunity to enhance and build on the success of Manor Royal.

Whilst we support your evidence base and the revised Topic Paper 5, these confirm that the ELAA for years 1-5 and the ELT state that there is a supply of only 17.56 ha of land supply against a requirement of 38.7ha (5.9ha office and 32.8ha industrial) resulting in an outstanding requirement of 24.1ha . Our site in the first instance can provide 19.6ha of space and 23.5 Ha in total in this most sustainable location for economic growth.

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 if Gatwick Green is allocated, it can meet Crawleys land supply requirements. We would however note that this assumes a baseline job growth scenario rather than using more appropriate past take-up rates. 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 the region hub for development, even when considering other SEL opportunities at HDC, RBBC and MSDC. We would also argue that Gatwick Green does not align with many of the other objectives of the plan, or the NPPF and alternative locations for the SEL should have been more appropriately considered.

In regard to our overarching Masterplan, we appreciate that the Landscape Character Assessment and Policy CL8 provide context for development currently outside the Built Up Area Boundary (BUAB), and we believe we can adequately demonstrate that our potential Masterplan development could meet those criteria. It can do so by utilising existing landforms to the south and east as context, grouping buildings together and therefore reflects a development that can successfully transition from Manor Royal to the countryside, retaining a 50% site coverage to reflect its unique location.

To assist, our previous rep also identified that our illustrative Masterplan could also enhance access into the currently private land, increasing valuable recreational links both for Manor Royal and Langley Green neighbourhood, and specifically the provision and network of walks from Cherry Lane & Manor Royal.

Listen Care



Innovate Lead



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 the most sustainable location, which respects its setting and context.

As you are aware, we already have consent for Building A as shown on the attached Masterplan. This was approved in 2020 and the relevant conditions have been discharged in May 2020 in order to facilitate implementation (June 2020). We therefore repeat our comment that the BUAB should reflect this as an amendment to the Proposals Map.

We also note that para 4.64 of the Jan 2020 Reg 19 plan 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 overarching principle. However, we believe that an urban extension into the current countryside, by extending the BUAB to include the boundary for our approved site, and beyond the proposed CWRR/link road, could allow commercial development to be properly planned. This will ensure that the contribution of the development and its juxtaposition to 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 our site is a highly logical and sustainable extension of the urban area, particularly compared to the site currently identified to be allocated at Gatwick Green and therefore our proposals more clearly align with Policies CL3 and CL8 of the emerging local plan on development outside the BUAB, impact on Countryside and Movement Patterns, Layout and Sustainable Urban Design.

Whilst we recognise that the January 2021 Sustainability Appraisal looks at the alternative options for allocating or not allocating a SEL site, and the merits of an AAP, it also identifies the Planning Inspectorate feedback, on safeguarding being retained. As already stated, we believe that this approach needs to be reconsidered against the more sustainable opportunities afforded by alternative sites such as ours, and how this and demonstrated land scarcity may override a blanket approach to safeguarding.

For our site, the impact and mitigation opportunities are significantly more appropriate, as an extension to the Built Up Area Boundary with less intrusive impact visually, and ecologically as well as enhanced connectivity and reduced movement patterns, than a new disconnected site to the north under EC4, at Gatwick Green.

We believe that your inclusion of the search corridor for ST4 already indicates a clear change in use and character for this area of land, in regard to travel patterns and form, and whilst a precise boundary is not yet identified, and further work is ongoing by SYSTRA, we believe this should form part of any new BUAB to facilitate much needed development. We would wish to be further consulted and involved on the outcomes of the SYSTRA reports that we believe are due to be finalised later this summer.

As our additional June representation, our additional information therefore seeks to demonstrate how we believe that our 19-24 ha site is more suited to the provision of the much needed employment land supply, in a more sustainable location than the proposed Gatwick Green SEL and we provide specific commentary on the proposed Reg 19 (2) local plan policies and its evolved evidence base but specifically the transport modelling undertaken by Stantec. Our additional detailed comments are as follows:

Listen Care



Innovate Lead



Response to Stantec Transport Modelling Report

The Local Plan evidence base is supported by strategic traffic modelling undertaken by Stantec on behalf of CBC. The “Crawley Transport Study: Transport Study of Strategic Development Options and Sustainable Transport Measures: Draft Crawley Local Plan 2021 – 2037” by Stantec (dated December 2020) was published on 18th May 2021. The strategic modelling assesses the traffic impact of three different Local Plan scenarios (1-3).

In terms of employment, Scenario 2 is the same as Scenario 1 but with the addition of the strategic employment site at Gatwick Green, which is modelled as comprising 77,500 square metres (sqm) gross floor area, comprising 10% B8 Parcels Distribution, 60% B8 Commercial Warehousing, and 30% B2 Industrial estate.

In Scenario 2 the Gatwick Green site is predicted to generate approximately 330 vehicle movements in the weekday AM peak hour and approximately 300 in the PM peak hour. The modelling has assumed that there will be a modest number of car trips made by staff working on site which will respond to sustainable travel modal shift, and predicts that measures will reduce the traffic impact by approximately 20 vehicle trips in each peak hour.

As the Jersey Farm proposal comprises similar land uses, but slightly less quantum than Gatwick Green, the development trip numbers are expected to be commensurate with the smaller GFA when compared with Gatwick Green. However, as set out below, Jersey Farm has considerably greater potential for sustainable travel mode shift given its location adjacent to the Manor Royal Main Employment Area and the associated non car travel opportunities and initiatives.

The strategic modelling identifies predicted traffic impacts on the B2036 Balcombe Road for most of its length, both north and south of the B2037 Antlands Lane junction with Balcombe Road. A significant proportion of these trips are freight / heavy goods traffic, which is not expected to respond to sustainable travel modal shift.

There are concerns about the sensitivity of the Gatwick Green freight traffic using the local residential roads, and an HGV ban is proposed through the built-up area in Horley. Also, a right turn ban is proposed for HGV traffic exiting the site, to prevent it using the northern sections of Balcombe Road to reduce the associated noise and air pollution in this area.

Again, the proximity of Jersey Farm to the established Main Employment Area and its purpose-built industrial road network which connects to the principal road network, ensures that this is not an issue for Jersey Farm. In this respect, Jersey Farm is appropriate development in an appropriate location, with limited impact on residential areas.

There is a planned new link road between the A2011 and Balcombe Road, designed to improve the access route to the North East Sector developments. This is shown in the modelling to have capacity problems in the Reference Case and the Local Plan scenarios, even after the proposed sustainable travel mitigation is applied.

In the vicinity of Jersey Farm, the strategic modelling predicts impacts at a number of junctions, notably the Ifield Roundabout (Ifield Avenue/A23 Crawley Avenue) and the Tushmore Gyratory, however, the report concludes that sustainable travel measures can successfully mitigate the impacts at almost all of the junctions.

Listen Care



Innovate Lead



Only the Ifield Roundabout is identified as needing some physical improvements, which are all deliverable within WSCC Highway Land. Stantec has identified a scheme to resolve this, which is proposed within their report.

Our further ongoing work also aims to provide further commentary as we analysis data and as you are aware we are in ongoing in dialogue with Stantec.

Additional comments to Chapter Seventeen: Sustainable Transport

Modal shift, and mobility strategy themes

A vital element of the Jersey Farm development will be its Mobility Strategy, which will be an overarching strategy for the whole development. The Strategy will focus on all transport users and travel modes, and will be developed in conjunction with the highway and planning authorities, as well as a number of other stakeholders including the Manor Royal Business Improvement District and Metrobus.

We have already engaged with West Sussex County Council Highways, Manor Royal BID, and Metrobus, and will continue to do so through the next steps of the planning process. The Project team are closely working with WSCC on other local schemes and have experience of bus viability studies, Statements of Common Ground, and mobility strategies to support their partnership working approach with key stakeholders, which in this location would be the CBC Sustainability Manager, MRBG and WSCC.

The Jersey Farm site has direct access to the existing network of pedestrian footways and road crossings within the County Oak and Manor Royal areas, and therefore has ready-made pedestrian connections between the site and the surrounding areas, including residential areas and other employment / retail land uses.

It is within a 2km walking commute of the residential areas of Langley Green, Ifield, and West Green, comprising a resident population of approximately 17,000 within walking distance. It is also within 2km of the whole of the Manor Royal area and Northgate.

The 5km cycling catchment for Jersey Farm includes the majority of Crawley to the south and southeast, all of Gatwick Airport, and the southern portion of Horley, to the north. This comprises a total resident population of approximately 120,000 within cycling distance.

With direct access to the existing network of pedestrian and cycle routes and infrastructure within Manor Royal and wider Crawley, there are real opportunities for future employees and visitors to travel by active modes.

The closest bus stops to the Jersey Farm site are adjacent to the site's eastern boundary and are served by regular and frequent buses on Routes 4 and 5, and the 100 Fastway service. These provide a total of seven buses per hour during the peak periods.

The Crawley Growth Programme includes a number of schemes in Manor Royal close to the Jersey Farm site, to provide improvements to the pedestrian infrastructure and environment, which aim to promote sustainable travel.

Listen Care



Innovate Lead



Additionally, Crawley has been successful in its bid for £21.1m from the Towns Deal, which will be invested in improvements to the public realm and improvements in active travel, particularly in the Manor Royal area, over the period 2022-2026. This will help to make walking, cycling, and bus travel more attractive and popular, which will facilitate the aim of reducing reliance on car travel to/from Jersey Farm.

In addition to the above, the Easit scheme at Manor Royal offers highly attractive incentives for employees to travel by sustainable modes, which will be available to Jersey Farm businesses, further enhancing the ability for Jersey Farm to achieve high levels of travel mode shift.

Vehicle Access Strategy

Our illustrative Masterplan indicates that the development can initially be accessed via County Oak Way. The quantum of this development will be dictated by the available capacity of the junction of County Oak Way and the A23 London Road, which will be determined from traffic modelling in conjunction with CBC's transport consultants and WSCC, which is ongoing at the time of writing, and will form further representations, hence the holding representation. This is due to the short time afforded to undertake additional modelling using the Strategic Modelling Data which we have only recently received.

The remainder of the development will be accessed from the east via a proposed new road and junction with the A23 London Road, north of the A23 Fleming Way Roundabout.

Additional comments to Policy ST4: Safeguarding of a search corridor for a CWRR/Link Road

The identification of the indicative search corridor for the relief road, as shown on page 214 and on the Proposal Map, indicate that there is an area that will be safeguarded against all development throughout the plan period.

Given the policy position, land within the Jersey Farm site will be safeguarded to accommodate the delivery of the CWRR; allowing it to be connected to the Jersey Farm access road from the west, allowing the access road to be widened to accommodate bus lanes and pedestrian/cycleways, and allowing the Jersey Farm / A23 junction to be upgraded.

We are in dialogue with both Homes England and Aberdeen Standard with regard to their respective development masterplans and the synergies in terms of the CWRR.

We understand that CBC has commissioned SYSTRA to undertake an additional study into the potential route and alignment of the CWRR. Given the location of the Jersey Farm site on the Policy ST4 search corridor, we have already supplied a draft copy of the indicative site masterplan, showing our proposed CWRR safeguard corridor, to CBC's consultant to assist them with their assessment.

Pre app with WSCC

We are engaged in pre-application consultation with WSCC Highways, and their advice will be incorporated into the Jersey Farm proposals as they develop; further traffic and transport assessment work will be undertaken to refine the proposed access arrangements as those discussions progress.

Listen Care



Innovate Lead



Jersey Farm Masterplan and the Local Plan Review Policy Context:

As part of our own evidence base we have developed alongside our current marketing for the Building A of the Jersey Farm employment location, our Promotion Statement that looks at high level, the main themes and aims of the wider masterplan and its role as a sustainable urban extension to Manor Royal.

The Masterplan and our supporting documents look at our opportunities through its sustainable location and its surroundings and context in proximity to the existing Main Employment Area Manor Royal.

Our Promotion Statement document also addresses the site constraints and opportunities, that we have considered, informing the Masterplan and its layout. This also enhances connectivity opportunities with Manor Royal and the surrounding countryside and its transition between the two.

In addition, we have also provided further information on market demand, economic benefits and the potential delivery strategy for the site given the wider project team with Vail Williams and KBA as significant local land agents, to assist marketability and delivery. This builds on the fact that our clients at Windsor Development and Ardmore, already have significant experience in bringing forward major developments such as the proposal at Jersey Farm.

Our Masterplan also picks up future potential phasing with any Crawley Western Relief Road and that there is an opportunity to provide essential small and medium enterprise space, and incubation opportunities on the western side of the site as it transitions to the countryside. These will provide grow-on space that is much needed in Crawley reflecting the findings of the Employment Growth Assessment and the wider ambitions of the Council and Manor Royal Business District.

These illustrative plans indicate approximately a 13% provision for support/amenity facilities and B1c/Class E facilities with the remainder of the site, available for B8 light high tech units.

The Masterplan also provides a range of size of units based on market intelligence and demand as captured by KBA and Vail Williams, providing flexibility on sites to react to market demand.

Masterplan Design principles:

Whilst this has been covered in our previous reps and is now supported by our Promotion Statement, central to the ethos of the Masterplan is the recognition of **Policy CL2: Principles of Good Urban Design** and the inclusion of criteria a) which adds the need for development proposals to consider the movement corridors, distant views, landmarks and views into and out of adjoining areas.

This is considered to have been important given the existing planning consent for the building on Jersey Farm approved at committee January 2020, and how it transitions from the urban area of Manor Royal to the countryside and rural fringe. This has been central to the development of the Masterplan with the scale and form reflecting the sensitivities to the west and the potential changing form of land to the North should the additional DCO runway be developed.

Listen Care



Innovate Lead



Chapter 9: Economic Growth

We continue to support the recognition that Manor Royal is the focus for business led economic growth in the Borough and that the Main Employment Areas will be required to make effective use of the land within them.

The Northern West Sussex Area EGA (January 2020) states that further growth would exist in an unconstrained land supply position, and that for employment land a Strategic Employment Location (SEL) to the north of Manor Royal and south and/or east of the Airport, would be the most likely location.

Our client wishes to support the recognition of the Local Plan and the EGA, that in an unconstrained scenario 113 ha of B-class business land would be required. However, we would argue that the SEL proposed at Gatwick Green is at odds with many internal policies of the emerging local plan in regards to layout, landscape setting and transport and that Jersey Farm provides a better opportunity to provide a SEL location, adjacent to Manor Royal with enhanced connectivity with the existing main employment area. This is also less intrusive through design and mitigation than the location of Gatwick Green. We therefore believe our Promotion Statement provides a more thorough explanation of how we are a more sustainable and deliverable SEL alternative site, building on the success of Manor Royal.

Policy EC2: Economic Growth in Main Employment Areas

We believe that our site will best reflect the Council's commitment to retaining economic growth and supporting the economic function of the Borough's Main Employment Areas, especially Manor Royal and partnership working with MRBG has already begun.

Conclusions

We are grateful for the opportunity to comment on the additional Regulation 19 Consultation and would seek further to engage directly with the Council in regard to the key matters regarding safeguarding, Crawley Western Relief/Link Road and general economic policies.

We also reserve the right to provide, as agreed, further representations as we complete our own traffic modelling work beyond the 30th June deadline, given the ongoing dialogue with CBC and Stantec and the additional information and points of clarification we are continuing to have dialogue on. We therefore intend to submit further reps as this strategic modelling is assessed further. We would also wish to assess and provide comment on the recently commissioned SYSTRA work as part of the Local Plan Review, ahead of any submission.

Listen Care



Innovate Lead



Please note that we would also wish to participate at any Local Plan Examination regarding the emerging framework for the Borough.

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

Yours sincerely

A handwritten signature in black ink, appearing to read 'S Holloway'.

Suzanne Holloway BA (Hons) BTP MRTPI
Partner
For and on behalf of Vail Williams LLP
Mob: 07796 938554
Email: sholloway@vailwilliams.com

Listen Care



Innovate Lead