



Crawley Local Plan

<p>Ref No:</p> <p><i>Office use only</i></p>
--

Crawley Submission draft Local Plan Representation

Please return your completed representation form to Crawley Borough Council.

Representations can be made via this form and emailed to 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. 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:	Mr	
First name:	Ken	
Surname:	Glendinning	
Organisation:	Homes England	
Address line 1:	5 th Floor, Town Hall	

Address line 2:

Town/city:

Postcode:

Telephone:

Email:

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 see attached letter to email.

- 5.1. Legally compliant? Yes No
- 5.2. Sound? Yes No
- 5.3. Compliant with the duty to co-operate? Yes No

6. Please give details explaining your response to 5.1, 5.2, or 5.3 below. Please be as clear as possible.

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.

*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

Homes England do not wish to appear at EiP in relation to Rowley Farm but may wish to appear on other matters – please see separate reps.

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

N/a

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

Signature

Ken Glendinning

Date

29.06.2021



Crawley Borough Council
Strategic Planning
Town Hall
The Boulevard
Crawley
West Sussex
RH10 1UZ

29th June 2021

Dear Sir / Madam,

**CRAWLEY BOROUGH COUNCIL LOCAL PLAN REVIEW REGULATION 19 -
JANUARY 2021 – ROWLEY FARM**

Please see below Homes England's representations to Crawley Borough Council's (CBC) Draft Local Plan Review 2021 – 2037 (Regulation 19 2021) (the **Draft Crawley Local Plan**) in relation to Rowley Farm, Crawley, RH10 9SL (the **Site**) only. Homes England has submitted a separate representation addressing other policies.

Homes England is responding in its capacity as the Government's housing accelerator and as the landowner / promoter of the Site. Separate responses will be submitted by Homes England in relation to its other interests.

Introduction

Homes England is an executive non-departmental public body, sponsored by the Ministry of Housing, Communities and Local Government. Homes England has the aspiration, influence, expertise and resources to drive positive market change. By releasing more land to developers who want to make a difference, Homes England are assisting in the delivery of the new homes England needs and is helping to improve neighbourhoods and grow communities. Homes England works in collaboration with partners who share our ambition. These include local authorities, private developers, housing associations, lenders and infrastructure providers. Within the next few years, Homes England will have invested over £27 billion across our programmes.

Homes England
50 Victoria Street
Westminster
London
SW1H 0TL

0300 1234 500
@HomesEngland
www.gov.uk/homes-england

#MakingHomesHappen

Homes England's mission is to ensure more homes are built in areas of greatest need, to improve affordability and is deploying our knowledge and delivery expertise to ensure that the scheme comes forward to meet local ambitions. Homes England has a strong track record in acting as a 'master developer' on schemes such as the Northern Arc in Burgess Hill and Northstowe in Cambridgeshire.

Previous representations

Homes England has submitted previous representations which relate to the promotion of the Site for employment across the various B Class uses. Homes England engaged with previous plan-making stages including Call for Sites, Regulation 18 (see letter dated 16 September 2019) and Regulation 19 (2020) consultation (see letter dated 2 March 2020).

Our representations set out below supersedes our previous Regulation 19 representation dated 2 March 2020 made in relation to the previous iteration of the Draft Local Plan which was published for consultation between 20 January 2020 and 2 March 2020 (our **Previous Representations**).

Purpose of Representations

Pursuant to Regulation 19 of Town and Country Planning Act (Local Planning) (England) Regulations 2012 these representations are made in respect of the Draft Crawley Local Plan to confirm our position in respect of the land interests described within this representation.

Documents reviewed

In preparing these representations, the following documents have been reviewed:

- Crawley submission Draft Local Plan (January 2021)
- Draft Sustainability Appraisal (January 2021)
- Infrastructure Plan (January 2021)
- Draft Duty to Cooperate Statement (March 2021)
- Topic Paper 1: Unmet Needs and Duty to Cooperate
- Topic Paper 2: Gatwick Airport
- Topic Paper 5: Employment Needs and Land Supply
- Topic Paper 7: Development and Noise Technical Appendix
- Employment Land Availability Assessment January 2021
- Employment Land Trajectory January 2021
- Crawley Transport Study (May 2021)

Homes England Land Interests

Homes England own key sites which fall within the Crawley Local Plan area. These landholdings comprise Land West of Ifield, Land at Rowley Farm, Land at Forge Wood and Land at Tinsley Lane.

These representations are written only in regard to Homes England's interests at Rowley Farm and therefore other landholdings are not described. Separate representations have been submitted where necessary.

Rowley Farm

Homes England wish to reiterate our consideration that the Site which is located immediately to the south of Gatwick Airport and abuts the Manor Royal employment area to the east and south should be considered as a logical extension of the Manor Royal Employment Area.

The Site is in an agricultural use. There are a number of trees / areas of hedgerow present and two established woodland areas, one in the northeast corner and Rowley Wood in the southwest. Both of these areas are designated as Ancient Woodland with the latter also a Site of Nature Conservation Importance.

The Site contains two listed buildings, namely Rowley Farmhouse (Grade II*) and Crown Post Barn (Grade II). All land with the exception of the immediate areas adjacent to Crawler's Brook is within Flood Zone 1. The Site can be accessed via either London Road to the north or James Watt Way to the south and there is potential to access the site from Gatwick Road.

The relationship of the Site to Manor Royal results in it being a logical extension of the existing employment area.

The Site's allocation for high quality employment floor space would support and grow the Gatwick Diamond and contribute to its future success. The importance of the Crawley/Gatwick area to the economic development strategy is acknowledged in the CBCLPR where it states that it *"is the leading economic driver in the Gatwick Diamond, identified by Coast to Capital Local Enterprise Partnership as forming the economic heart of the Coast to Capital area, and recognised by the Gatwick Diamond Initiative as a main focus for **future** economic development"*. (Our emphasis).

The Site would also strengthen the strategic importance of The Coast to Capital LEP and the Gatwick 360* Strategic Economic Plan to deliver eight economic priorities, one of which seeks to develop business infrastructure and support. There is already a known demand for new, high-quality business space and the Site would create a logical extension to Manor Royal, providing the ideal opportunity to encourage further economic growth building on existing infrastructure allowing the cluster of economic activity to grow.

The Site was previously considered for development as part of the preparation of the adopted Crawley Local Plan, but it was discounted because of *"safeguarding for the possible development of an additional runway at Gatwick Airport"*. Homes England's comments on the safeguarding is set out below.

Notwithstanding the possibility of a need being established for continued safeguarding for the expansion of Gatwick Airport, Homes England confirms that the Site is available for development in the short term. As this Site satisfies all of the criteria in Policy LC5 which deals with B Use Class development, Homes England consider that all or part of the Site should be allocated for the expansion of Manor Royal.

The case for the Site's development for employment use is compelling. It would be able to take advantage of hard and soft infrastructure already in place which include nearby public transport links available at Gatwick Airport train station, Crawley train station and Three Bridges train station and the 'soft' infrastructure that has been developed through the success of Manor Royal. The Site could also be developed in a phased manner alongside the delivery of the

Western Link Road (should the most eastern section be required) and proactively support the priority of the Council and that set out within the Strategic Economic Plan which seeks to build on the success of the existing employment area of Manor Royal.

Removal of Policy SD3: North Crawley Area Action Plan and inclusion of Policy GAT 2

The Site is proposed under Policy GAT2 of the Draft Crawley Local Plan as Gatwick Airport Safeguarded land as part of a strategic parcel of land south, east and west of Gatwick Airport. This land has been identified to accommodate a second runway (southern runaway) to support the growth of the airport if required.

Homes England notes and accepts the justification for the removal of policy SD3 and the previously proposed Area Action Plan and the inclusion of the new Policy GAT2 noting that the updated policy position applies the same protections of the previous safeguarding policy to the area identified in the Gatwick Airport Masterplan 2019 until the national policy position is further outlined and considered through a comprehensive Local Plan Review, as identified in paragraph 1.33. If continued safeguarding of the land is removed in full or in part, the Site should be brought forward for employment allocation for the reasons explained above.

However, Homes England has concerns around the extent of the safeguarding of the future expansion of Gatwick Airport. It is noted that the proposed safeguarding is based on the Gatwick Airport Masterplan Option for a new southern runway based on the submission to the Airports Commission. On the basis of the current challenges facing the aviation sector and commitment from Gatwick Airport Limited (GAL) to progress its northern runway in the short to medium term, it is not clear whether the basis for the safeguarding boundary is fully justified, especially where this relates to non-operational land and where there is a risk this could fetter the delivery of essential infrastructure (Crawley Western Link Road) required to deliver the wider objectives of the Draft Crawley Local Plan and much needed employment floorspace in sustainable locations such as the Site which is adjacent to Manor Royal. This would support the wider objectives of the Local Plan.

A more robust approach would be to undertake further work in terms of land required for both the Gatwick expansion to understand exact requirements and opportunities to use the Site for employment uses.


Homes England considers the Site supports a number of Strategic Policies in the preceding Local Plan Review and these have been outlined in our Previous Representations. Homes England maintains any scheme would strongly contribute to the Gatwick Diamond strategic aims around productivity and economic resilience. CBC calculates that there is an outstanding requirement for 24.1 hectares of industrial land; should the Site be brought forward it could provide 35 hectares and a natural extension to Manor Royal.

The potential for the Site offers significant capacity for employment development across a range of B Class uses. This would complement the emerging proposals at West of Ifield by providing substantial employment opportunities for existing residents and the new resident population at West of Ifield. This would lead to sustainable patterns of development for the expansion of Crawley, which is explicitly encouraged by national planning policy.

To conclude, Homes England understands the rationale behind the Gatwick Safeguarding Zone but suggests an amendment to enable CBC to meet its employment needs in sustainable

locations such as the Site which is adjacent to Manor Royal. Homes England supports the trigger of a Local Plan Review should a change in policy come forward and we will welcome engagement in any future Local Plan Review.

Yours faithfully

A handwritten signature in black ink, appearing to read 'Ken Glendinning', written over a light blue horizontal line.

Ken Glendinning FRICS

Project Director

Homes England

Ken.Glendinning@homesengland.gov.uk