

Crawley 2037

Draft Crawley Borough Local Plan 2021 – 2037

June 2021

Regulation 19 Consultation

Representation on behalf of the Wilky Group



GatwickGreen

WHERE THE FUTURE WORKS

Employment Land Trajectory

June 2021



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 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:	Ms	Mr
First name:	Sally	Simon
Surname:	Fish	Fife
Organisation:	Wilky Group	Savills
Address line 1:	Fetcham Park	Wessex House

Address line 2:	Lower Road	Priors Walk
Town/city:	Leatherhead	Wimborne
Postcode:	KT22 9HD	BH21 1PB
Telephone:	01483 230320	01202 856912
Email:	Sally.fish@Wilky.co.uk	sfife@savills.com

PART B – Your representation

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

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

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

Paragraph:	<input type="text"/>	Policy:	<input type="text"/>	Other:	<input type="text" value="Employment Land Trajectory"/>
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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.

Please see response and appendices

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 response and appendices

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:

The Planning Inspectorate's procedure guide for Local Plan Examinations (Feb 2021) states at para 3.10 that a representor has a right to appear at Hearings where a change to the Plan has been sought.

The Employment Land Trajectory (ELT) is an important part of the Local Plan that sets out profile of the supply of land for employment purposes and related parameters. In the context of the proposed allocation of Gatwick Green, TWG is seeking some important changes to the text of the ELT to ensure consistency with other policies and provisions in the Local Plan. It is therefore considered that the representation raises important and significant planning matters of consistency across the Local Plan, which justify the attendance of TWG at the Hearings.

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



Date

29/06/2021

**Draft Crawley Borough Local Plan 2021 - 2037
January 2021**

Regulation 19 Consultation

Representation on behalf of the Wilky Group

Employment Land Trajectory

June 2021



1.0 Introduction

- 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 the Employment Land Trajectory (ELT) in the draft Crawley Borough Local Plan, 2021 (DCBLP).
- 1.2 The ELT is based largely on evidence contained in the Council's Employment Land Availability Assessment (ELAA¹) and is reflected Topic Paper 5 (Employment Needs and Land Supply²). This representation cross-refers to these documents and proposes some changes to the ELT.
- 1.3 TWG owns about 48 ha (119 acres) of land east of Gatwick Airport as shown the plan at **Appendix 1**. The land has been promoted by TWG as a strategic employment opportunity known as Gatwick Green (the Site). The Site is proposed for allocation as a Strategic Employment Location (SEL) of 47 ha (116 acres) in the DCBLP under Strategic Policy EC4 as a comprehensive industrial-led development of predominantly storage and distribution uses under use class B8. The extent of the SEL allocation is identified on the plan at **Appendix 1**.

Executive Summary

- 1.4 Gatwick Green is suitable, available, viable and therefore deliverable. TWG has unencumbered ownership of all the land within the allocation area (as proposed to be amended in representations by TWG). TWG also has sufficient funding and will draw in additional funding via a development agreement / JV so that the finance is in place to ensure the Site can be developed in a sustainable and comprehensive manner. The Council's viability assessment and Savills' review demonstrate that development as envisaged in DCBLP policy is viable and deliverable. TWG is therefore able to deliver the development of Gatwick Green in line with the provisions in the ELT.

Key Considerations for the ELT

- 1.5 This representation will provide evidence to demonstrate that Gatwick Green can be delivered over the period of the DCBLP. It will therefore address the key headings in the ELT and respond to each of these with regard to the revised / updated evidence

¹ Employment Land Availability Assessment, Crawley Borough Council, January 2021 (Base Date 1 September 2020)

² Crawley Borough Local Plan Topic Paper 5: Employment Needs and Land Supply, Crawley Borough Council, January 2021

attached to TWG's representations on Strategic Policies EC1 and EC4, and based on the relevant policies contained in the DCBLP:

- Suitability of the site for employment development.
- Availability of the site for employment development over the DCBLP period.
- Achievability of development over the DCBLP period.
- The viability of delivering employment on the Site.
- The scale of employment development identified for the Site.
- The time-frame for the delivery of employment development identified for the Site.

1.6 In the context of the urgent need to plan and provide for the unmet and long-standing employment and economic needs of the Borough – significantly in the context of the COVID-19 pandemic – and the removal of safeguarding of the Site, evidence is put forward to demonstrate that Gatwick Green is viable and deliverable.

2.0 Policy tests

2.1 Planning Practice Guidance (PPG) requires that sites that are put forward for development in Local Plans must be suitable, available and achievable for economic development over the plan period. The assessment should identify the sites and broad locations with potential for development, assess their development potential and then assess their suitability for development and the likelihood of development coming forward (their availability and achievability) (para 001 Reference ID: 3-001-20190722). These tests are addressed below.

Suitability

2.2 Gatwick Green is a highly suitable site for strategic employment. In view of its close proximity and accessibility to the M23 and Gatwick Airport, it is well suited to bringing forward a high-quality logistics hub to optimise the potential of this strategic and sustainable location at the confluence of several national transport infrastructure networks – Gatwick Airport, London-Brighton Mainline Rail, the Gatwick Express service, the M23 motorway and the Crawley-Gatwick-Horley Fastway bus service. A review of the Industrial & Logistics (I&L) market by Savills Economics on behalf of TWG forms Appendix 3 to TWG's representation on Strategic Policy EC1. It sets out market evidence that supports the Council's positive economic strategy and the approach to increasing the supply of employment land through the allocation of Gatwick Green. Savills Economics has also undertaken an assessment that shows how Gatwick Green

is complementary to the key Main Employment Areas in Crawley and the planned Horley Business Park north of the M23 spur road in Reigate and Banstead Borough (Appendix 4 to TWG's representation on Strategic Policy EC1).

- 2.3 The Savills review identified a series of trends and structural changes in the economy that are driving growth in the Industrial and Logistics (I&L) market. The market is growing in the more peripheral parts of the country away from the traditional midlands base and providing a greater diversity, and enhanced quality, of employment opportunities. Against this background, the I&L sector is severely underrepresented in Crawley compared to other markets and areas, and in particular when compared to markets around major airports. In these circumstances, and given the constrained supply of suitable sites for major B8 uses around Crawley, the demand for a high-profile site in Crawley with access to the Strategic Road Network (SRN) is very strong. This market analysis supports the empirical assessment of employment land needs contained in the Council's Economic Growth Assessment Update for Crawley³ (EGA CU).
- 2.4 The site is not affected by any significant environmental, physical or heritage constraints and could be developed within the current / future aircraft noise environment and aerodrome safeguarding requirements relating to the Airport. A number of evidence based reports were prepared to support the allocation of Gatwick Green for strategic employment. The reports formed Appendices to TWG's representation on Policy EC1 of the DCBLP (2020) (2020 Appendices) and form part of the Council's evidence base (Consultation appendix 4b: Wilky Group appendices combined). These reports have been supplemented by Addenda and fresh evidence to reflect the revised policy framework in the DCBLP and other changes in circumstances since the original appendices were prepared.
- 2.5 The reports, addenda and evidence conclude that there are no significant impediments to the site's development, subject to the inclusion of a range of sustainability and mitigation measures to address either policy requirements or site-specific circumstances. The reports/addenda/evidence cover transport, flood risk, surface water drainage, foul drainage and sewage treatment, water supply, utilities, air quality, noise, ground conditions, renewable energy, landscape & visual, heritage, and ecology & hedgerows.

³ North West Sussex, Economic Growth Assessment, Focused Update for Crawley, Lichfields, September 2020

2.6 The reports/addenda/fresh evidence are appended to the representation on behalf of TWG on Strategic Policy EC1 (Appendix 3 and Appendix 4) and Strategic Policy EC4 (Appendices 2-7), and comprise:

1. Market Assessment: Industrial and Logistics
2. Complementarity with existing / proposed employment areas
3. Outline Transport and Access Appraisal – evidence by Empiric Partners and i-Transport
4. Addendum: Environmental and Utilities Preliminary Assessment report
5. Addendum: Preliminary Ecological Appraisal (PEA) report
6. Addendum: Hedgerow Regulations Assessment report
7. Addendum: Landscape Character and Visual Appraisal report
8. Addendum: Heritage Constraints Appraisal report

2.7 The evidence presented by TWG through its various representations demonstrates that Gatwick Green can be designed and developed such that it can be fully compliant with the development control requirements in Strategic Policy EC4 – the key elements of which are:

- Gatwick Green can deliver a highly sustainable pattern of movement and access consistent with guidance in the NPPF and the Council's sustainable transport strategy.
- Gatwick Green can be developed in a way that achieves sustainable drainage design and construction / operation in accordance with specific policies on flood risk, drainage and sustainability.
- As a new-generation storage and logistics development, Gatwick Green will incorporate future-proofed digital communications in accordance with Policy IN3 (Supporting High Quality Communications).
- Evidence contained in appendices to this representation confirm that Gatwick Green can be developed with appropriate avoidance and mitigation measures so as to respect the various environmental values in and around the Site.
- There is a high level of complementarity between Gatwick Green and other existing and planned strategic employment sites in and near to Crawley.
- Gatwick Green is viable and deliverable in accordance with the provisions in Strategic Policy EC4.

2.8 Gatwick Green is also complementary to Gatwick Airport's growth plans in its Master Plan 2019, including the DCO for the use of the standby runway and the longer term

possibility of an additional wide-spaced southern runway. Evidence in this regard is contained in Savills representation on behalf of the TWG on Policy GAT2.

- 2.9 Overall, the site is considered to be highly suitable for strategic employment, supported by evidence from Savills Economics, and other technical reports relating to infrastructure and environmental considerations.

Availability

- 2.10 TWG owns all the land in the proposed to be allocated under Strategic Policy EC4 and as shown on the Local Plan Map. TWG also confirms that the Site is unfettered by any significant encumbrances on title that could affect the comprehensive development of the Site – in this context, the Site could therefore accommodate 24.1 ha or more of employment land. The Site can therefore be developed in a comprehensive and phased way, including the provision of enabling infrastructure. TWG's ownership of the whole allocation (as proposed to be amended) and land south of the M23 spur road required for access purposes therefore ensures that the Site is available and that in this regard there are no risks to the delivery of development within the Plan period.
- 2.11 TWG's representations on Strategic Policy EC4, Policy GAT2 and the Local Plan Map contain a justification for some minor amendments to the extent of the Gatwick Green allocation, and consequently to the Safeguarded Land, to address some mapping errors on the Local Plan Map. These minor revisions are justified in Savills representations on behalf of TWG on Strategic Policy EC4 and shown in the plans at Appendix 10 to that representation. The revised extent of the Gatwick Green allocation is under the sole ownership of TWG, guaranteeing that the land is available and can be brought forward in a timely and coordinated manner in accordance with the provisions of Strategic Policy EC4.
- 2.12 TWG also owns the Safeguarded Land south of the M23 spur road and located outside the Gatwick Green allocation. However, the extent of this Safeguarded Land shown on the Local Plan Map does not match the safeguarded areas shown on plans provided by Gatwick Airport Limited (GAL) to TWG – the area therefore needs to be amended to reflect the plans from GAL so as to accommodate the extent of the proposed highway infrastructure from the M23 to serve the possible additional wide-spaced runway for Gatwick. Consequently, a further minor amendment is required to the Local Plan Map to address this mapping error – the justification for this is contained in Savills representation on behalf of TWG on Policy GAT2 and shown in the plan at Appendix 5 to that representation.

2.13 The representation on Policy GAT2 also justifies the provision of the northern access road to Gatwick Green within the Safeguard Land south of the M23 spur road – this in turn could also form the part of the future diversion of Balcombe Road in the event that Gatwick Airport decided to develop an additional wide-spaced southern runway. The arrangement offers significant resource and land-efficiency benefits alongside providing part of the future highway infrastructure associated with a future wide-spaced runway. TWG owns all the land within this revised Safeguarded Land area south of the M23 spur road, so it is available to TWG to deliver this highway infrastructure in a manner compliant with the future development of an additional runway at Gatwick.

Site capacity

2.14 A Development Framework Plan (DFP) (**Appendix 2**) has been prepared to illustrate the framework within which the Site can deliver the **minimum** of 24.1 ha of developable land as an industrial-led development or predominantly B8 storage and distribution uses. The DFP also shows Site's ability to incorporate a range of sustainable transport and environmental requirements arising out of national and local planning policy and other statutory requirements. Feasibility work confirms that the DFP could accommodate the minimum of 24.1 ha of development land and 77,800 sqm of floorspace within an overall Site of 47 ha in a sustainable and environmentally acceptable manner. There are therefore no impediments to the Site accommodating at least 24.1 ha of employment development.

2.15 The DFP illustrates the framework for an integrated industrial-led development and co-ordinated transport and green infrastructure solution within the overall Site of 47 ha. The Site could therefore include integrated transport, green infrastructure and Sustainable Urban Drainage (SuDS) solutions within the overall 47 ha, along with at least 24.1 ha of development. The feasibility work has confirmed that the development would comprise the following:

- A minimum of 24.1 ha of predominantly Use Class B8 with some Use Class B2 – storage and distribution and general industrial uses.
- Ancillary / incidental uses under Use Class E – office, business and services uses.
- Supporting education uses for apprenticeships & staff training.
- An amenity hub to provide support facilities for staff.
- An integrated green infrastructure framework – landscape, biodiversity, amenity space to address the objectives of the Biodiversity Opportunity Area and the requirement for Biodiversity Net Gain.
- Sustainable mobility at the heart of the concept:

- Two bus super hubs to facilitate modal switch and a high level of service for users.
 - A sustainable transport route through the site offering a high level of service for buses (notably the Fastway bus service), pedestrians and cyclists.
 - Ancillary car parking with Electric Vehicle Charging facilities.
- 2.16 Gatwick Green represents a strategic opportunity to bring forward a highly sustainable mixed-use employment area, offering a unique opportunity to deliver significant benefits to all three of the key components of sustainability noted in the NPPF.
- 2.17 The Site will have a focus on B8 use class floorspace, but may accommodate some limited industrial development. This may help the site to come forward more quickly given its wider appeal to a number of different market sectors. Gatwick Green can deliver about 630 construction jobs over 2 years and about 1,500 permanent on-site operation jobs – research by Savills Economics shows that the I&L sector can deliver a variety of high quality employment opportunities given the highly automated and sophisticated nature of new-generation logistics operations, so helping to transform and rebalance the economy of Crawley, to the long-term benefit of the local community.

Viability

- 2.18 The Council's plan-wide viability assessment⁴ has concluded that *"The Gatwick Green site appears to have the potential to support a more certain or stronger viability outcome, with a wide range of our sensitive tests producing RLVs either well in excess of greenfield land values on the established EUV+ basis again, and values representing serviced, ready to develop industrial land (equivalent to PDL values) also potentially supportable."*
- 2.19 Savills Economics has undertaken a review of the Council's viability assessment (**Appendix 3**) which supports the Council's findings and concludes that *"We agree with the overall conclusion of the viability evidence that the proposed Gatwick Green allocation is deliverable and generates a Residual Land Value in excess of Greenfield Land Values of circa £250k per gross hectare, which we consider reasonable for high level viability testing. We do note however the upper Greenfield Land Value of £500k per gross hectare is higher than typically applied in Local Plan and CIL viability testing."*

⁴ Crawley Borough Council Local Plan Review: Whole Plan Policies & CIL Viability Assessment – Final Report Issued March 2021 (DSP19682 – Final v8), DixonSearl Partnership, March 2021

2.20 Based on the development profile noted at paragraph 2.15 above and in accordance with the provision of Strategic Policy EC4 and other policies of the Plan, Gatwick Green represents a viable development opportunity, which will have a positive internal rate of return and benefit from offering a positive economic rate of return.

Delivery timeframe

2.21 Gatwick Green could be developed as an industrial-led proposal for predominantly B8 uses that achieves an appropriate build-out rate; can be parcelled up and phased to de-risk delivery; can benefit from agglomeration, and delivers wider economic benefits. On this basis, it is considered that the market could support a build-out in accordance with that noted in the ELT, i.e. over years 6 - 15 of the Plan and completion in 2035. Evidence by Savills Economics suggests that the market could support the delivery of the Site earlier than anticipated in the ELT. The DCBLP rightly contains no policy to constrain delivery timing or phasing, and so the earlier development of the Site would be supported by the Plan. Evidence put forward by TWG shows that Gatwick Green is available now to meet the shortfall in industrial land of at least 24.1 ha and help to address the COVID-19 induced economic downturn in Crawley.

2.22 Based on current and foreseeable market conditions and occupier demand, TWG anticipates advancing a planning application in 2022, assuming Policy EC4 is confirmed in the adopted DCBLP. Early work has already commenced in this regard with seasonal ecology surveys taking place in 2021 alongside other technical investigations: these will inform the preparation of early conceptual plans for public consultation to inform the masterplan required under Strategic Policy EC4.

Conclusions

2.23 In conclusion, Gatwick Green represents a regionally and nationally significant opportunity for a high quality industrial-led development for predominantly storage and distribution uses to address Crawley Borough's growing deficit of employment land for industrial uses as identified in its employment land evidence base. Gatwick Green can therefore be delivered within the Plan period for the following reasons:

- TWG controls all the land within the area allocated for Gatwick Green (as proposed to be amended in representations by TWG – this relates to addressing a mapping error by the inclusion of some small parcels of land owned by TWG within the allocation).
- There is a small part of the site subject to an encumbrance on title – this would not materially affect the development of the site or the delivery of 24.1 ha or more of employment land.

- Given the significant interest TWG has received from occupiers, investors and funders, it is confident that the proposals can be developed in a sustainable and comprehensive manner, subject to the site being allocated in the DCBLP.
- TWG has sufficient funding and will draw in additional funding via a development agreement / JV so that the finance is in place to ensure the Site can be developed in a sustainable and comprehensive manner.

3.0 The ELT

- 3.1 The ELT notes the amount of developable land and floorspace the Site is expected to deliver – this is supported, but must be expressed as a **minimum** consistent with how this is expressed within the policies of the Plan. There are also strong market and policy reasons for expressing the requirement in this way.
- 3.2 When the use class requirements are set against the equivalent levels of supply, the outstanding requirement is all for industrial uses extending to 24.1 ha of land (Economic Growth Assessment Focused Update for Crawley, September 2020 - EGA CU, Table 3.2). The EGA CU tells us that this land requirement relates principally to storage and distribution uses (EGU CU, Table 2.8). Whilst the analysis did not take into account wider nationally based demand, it did represent a logistics-specific assessment and selected the forecast that reflected past growth trends in this sector in Crawley. The EGA CU references the presence of Gatwick Airport as a factor in past demand, but the emerging trend towards online retail during the COVID-19 pandemic, which is set to continue, suggests that the demand is **at least** that identified in the EGA CU.
- 3.3 Given the advice on the NPPF to incorporate flexibility to accommodate needs not articulated in the plan and the guidance in PPG to plan for alternative scenarios, the Council has rightly adopted a flexible approach to the application of the forecast land requirements in policy. This is reflected in the DCBLP, which states that to prioritise economic recovery, there is a need for *“flexible policies to support employment growth and enable adaption to change”* (DCBLP, para 9.5) and to *“plan positively to support economic recovery...whilst facilitating and expansion and diversification of Crawley’s economy that will enable it to adapt to unforeseen economic circumstances that could otherwise hinder economic growth”* (DCBLP, para 9.6). These intensions are reflected in the need for *“flexibility...to support, reinvigorate and future-proof a local economy that has been significantly impacted by the COVID-19 pandemic”* (DCBLP, para 9.9).
- 3.4 Based on these policy imperatives, the Council has adopted the Experian Baseline Job Growth projection, but applied it so that it is expressed as a **minimum** of 38.7 ha of land for new employment development to meet needs up to 2036 (DCBLP, para 9.12). The approach is in line with national policy and local priorities noted above to plan

positively and future-proof the local economy in the face of long-standing needs and the impacts of the COVID-19 pandemic. This approach is largely reflected in wording in Strategic Policy EC1 and Strategic Policy EC4 – there is, however, some inconsistency between these policies, and the ELT where the requirements are not expressed as ‘minima’. This inconsistency needs to be resolved if the Plan’s economic strategy and policies are to be interpreted and applied in the way that is clearly intended – a number of minor changes to the ELT are therefore advanced in this representation.

- 3.5 There is also a need to amend the ELT to reflect the provisions in Strategic Policy EC4, which allow for further industrial development above the minimum 24.1 ha, provided that there is a justified need for such development. The text in the ELT currently states that such further industrial development, within the overall allocation of 47 ha, is restricted to supporting uses catering for the needs of employees. In contrast, Strategic Policy EC4 contains no such proviso, clearly stating that any further industrial development would be above the 24.1 ha and thereby within the overall allocation area of 47 ha. The text of the ELT should therefore be amended such that it is consistent with Strategic Policy EC4.
- 3.6 Based on the evidence in this representation, TWG supports the ELT, but subject to some minor adjustments to the text in the ‘Commentary’ column relating to Gatwick Green. These minor changes would:
1. Amend the ‘Commentary’ column relating to Gatwick Green by prefixing the outstanding industrial land and floorspace requirements by the word ‘**minimum**’ consistent with the Strategic Policies of the Plan.
 2. Amend the ‘Commentary’ column relating to Gatwick Green to reflect the provisions in Strategic Policy EC4 that allow for further industrial development above the minimum 24.1 ha provided there is a justified need for such development.
- 3.7 The above proposed changes have been applied to the text of the ELT and are attached at **Appendix 4**.
- 3.8 As a consequence of these proposed changes, there is a need to adjust the Council’s Employment Land Availability Assessment (ELAA) to reflect the proposed amendment at 1 above.

Appendix 1

Site Plan





GatwickGreen

WHERE THE FUTURE WORKS

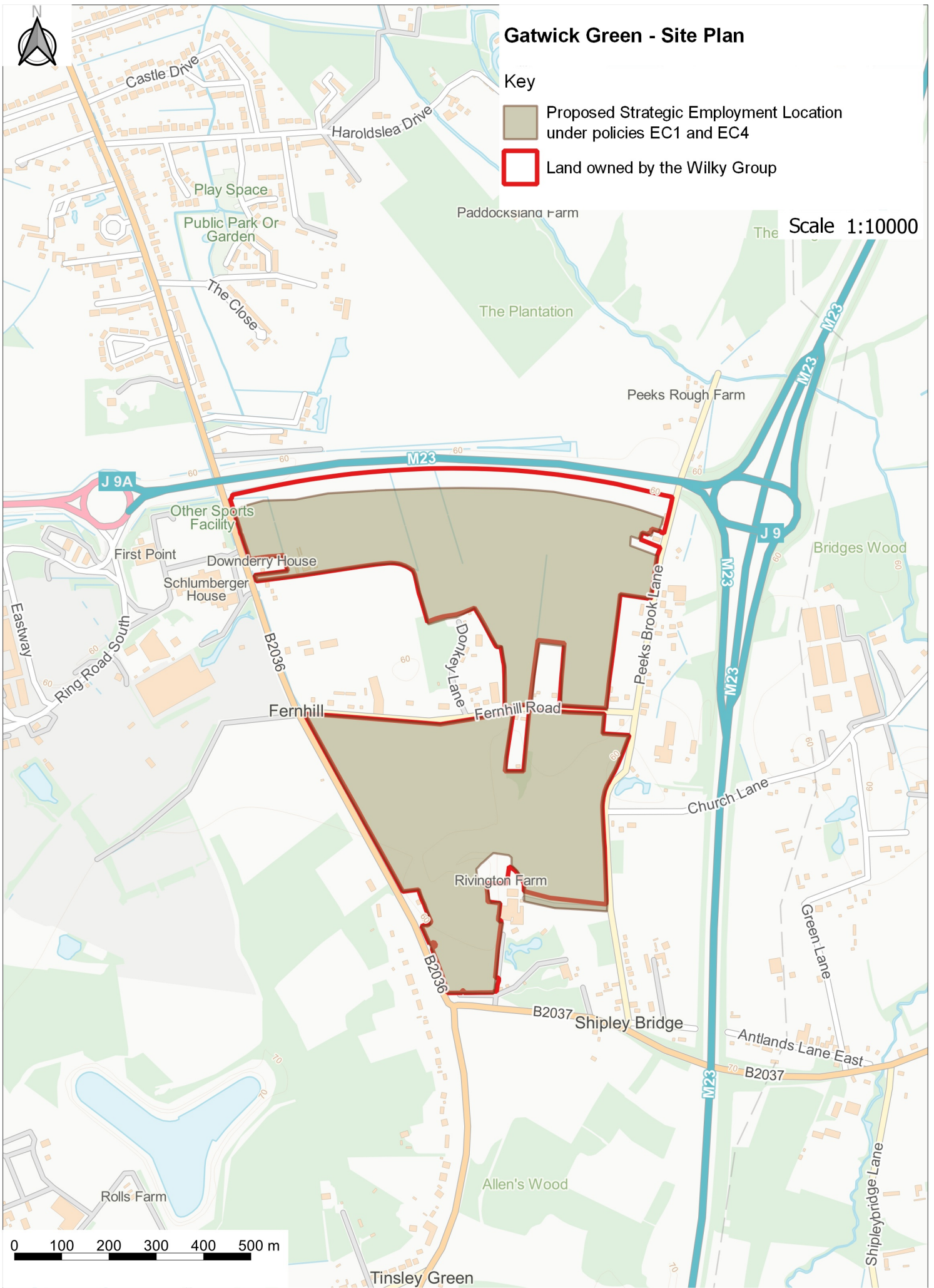


Gatwick Green - Site Plan

Key

-  Proposed Strategic Employment Location under policies EC1 and EC4
-  Land owned by the Wilky Group

Scale 1:10000



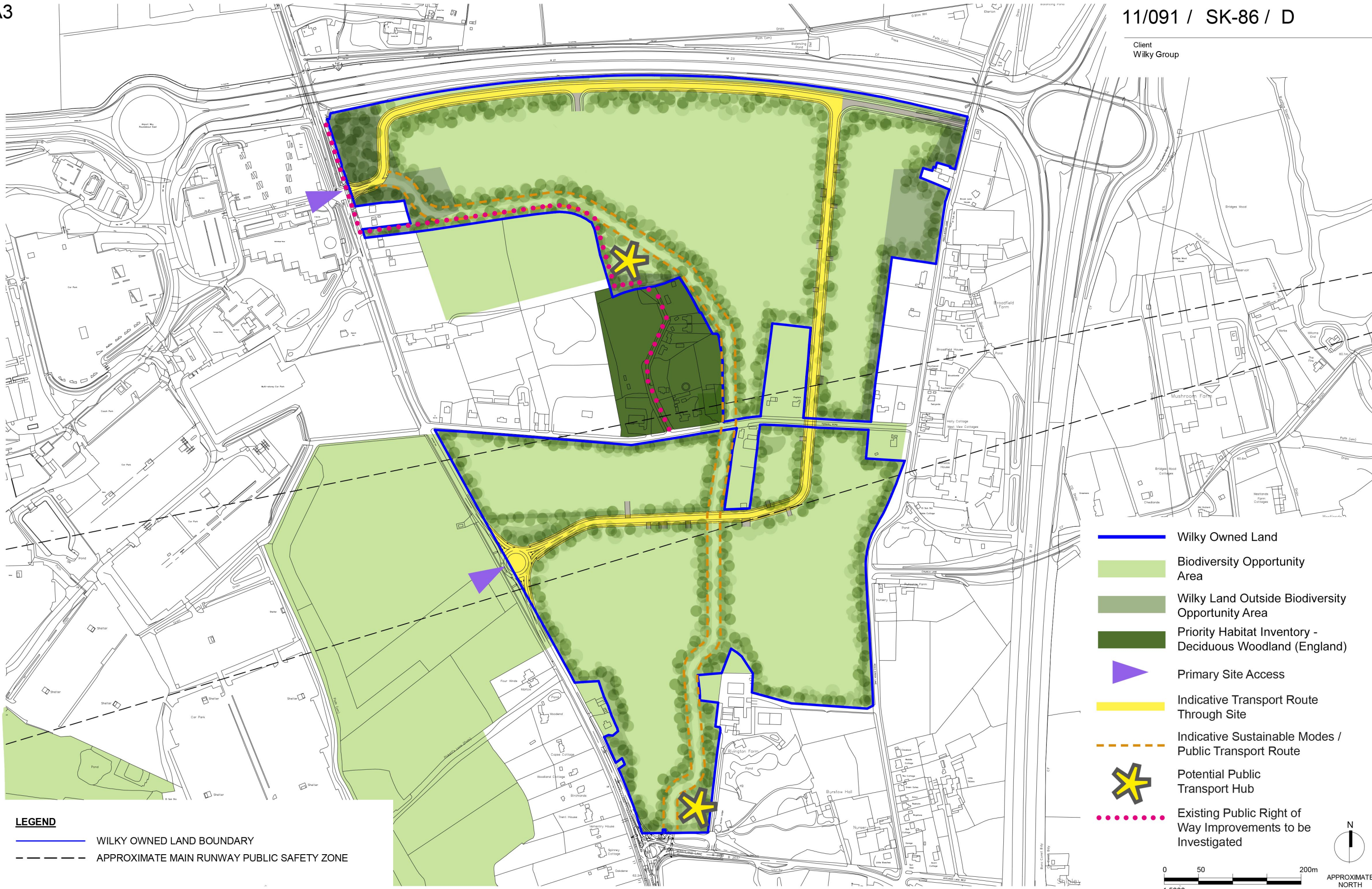
Appendix 2

Development Framework Plan



GatwickGreen

WHERE THE FUTURE WORKS



LEGEND

- WILKY OWNED LAND BOUNDARY
- - - APPROXIMATE MAIN RUNWAY PUBLIC SAFETY ZONE

- Wilky Owned Land
- Biodiversity Opportunity Area
- Wilky Land Outside Biodiversity Opportunity Area
- Priority Habitat Inventory - Deciduous Woodland (England)
- ▲ Primary Site Access
- Indicative Transport Route Through Site
- - - Indicative Sustainable Modes / Public Transport Route
- ✳ Potential Public Transport Hub
- Existing Public Right of Way Improvements to be Investigated



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Job N Drg N	Rev	Scale	Status	Job
11/091 / SK-86	D	1 : 5000	WORK IN PROGRESS	GATWICK GREEN
Date	Director	Author	Check	Drawing
19/02/2021	JA	AH	JA	Development Framework Plan (2021)

NOTE: All figures are approximate and have been measured and expressed in a manner as defined by the current edition of the RICS Code of Measuring Practice, unless otherwise stated. Figures relate to the current stage of the project and any development decisions to be made on the basis of this information should include due allowance for the increases and decreases inherent in the design and building processes. Reproduced from Ordnance Survey mapping under Licence Numbers 10002432 & 10016463

This drawing may be scaled or cross referenced to the scale bar for Planning Application purposes only. Do not scale for any other purpose, use figured dimensions only. Subject to site survey and all necessary consents. All dimensions to be checked by user and any discrepancies, errors or omissions to be reported to the Architect before work commences. This drawing is to be read in conjunction with all other relevant materials.

Appendix 3

Gatwick Green Viability Note



GatwickGreen

WHERE THE FUTURE WORKS

Appendix 3 – Gatwick Green Viability Note

Savills Economics

April 2021



1.0 Introduction

- 1.1 This appendix provides Savills review of the Council's viability evidence specific to the proposed Gatwick Green allocation.

2.0 Reader Note

- 2.1 When we refer to the industrial and logistics (I&L) sector we mean Light Industrial (formally B1c use class now part of class E), General Industrial (B2 use class) and Storage and Distribution (B8 use class). Effectively the primary use classes that require shed-type units (including ancillary offices) and associated yard spaces. These use classes typically cover the diverse range of industrial, manufacturing and logistics companies that operate within England.

3.0 Crawley Viability Evidence

- 3.1 The viability evidence in support of the Submission Version of the Local Plan is detailed in the Local Plan Review: Whole Plan Policies & Community Infrastructure Levy Viability Assessment (March 2021).
- 3.2 We agree with the overall conclusion of the viability evidence that the proposed Gatwick Green allocation is deliverable and generates a Residual Land Value in excess of Greenfield Land Values of circa £250k per gross hectare which we consider reasonable for high level viability testing. We do note however the upper Greenfield Land Value of £500k per gross hectare is higher than typically applied in Local Plan and CIL viability testing.
- 3.3 We agree with the conclusions of paragraphs 3.8.22, 3.11.35 and 4.1.23 that S106 rather than CIL is the more appropriate mechanism for securing enabling infrastructure for strategic development projects such as the proposed Gatwick Green allocation. S106 will ensure critical infrastructure is delivered alongside the development and therefore avoid delays which is common place with the collection and then subsequent spending of CIL receipts.
- 3.4 We broadly agree with the viability assumptions used to test the deliverability of the proposed Gatwick Green allocation and the subsequent sensitivity testing detailed within Table 4i of Appendix IIIb.
- 3.5 In our view I&L yields relevant to the Gatwick Green allocation are likely to be in the range of 4.5% to 5.5% as indicated in paragraph 3.8.21 of the main report. We also consider the £500k per gross hectare for site works and infrastructure costs to be

reasonable for high level viability testing. While this assumption is mentioned in paragraph 2.11.2, for clarity we feel it should be reiterated specific to Gatwick Green in either Appendix 1 or Table 4i of Appendix IIIb.

- 3.6 **Appendix 3 – Industrial & Logistics Land Needs¹** demonstrates Gatwick Green will experience strong market demand, including for larger units over 100,000 sqft which are currently under-represent in the Crawley market. In this regard the baseline rental assumption of £120 psqm is considered to be at the high end for larger units although we note sensitivity testing goes as low as £100 psqft, which is considered more appropriate as a blended rate should only larger units come forward at Gatwick Green. The counter balance to this is that larger units may have lower build costs to the £826 sqm assumption used which we note does not appear to have been sensitivity tested.

¹ Appendix 3 to the representation by TWG on Strategic Policy EC1

Appendix 4

Proposed changes to Employment Land Trajectory



GatwickGreen

WHERE THE FUTURE WORKS

Proposed changes to the Draft Crawley Borough Local Plan 2021-2037 (January 2021)

Savills on behalf of the Wilky Group

Changes to text

Proposed changes to the policies and text of the DCBLP are set out below and are indicated by the following means:

Additions: underlined

Deletions: crossed out

Employment Land Trajectory

“The Local Plan allocates land at East of Balcombe Road and south of the M23 spur, referred to as Gatwick Green, for development of an industrial-led Strategic Employment Location of a minimum of 24.1ha predominantly B8 storage and distribution warehouse (Class B8) uses, potentially supported by light industrial and general industrial and a limited amount of complementary ancillary uses that support the principal storage and distribution function. The allocation will meet Crawley's outstanding business land supply requirement, which equates to a minimum of 77,800sqm B8 floorspace. Development would come forward Years 6-15 of the Plan, with a seven to ten year build out anticipated for completion 2035. The site would therefore meet employment needs in the later part of the Plan period. 47ha of land are included in the allocation boundary but any industrial floorspace or ancillary uses beyond the 24.1ha allocation would have to be justified by appropriate evidence. The identified site is larger because of the potential, where justified by evidence, for further industrial uses, and supporting uses catering for the needs of employees, and because of the need for the strategic development to provide comprehensive supporting infrastructure, appropriate landscaping and to protect the amenity of neighbouring properties.”