

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

Local Plan Map

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:		Policy:		Other:	Local Plan Map
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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 attached

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 attached

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 Local Plan Map is an important document that provides spatial guidance related to the policies within the Local Plan. In the context of the proposed allocation of Gatwick Green, TWG is seeking important changes to the Local Plan Map to address more detailed information and a number of mapping errors relating to the extent of the Safeguarded Land and the Gatwick Green employment allocation. It is therefore considered that the representation raises important and significant planning matters relating to the spatial interpretation of the policies in the Local Plan that need to be addressed to ensure that development can proceed in an efficient and comprehensive manner. These matters 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

Local Plan Map

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 Local Plan Map associated with the draft Crawley Borough Local Plan, 2021 (DCBLP).
- 1.2 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

- 1.3 This representation addresses changes to the Local Plan Map consequential to representations by Savills on behalf of TWG in relation to Strategic Policy EC4 and Policy GAT2. These cover the following changes:
1. Changes to the Local Plan Map to reflect a mapping error with regard to the extent of land requested by Gatwick Airport Limited (GAL) to be safeguarded in the strip of land south of the M23 spur road. This land is required to accommodate proposed slip roads from the M23 designed to serve a possible wide-spaced runway south of the Airport. The revised safeguarded area has been discussed with GAL – it is larger than, and a different configuration from, that shown on the Local Plan Map. The revised safeguarded area would result in changes to the extent of the land allocated for Gatwick Green comprising two exclusions and one small inclusion.
 2. Changes to the Local Plan Map to address some minor mapping errors in the extent of the land owned by TWG that were reflected in the extent of the land allocated for Gatwick Green under Strategic Policy EC4. Crawley Borough Council's intention was to allocate all the land owned by TWG, except a strip of land south of the M23 spur road required for safeguarding under Policy GAT2. The consequence of these changes would be that some small areas currently safeguarded would be removed and allocated as part of Gatwick Green. The areas concerned are located north west of Rivington Farm and north of Royal Oak House.

- 1.4 Detailed evidence justifying these minor changes to the Local Plan Map are contained in Savills' representations on behalf of TWG regarding Strategic Policy EC4 and Policy GAT2. This representation summarises the key elements of those representations with regard to the changes to the Local Plan Map.

2.0 Safeguarded Land

- 2.1 Between the Gatwick Green allocation and the M23 spur road is a strip of Safeguarded Land retained to accommodate highway infrastructure required for the possible additional wide-spaced runway at the Airport. This highway infrastructure comprises the following:
1. Two slip roads (that merge into one) intended to connect the diverted A23 to Junction 9 on the M23, following an alignment close to the existing M23 spur road.
 2. The diversion of Balcombe Road to the east to follow the M23 and to re-join the diverted A23 to the south.
- 2.2 The strip of Safeguarded Land south of the M23 spur road, as shown on the draft Local Plan Map, requires amendment to address a mapping error so as to fully accommodate the GAL future highways infrastructure noted at 1 and 2 above. **Appendix 2** contains a plan that shows the full extent of the land that needs to be safeguarded based on information provided by GAL to TWG as part of ongoing discussions between the two parties.
- 2.3 The plan also shows how the highway infrastructure for Gatwick Green can be accommodated in the revised Safeguarded Land in this area in a manner compatible with the Airport's slip roads associated with the additional wide-spaced runway. To avoid a land and resource-inefficient outcome, the Gatwick Green access road has been designed to coincide with a logical alignment of a diverted Balcombe Road within the safeguarded area, which could, in the future, form part of the diverted Balcombe Road and be upgraded as required by GAL. The access road has been designed with limited intersections so as to ensure it can perform satisfactorily as the diverted Balcombe Road. The slip roads could be accommodated within the amended Safeguarded Land in a manner compatible with the proposed Gatwick Green access road.
- 2.4 To address this mapping error and align the Safeguarded Land south of the M23 spur road with that requested by GAL to accommodate all of GAL's future additional highway

infrastructure, the Local Plan Map would need to be amended. TWG considers that there is a strong case to accommodate this change in order to ensure that the extent of Safeguarded Land is sound and reflects the needs of GAL and TWG with regard to future access arrangements.

3.0 Allocation for the Strategic Employment Location at Gatwick Green

- 3.1 The site plan submitted as part of TWG's representations on the DCBLP 2020 (March 2020) contained three mapping errors with regard to the land owned by TWG. Two small parcels of land north west of Rivington Farm and adjacent to Royal Oak House owned by TWG were erroneously omitted from the land shown on the plan as being owned by TWG. In addition, the Council has in error omitted a parcel of land owned by TWG from the allocation – this relates to a parcel of land fronting Peeks Brook Lane north of Royal Oak House. It was Crawley Borough Council's intention to allocate all of the land owned by TWG under Strategic Policy EC4 (except the Safeguarded Land south of the M23 spur road), but owing to the mapping errors, parts of the land near Rivington Farm and Royal Oak House were omitted from the allocation and inadvertently included as Safeguarded Land. The parcels of land are shown on the plan at **Appendix 3**, which also includes a plan showing the full extent of the land owned by TWG.
- 3.2 This error only affects 5,589 sqm (0.56 ha) of land - the inclusion of these areas would result in a very minor loss of Safeguarded Land. Based on evidence provided by Mott Macdonald on the need for Safeguarded Land for airport-related surface car parking (Appendix 3 to TWG's representation on Policy GAT2 (Safeguarded Land)), it is considered that the loss of these small areas of future surface car parking would not prejudice the future development of an additional wide-spaced runway and associated surface access requirements. It is therefore proposed that in order to effect an efficient use of land resources and the proper and effecting planning of the area, the draft Local Plan Map should be adjusted to correct these mapping errors.

4.0 Changes to the Local Plan Map

- 4.1 Based on the evidence provided in this representation and those by TWG relating to Strategic Policy EC4 and Policy GAT2, the following amendments should be made to the allocation for Gatwick Green and the extent of Safeguarded Land on the Local Plan Map:
1. **Amend the allocation of the Strategic Employment Location (Gatwick Green) on the draft Local Plan Map** to include the three small parcels of land owned by TWG as shown on the plan at **Appendix 3**. As a consequence, these parcels of land would be removed from the

area designated as Safeguarded Land on the Local Plan Map under Policy GAT2

2. **Amend the Safeguarded Land on the draft Local Plan Map between Gatwick Green and the M23 spur road so as to accommodate the proposed spur roads from Junction 9 on the M23** to serve a future possible additional wide-spaced runway – the extent of the Safeguarded Land is as advised by GAL to TWG and shown on the Plan at **Appendix 2**. As a consequence, some small parcels of land would be removed from / added to the land allocated as a Strategic Employment Location (Gatwick Green) on the draft Local Plan Map under Strategic Policy EC4.

Appendix 1

Site Plan



GatwickGreen

WHERE THE FUTURE WORKS

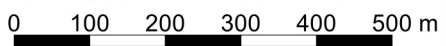
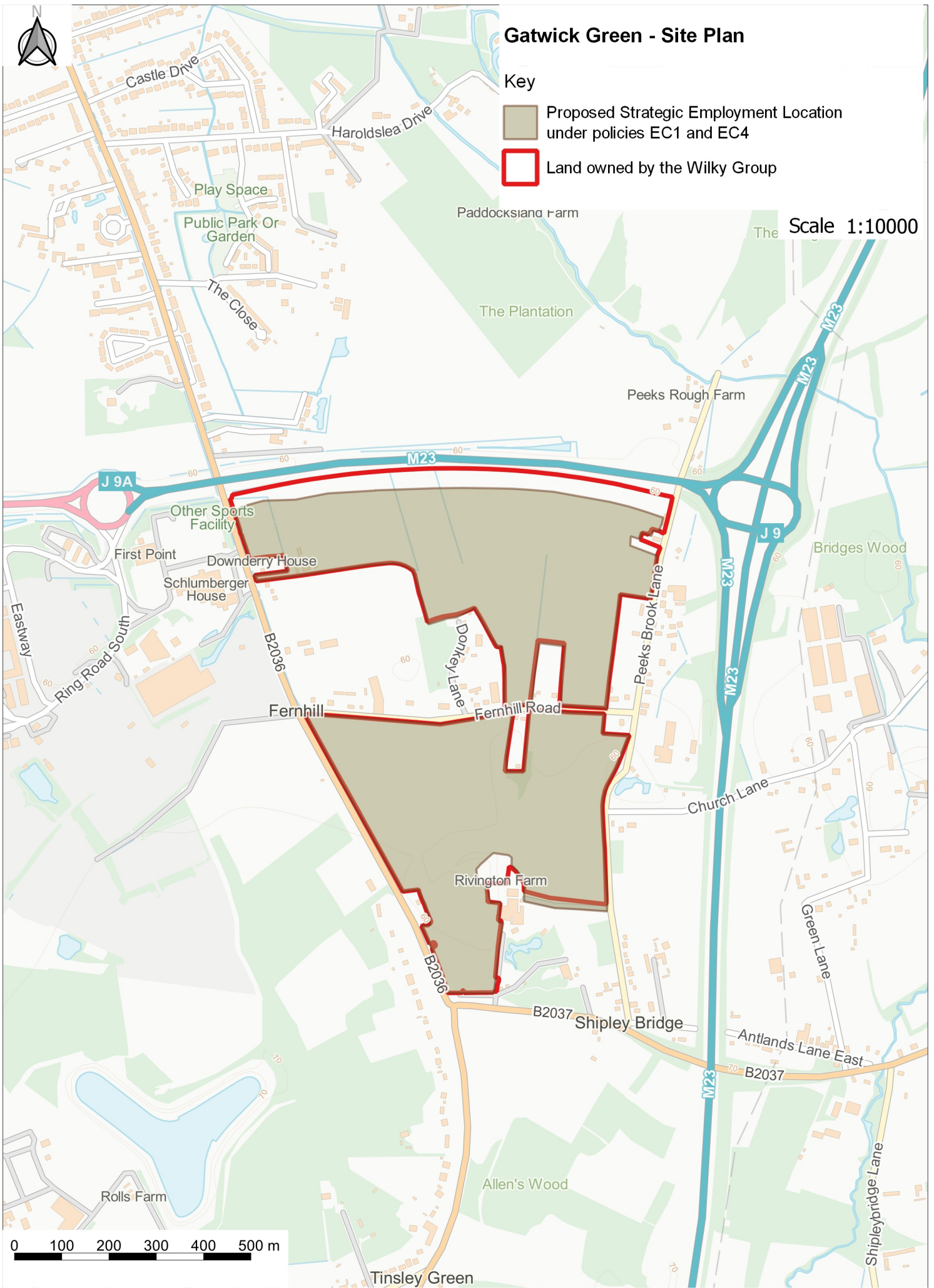


Gatwick Green - Site Plan

Key

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

Scale 1:10000



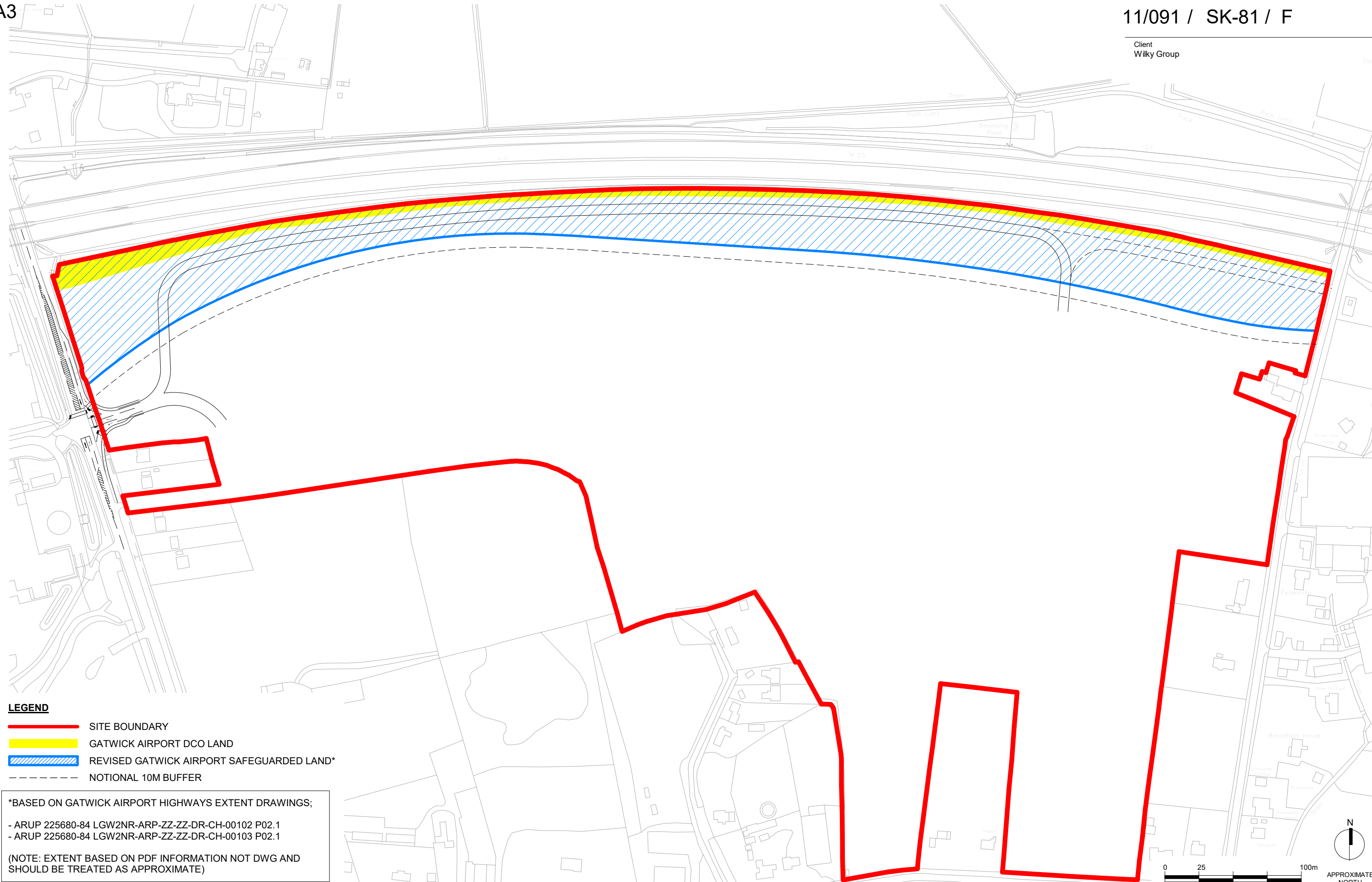
Appendix 2

Revised Gatwick Airport Safeguarded Land



GatwickGreen

WHERE THE FUTURE WORKS



Job N Drg N	Rev	Scale	Status	Job
11/091 / SK-81	F	1 : 2500	WORK IN PROGRESS	GATWICK GREEN
Date	Director	Author	Check	Drawing
21/01/2021	JA	AH	--	GAL Highways Extent - Overlay 1

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 100022432 & 100018493

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

Proposed Amendments to the Local Plan Map
Red Line Plan (Wilky Control)








GatwickGreen

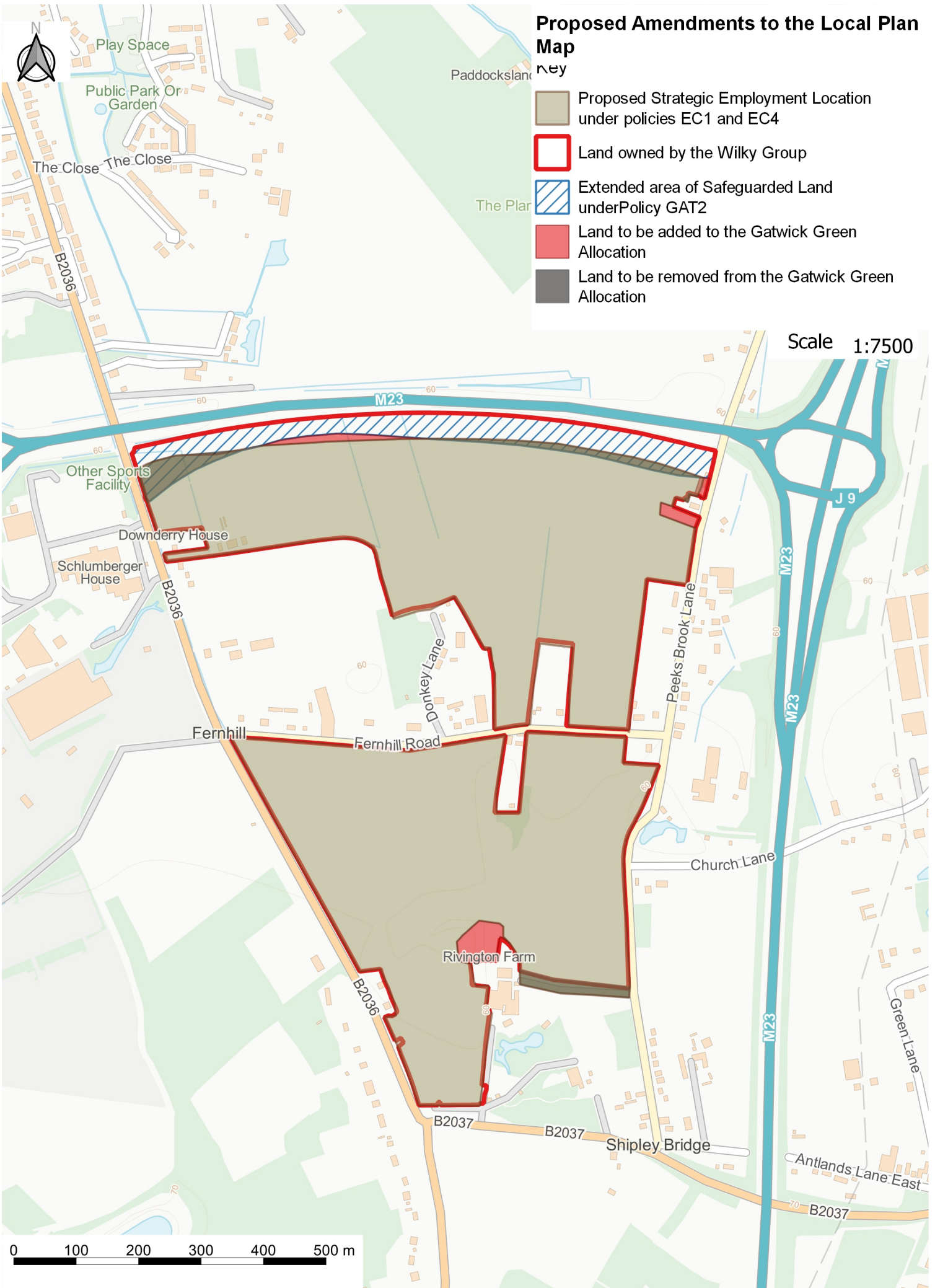
WHERE THE FUTURE WORKS

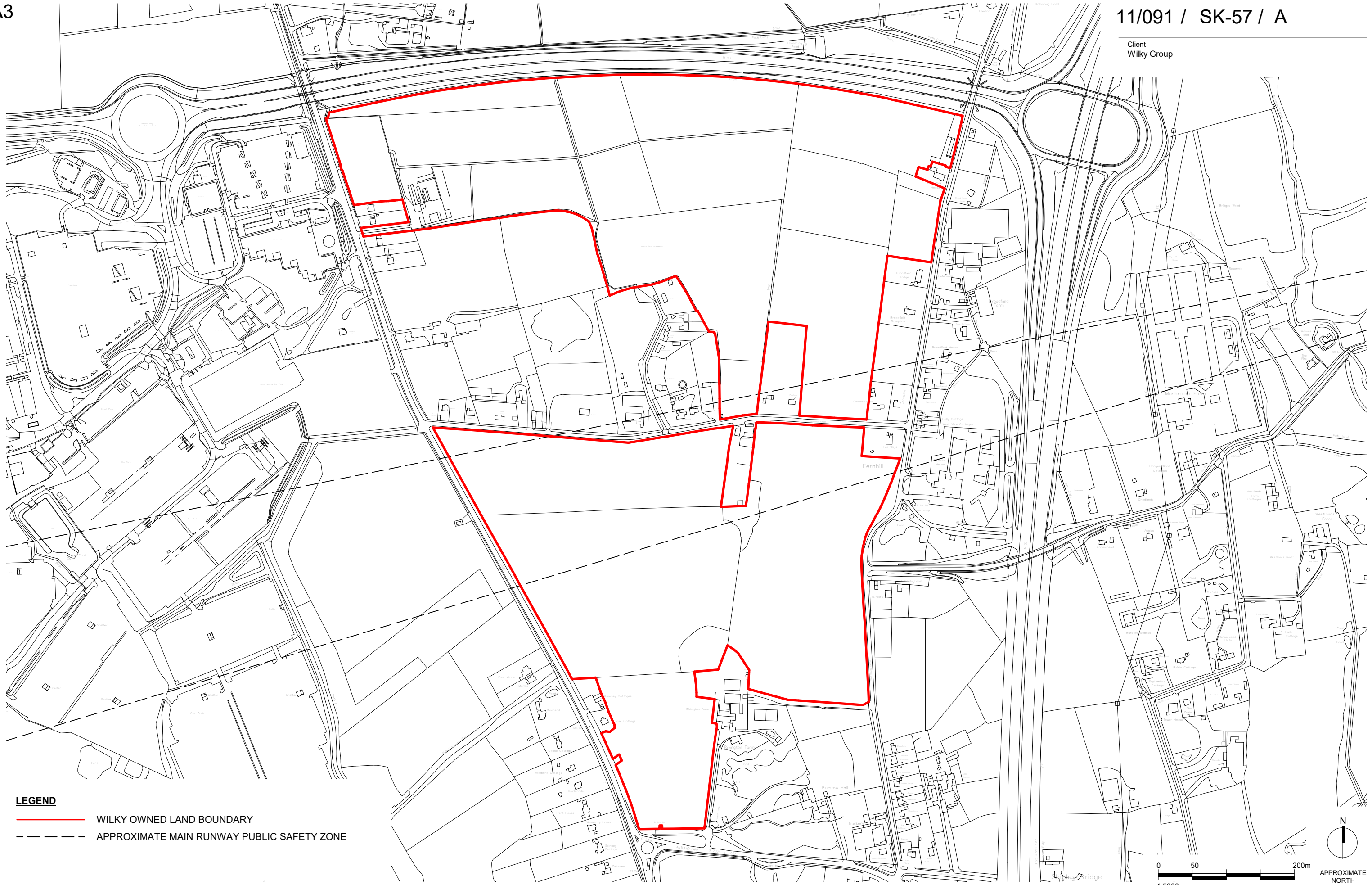
Proposed Amendments to the Local Plan Map

Key

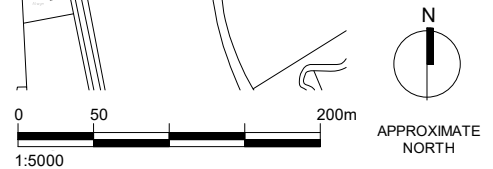
-  Proposed Strategic Employment Location under policies EC1 and EC4
-  Land owned by the Wilky Group
-  Extended area of Safeguarded Land under Policy GAT2
-  Land to be added to the Gatwick Green Allocation
-  Land to be removed from the Gatwick Green Allocation

Scale 1:7500





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



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Job N Drg N	Rev	Scale	Status
11/091 / SK-57	A	1 : 5000	PRELIMINARY
Date	Director	Author	Check
25/02/2020	JA	AH	JA

Job
GATWICK GREEN

Drawing
Red Line Plan (Wilky Control)

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