

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

Policy EC2
Economic Growth in Main Employment Areas
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:

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

- | | | |
|---|---|--|
| 5.1. Legally compliant? | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> |
| 5.2. Sound? | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |
| 5.3. Compliant with the duty to co-operate? | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> |

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

Please see attached 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 attached 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.

Policy EC2 is an important policy that identifies the Main Employment Areas and contains policy guidance relating to their future development and protection to ensure they make a significant contribution to the economy. In this context, TWG is seeking an important change to the policy to include Gatwick Green in the list of Main Employment Areas consistent with its status as a proposed Strategic Employment Location. It is therefore considered that the representation raises important and significant planning matters relating to the economic status of Gatwick Green in policy, 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

Policy EC2: Economic Growth in Main Employment Areas

June 2021



1.0 Introduction

Background

- 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. This representation relates to Policy EC2 Economic Growth in the Main Employment Areas (MEAs) in 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**.

Scope of representation

- 1.3 Gatwick Green is not included in the list of MEAs in Policy EC2, even though once developed, it would be of a scale and importance comparable to many of the MEAs in Crawley and perform a key role and function in the town's economy. This also applies to the value of the Site to the wider Coast to Capital LEP area and the Gatwick Diamond. TWG therefore considers that Gatwick Green should be included in the list of MEAs given that it will be a key part of Crawley's economic infrastructure and make a significant contribution to the growth, diversification, resilience and quality of Crawley's economic base. Further evidence on the importance and socio-economic value of Gatwick Green is contained in Savills' representation on behalf of TWG to Policy EC1 (Sustainable Economic Growth).
- 1.4 This representation sets out the evidence in support of the inclusion of Gatwick Green in the list of MEAs under Policy EC2 with reference to:
 - The National Planning Policy Framework (NPPF, 2019).
 - The economic function and role of Gatwick Green in the economy of Crawley and the wider region.
 - Evidence on Strategic Policy EC1 by Savills on behalf of TWG.
 - The scale and nature of Gatwick Green relative to other MEAs.

- Appropriate controls over development at Gatwick Green.

2.0 Justification for Gatwick Green as a Main Employment Area

Strategic role and function of MEAs

- 2.2 MEAs have a strategic role and function in Crawley's economy – this is embedded in Strategic Policy EC1 in which Crawley's economic role and function is centred on optimising the economic value of the MEAs, with Manor Royal identified as the key mixed business location at the Heart of the Gatwick Diamond and Coast to Capital areas. Strategic Policy EC1 also references the allocation of Gatwick Green as an industrial-led Strategic Employment Location (SEL), which is then allocated under Strategic Policy EC4.
- 2.3 The DCBLP states that Crawley's economy is characterised by a range of employment areas, each with an established character and function, performing an identified role. The MEAs therefore represent the focus for sustainable economic growth. Policy EC2 seeks to protect and improve the existing economic areas, maximising the potential to utilise existing employment sites (DCBLP, para 9.24). Manor Royal, Gatwick Airport and Crawley Town Centre represent the key MEAs.
- 2.4 The role and function of Gatwick Green is emphasised in Topic Paper 5 (Employment Needs and Land Supply, January 2021), which states that *“Allocation of Gatwick Green for industrial-led employment will help to reinvigorate Crawley's economy, supporting existing businesses, attracting new and diverse growth, and reinforcing the key economic role of Crawley within the Gatwick Diamond”* (para 4.64). The Topic Paper goes on to conclude that the economic strategy of the DCBLP is centred on two interconnected elements, (1) protecting and maximising the efficient use of the MEAs, and (2) identifying opportunities for new business land, most significantly through the allocation of a Strategic Employment Location at Gatwick Green (para 5.1). The Topic Paper goes on to state that through this twin-pronged approach, the DCBLP will be able to maintain *“Crawley's role and function at the heart of the Gatwick Diamond and Coast to Capital LEP”* (para 5.2).
- 2.5 It is therefore clear that Gatwick Green is a strategic site that is a key part of the economic strategy for Crawley in order to maintain its strategic role in the wider region. It is therefore anomalous not to identify Gatwick Green in the list of MEAs in Policy EC2. The MEAs are a core part of the economic strategy for Crawley and Gatwick Green is a Strategic Employment Location that forms a core part of that strategy. Including Gatwick

Green in the list of MEAs is therefore both logical in policy terms and consistent with the status of Strategic Policies EC1 and EC4 as 'strategic' policies within the meaning given in the NPPF (paras 17 & 20-23).

Importance, role and function

2.6 The representation by Savills on behalf of TWG on Strategic Policy EC1 sets out the case for Gatwick Green in employment and economic terms. This evidence underlines the strategic importance of Gatwick Green and its role and function in addressing:

- The unmet need for employment land and a Strategic Employment Location identified in the adopted DCBLP (2015).
- The current outstanding need for a minimum of 24.1 ha of land for industrial uses (B1c/B2/B8).
- The outstanding need for a Strategic Employment Location to the north of Crawley within the Area of Search identified in the adopted DCBLP (2015) and not required for critical airport infrastructure associated with a possible additional wide-spaced runway at Gatwick Airport.
- The market requirements for Industrial & Logistics (I&L) floorspace at Crawley contained in evidence by Savills Economics.
- The wider regional / sub-regional strategy that focuses economic growth and development at Crawley/Gatwick at the heart of the Coast to Capital and Gatwick Diamond areas.
- The underlying problems with Crawley's economy related its dependence on Gatwick Airport for employment; high levels of net out-commuting; relatively narrow range of employment and opportunities for career progression, and relatively low levels of productivity.

2.7 Gatwick Green has a central role in addressing the above structural economic issues, giving it a strategic function in the Crawley and wider sub-regional economy. This role and function must be acknowledged in policy through its identification as a MEA in Policy EC2. This role is reinforced by the significant and strategic socio-economic benefits offered by Gatwick Green: these relate to supporting the growth and diversification of the area's economy; widening Crawley's employment base; delivering quality employment opportunities in the context of Crawley's growing workforce, and addressing the impacts of the COVID-19 pandemic.

Complementarity with the MEAs

2.8 TWG's representation on Strategic Policy EC1 also provides evidence to demonstrate that Gatwick Green would be complementary to the other MEAs, and in particular Manor Royal, the Town Centre and the planned Horley Business Park in Reigate and Banstead

Borough. The complementarity of the MEAs with each other is an important pre-requisite for MEAs. This is borne out by the requirement for Gatwick Green to be complementary with the MEAs (Strategic Policy EC4) and in the justification for Policy EC2, which states that *“Each performs a different but vital role in helping to meet economic needs in Crawley. The largest Main Employment Areas are Manor Royal, the leading business destination in the Gatwick Diamond; Crawley Town Centre, a focus for Main Town Centre uses and a sub-regionally significant centre; and Gatwick Airport, a key location for airport-related employment. The borough’s other Main Employment Areas perform an important complementary role, supporting a range of employment uses that includes small businesses, offices, and high quality leisure facilities”* (para 9.28).

- 2.9 Gatwick Green is an industrial-led allocation for predominantly B8 storage and distribution uses, offering good access to the M23 and in a high-profile and sustainable location – it is also uniquely placed to provide for the new generation logistics market and the evidenced demand for units in excess of 75,000 sq ft (c 7,000 sqm). No other MEA has the potential to offer sites that can meet this segment of the I&L market, though there may be some very limited opportunities at Manor Royal. This makes Gatwick Green highly complementary to the other MEAs and other key employment sites in the wider north West Sussex FEMA such as north of Horsham and the Horley Business Park.

Relative scale and profile

- 2.10 Table 2.1 below shows the size and use profile of some of the core business areas in Crawley against the proposed profile for Gatwick Green based on the provisions of Strategic Policy EC4. Gatwick Airport, the Hawth, Broadfield Stadium & K2 Crawley and the town centre are excluded given the more specialist function of these areas. The data shows that Gatwick Green is the second largest employment area behind Manor Royal and significantly larger than any of the other areas. The data also shows that Gatwick Green will serve a very distinct segment of the business market, namely for new generation logistics uses requiring a high profile location with good access to the Strategic Road Network (M23/M25). Gatwick Green is also the only area that can offer large floorspace units over 75,000 sq ft (7,000 sqm), where there is an evidenced gap in the market.

Table 2.1 – Profile of Crawley’s employment areas and Gatwick Green

Employment Area	Size (ha)	Predominant Use Classes
Manor Royal	240 ha	B1/B2/B8
Lowfield Heath	16 ha	B1c
Three Bridges Corridor	27 ha	B1(a), B8, Sui Generis
Maidenbower Business Park	6.3 ha	B1(a), Sui Generis, D2

Employment Area	Size (ha)	Predominant Use Classes
Broadfield Business Park	1.48 ha	B1(a), Sui Generis, D2
Tilgate Forest Business park	3.33 ha	B1(a), Sui Generis, D2
Gatwick Green	47 ha	B8

- 2.11 Based on this comparative assessment, there is a clear case to identify Gatwick Green as a MEA based on its size and specific market position in the overall Crawley economy.

Application of Policy EC2 to Gatwick Green

- 2.12 MEAs are a focus for sustainable economic growth and where development is supported under Policy EC2 – this is a permissive policy that supports development where it makes an efficient use of land and contributes to the economic function of Crawley. The inclusion of Gatwick Green in the list of MEAs in Policy EC2 would mean that this permissive policy would apply – such an approach is not only consistent with the economic metrics noted in this representation, but can also be reconciled with the environmental considerations that apply to the Gatwick Green allocation and its setting. These environmental considerations are addressed fully in Strategic Policy EC4, with which development of the allocation must have regard. In addition, other environmental protection policies in the Plan addressing such matters as biodiversity and heritage would continue to apply to the Gatwick Green site once developed-out in accordance with the masterplan required under Strategic Policy EC4.
- 2.13 The purpose of Policy EC2 is to identify, and provide a policy framework for, the Main Employment Areas (MEAs) in Crawley such as Manor Royal, Gatwick Airport and the town centre. The policy makes the MEAs the focus for sustainable economic growth. It goes on to state that employment generating development will be supported in the MEAs provided it makes efficient use of the land or buildings and contributes positively to the sustainable economic growth of the MEAs and Crawley. It then sets out the pre-conditions for supporting any development that involves a net loss of land or floorspace, comprising the wider socio-economic benefits for the site / Crawley and the avoidance of adverse economic impacts on the function of the MEA or Crawley.
- 2.14 If Gatwick Green was included in the list of MEAs, it is important to understand that whilst Policy EC2 would apply a fairly permissive approach to supporting growth and development within the MEAs, such support is tempered by the need to have regard to other policies in the Plan. The different environmental characteristics of the MEAs therefore results in a differential level of development control being applied through the various topic-specific policies in the DCBLP. MEAs with a very urban character would be less likely to be subject to many additional development controls and so Policy EC2

would dictate a fairly permissive approach to development. Other MEAs may have specific environmental / amenity considerations that need to be taken into account, with the result that other development control policies would apply that may influence the scale and nature of new development.

2.15 In addition to the other development control policies in the Plan, Policy EC2 fits into a wider economic strategy in the DCBLP so these strategic policy objectives also apply. When applying Policy EC2 therefore, the following policy framework would be applied:

- **Presumption in favour of sustainable development** under Strategic Policy SD1 – supports development that meets the strategic objectives, which includes, *inter alia*, conserving heritage and green infrastructure and accords with all other policies in the Plan unless material considerations indicate otherwise.
- **Healthy living and wellbeing** Strategic Policy SD2 – this requires new development to meet a range of design objectives including, *inter alia*, incorporating biodiversity, green infrastructure and climate change resilience (Policies GI1 and GI3).
- **Heritage** Policies HA1 to HA7
- **Landscape and development form** Policies CL6 and CL7.
- **Design** Policies DD1, DD4 and DD5.
- **Green infrastructure and biodiversity** Policies GI, GI2 and GI3
- **Sustainable design and construction** Policies SDC1 and SDC3.
- **Environmental protection** Policies EP1 – EP6
- **Sustainable transport** Policies ST1 and ST2.

2.16 The Gatwick Green site has a specific range of characteristics that distinguish it from the MEAs identified in Policy EC2. This includes the designated Biodiversity Opportunity Area under Policy GI2 (Gatwick Woods BOA); green infrastructure (hedgerows/trees) (Policy GI1); nearby Listed and Locally Listed Buildings (Policies HA4 and HA5) and important and valued views (Policy CL7). These environmental assets / characteristics mean any development proposals, including those that may come forward following the development of the Site in accordance with the Masterplan approved under Strategic Policy EC4, must also have regard to these policies.

2.17 The policy framework that applies to all the MEAs therefore ensures that the development of each can be optimised in line with Policy EC2, whilst ensuring that account is taken of any significant and important environmental characteristics. The inclusion of Gatwick Green in the list of MEAs in Policy EC2 will therefore acknowledge its key role and function in the economic growth and recovery of Crawley and the wider

area, but also ensure that such growth is accommodated in manner that has had regard to the environmental characteristics of the Site.

3.0 Conclusions

3.1 It is concluded that against the tests of soundness at para 35 of the NPPF, **Policy EC2 is not sound** as it excludes Gatwick Green from the list of Main Employment Areas (MEAs). In doing so, it fails to acknowledge the strategic role, function, scale and relative importance of Gatwick Green in the future of the Crawley and sub-regional economies. More specifically, Policy EC2 is not sound for the following reasons:

- **Positively prepared** – The policy does not represent a positive response to the economic needs of the Borough and wider sub-region or acknowledge the strategic nature of Gatwick Green, which is embedded in Strategic Policies EC1 and EC4.
- **Justified** – The policy does not acknowledge the status of Gatwick Green as a SEL, which was identified following an assessment of the reasonable alternatives.
- **Effective** – Gatwick Green is the most effective option for a SEL in the context of the Council’s collaborative approach to assessing the needs of the economy across the North West Sussex area (Crawley Borough and Mid-Sussex and Horsham Districts), but this is not reflected in Policy EC2.
- **Consistent with national policy** – The NPPF provides for Local Plans to include strategic policies that identify the strategy of the pattern, scale and quality of major development. To allocate Gatwick Green under a strategic policy (Strategic Policy EC4), but then omit it from the list of strategic employment areas (MEAs) under Policy EC2 is therefore contrary to national planning policy.

3.2 For the reasons noted in this representation, including Gatwick Green in the list of MEAs is reconcilable with the need to have regard to the environmental characteristic of the Site addressed in other policies in the DCBLP. This is consistent with the approach that applies to all MEAs.

3.3 In order to make Policy EC2 sound, Gatwick Green should be added to the list of MEAs – on this basis, Policy EC2 should be reworded as follows (additional text underlined):

“As a key economic driver in the sub-region, Crawley’s Main Employment Areas make a significant contribution to the economy of the town and the wider area, and are designated as a focus for sustainable economic growth.

*The Main Employment Areas are:
 Manor Royal;
Gatwick Green;
 Crawley Town Centre;
 Gatwick Airport;*

*Three Bridges Corridor (including Denvale Trade Park, Spindle Way,
Stephenson Way and Hazelwick Avenue);
Maidenbower Business Park;
Tilgate Forest Business Centre;
Broadfield Business Park;
Lowfield Heath;
Broadfield Stadium and K2 Crawley;
The Hawth.*

.....”

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

