

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 EC4

Strategic Employment Location

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 |

| | | |
|-----------------|------------------------|-------------------|
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| Town/city: | Leatherhead | Wimborne |
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| 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 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 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.

Strategic Policy EC4 is an important policy that allocates the Gatwick Green Strategic Employment Location and provides the framework of development management provisions to ensure the comprehensive and sustainable development of the site. TWG supports Strategic Policy EC4, but is seeking important changes to the policy and/or the supporting text to provide for consistency with other policies in the Local Plan and to ensure infrastructure requirements are defined as strategic; flexibility in how off-site highway infrastructure is provided/delivered; site access within the Safeguarded Land; clarity with regard to s106 contributions and development over and above the minimum 24.1 ha provided for in policy, and the extent of the allocation and the adjacent Safeguarded Land to address more detailed information and a number of mapping errors. It is therefore considered that the representation raises important and significant planning matters relating to effective and efficient implementation of Gatwick Green under Strategic Policy EC4. 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

Strategic Policy EC4: Strategic Employment Location

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. This representation relates to Strategic Policy EC4 Strategic Employment Location 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**.

Background

These are TWG's representations made in the light of the updated DCBLP 2020, which was published following the advice from the Planning Inspectorate to Crawley Borough at the Advisory Visit in April 2020: the advice was that the Local Plan had to include a strategy to address Crawley's employment needs and that the removal of safeguarding could not be regarded as certain. Accordingly, the representations revise TWG's position, given the changes in the draft Plan and the revised / updated evidence base since the original representations were made.

Scope of representation

- 1.3 Savills' representation on behalf of TWG on Strategic Policy EC1 contains evidence in support of the DCBLP in relation to economic strategy, the scale of employment land provision and the allocation of Gatwick Green as a Strategic Employment Location (SEL). In particular, the representation sets out the evidence in support of how policy expresses the employment land requirement as a **minimum**, with provision beyond this to be justified by evidence of market requirements / need. This representation cross-refers to evidence contained in the representation on Strategic Policy EC1 as necessary to support considerations raised in connection with Strategic Policy EC4.
- 1.4 This representation therefore focuses on evidence in support of Strategic Policy EC4 with regard to the development control provisions within the policy. Where matters relating to employment land requirements are raised, the representation cross-refers to evidence contained in the representation on Strategic Policy EC1. The representation makes reference to the following sources and technical reports/evidence:

1. Evidence by Empiric Partners and i-Transport on the transport provisions of Strategic Policy EC4.
 2. An Environmental and Utilities Preliminary Assessment report and related Addendum.
 3. A Preliminary Ecological Appraisal (PEA) report and related Addendum.
 4. A Hedgerow Regulations Assessment report and related Addendum.
 5. A Landscape Character and Visual Appraisal report and related Addendum.
 6. A Heritage Constraints Appraisal report and related Addendum.
- 1.5 The reports noted at 2-6 above 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 to reflect the revised policy framework in the DCBLP and other changes in circumstances since the original appendices were prepared.

Executive Summary

- 1.6 The DCBLP adopts the Experian Baseline Job Growth projection as the basis for the amount of employment land provided for in Strategic Policy EC4. The Council has expressed this requirement as a **minimum** in both policy and the supporting text – this includes Strategic Policy EC4, which provides for a **minimum** of 24.1 ha of new industrial land predominantly for B8 storage and distribution use, with provision for additional land if appropriate evidence on market demand/need can be demonstrated. TWG supports this approach insofar as it reflects national planning policy and guidance and local economic and policy priorities by planning positively to future-proof the local economy in the face of long-standing needs and the impacts of the COVID-19 pandemic.
- 1.7 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 this 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 the and near to Crawley.
- Gatwick Green is viable and deliverable in accordance with the provisions in Strategic Policy EC4.

1.8 Strategic Policy EC4 is therefore considered to be sound with regard to the how it plans for the provision of further employment land such that it is in accordance with the four soundness tests contained in the NPPF (para 35). The representation also sets out the case for some minor adjustments to the policy, the supporting text and the Local Plan Map as follows:

1. Provide consistency of wording within the policy with regard to the strategic nature of the 'Requirements' referred to in the policy.
2. Ensure flexibility in the approach to the delivery of strategic infrastructure to support the Strategic Employment Location allocated under Strategic Policy EC4 so as to retain a broad base of delivery options and be consistent with the Annex on Planning Obligations.
3. Allow for the dual use of the Safeguarded Land south of the M23 spur road to ensure a land / resource-efficient outcome with regard to the provision of highway infrastructure to serve both Gatwick Green and the future additional wide-spaced runway.
4. Make it clear that all the employment land requirements are **minimum** requirements consistent with how these are expressed in Strategic Policies EC1 and EC4.
5. Provide clarity that the allocation under Strategic Policy EC4 can accommodate additional employment land over and above the **minimum** of 24.1 ha, subject to the development controls in the policy and evidence of market demand/need.
6. Amend the Local Plan Map to redress a mapping error by revising the extent of the Safeguarded Land south of the M23 spur road to reflect the areas advised by GAL to TWG.
7. Amend the Local Plan Map to correct a mapping error by including two parcels of land owned by TWG within the allocation for Gatwick Green.
8. Clarify that the s106 sustainable transport contribution relates to that identified in the formula contained in the Planning Obligations Annex.

2.0 Meeting Crawley's employment land requirement

- 2.1 The Council has adopted the employment land requirement based on the Experian Baseline Job Growth projection contained in the Economic Growth Assessment update for Crawley (EGU CU), but applied it so that it is expressed as a **minimum** of 38.7 ha of land to meet needs up to 2036 (DCBLP, para 9.12 and Strategic Policy EC1). The industrial component of this employment land requirement is 32.8 ha, leading to an **outstanding need for a minimum of 24.1 ha of industrial land** (after taking account of the industrial land supply of 8.7 ha). Savills' representation on behalf of TWG in relation to Strategic Policy EC1 sets out, *inter alia*, the case in support of this approach and in particular, the Council's decision to express the employment land needs as **minimum** requirements in Strategic Policies EC1 and EC4 and the supporting text.
- 2.2 This approach is in line with national planning policy and guidance, and local economic and policy priorities, 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 the policies, and within the supporting text of the Plan relating to both policies – this relates to the need to consistently express the employment land requirements as '**minimum**'. These inconsistencies need 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 supporting text to Strategic Policy EC4 are therefore advanced in this representation.

3.0 Requirements for Gatwick Green under Strategic Policy EC4

Sustainability

- 3.1 The Council has assessed the alternative options in its Sustainability Appraisal¹ (SA/SEA). This evaluated three options: (1) allocate a SEL only through Strategic Policy EC1, (2) allocate a SEL through a dedicated local plan policy, and (3) explore the scope to allocate an industrial-led SEL through an Area Action Plan. Option 2 was selected as it allowed for detailed matters relating to the amount and type of business floorspace, transport and access, design and amenity and environmental considerations to be addressed in policy and provide a framework to achieve a sustainable development through a masterplan and planning application. The Council's approach is supported in that it has allowed for the Gatwick Green SEL to be identified as part of the overall

¹ Crawley Borough Council Local Plan Review | Sustainability Appraisal / Strategic Environmental Assessment, Draft Report, For the Submission Local Plan, January 2021

economic strategy for the Borough articulated in Strategic Policy EC1, with the detailed matters relating to site / development requirements to be addressed separately in a site-specific policy (EC4).

The effect of policy

3.2 Strategic Policy EC4 sets out a clear basis for the development of Gatwick Green in a sustainable and efficient manner. Before reviewing the various requirements of the policy, it is worth setting out what the policy means for the implementation of Gatwick Green.

3.3 Strategic Policy EC4 provides for the following, with the key aspects underlined:

- I. The Gatwick Green site is allocated for comprehensive development as an industrial-led Strategic Employment Location.
- II. The development of a minimum amount of new industrial land of 24.1 ha (item a).
- III. The development of the site for predominantly B8 storage and distribution uses (item a).
- IV. Any further industrial development beyond the 24.1 ha must be justified by appropriate evidence (item a).
- V. The provision of limited complementary ancillary uses such as office floorspace, small-scale convenience retail and small-scale leisure facilities to support the industrial-led function to be justified (item b).
- VI. Limitations on development through the application of a number of development control policies that will limit the scale of development at the site and ensure the timely delivery of appropriate physical and blue/green infrastructure so as to make the development acceptable in planning and environmental terms (items c – t).
- VII. The provision of an Impact Assessment to provide evidence to demonstrate that any proposals will address Crawley's identified need for industrial focused business floorspace and how such will be complementary to key employment areas within Crawley, the Horley Business Park (HBP) and other key planned strategic employment sites in the functional economic market area (Crawley Borough, Mid-Sussex District and Horsham District).
- VIII. Planning conditions and obligations to ensure on-site and off-site physical, social and green infrastructure to control the delivery of development – these obligations will include economic impact testing, the delivery of the objectives of the Crawley Employment and Skills programme and the development of a masterplan in consultation with the Council to be advanced at the outline planning application stage to guide future detailed applications.

3.4 TWG supports the framework of parameters and controls within Strategic Policy EC4, which recognise that the Site could accommodate more development than the

minimum 24.1 ha provided for within the overall site area of 47 ha, but within the limitations imposed by the various development controls noted at points IV to VIII above.

Development control provisions

3.5 Strategic Policy EC4 also identifies the development control requirements that must be addressed at the planning application stage. This representation refers to a range of technical and environmental reports that provide sufficient policy-level evidence to demonstrate that Gatwick Green can be developed in a manner consistent with Strategic Policy EC4 and other DCBLP policies – the evidence comprises:

- 2020 Appendices²:
 - Environmental and Utilities Preliminary Assessment
 - Updated Preliminary Ecological Appraisal (PEA)
 - Hedgerow Regulations Assessment
 - Landscape Character and Visual Appraisal
 - Heritage Constraints Appraisal

- 2021 Appendices:

| | |
|--|-------------------|
| Outline Transport and Access Appraisal | Appendix 2 |
| Addendum: Environmental & Utilities Report | Appendix 3 |
| Addendum: Updated Preliminary Ecological Appraisal | Appendix 4 |
| Addendum: Hedgerow Regulations Assessment | Appendix 5 |
| Addendum: Landscape Character & Visual Appraisal | Appendix 6 |
| Addendum: Heritage Constraints Appraisal | Appendix 7 |

3.6 Gatwick Green is proposed for a comprehensive industrial-led strategic development of predominantly storage and distribution uses. Whilst conceptual site planning is still at an early stage, it is anticipated that the development could 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.

² Appendices 7 – 12 to the representation by TWG on Policy EC1 of the 2020 DCBLP (dated February/March 2020)

- 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.

3.7 A Development Framework Plan (DFP) is contained at **Appendix 8** – this provides a high level framework for the future masterplanning of the Site and shows indicative sustainable transport, green infrastructure and various environmental considerations that will influence the nature and extent of development in accordance with the various development control provisions in Strategic Policy EC4. A review of these provisions in the context of related technical and environmental evidence, is set out below which includes some preliminary findings on the types of measures that may be deployed to address the impacts of development at the Site.

Movement and Accessibility

3.8 Provisions c to h of Strategic Policy EC4 set out the requirements / guidance with regard to movement and accessibility for Gatwick Green. These require:

- A Transport Assessment (TA) to demonstrate access can be provided and the proposals can be accommodated on the strategic and local road network taking account of other developments in the area.
- A Mobility Strategy (MS) to demonstrate how the proposals can maximise sustainable access to the Site.
- Provision of improvements to public transport facilities so as to maximise the accessibility of routes/services to serve occupiers of the Site.
- Upgrading / extension of pedestrian/cycle routes to the Site from residential areas and Gatwick Airport rail station.
- Provision of appropriate on-site parking and ensure no airport-related car parking can occur.
- Submission of air-quality modelling to address air quality considerations along the road network.

3.9 **Appendix 2** contains a review by Empiric Partners and i-Transport of the above requirements / guidance, so as to demonstrate that, at a policy-level, the Site can be developed in a manner that is highly sustainable and deliverable in transport terms. The transport work adopted a highly sustainable approach in the context of the nature and capacity of the strategic and local highway infrastructure and is in line with the Council's Borough-wide transport strategy, published in January 2020³, which sets out urgent action to achieve the Council's overarching aims:

“The major challenges posed by the climate crisis, air quality, affordable homes and poor health related to inactivity have to be addressed. We need to develop a forward-focused vision for a low carbon, healthy and attractive town where people want to continue to live and work.”

3.10 The review covers the above considerations in turn and concludes that:

- There are no fundamental issues to access, promoting sustainable travel or mitigating traffic impacts. Any applications will be supported by a full Transport Assessment to demonstrate that the proposals can be accessed sustainably and would not have a severe impact upon the local highway network.
- Initial assessments for a mobility strategy demonstrate how the Site will be integrated into the existing network, with off-site improvements aimed at promoting sustainable modes of travel for both future users of the Site and existing residents / businesses.
- Any planning application will be accompanied by a range of infrastructure improvements to active travel and public transport to cost effectively mitigate development impacts.
- Proposals to improve accessibility to the Site by public transport have been discussed and agreed in principle with Metrobus and the proposed site layout will bring forward bespoke public transport infrastructure.
- Local upgrades to cycle and pedestrian facilities in the vicinity of the local area as well as Public Rights of Way are achievable and can be linked to improvements identified in the Crawley Walking and Cycling Infrastructure Improvement Plan.
- The Site can be designed to provide appropriate levels of on-site parking for both cars and Heavy Goods Vehicles to ensure that all demand can be accommodated on site.

3.11 Based on the above findings and provisions, proposals for Gatwick Green will contribute towards a defined strategy to link existing and developing residential areas, employment opportunities and day-to-day facilities within Crawley town centre, Horley, Forge Wood, Manor Royal, Three Bridges and Gatwick Airport, in line with the principle of the '15 minute Neighbourhood'. This will enable the development of infrastructure and transport services that cater for carbon neutral modes of travel, potentially reducing reliance on

³ New Directions for Crawley, Transport and access for the 21st century, January 2020

the private car, in line with the concept of Mobility as a Service, (MAAS) and the Government's ambition for a step-change in the number of walking and cycling trips undertaken on a daily basis. The Development Framework Plan (**Appendix 8**) illustrates indicative infrastructure as part of the package of measures needed to make the development sustainable in transport terms:

- An indicative Sustainable Modes / Public Transport Route through the Site to provide a dedicated and quality public transport route for buses, pedestrians and cyclists. This will avoid any negative interface with cars and HGVs using the main Transport Route through the Site and, in so doing, ensure that the number of users is maximised through the high level of service offered.
- The indicative Sustainable Modes / Public Transport Route through the Site will form part of an extension of the Fastway on road / dedicated bus route service between Maidenbower/Brewbush, Crawley, Gatwick Airport, Three Bridges, Horley, and Redhill.
- Two Public Transport Hubs to facilitate modal shift (bus/walking/cycling) with facilities for all users such as bike stores, shelters and real-time timetabling.
- The diversion of the existing Public Right of Way on the Site to ensure continued connectivity via a high quality route between the centre of Gatwick Green and Balcombe Road to the north leading to Horley.
- Two points of vehicular access to the Site on Balcombe Road to ensure an appropriate distribution of vehicle movements.

3.12 In conclusion, the policy-level work undertaken shows that Gatwick Green can be delivered in line with Strategic Policy EC4 and other transport policies in the DCBLP⁴ so as to provide an industrial-led development that benefits from a highly sustainable pattern of movement and access consistent with guidance in the NPPF and the Council's sustainable transport strategy. Gatwick Green can therefore be developed in a way that achieves sustainable transport outcomes. These matters will be addressed at the planning application stage via a TA and MS with obligations that can be guaranteed via planning conditions / a s106 agreement.

Sustainable Design and Construction

3.13 Provisions i to k of Strategic Policy EC4 set out the requirements / guidance with regard to Sustainable Design and Construction for Gatwick Green. These require achieving BREEAM Excellent rating; Net Zero emissions and carbon neutrality by 2050; implementing an energy strategy under Policy SD2, and provision of surface water drainage so as to avoid increasing flood risk.

⁴ DCBLP policies SD1, CL3, ST1, ST2, ST3

- 3.14 The Environmental and Utilities Preliminary Assessment Report (EUPAR)⁵ forms part of the 2020 Appendices and sets out the various design parameters for surface water drainage and flood prevention. The Site is located in Flood Zone 1 and the EUPAR sets out the approach, incorporating Sustainable Urban Drainage Systems (SuDS) and surface water attenuation arrangements that are Airport-compliant. An Addendum to the EUPAR has been prepared by Clarkebond (**Appendix 3**), which contains a surface water and flood risk strategy that sets out the core drainage design principles and demonstrates that the various site and local hydrology/hydrogeology considerations can be satisfactorily addressed at the planning application stage.
- 3.15 Gatwick Green can be developed in a way that achieves sustainable drainage design and construction / operation and in accordance with specific policies in the DCBLP in respect of flood risk, drainage and sustainability⁶. These matters will be addressed at the planning application stage and set out in a sustainability assessment and FRA with obligations that can be guaranteed via planning conditions / a s106 agreement.

Digital Technology

- 3.16 Provisions in Strategic Policy EC4 set out the requirements / guidance with regard to Digital Technology for Gatwick Green. This requires the provision of high quality communications infrastructure including gigabit capable full fibre broadband. As a new-generation storage and logistics development, Gatwick Green will incorporate future-proofed digital communications as indicated at Section 5.4.2.2 of the EUPAR and in accordance with Policy IN3 (Supporting High Quality Communications). This requirement will be addressed at the planning application stage and set out in a utilities report with obligations that can be guaranteed via planning conditions / a s106 agreement.

Character and Design

- 3.17 Provisions in Strategic Policy EC4 set out the requirements / guidance with regard to Character and Design for Gatwick Green. These require that a range of environmental and design / amenity considerations are taken into account in the design and operation of the proposals for the Site. These include:
- A layout and design that respects the interface between the surrounding residences and countryside areas within the North East Crawley Rural Fringe landscape character area.

⁵ DCBLP Evidence Base: Consultation appendix 4b: Wilky Group appendices combined

⁶ DCBLP policies SD1, EP1, EP2, EP3, DD1, DD2, CL3, CL4, SDC1

- A design that is in compliance with the Aerodrome Safeguarding requirements⁷.
- The inclusion of landscape buffers and public open space to address separation of Gatwick Green from Gatwick Airport, Horley and the wider countryside.
- An exemplar standard of flexible design with a high quality public realm.
- The integration of trees, hedgerows and biodiversity into the layout and design and enhance blue/green infrastructure in the context of the Gatwick Woods Biodiversity Opportunity Area.
- Minimising the impacts of lighting on neighbouring residences.
- Respecting the setting of Listed Buildings and Locally Listed Buildings, the integration of 'important' hedgerows and retaining a green buffer along Balcombe Road.

3.18 The environmental considerations relating to hedgerows and ecology, heritage and landscape / visual matters are addressed in the 2020 Appendices and subject to Addenda contained at **Appendices 3 - 7**. These Addenda confirm that the original recommendations remain valid in the context of the proposed allocation of Gatwick Green under Strategic Policies EC1 and EC4 and any other changes in circumstances.

3.19 The specialist reports in the 2020 Appendices and the Addenda at **Appendices 3 - 7** contain a series of conclusions that confirm that the Site can be developed whilst respecting the various environmental values in and around it, and include recommendations on appropriate avoidance and mitigation measures in the context of the specific policies in the DCBLP in respect of environmental protection and enhancement⁸. These matters will be addressed at the planning application stage and set out in a Design and Access Statement.

Impact Assessment

3.20 Strategic Policy EC4 requires an assessment to demonstrate how the SEL will address Crawley's identified need for industrial focused business floorspace and how such will be complementary to key employment areas within Crawley, the HBP and other key planned strategic employment sites in the function economic market area (Crawley Borough, Mid-Sussex District and Horsham District).

⁷ DfT Circular "Control of Development in Airport Public Safety Zones", DfT, March 2010

⁸ DCBLP Policies HA1, HA4, HA5, HA7, OS3, GI1, GI2, GI3, EP4, EP5, EP6, CL6, CL7, DD4, DD5

- 3.21 Savills Economics has undertaken an assessment of Industrial and Logistics (I&L) market and its implications for the economic needs of Crawley⁹. The assessment looked at the importance of the I&L sector to the national economy; the diversity of I&L employment opportunities; the supply-chain and locational characteristics of I&L development; the implications of the COVID-19 pandemic; the I&L market signals for Crawley, and how these factors support the economic strategy in the DCBLP focused on optimising opportunities at Manor Royal alongside the industrial-led allocation at Gatwick Green, primarily for distribution and storage uses. The assessment concludes that various trends and factors are fuelling growth in the I&L sector; the sector is growing in all areas of England; there is a paucity of opportunities for larger I&L units in Crawley, and the Crawley market is very undersupplied when compared to similar markets, including those near to major airports. The assessment's overall conclusion is that Gatwick Green can deliver new supply in an ideal location adjacent to the M23 and the UK's second largest airport - it will also offer a scale of development that can include a focus on larger and very large units (>100,000 sqft).
- 3.22 Savills representation on Strategic Policy EC1 includes a review of the employment land supply in Crawley. It concludes that the land supply in the Employment Land Trajectory (ELT) has limitations related to the scale of industrial units it can accommodate and the segments of the market it can serve. This underlines the need for Gatwick Green to meet the market needs that are not catered for by the supply of sites mainly at Manor Royal, which is focused on smaller/medium and some large units. Gatwick Green will therefore focus on the need for strategic-scale storage and distribution uses aligned with occupier demand for buildings in the 100,000+ sqft range, which are unlikely to be accommodated at Manor Royal. Gatwick Green offers a premier location with high levels of accessibility and connectivity that can be developed in a sustainable manner so as to meet a key part of the outstanding Crawley-derived future employment needs in quantitative and qualitative terms.
- 3.23 A more detailed analysis of the degree of complementarity between Gatwick Green and the other key employment areas in, and in the vicinity of, Crawley is included in a separate assessment by Savills Economics¹⁰. This analyses the market position of Manor Royal, the proposed Horley Business Park (HBP), the town centre the proposals for Gatwick Green, and the opportunities at each location. The findings show clearly how the business profile of each of the employment areas is clearly distinct and that the development opportunities they offer are very different, and in turn serve different segments of the industrial market. The analysis demonstrates the complementarity of Gatwick Green with these key employment areas, so supporting the Council's objective

⁹ Appendix 3 to representation on Strategic Policy EC1 – Savills on behalf of TWG

¹⁰ Appendix 4 to representation on Strategic Policy EC1 – Savills on behalf of TWG

that these areas will serve different sectors of the market in a complementary way (DCBLP, para 9.49).

- 3.24 The current evidence therefore supports the conclusion that there is a high level of complementarity between Gatwick Green and the other key employment areas in and close to Crawley. A further impact assessment will be undertaken at the planning application stage to confirm the position with regard to these policy tests.

Delivery

Policy requirements

- 3.25 Strategic Policy EC4 requires planning conditions and obligations to ensure on-site and off-site physical, social and green infrastructure to control the delivery of development. These obligations will include economic impact testing, the delivery of the objectives of the Crawley Employment and Skills programme and the development of a masterplan in consultation with the Council to be advanced at the outline planning application stage to guide future detailed applications.
- 3.26 As noted at paragraphs 3.20 – 3.22, Gatwick Green would complement the existing employment sites in Crawley and the wider area – biannual impact testing will be undertaken throughout the implementation period to comply with this requirement. In terms of employment and skills, it is envisaged that Gatwick Green will include a provision for education uses to support apprenticeships & staff training, whilst an Employment and Skills Plan will be developed to source local labour for the construction and operational phases.
- 3.27 A masterplan will be prepared taking account of the policy-level baseline surveys and investigations already undertaken for the DCBLP Examination. These will be supplemented by further detailed technical, urban design and environmental investigations to inform a comprehensive masterplan for the Site. For the purposes of the DCBLP Examination, a conceptual Development Framework Plan (DFP) has been prepared (**Appendix 8**), which illustrates the green framework for the Site comprising the adjacent priority habitat; peripheral hedgerows (including some classified as ‘important’); the extent of the Biodiversity Opportunity Area; the key transport corridors / hubs; the extent of the Airport’s main runway Public Safety Zone (PSZ), within which land uses are restricted, and areas where built development is likely to be accommodated. The DFP acknowledges all these key considerations and that they will indicatively inform the preparation of a masterplan.

Deliverability – tenure, funding and viability

3.28 TWG sets out its case in relation to the deliverability of Gatwick Green in its separate representations on the Employment Land Trajectory (ELT). These representations conclude as follows:

- 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.
- The Council’s plan-wide viability assessment¹¹ 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.”*
- Savills Economics has undertaken a review of the Council’s viability assessment (**Appendix 9**) 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.”*

3.29 Overall therefore, Gatwick Green is available and 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 Strategic Policy EC4.

3.30 Paragraph 2.22 of TWG’s representation on the Employment Land Trajectory (ELT) sets out TWG’s intentions to advance a planning application in 2022 based on seasonal survey work and technical investigations that have commenced. The work will inform

¹¹ Crawley Borough Council Local Plan Review: Whole Plan Policies & CIL Viability Assessment – Final Report Issued March 2021 (DSP19682 – Final v8), DixonSearl Partnership, March 2021

the preparation of a masterplan as required under Strategic Policy EC4 and other documentation necessary for an outline planning application. This further demonstrates the deliverability of the Gatwick Green proposals. 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.

Conclusions

- 3.31 Overall, the technical and environmental evidence produced by TWG and contained in the 2020 Appendices and more recent assessment updates (**Appendices 2 – 7**) demonstrate that at a policy-level, there are no issues or matters that would mitigate against the comprehensive development of the Site, in accordance with the various development controls contained in Strategic Policy EC4 and other policies of the DCBLP, as noted. Indeed, all feasibility investigations to date indicate that the 24.1ha minimum requirement can be delivered in accordance with these requirements. The evidence therefore indicates that the Site can be developed in a highly sustainable manner such as to promote a range of environmental, design and sustainability policy objectives, whilst delivering a viable scheme that can offer the range of benefits noted in this representation.

4.0 The policy response

Overview

- 4.1 Strategic Policy EC4 of the DCBLP allocates Gatwick Green for an industrial-led Strategic Employment Location and sets out the requirements to ensure the Site can be developed in a sustainable manner. It identifies the Site for a **minimum** of 24.1 ha of new industrial land, predominantly for B8 uses.
- 4.2 The Council has therefore responded positively to the shortfall in employment land availability in Crawley and to critical challenges facing the Crawley economy as a result of the COVID-19 pandemic by allocating Gatwick Green for strategic employment development under Strategic Policies EC1 and EC4. This allocation has been made recognising that retaining the Site for possible long term airport-related surface car parking would represent “*an inefficient use of the land*” in the context of:

- (1) The Airport’s plans for decked and other more land efficient operations including robotic parking to serve its expansion plans under the proposed Development Consent Order (DCO).

(2) The Airport's increasing switch to more sustainable modes of transport under its Surface Access Strategy (para 3.4.1, Topic Paper 2: Gatwick Airport, January 2021).

- 4.3 TWG therefore broadly supports Strategic Policy EC4 and the range of development controls and other requirements relating to the need for impact assessments, planning conditions and obligations and a masterplan to guide the comprehensive development of the Site.

Changes to supporting text in relation to employment land requirements

- 4.4 As referred to in paragraphs 2.1 and 2.2 above, TWG supports the Council's decision to express the employment land requirements as a **minimum** in Strategic Policies EC1 and EC4. TWG's evidence in support of this policy response is set out in full in its representations on Strategic Policy EC1 – the evidence also supports the approach adopted in Strategic Policy EC4, which expresses the outstanding industrial land need of 24.1 ha as a **minimum**. Based on this evidence, it is proposed that the supporting text to Strategic Policy EC4 should be subject to some minor amendments to express the employment land requirements as **minimum** requirements over the Plan period. Other proposed minor changes to the policy are addressed below.

Minor changes to Strategic Policy EC4 and supporting text

- 4.5 It is considered that there is a planning case for some minor adjustments to Strategic Policy EC4 to ensure consistency within the policy, ensure there is some flexibility in the implementation/delivery of off-site infrastructure and to ensure clarity in meaning. There are four proposed such adjustments, which are set out below alongside the justification in planning terms.

1. Consistency within Strategic Policy EC4 – strategic infrastructure

- 4.6 Insofar as Strategic Policy EC4 is a 'strategic' policy within the meaning given in the NPPF (paras 17 & 20-23), its provisions should also be 'strategic' in that they are of a strategic nature to guide and manage the development of the Strategic Employment Location. In the case of Strategic Policy EC4, there is an inconsistency in that the 'Requirements' in the policy are not explicitly stated as 'strategic'. It would, therefore, ensure consistency within the policy if these 'Requirements' were identified as 'strategic' – this will ensure they assume strategic importance, such that their delivery by the developer can be advanced in partnership with the Borough Council.

2. Consistency with Strategic Policy EC4 – further industrial development

- 4.7 There is a need to amend paragraph 9.54 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 paragraph currently states that such further industrial development, within the overall allocation of 47 ha, is restricted to complementary and ancillary uses where justified by evidence. 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 paragraph 9.54 should therefore be amended such that it is consistent with Strategic Policy EC4.

3. Flexibility in the provision of off-site highway infrastructure

- 4.8 The policy implies that off-site highway infrastructure associated with Gatwick Green can only be 'delivered' as part of the development, whereas in reality there may be other means of securing such infrastructure, for example through a scheme-specific or generic development contribution to fund such works or general improvements. Policy should not pre-judge the most appropriate approach. Instead, it should provide the flexibility to allow the most appropriate approach to be adopted, which will in turn more fully support the delivery of the allocation.
- 4.9 Planning Practice Guidance (PPG) states that developers may be asked to provide contributions for infrastructure in several ways (Paragraph: 003 Reference ID: 23b-003-20190901). Therefore, on this basis and in order to maintain flexibility, Strategic Policy EC4 and paragraph 9.59 should therefore be amended to provide for a flexible approach to the provision of infrastructure associated with the development of Gatwick Green.

4. Clarity in relation to the application of sustainable transport contributions under s106

- 4.10 Strategic Policy EC4 states that as Gatwick Green will be required to address its own highway impacts, a s106 sustainable transport contribution will not be sought. This approach is supported by TWG, but it needs to be made clear that this contribution relates to that identified through the formula contained in the Planning Obligations Annex. As worded in the policy, it could exclude other one-off contributions towards sustainable transport related to addressing the specific impacts of Gatwick Green. This clarification can be provided through a minor amendment to paragraph 9.59 of the DCBLP.

Interface between Gatwick Green and Safeguarded Land

- 4.10 Evidence is set out in TWG's representation on Policy GAT2 (Safeguarded Land) to justify complementary and compatible amendments to Policy GAT2 and Strategic Policy EC4 to bring about a more resource and land-efficient approach to the planning of highway infrastructure to serve Gatwick Green and the possible addition of a wide-spaced southern runway for Gatwick Airport. These changes would enable the Safeguarded Land south of the M23 spur road to accommodate the northern on-site access road to serve Gatwick Green, without prejudicing GAL's ability to bring forward the highway infrastructure associated with the development of an additional wide-spaced runway. The approach would not only reduce the number of roads in the same broad corridor from three to two, but would also enable one of those roads to serve a dual purpose (with some modest upgrading) for Gatwick Green, and for surface access arrangements associated with a possible future wide-spaced runway (diversion of Balcombe Road). The approach has been discussed with Gatwick Airport Limited and a statement setting out progress on those discussions is appended to TWG's representation on Policy GAT2.

Amendments to the extent of the SEL allocation and Safeguarded Land

- 4.11 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 10**.
- 4.12 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.

4.13 There is also a discrepancy between the land safeguarded between the Gatwick Green allocation and the M23 spur road – details of this discrepancy are set out in paragraph 3.3 of TWG’s representation on Policy GAT3 (Safeguarded Land). This has resulted in a mapping error in respect of the amount of land required to be safeguarded south of the M23 spur road to accommodate all of GAL’s future additional runway related access infrastructure. The result is that the Safeguarded Land in this area is not sufficient to accommodate all the surface access infrastructure associated with the possible additional wide-spaced runway, comprising new slip roads from the M23. The revised extent of this Safeguarded Land is shown on the plan at **Appendix 11**. It is therefore proposed that the draft Local Plan Map should be adjusted accordingly to correct this additional mapping error.

5.0 Conclusions

5.1 It is concluded that against the tests of soundness at para 35 of the NPPF, **Strategic Policy EC4 is sound** as it allocates Gatwick Green as a major Strategic Employment Location to respond to the urgent and longer-term needs of the Crawley economy and to address the urgent needs arising from the COVID-19 induced economic downturn in the economy of the Crawley area. More specifically, Strategic Policy EC4 is sound for the following reasons:

- **Positively prepared** – Gatwick Green can meet the Borough’s minimum objectively assessed need for industrial land, and specially for B8 uses, in a sustainable manner.
- **Justified** – Gatwick Green advances the vision for Crawley and the strategy for the economy contained in a range of regional and sub-regional strategies and the DCBLP, having taken account of the absence of any reasonable alternatives, such that are constrained by safeguarding for critical airside and landside airport infrastructure related to an additional wide-spaced runway at Gatwick.
- **Effective** – The Gatwick Green allocation is deliverable over the Plan period as evinced in this representation and in separate representations by TWG on the Employment Land Trajectory, and is also the most effective option 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).
- **Consistent with national policy** – The policy allocates Gatwick Green as a SEL: the Site represents a highly sustainable location and can be development in a sustainable manner in accordance with the development control provisions of Policy EC4 to deliver significant socio-economic and environmental benefits to Crawley Borough.

5.2 Whilst Strategic Policy EC4 is sound, there are some minor changes to the DCBLP text and/or the policy to ensure it is clear that the employment land requirements of the

Borough are a **minimum**; there is consistency within the policy; there is flexibility with regard to the delivery of Planning Obligations, and there is a more land and resource-efficient dual use for highway infrastructure in the Safeguarded Land south of the M23 spur road owned by TWG. These minor changes are referred to in this representation, and include:

1. **Amend Strategic Policy EC4 such that the 'Requirements' of the policy refer to 'strategic infrastructure requirements'**. This will ensure consistency with the status of the policy as a 'strategic policy' as defined in the NPPF.
2. **Amend Strategic Policy EC4 and paragraph 9.59** to provide for a flexible approach to the provision of off-site highway improvements via planning obligations, by the introduction of more flexibility in how these are delivered. The same change is proposed to the Annex on Planning Obligations in separate representations by TWG.
3. **Amend Strategic Policy EC4** to enable the Safeguarded Land south of the M23 spur road to accommodate the northern on-site access road to serve Gatwick Green without prejudicing GAL's ability to bring forward the highway infrastructure associated with the development of an additional wide-spaced runway for Gatwick Airport. A complementary change to the DCBLP safeguarding policy is addressed in Savills representation on behalf of TWG on Policy GAT2.
4. **Amend paragraphs 9.48 and 9.59 of the supporting text to Strategic Policy EC4 to reflect that the overall and outstanding requirements of new employment land are a 'minimum'**. The employment land requirements are expressed as a 'minimum' in relation to the overall requirement of 38.7 ha (Strategic Policy EC1) and the outstanding requirement of 24.1 ha (Strategic Policy EC4), but this is not reflected in the supporting text where these requirements are not expressed as minima (paras 9.48 and 9.50). This also applies to the overall requirement for industrial land noted in paragraph 9.48. This represents an inconsistency between the text and the policies of the DCBLP and should be amended to ensure a coherent approach to the provision of employment land and achieve consistency across Plan.
5. **Amend paragraph 9.59** to make clear that the s106 sustainable transport contribution relates to that identified through the formula contained in the Planning Obligations Annex.
6. **Amend paragraph 9.54** 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.

5.3 In addition, 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 10**. 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 11**. As a consequence, some small parcels of land would be removed from the land allocated as a Strategic Employment Location (Gatwick Green) on the draft Local Plan Map under Strategic Policy EC4.

- 5.4 The above proposed changes to the DCBLP have been applied to Strategic Policy EC4 and the supporting text of the Plan and are attached at **Appendix 12**.

Appendix 1

Site Plan





GatwickGreen

WHERE THE FUTURE WORKS

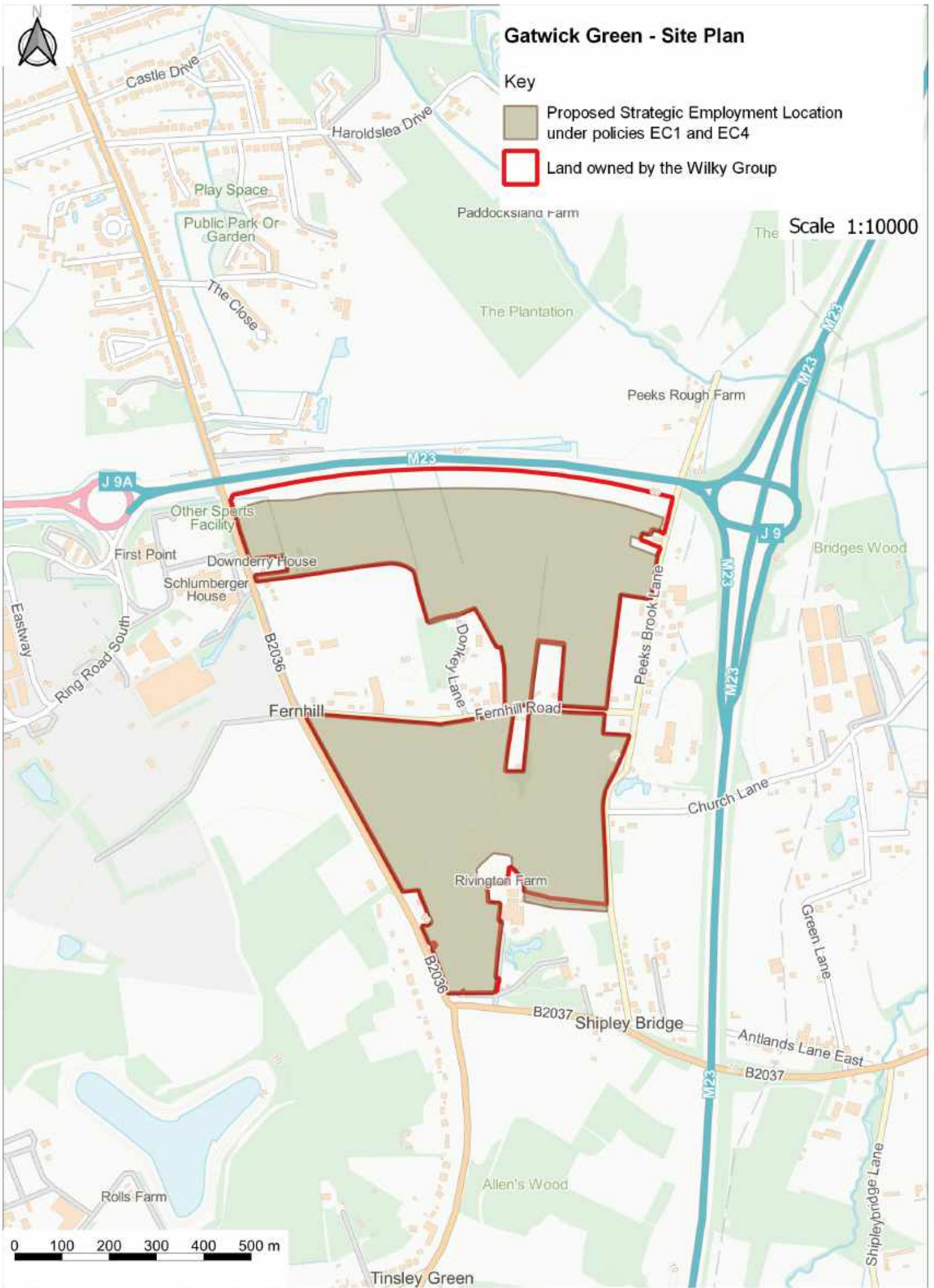


Gatwick Green - Site Plan

Key

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

Scale 1:10000



Appendix 2

Outline Transport and Access Appraisal



GatwickGreen

WHERE THE FUTURE WORKS

Appendix 2 – Outline Transport and Access Appraisal

1.0 Introduction

Background

- 1.1 This transport appraisal has been prepared by Empiric Partners and i-Transport (the transport consultants) on behalf of the Wilky Group (TWG). It provides a supporting Appendix to the representation by Savills relating to Strategic Policy EC4, Strategic Employment Location, in the Draft Crawley Borough Local Plan, 2021 (DCBLP). It specifically addresses the ‘Movement and Accessibility’ provisions within Strategic Policy EC4 (provisions c – h) and sets out, at a policy level, how the proposals for Gatwick Green will comply with these provisions.
- 1.2 TWG owns about 48 ha (119 acres) of land east of Gatwick Airport. 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.
- 1.3 This appraisal should be read in conjunction with the Crawley Transport Study Report (CTSR - Transport Study of Strategic Development Options and Sustainable Transport Measures). The CTSR specifically considers a n industrial-led Strategic Employment development at Gatwick Green of predominantly B8 storage and distribution uses: this is reflected in the central scenario tested by the Council’s consultants (Stantec) (Scenario 2), comprising of 77,500 square metres (SQM) (GFA) split into: B8 Parcels Distribution (10%), B8 Commercial Warehousing (60%) B2 Industrial estate (30%).

Strategy

- 1.4 The overall transport strategy for the Gatwick Green proposal is based on a philosophy which requires the application of an accessibility ‘hierarchy’: which assumes that, for employees, there will be a priority order of transport mode based on cycling/walking, bus, train and then private car. This ensures that the emphasis is placed first on sustainable transport modes before transport by private-car. This Appendix confirms that the proposed development meets the criteria defined in Strategic Policy EC4, specifically to ensure that:
- A Transport Assessment will be provided to demonstrate that appropriate access can be provided to the Site;
 - A Mobility Strategy is prepared to show optimisation in the use of sustainable modes;
 - Infrastructure improvements can be identified to mitigate development impacts;

- Improvements to public transport infrastructure are defined;
 - Upgrades to cycle and pedestrian facilities are achievable; and
 - Appropriate levels of on-site parking are provided in the context of the approach to sustainable transport.
- 1.5 The freight movements associated with the proposed uses can only use HGV-borne transport, requiring this traffic to be accommodated on the existing highway network in the most sustainable manner. Over time, the continued switch to hydrogen-powered HGVs, (which is expected to become common place over the early years of operation at Gatwick Green), will significantly improve the sustainability profile of this traffic.
- 1.6 The development scheme will be designed in accordance with the mitigation strategy identified within the CTSR and will bring forward a package of measures aimed at delivering non-car access as a priority, whilst ensuring the local highway network can accommodate predicted vehicular traffic. Whilst some car-borne traffic is inevitable, measures will be put in place to ensure trips are completed as sustainably as possible and that these measures assist with improving conditions for all users at a local level to encourage modal shift.
- 1.7 This appraisal is not intended to fulfil the requirements of a Transport Assessment, (TA) but does provide a policy-level appraisal of the impacts of the scheme, and related mitigation, using parameters which typically form the basis of a TA and which have been discussed with West Sussex County Council as Highway Authority whilst also taking account of the findings of the CTSR. It therefore defines an access and mobility strategy which demonstrates that the Site can be accessed in a sustainable manner and that there are no major transport constraints or impediments which would prevent development of the Site.

Transport Assessment

- 1.8 Following consultation with the relevant local authorities and stakeholders, a full Transport Assessment and Mobility Strategy will be provided in support of a Planning Application.
- 1.9 The Transport Assessment will be undertaken in accordance with the requirements of the National Planning Policy Framework (NPPF) and the National Planning Practice Guidance (NPPG) and, more particularly, the three critical tests outlined in paragraph 108 of the NPPF which require that:
- Safe and acceptable access can be provided to the Site for cars, HGVs, pedestrians, cyclists and public transport;
 - Through best practice design and a package of mitigation measures, the existing sustainable travel options will be enhanced and opportunities for sustainable travel will be taken up; and
 - Impacts will be suitably mitigated through a package of pedestrian, cycle, public transport and highway capacity improvements, ensuring that there will not be a 'severe' residual cumulative transport impact.

Report structure

1.10 The remainder of this report is structured as follows:

Section 2 – sets out the details of the proposed access strategy;

Section 3 – sets out the outline mobility strategy to show how the development will optimise the use of sustainable modes of transport;

Section 4 – provides an indication of improvements to public transport facilities and infrastructure;

Section 5 – identifies potential upgrades and extensions to pedestrian/cycle routes;

Section 6 – demonstrates that consideration has been given to the impacts of the development on the highway network along with some initial assessment of the infrastructure improvements required to avoid or mitigate such impacts;

Section 7 – confirms that appropriate levels of on-site parking will be provided; and

Section 8 – Summarises the findings and conclusions.

2.0 Access Strategy

2.1 The Site has ample frontage onto Balcombe Road, both north and south of Fernhill Road, as well as frontage onto Antlands Lane. It is currently proposed that two separate access points will be provided into the Site from Balcombe Road. There is no direct access planned to the M23, M23 spur or Junction 9A of the M23 spur. The location of the access points is shown in the Development Framework Plan (DFP) forming Appendix 8 to Savills representation on Strategic Policy EC4.

2.2 The two junctions would be linked by an internal spine road providing an HGV and all vehicular corridor through the Site. A separate access will be provided for a Sustainable Transport Corridor (STC) for pedestrians, cyclists and possibly buses. This will provide a safe route through the Site for these modes of travel and thereby promote alternatives to the private car.

2.3 This access strategy is in line with the modelling contained within the Crawley Transport Study Report (CTSR).

2.4 The STC will also be served by two public transport / mobility hubs that will enable safe and efficient transfer from bus / cycle modes to pedestrian mode, including a potential range of transfer facilities (bicycle racks, shelters, real-time information etc) to ensure a high level of service.

2.5 All junctions have been designed to accord with the latest guidance and best practice. The accesses have been sized, (and modelled) to accommodate likely traffic flows associated with

the proposed development. This is based on trip generation rates, derived from TRICS, which will be reviewed as the mobility strategy progresses.

- 2.6 The development is likely to be constructed on a phased basis, with the necessary infrastructure being delivered at the time it is required. Given the recent changes in travel behaviour, as well as anticipated changes in the way in which mobility is considered, the Council's infrastructure delivery plan should be as flexible as possible. This is in line with latest 'Decide and Provide' guidance promoted by TRICS.

Northern Access

- 2.7 Access to the northern section of the Site will be provided by a new all moves signal junction arrangement. The proposed junction is currently designed to maximise capacity by the provision of two lanes at the stop line on each approach. The CTRS has identified that, by restricting HGV movements at the northern junction, the impacts arising from increases in HGV traffic on Balcombe Road north of the Site and therefore within Horley can be reduced. The need for such restrictions will be considered within any Transport Assessment in support of the Site.

- 2.8 Almost immediately opposite the proposed junction is a gated and unused access from Balcombe Road onto Buckingham Gate, which provides onwards access to the Gatwick Airport Road network. The Gatwick Green strategy does not prejudice the reinstatement of this access for pedestrians and cyclists accessing the South Terminal, or the significant benefits that could be derived if the access were reinstated for buses. It is acknowledged that the reinstatement of this access will require collaboration between West Sussex County Council, Gatwick Airport and Crawley Borough Council. This is not critical to achieving an acceptable transport strategy for the Site but does offer some wider benefits and so is supported by TWG.

Southern Access

- 2.9 Access for general traffic into the southern section of the Site will be provided by a new three arm roundabout on Balcombe Road. This would be the primary access point to the Site, given the propensity for most traffic to arrive from/depart to the south.
- 2.10 Where necessary, it is proposed that the junction would accommodate new and improved pedestrian and cycle facilities.

Antlands Lane Access

- 2.11 There is also an opportunity to provide access to Gatwick Green from Antlands Lane using the frontage of Balcombe Road and Antlands Lane. The development at Forge Wood has identified potential improvements at this junction in the form of signalisation. These improvements are included within the CTRS modelling. The delivery of Gatwick Green could bring forward additional land to further improve the junction, including the provision of priority to buses, pedestrians and cyclists.

Operational Assessments

- 2.12 Initial assessments of the northern and southern access points identified above have been undertaken. These are based on anticipated future traffic flows on Balcombe Road, including those associated with the allocation of the Horley Business Park (HBP) under Policy HOR9 of Reigate & Banstead Borough Council's Development Management Plan (DMP): this involves a proposed primary access via junction 9a of the M23 and very limited traffic access via Balcombe Road.
- 2.13 The northern and southern Site access junctions will be designed to work within their theoretical design capacities providing for future year traffic, with the additional trips generated by development at Gatwick Green (GG). The northern junction (signalised) is the most sensitive of the two, although there are no fundamental concerns in catering for the anticipated demand, whilst accommodating pedestrian, cycle and bus priority.
- 2.14 The north and south junctions would provide a high-quality access to the new development and critically, would do so without generating any significant detriment to the operation of Balcombe Road.

Construction phase

- 2.15 Any planning application will be accompanied by a Construction and Environmental Management Plan (CEMP), which will ensure that all the junctions and the proposed construction phase of the development can be delivered with minimal impact on the highway network. The CEMP may include the identification of temporary construction access points, as part of any measures to minimise impacts.

Summary

- 2.16 In the context of the NPPF transport tests, it is demonstrated that the Site benefits from two main deliverable points of access, plus a dedicated entry/exit point for cyclists and pedestrians, ensuring safe and suitable access to the Site can be delivered for all modes.

3.0 Mobility Strategy

- 3.1 TWG is committed to delivering a Mobility Strategy in line with the aspirations of both WSCC and CBC to establish a multi-modal, comprehensive and flexible Sustainable Transport Network.
- 3.2 The Mobility Strategy will draw on the excellent location of the Site to deliver development which can be accessed via a range of travel modes, with public transport, walking and cycling at its heart.

- 3.3 The location of new development in proximity to existing residential areas will reduce levels of “out-commuting” and, therefore, the length of trips, through the provision of a range of high-quality employment opportunities which will diversify and improve the skill-base of residents in Crawley and its immediate neighbours.
- 3.4 Given it’s sustainable location within Crawley’s boundary and close to existing employment areas and neighbourhoods, there is an opportunity to link the Site into established bus and Fastway routes and the emerging Fastway development programme. Targeted improvements to pedestrian and cycle routes will also benefit both existing residents and future travellers to Gatwick Green.
- 3.5 Transport and access for the Site would also be supported by a Full Travel Plan and associated environmental strategy with the aim to promote the use of sustainable travel options, including measures such as car clubs and digital travel platforms and to deliver Virtual Mobility.
- 3.6 The proposed approach to access, traffic impacts and sustainable transport are subject to ongoing discussions with Local Highway Authorities of West Sussex and Surrey County Councils, (WSCC and SCC); Highways England (HE); Crawley Borough Council (CBC), and the local Fastway and bus operator, Metrobus. In preparing this work the following transport policies and documents were considered:
- Draft Crawley Borough Council Local Plan 2020 – 2035;
 - The Local Transport Plans of Crawley Borough Council (CBC) and West Sussex County Council;
 - The proposals within the Crawley Borough Council (CBC) Growth Programme;
 - New Directions for Crawley - Transport and access for the 21st century (Crawley Borough Council) (March 2020);
 -
 - The recently published Gatwick Airport Master Plan (GAMP, 2019), which proposes the use of the existing emergency runway (take-off only) as an operational runway for regular use in dependent operating modes with the existing main runway;
 - The Development Consent Order (DCO) (Scoping Opinion) for the expansion of Gatwick Airport through use of the standby runway as submitted (28 August 2019). The currently identified improvements are noted and any additional information will be examined, and proposals considered as the DCO progresses. It is recognised that the impact on aviation of the global pandemic may influence work on the DCO. This will be considered in preparing the Transport Assessment for the planning application;
 - The committed and proposed measures which form part of the Coast to Capital Growth Fund and those indicated in the Gatwick 360 Strategic Economic Plan;
 - The emerging Transport Strategy for the South-East;
 - The Network Rail improvements to Gatwick Railway station;
 - Priorities and future aspirations of the transport network providers and operators;

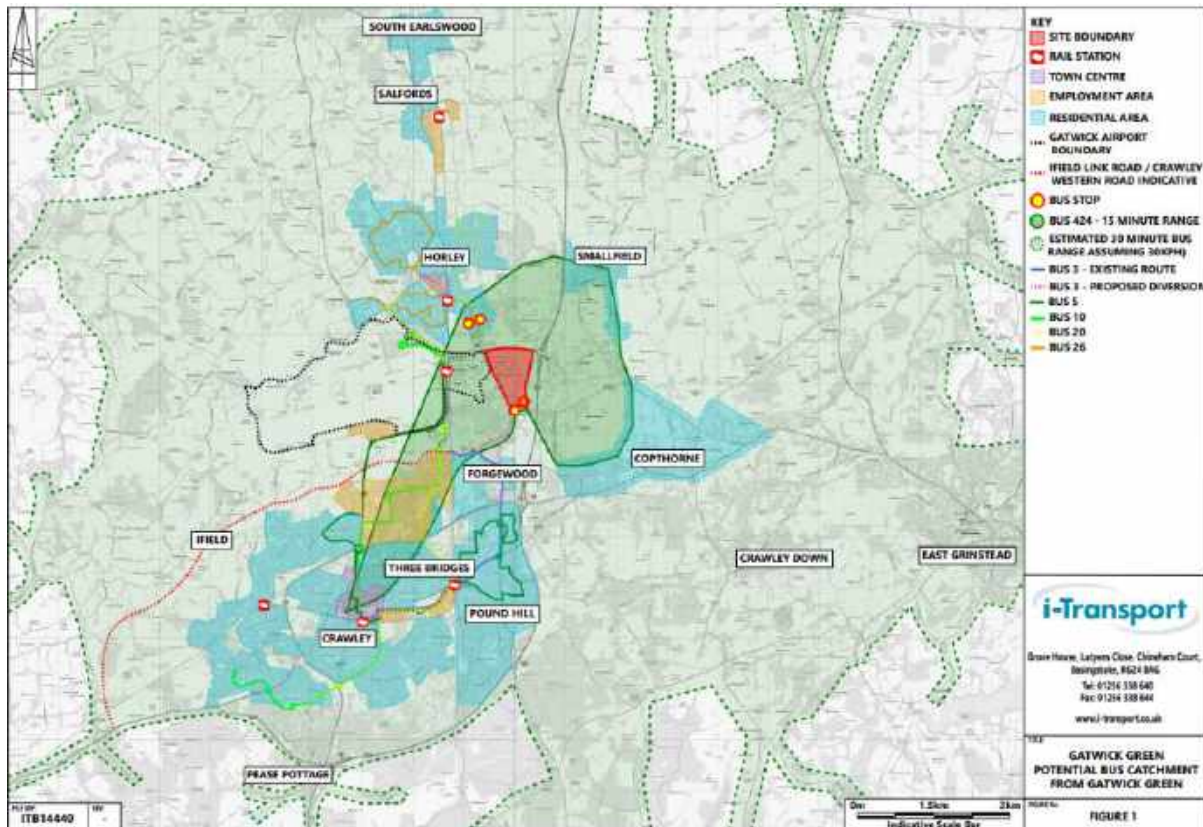
- The committed and proposed development in the area, which includes promoted strategic schemes at pre-planning stage;
 - Guidance and best practice, including Manual for Streets (MfS) and Manual for Streets 2 (MfS2);
 - Gear Change – A bold vision for Walking and cycling (DT – July 2020);
 - Decide and Provide Guidance (TRICS March 2021); and
 - Various papers on changing travel behaviours and likely future travel patterns.
- 3.7 The current Covid-19 crisis is having profound effects on traffic volumes, travel patterns and the economy. The precise impacts and the long-term changes which occur as the UK enters a 'new normal,' are not known at this early stage, (June 2021).
- 3.8 The approach adopted by TWG is described in the following sections and confirms that in the context of the NPPF Transport tests, there will be enhanced opportunity for sustainable travel, attracting new users and simultaneously discouraging travel by private car.
- 3.9 The approach promoted by TWG accords with the modelling assessment undertaken by Crawley to support the Local Plan, as summarised in the Transport Study of Strategic Development Options and Sustainable Transport Measures Report (CTRS), which is supported by New Directions for Crawley – Transport and access for the 21st century, March 2020. In this context, the overarching objectives of the Mobility Strategy will be to:
- Provide a masterplan with sustainable movement at its heart, including a Sustainable Transport Corridor (STC) with dedicated pedestrian, cycle and public transport provision alongside public transport / mobility hubs;
 - Promote the extension of the Fastway development programme;
 - Link the Site to existing public transport infrastructure and the three local railway stations;
 - Improve walking and cycling infrastructure in the local vicinity and link the Site to the network of routes to be delivered through Crawley's Local Cycling, Walking, and Implementation Plan (LCWIP);
 - Contribute towards the delivery of the LCWIP;
 - Encourage users of the proposed development as well as encourage residents from developments such as Forge Wood and Steers Lane to use these facilities rather than the car; and
 - Promote sustainable travel options through a comprehensive Travel Plan.

4.0 Public Transport Facilities

Bus Travel

- 4.1 Bus stops are located on Balcombe Road / Meadowcroft Close to the north of the Site and on Antlands Road to the south of the Site. The locations of these bus stops provide different opportunities to travel to a range of destinations including Horley, Crawley, Reigate and Redhill.
- 4.2 The bus stops on Balcombe Road / Meadowcroft Close are located some 1.3km to the north of the Site i.e., outside of typical walking distance and are served by route 26, which provides four services a day on Mondays, Wednesdays and Fridays. These provide a route to Horley and the nearby suburbs. The bus stop on Antlands Lane is some 1.2km from the centre of the Site and provides a more frequent, hourly service Monday to Saturday via bus service 424. This route provides the opportunity to travel to Crawley, Horley, Reigate and Redhill.
- 4.3 While there are bus services which operate within the local area, due to limited development in the immediate vicinity of the Site, the local bus infrastructure is limited. Figure 1 (also included in **Appendix A**) summarises a potential bus catchment assuming up to 15 and 30 minute journey times to the Site.

Figure 1 - Potential Bus Catchment Area for Gatwick Green



The Bus and Fastway Strategy for Gatwick Green

- 4.4 The operator of bus services and Fastway in Crawley has been consulted and is closely involved in the development of the basis for a Bus and Fastway Strategy for Gatwick Green. As such an endorsement has been received from Patrick Warner, Head of Innovation Strategy at Metrobus in an email which contains the following statement:

“It is with great pleasure that we are able to confirm that we have been collaborating with Wilky Group and Empiric Partners in the creation of a draft transport strategy to support the proposed Gatwick Green development.

Our shared vision as detailed in their strategy mentions zero emission buses, the future evolution of the highly successful Fastway network and the upcoming delivery of the first 'Superhub' mobility hub concept in Manor Royal. These are all high quality complimentary public transport assets that are subscribed to fully by us and a wide coalition of local stakeholders. We look forward to the opportunity to continue to work with Wilky Group, Empiric Partners, the planning and highway authorities to ensure that they are taken forward during any forthcoming planning process for Gatwick Green”. (Patrick Warner, Metrobus, 15th June 2021).

- 4.5 The strategy has four components, each designed to improve services, increase demand amongst existing travellers and form lasting “habits” amongst those working and visiting the new development at Gatwick Green. The four components are:

1. Strengthening existing services to offer an improved frequency and greater flexibility to those living and working along the Balcombe Road corridor or those travelling to origins and destinations within the Gatwick area. This could include:
 - a. The existing service number 3 (Crawley Town Centre - Forge Wood - Gatwick South Terminal) being extended and diverted into the Site;
 - b. Fastway 10 being extended to serve the Site; and
 - c. Further opportunities to extend bus services 4 and 5 to serve the development.
2. To provide a safe and prioritised route for buses travelling through the heart of the new development, offering faster journey times to encourage greater use of services as part of CBC's wider aspirations to deliver Fastway across the Borough. This could be delivered via:
 - a. Dedicated access e.g., bus gate, priority incorporated into the junctions and on the approaches to Site access junctions.
 - b. An internal site layout designed to incorporate the extension of the Fastway network through the provision of priority to buses, with a Sustainable Transport Corridor through the Site.
3. To deliver mobility hubs which significantly improve waiting facilities and achieve better integration between active and carbon-neutral modes of travel and public transport services.
4. To ensure that Gatwick Green is a key player in the creation of high quality connections between new residential and employment areas, including links with Reigate and other nearby centres in line with CBC aspirations.

- 4.6 The investment in zero carbon vehicles by Metrobus, in conjunction with CBC and other partners, has offered a key to improvements in air quality and an illustration of the benefits of transferring journeys by private car to public transport. Gatwick Green will promote this evolutionary approach, by providing a new development which recognises the climate change agenda and supports the delivery of high quality public transport services and their integration with active and carbon-neutral modes of travel.
- 4.7 The approach to providing twin accesses onto Balcombe Road/Antlands Lane, offers an opportunity to divert existing services or provide a new Fastway/bus route which will penetrate the Site. This will incidentally provide additional services to Balcombe Road, benefitting residents and businesses and potentially new development along the route towards Horley.
- 4.8 Public transport provision for the Site will, therefore, be integrated into the Fastway Development Programme and, subject to further analysis, provides an opportunity for additional funding to be made available to enhance the network of routes through targeted investment and the provision of new infrastructure. The Site could for example be linked via public transport to Manor Royal, Crawley Town Centre and the emerging development opportunities at Ifield (which includes 10,000 homes located within Horsham District) and the planned Horley Business Park.
- 4.9 Within the Site, on the Sustainable Transport Corridor (STC), small public transport / mobility transport hubs and/or 'Super Hubs' will be developed. An illustration is provided below at Image 1.1. These hubs, which are already planned as part of a pilot scheme at Manor Royal, would act as a bus Fastway waiting area, but would potentially have expanded facilities such as shelters, Wi-Fi, phone charging, coffee outlet, charging and storage for electric bike and electric scooters (subject to legislation).

Image 1.1. – Public Transport / Mobility Hub



- 4.10 This type of infrastructure allows for seamless and hassle-free interchange between ride sharing, public transport and non-motorised modes of travel and is in line with existing

initiatives, such as those identified within the Crawley Growth Programme and Crawley New Directions.

Rail Travel

- 4.11 The Site is located within the vicinity of three local railway stations, with the closest being Gatwick Airport to the west. Horley Railway Station is located to the north, whilst Three Bridges is located to the south.
- 4.12 The Local Plan supporting evidence refers to station improvements at Crawley and Three Bridges which are included within the Crawley Growth Programme, while Gatwick Airport station is to be significantly improved and upgraded, alongside improved access to local Fastway bus services. These improvements will enhance the transport interchanges and help achieve modal shift from the private car.

Gatwick Airport Station

- 4.13 Gatwick Airport is located some 1.7km from the centre of the Site and provides an opportunity to travel to key destinations including London Victoria, Brighton, Horsham, Cambridge, Peterborough and Reading.
- 4.14 A scheme to improve Gatwick Airport Railway Station is currently underway, including measures to improve accessibility, widening platforms 5 and 6 and installing new escalators, stairways and lifts. In addition, the size of the railway concourse will be increased and connections to the airport terminals and passenger wayfinding will be upgraded.
- 4.15 It is possible to access the station from Gatwick Green via existing pedestrian facilities and via Ring Road South, as well as via the Public Right of Way network using Footpath 359Sy. The station is also within easy cycle distance from the Site, via relatively quiet roads.

Horley Railway Station

- 4.16 Horley Railway Station is located some 2.3km from the centre of the Site and provides the opportunity to travel on the rail network with direct links to a variety of stations including Peterborough, London Bridge and Horsham. The railway station is within a reasonable cycle distance and there are 76 cycle spaces at the station. It can also be accessed using bus service 26 and 424. It is possible to access Horley Railway Station via Balcombe Road. At least one footway is provided along Balcombe Road and continues along Victoria Road from the roundabout. This footway continues to Horley Railway Station. An additional route via Footpaths 362a, 360 and 355a from Balcombe Road and across the railway line up to the station is also available.

Three Bridge Railway Station

- 4.17 Three Bridges Railway Station is located some 5.2km from the centre of the Site and provides opportunities to travel to similar destinations to Horley and Gatwick Airport stations. Three

Bridges has a station car park in addition to 276 cycle spaces. It is possible to access the station via Balcombe Road, Milton Mount Avenue and Worth Park Avenue. Although crossing points are limited in some locations at least one footway is provided for the entire route. A shared footway / cycleway is provided along Worth Park Avenue on approach to Three Bridges Railway Station.

Station Accessibility Improvements

- 4.18 As part of the package of measures to improve and enhance accessibility, localised improvements to walking, cycling and Fastway routes will be brought forward which will improve accessibility between the Site and the local railway stations.

5.0 Walking and Cycling

Walking

- 5.1 The National Travel Survey (NTS) 2019 identifies the mode share of journeys of different lengths: the majority (80%) of trips are undertaken on foot for journeys up to one mile. The data also shows that approximately 31% of journeys between one and two miles (3.2 km) will be on foot i.e., a significant proportion of people are prepared to walk for journeys up to two miles.

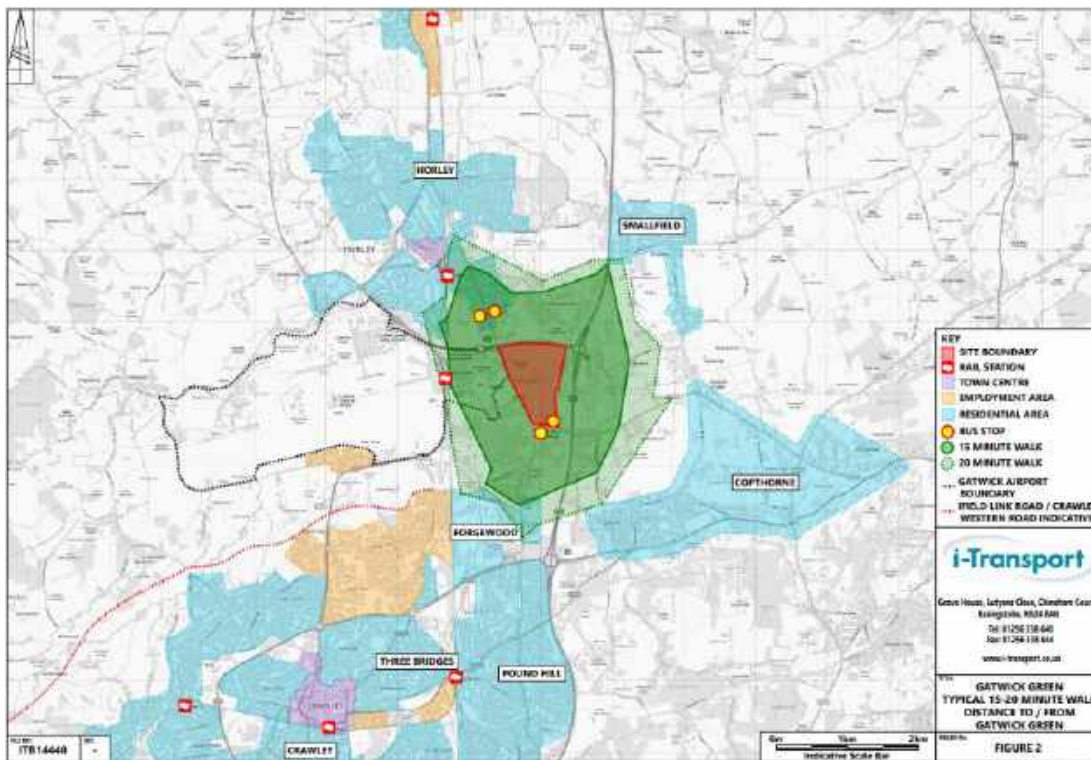
- 5.2 The Chartered Institution of Highways and Transportation (CIHT) guidance 'Planning for Walking' (2015) further states that:

“Across Britain, approximately 80% of journeys shorter than 1 mile are made wholly on foot – something that has changed little in 30 years. The main reason for the decline in walking is the fall in the total number of journeys shorter than 1 mile, which has halved in thirty years. It is not that people are less likely to make short journeys on foot but rather that fewer of the journeys they make can be accomplished on foot. If destinations are within walking distance, people are more likely to walk if walking is safe and comfortable and the environment is attractive.”

- 5.3 Locating employment within one mile (1.6km) of residential development and local facilities and services will provide the greatest opportunity for trips to be made by foot. One mile is not however, the maximum that people are prepared to walk, it is clear from the NTS data that around one-third of journeys between one and two miles are undertaken on foot.

- 5.4 Figure 2 (also included as Appendix A) shows a typical walk distance of 15 and 20 minutes from the Site. It is evident that the development is within one mile (1.6km) of existing (Horley and Tinsley Green) and emerging development areas (Forge Wood and Steers Lane), which will provide the greatest opportunity for a significant proportion of trips to be made on foot.

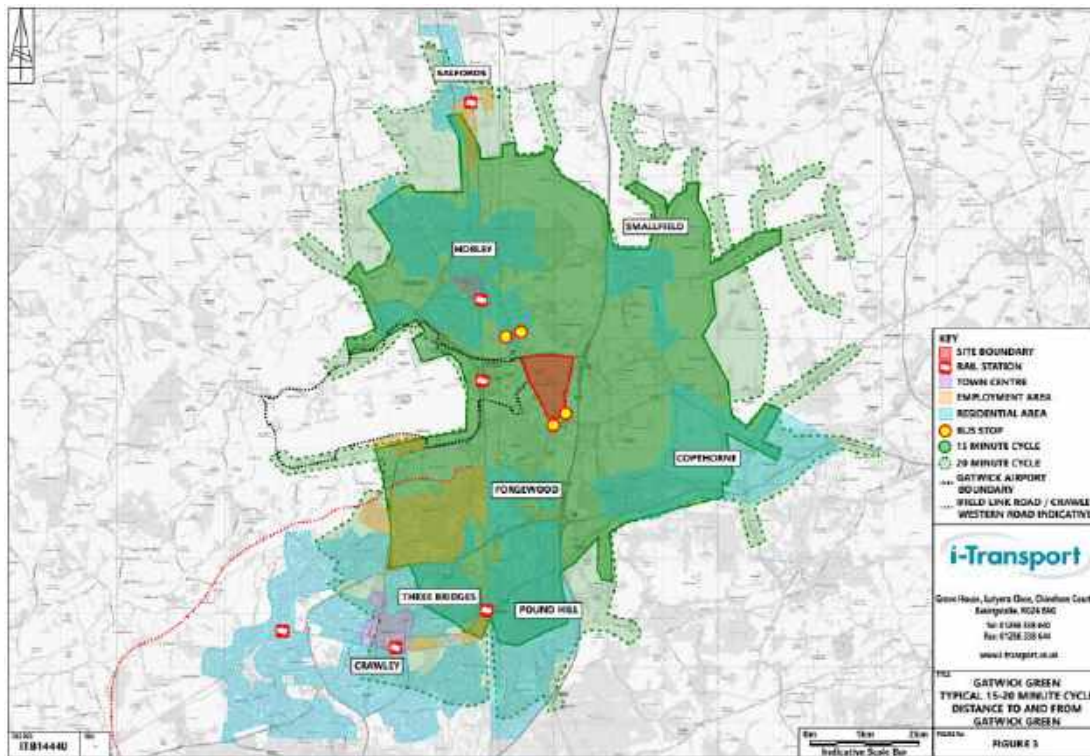
Figure 2 - Typical 15-20 minute Walk distance to / from Gatwick Green



Cycling

- 5.6 Data provided within the National Travel Survey (NTS) demonstrates that the average distance per journey by bike is approximately 4.4km, with the current average length of an employment and leisure cycle trip some 5.2km. On this basis, a cycle distance of 5km is considered reasonable.
- 5.7 Furthermore, more people are acquiring e-bikes, which enable greater distances to be covered in shorter times travel. E-bikes are particularly useful for people who, for example, need to ride in business clothes, to ride up hills, to travel long distances, or who are older or less fit and discouraged by the physical effort of an ordinary bike. Journeys by e-bike of up to 8km are not uncommon. Figure 3 (also included as Appendix A) shows a typical cycle distance of 15 and 20 minutes to the Site.

Figure 3 - Typical 15-20 minute cycle distance to and from Gatwick Green



Public Right of Way Network

5.8 There are several public rights of way in the local area (Image 1.2). An existing public footpath runs through the northern part of the Site and connects onto Balcombe Road. Opposite the junction of Ferndown Road on Balcombe Road, adjacent to the southern development parcel, the network of public rights of way continues west providing access into Gatwick Airport and the Rail Station. As part of the package of sustainable transport measures, there will be an opportunity to improve this network, providing traffic free routes between residential areas and existing and future employment. This will both reduce the need for people to travel by private car and enhance the opportunity for sustainable travel modes to be taken up.

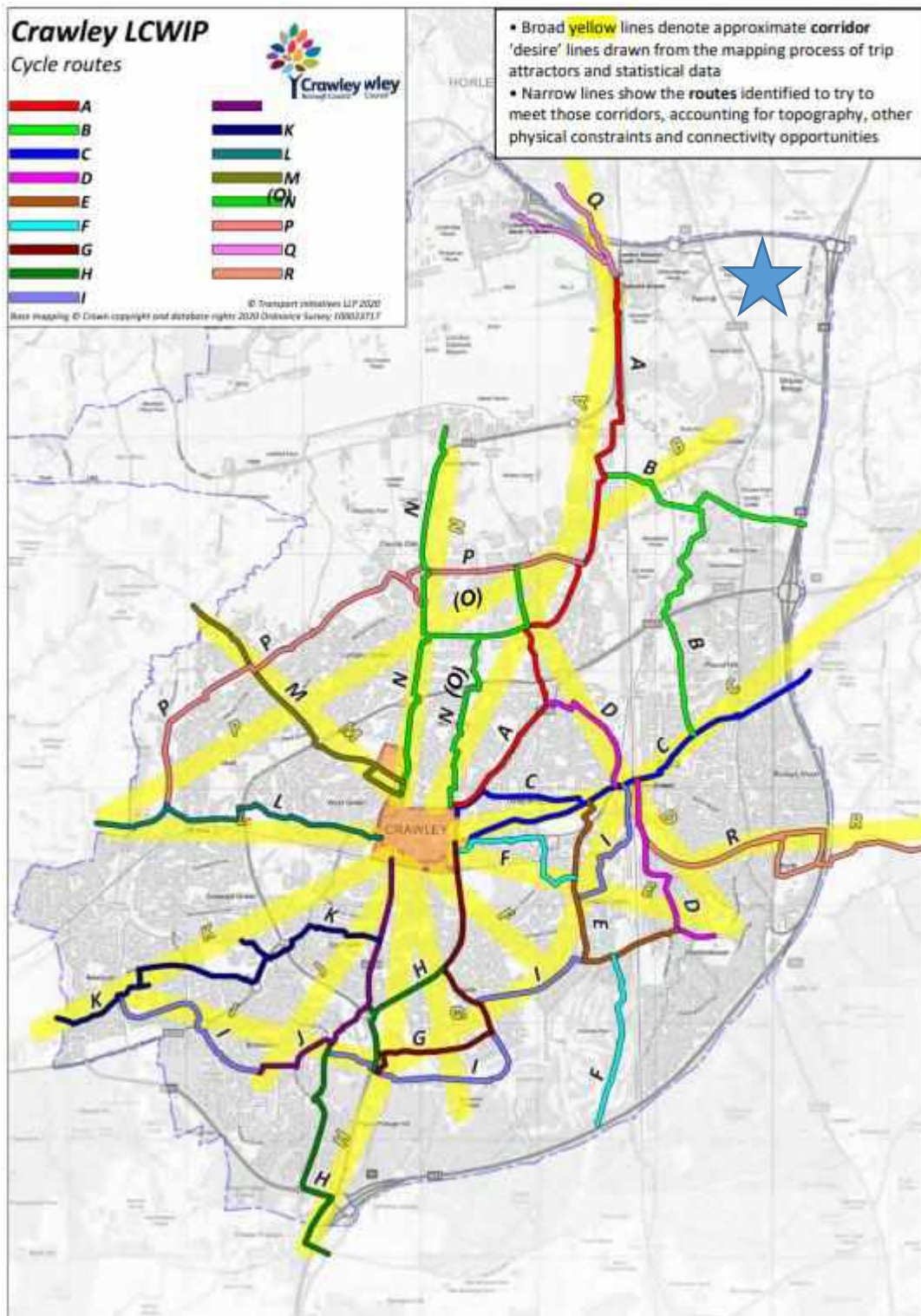
Image 1.2 - Existing Public Rights of Way



Local Cycling, Walking, and Implementation Plan (LCWIP)

- 5.9 The Government's first Cycling and Walking Investment Strategy (CWIS) (published in 2017) set out initiatives to make walking and cycling the natural choice for shorter journeys or as part of a longer journey. LCWIPs are a new strategic approach to identifying cycling and walking improvements required at the local level and enable a long-term approach (ideally over a 10-year period) to developing local cycling and walking networks. They form a vital part of the Government's strategy to increase the number of trips made on foot or by cycle. The Crawley LCWIP identifies functional, direct routes and zones and outlines measures to develop these into a connected network. It will inform the new Local Plan, guiding building development, and is an important contribution to New Directions for Crawley, the council's transport and access plan.
- 5.10 As stated in the Crawley Transport Study, *"Investment in walking and cycling infrastructure to access key destinations and public transport services, will lead to greater uptake in active travel, healthier lifestyles, reduced carbon emissions, improved air quality, and a reduction in traffic volumes."*
- 5.11 The Gatwick Green site is ideally placed to link into and assist in the delivery of pedestrian and cycling links, especially those identified within the Crawley Local Cycling, Walking, and Implementation Plan (LCWIP). An extract from the Crawley LCWIP, (image 1.3) is provided below.

Image 1.3: Crawley Local Cycling, Walking and Implementation Plan (LCWIP)



Source: Extract from Page 22 of Crawley LCWIP – Gatwick Green site represented by star

5.12 There are opportunities to improve walking and cycling facilities on Balcombe Road to the north and south of the Site, with the potential to link the Site to the proposed routes A and B. In this respect, the Site is well located to the existing centre of Crawley and its northern suburbs (Pound Hill, Three Bridges, Northgate, Langley Green and Ifield), central Horley, the emerging

residential areas such as Forge Wood, and complementary employment areas of Manor Royal and Gatwick Airport.

- 5.12 These opportunities align with the modelling associated with the Crawley Transport Study Report. The detail of these routes will be included within the Transport Assessment following consultation with relevant stakeholders.

Summary

- 5.13 The promotion of walking for short trips and cycling for increasingly longer distances, (because of the emergence of powered cycles), alongside conventional and demand responsive public transport networks is important and forms a key part of the Authorities' ambitions. It is central to The Crawley Transport Strategy, 'New Directions' and Crawley Growth Programme.

The transport strategy for Gatwick Green includes:

- Providing high quality walking and cycling routes within the Site. The delivery of facilities in line with latest guidance will prioritise and encourage travel via the walking and cycling network, reducing dependency on travel by private motor vehicles;
 - Plugging the 'missing gaps' on Balcombe Road and local roads to improve walking and cycling facilities;
 - Local upgrades to cycle and pedestrian facilities in the vicinity of the area as well as improving Public Rights of Way;
 - Providing improved connections to existing and proposed walking and cycling improvement schemes; and
 - Contributing towards the delivery of the Crawley Local Cycling and Walking Infrastructure Plan.
- 5.14 As such, the proposal will contribute towards a defined strategy to link existing and developing residential areas, employment opportunities and day-to-day facilities, within Crawley town centre, Horley, Forge Wood, Manor Royal, Three Bridges and Gatwick Airport in line with '15 minute Neighbourhood' principles.
- 5.15 This will enable the development of infrastructure and transport services that cater for carbon-neutral modes of travel, potentially reducing reliance on the private car and in line with the concept of Mobility as a Service (MAAS), and the Governments ambition for a step-change in the number of walking and cycling trips undertaken daily.

6.0 Traffic Impact and Infrastructure Improvement

- 6.1 In advance of a full Transport Assessment, initial junction capacity assessments have been undertaken for the local highway network.
- 6.2 This is based on traffic surveys completed in January 2020 (following agreement with WSCC that they represent typical operating conditions). These counts are worse case, since they were undertaken at a time when the economy was functioning normally, prior to the Covid-19 crisis.

It is likely that there was higher than usual demand on Balcombe Road and surrounding roads in response to the ongoing traffic management on the M23 associated with the implementation of the Smart Motorways scheme.

- 6.3 Future year traffic forecasts were derived which included planned and committed development at, Forge Wood; Steers Lane, and Copthorne.
- 6.4 Based on the traffic generation, assignment and distribution, local junctions in the vicinity of the Site were tested using industry standard modelling tools. The identified capacity issues generally occur in the peak hour and for short periods, where there is a “mini” peak within that period. On this basis, it is reasonable to conclude that investing in a scheme to alleviate peak hour capacity is not an efficient use of capital funding. An alternative approach, (consistent with CTSR) would focus on investment in schemes which promote modal shift and provide benefit throughout the day and have more positive merit in delivering improvements to public transport and active travel modes.
- 6.5 Rather than follow an exclusive ‘Predict and Provide’ approach to addressing capacity issues, the Gatwick Green mobility strategy is designed to follow the ‘Decide and Provide’ philosophy in a way which complements the aspirations of WSCC and CBC. In this context it is pertinent to understand how changes in travel patterns and future opportunities will impact upon demands and to develop a range of plausible scenarios which can be developed and tested, to understand their impacts on the surrounding transport network.
- 6.6 The strategy for the Site is, therefore, to consult with the local highway authorities (WSCC and SCC) and Crawley Borough Council (CBC) to derive a holistic approach to mobility in the area, which may include proposals for some additional highway capacity schemes where appropriate.

Crawley Transport Study Report

(Transport Study of Strategic Development Options and Sustainable Transport Measures Draft Crawley Local Plan 2021 - 2037) (December 2020)

- 6.7 Crawley published its study into the impact of the development proposed in the Local Plan in May 2021. The report specifically considers an industrial-led development of predominantly storage and distribution uses under use class B8 at Gatwick Green, comprising of 77,500 square metres (SQM) (GFA) split into: B8 Parcels Distribution (10%), B8 Commercial Warehousing (60%) B2 Industrial estate (30%). This is referenced as Scenario 2 within the modelling report.
- 6.8 The Report (CTSR) identifies the impacts likely to arise for planned development when no interventions are included and then considered mitigation in the form of modal shift resulting from improvements to pedestrian, cycling and public transport facilities. Additional measures which could reduce the demand for the private car and further encourage modal shift are also considered; however, these are not considered within the future year modelling assessment. Where these interventions do not address congestion hotspots, additional ‘capacity’



improvements are identified, either in the form of modest junction amendments, or improvements to signal timing and equipment.

- 6.9 The 'Decide and Provide' approach set out in the CTSR is in line with the latest thinking and Government Policy, aimed at delivering sustainable interventions before physical capacity improvements. The mitigation identified builds on the existing Fastway network within Crawley and the already identified and costed improvements to walking and cycling as set out in the LCWIP.
- 6.10 Section 7.8 of the report identifies that the unmet demand at almost all junctions analysed can be addressed through sustainable mitigation measures. These measures would include:
- Limited bus priority measures to increase uptake of bus ridership;
 - The delivery of the LCWIP to increase uptake in active modes walking and cycling; and
 - Increased Virtual Mobility, particularly working from home which would lead to reduced car travel at peak times.
- 6.11 The report identifies that in respect to Scenario 2 and 3, the sustainable travel interventions could mitigate the impacts of the development in most locations. However, the Ifield Roundabout/Ifield Avenue/A23 Crawley Avenue junction would benefit from a modest improvement in terms of improving capacity on its link approaches.
- 6.12 The report confirms that any impacts on the Strategic Route Network (SRN) i.e., the M23 and associated junctions, can be mitigated through planned improvements and signal optimisation.
- 6.13 The strategy identified by Crawley, though the CTSR modelling report, is wholly in line with the mobility strategy identified for Gatwick Green. As such, development at Gatwick Green provides the opportunity to deliver improved walking, cycling and public transport infrastructure, with targeted junction improvements. This approach will not only mitigate the impacts of the development, but also assist in the delivery of the Local Plan as a whole, as these active mode improvements will benefit existing residents and businesses as well as those travelling to Gatwick Green.

7.0 Provision of Parking

- 7.1 Whilst the parking provision on Site is a matter for planning, normally determined at the Reserved Matters stage, the masterplan will be developed after considering:
- Assumptions on changing travel behaviour and modal shift;
 - Local Parking Standards for commercial uses;
 - A parking accumulation analysis utilising TRICS arrival and departure patterns throughout a typical day;
 - Experience of other similar sites;

- Input from typical end users; and

7.2 A full detailed analysis will be provided within the Transport Assessment that will accompany any planning application. This will identify that:

- Adequate parking for cars and HGVs will be provided in line with local parking standards;
- That there will be no overspill parking onto local roads;
- Adequate lay-over parking with associated facilities will be provided for HGVs to ensure that there is no HGV parking off site and that any parking is appropriately provided for;
- Facilities will be provided for Electric Vehicle charging;
- Opportunities for alternative future fuelling, such as hydrogen will be considered, and
- Space will be provided for Car Clubs and priority spaces for car/ride sharing etc.

8.0 Summary and Conclusion

Summary

8.1 The Wilky Group (TWG) propose to bring forward an innovative industrial and logistics development and co-ordinated infrastructure solution to deliver the 47 ha (116 acre) Gatwick Green site allocation which lies within the heart of the Gatwick Diamond.

8.2 This Appraisal has been undertaken in support of the Regulation 19 representation by Savills on behalf of TWG on the Draft Crawley Borough Local Plan (January 2021).

8.3 The Gatwick Green allocation has been tested in terms of its impacts on the strategic and local transport networks, both by TWG and through Crawley's CTSR. Both studies conclude that the impacts of Gatwick Green can be addressed and mitigated through a combination of improved infrastructure for walking, cycling and public transport, alongside some targeted capacity improvements. The CTSR additionally concludes that the impacts arising from the Local Plan generally, including Gatwick Green, can be adequately dealt with.

8.4 The allocation proposal will bring forward a package aimed at delivering non-car access as a priority, whilst ensuring that the local highway network can accommodate predicted vehicular and HGV traffic. While some car-borne traffic is inevitable, measures will be put in place to ensure trips are completed as sustainably as possible. The transport strategy includes:

- Delivery of an access strategy and internal layout with a Sustainable Traffic Corridor (STC) which prioritises on-site public transport (Fastway) provision, with high quality walking and cycling routes in line with latest emerging guidance;
- Contributions towards strengthening existing Fastway and bus routes and delivery of targeted Fastway/bus infrastructure, including bus priority and transit routes alongside enhancing existing pedestrian and cycle routes.

- Plugging the 'missing gaps' and connecting to the Crawley Local Cycling and Walking Infrastructure Plan; and
- A 'Decide and Provide' approach to highway capacity rather than the 'Predict and Provide' approach which has led to capacity improvement schemes designed to accommodate car based journeys at the expense of public transport, walking, and cycling.

8.5 The proposal will contribute towards a defined strategy to link existing and developing residential areas, employment opportunities and day-to-day facilities within Crawley town centre, Horley, Forge Wood, Manor Royal, Three Bridges and Gatwick Airport in line with the principle of the '15 minute Neighbourhood'. This will enable the development of infrastructure and transport services that cater for carbon-neutral modes of travel, potentially reducing reliance on the private car and in line with the concept of Mobility as a Service, (MAAS) and the Government's ambition for a step change in the number of walking and cycling trips undertaken daily.

8.6 The allocation proposals can therefore meet Strategic Policy ST1 which sets out the requirements for development in relation to sustainable transport. The objectives of the policy are set out below, followed by how the Gatwick Green proposals can fulfil these:

- Locating and designing development to prioritise and encourage travel via the walking and cycling network and public transport routes, while reducing dependency on travel by the private motor vehicle.

Gatwick Green is located in a highly sustainable location between Crawley and Horley, offering significant opportunities to provide infrastructure that prioritises public transport.

- Development should contribute to improved sustainable transport infrastructure off-site, including, where appropriate, bus priority measures, enhanced passenger information, and routes identified in the Council's Local Cycling and Walking Infrastructure Plan.

Gatwick Green can bring forward a range of off-site sustainable transport infrastructure to support and advance the use of public transport for access to the Site and more widely in Crawley.

- Development should provide an appropriate amount and type of parking in accordance with Policy.

Gatwick Green will include appropriate parking provision aligned with the sustainable transport strategy for the Site.

- Developments should not cause an unacceptable impact in terms of increased traffic congestion or highway safety.

The CTSR and TWG's transport investigators demonstrate that Gatwick Green can be developed without unacceptable harm in terms of highway capacity and safety.

- Development will be considered acceptable in highways terms unless there would be an unacceptable impact on highway safety, or the cumulative impact on the transport network is severe and cannot be satisfactorily mitigated.

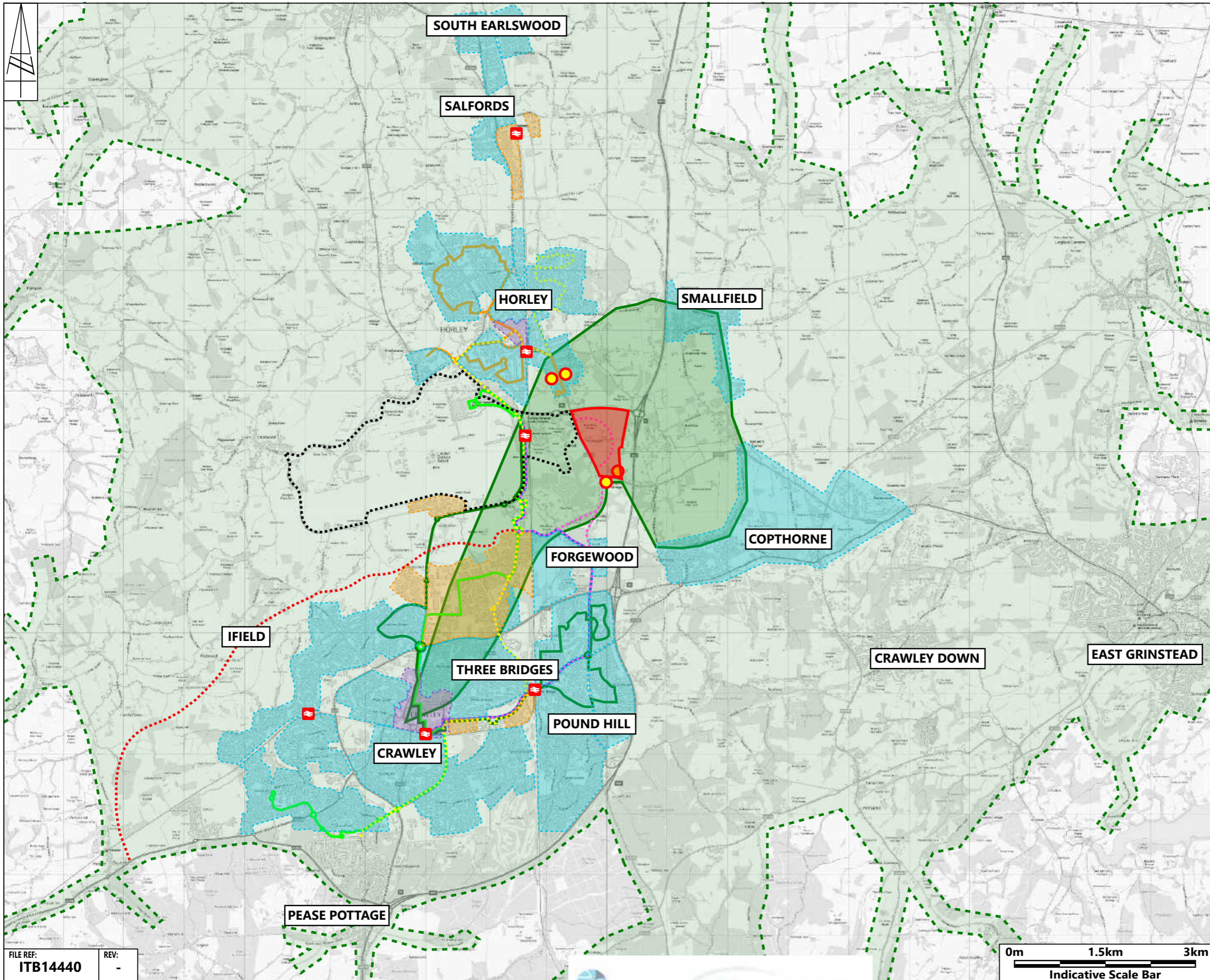
The CTSR concludes that with mitigation, the cumulative impacts of the DCBLP proposals on Crawley's transport networks and in terms of highway safety are acceptable.

Conclusion

- This appraisal contains the findings of an initial assessment of access and transport considerations to support the allocation of the Gatwick Green site.
- The Appraisal work has identified that there are no fundamental issues to access, promoting sustainable travel or mitigating traffic impacts. Any applications will be supported by a full Transport Assessment to demonstrate that the proposals can be accessed sustainably and would not have a severe impact upon the local highway network.
- Initial assessments for a mobility strategy demonstrate how the Site will be integrated into the existing network, with off-site improvements aimed at promoting sustainable modes of travel for both future users of the Site and existing residents / businesses;
- Any planning application will be accompanied by a range of infrastructure improvements to active travel and public transport to cost effectively mitigate development impacts;
- Proposals to improve accessibility to the Site by public transport have been discussed and agreed in principle with Metrobus and the proposed site layout will bring forward bespoke public transport infrastructure;
- Local upgrades to cycle and pedestrian facilities in the vicinity of the local area as well as Public Rights of Way are achievable and can be linked to improvements identified in the Crawley Walking and Cycling Infrastructure Improvement Plan.
- The Site can be designed to provide appropriate levels of on-site parking for both cars and Heavy Goods Vehicles to ensure that all demand can be accommodated on site.

Gatwick Green – Access and Outline Transport Appraisal Note

Appendix A - Figures



- KEY**
- SITE BOUNDARY
 - RAIL STATION
 - TOWN CENTRE
 - EMPLOYMENT AREA
 - RESIDENTIAL AREA
 - GATWICK AIRPORT BOUNDARY
 - IFIELD LINK ROAD / CRAWLEY WESTERN ROAD INDICATIVE
 - BUS STOP
 - BUS 424 - 15 MINUTE RANGE
 - ESTIMATED 30 MINUTE BUS RANGE ASSUMING 30KPH)
 - BUS 3 - EXISTING ROUTE
 - BUS 3 - PROPOSED DIVERSION
 - BUS 5
 - BUS 10
 - BUS 20
 - BUS 26



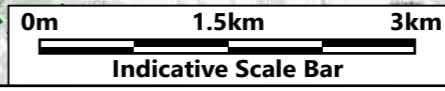
Grove House, Lutyens Close, Chineham Court,
 Basingstoke, RG24 8AG
 Tel: 01256 338 640
 Fax: 01256 338 644
 www.i-transport.co.uk

TITLE:
**GATWICK GREEN
 POTENTIAL BUS CATCHMENT
 FROM GATWICK GREEN**

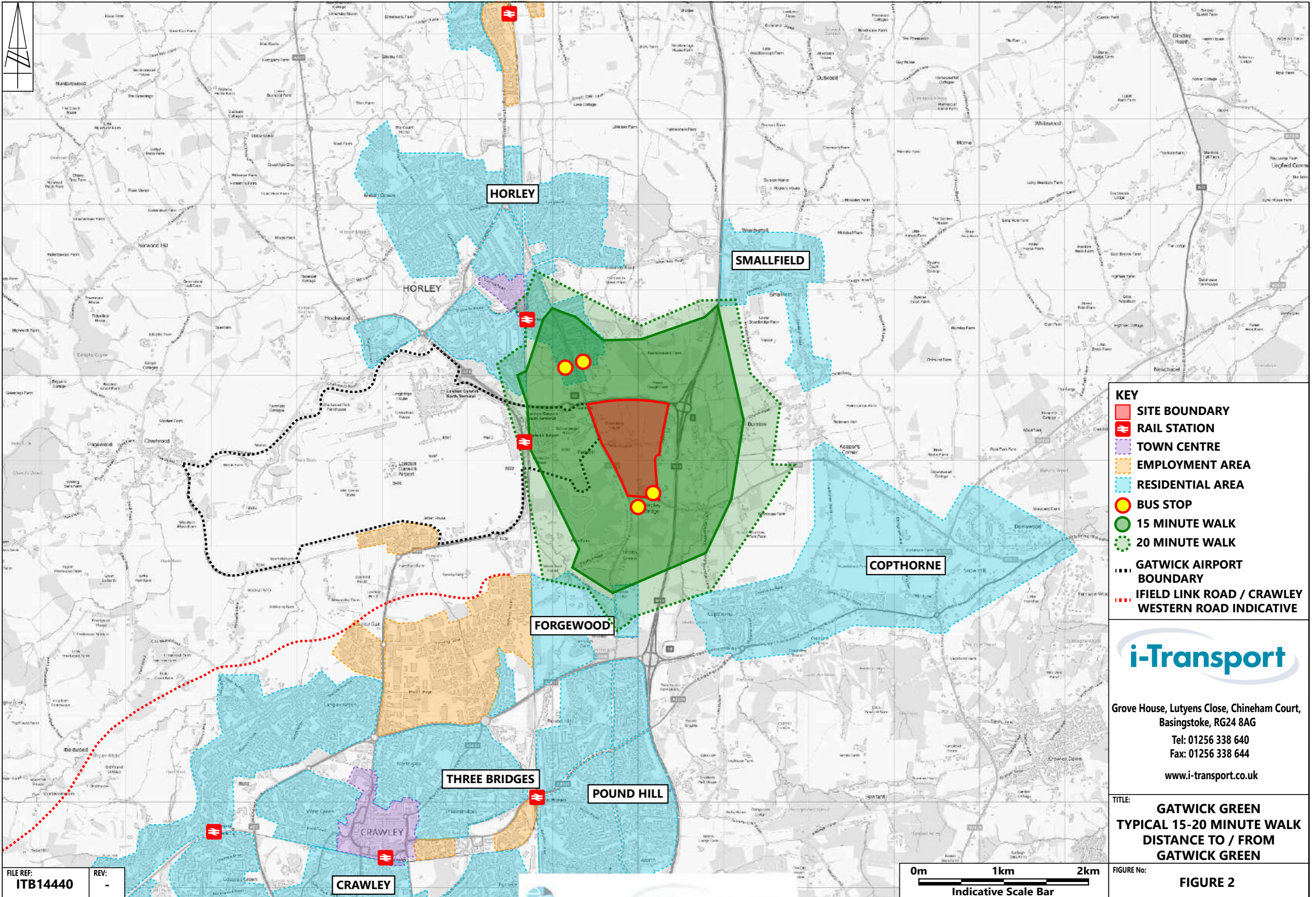
FIGURE No:
FIGURE 1

FILE REF:
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- KEY**
- SITE BOUNDARY
 - RAIL STATION
 - TOWN CENTRE
 - EMPLOYMENT AREA
 - RESIDENTIAL AREA
 - BUS STOP
 - 15 MINUTE WALK
 - 20 MINUTE WALK
 - GATWICK AIRPORT BOUNDARY
 - IFIELD LINK ROAD / CRAWLEY WESTERN ROAD INDICATIVE

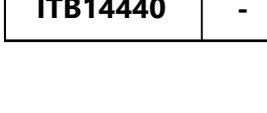
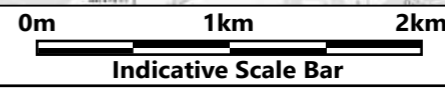


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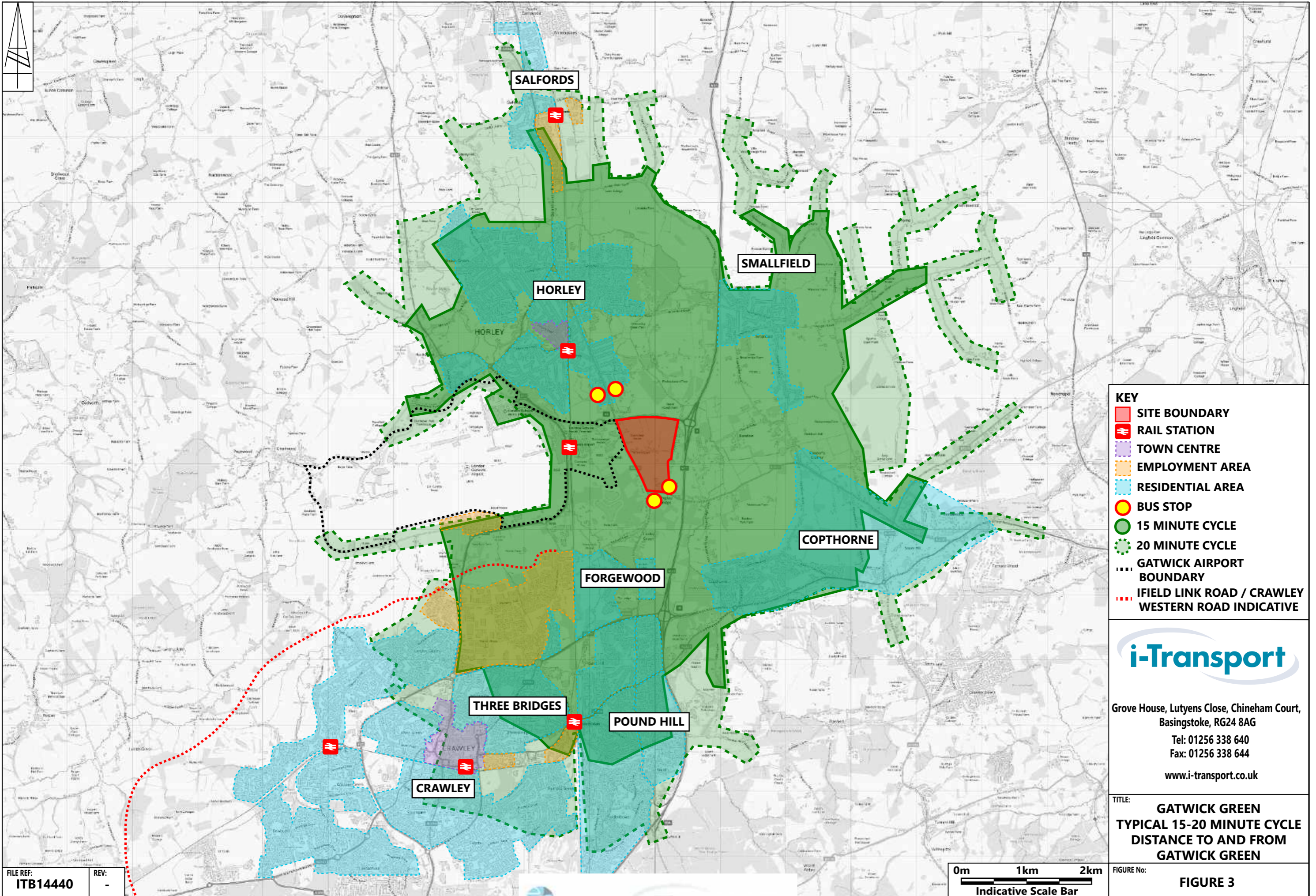
TITLE: **GATWICK GREEN
 TYPICAL 15-20 MINUTE WALK
 DISTANCE TO / FROM
 GATWICK GREEN**

FIGURE No: **FIGURE 2**

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- KEY**
- SITE BOUNDARY
 - RAIL STATION
 - TOWN CENTRE
 - EMPLOYMENT AREA
 - RESIDENTIAL AREA
 - BUS STOP
 - 15 MINUTE CYCLE
 - 20 MINUTE CYCLE
 - GATWICK AIRPORT BOUNDARY
 - IFIELD LINK ROAD / CRAWLEY WESTERN ROAD INDICATIVE

i-Transport

Grove House, Lutyens Close, Chineham Court,
Basingstoke, RG24 8AG
Tel: 01256 338 640
Fax: 01256 338 644
www.i-transport.co.uk

TITLE: **GATWICK GREEN
TYPICAL 15-20 MINUTE CYCLE
DISTANCE TO AND FROM
GATWICK GREEN**

FIGURE No: **FIGURE 3**

FILE REF: **ITB14440**
REV: **-**

0m 1km 2km
Indicative Scale Bar



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Appendix 3

Addendum: Environmental & Utilities Preliminary
Assessment Report



GatwickGreen

WHERE THE FUTURE WORKS

Addendum to Environmental and Utilities Preliminary Assessment Report, Clarkebond, 26 February 2020: Surface Water Drainage, Foul Water Drainage and Air Quality

Gatwick Green



B05268-CLK-TN01

22-06-2021

The Wilky Group

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Project: Gatwick Green

Date: 15/04/2021

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 Report, Clarkebond, 26 February 2020
 Surface Water Drainage, Foul Water Drainage and Air Quality

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| 15-04-2021 | P1 - S2 Draft | |
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| 22-06-2021 | P3 – S2 Final | Minor changes from project team feedback |

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1 Background

This is an Addendum to the report by Clarkebond entitled ‘Environmental and Utilities Preliminary Assessment Report, Gatwick Green’ dated 26 February 2020 (2020 report) on behalf of the Wilky Group (TWG). TWG has a long-standing interest in the promotion of strategic employment land within the Crawley Borough Council (CBC) area – a site known as Gatwick Green.

TWG owns about 47 ha (116 acres) of land east of Gatwick Airport as shown on the plan in **Appendix 1** (Gatwick Green / the Site). The Site is a proposed allocation as a Strategic Employment Location (SEL) in the draft Crawley Borough Local Plan, January 2021 (DCBLP) under Policy EC1 and Policy EC4 for an industrial-led scheme, predominantly for B8 use (strategic storage and distribution). The extent of the allocation for Gatwick Green is identified on the plan in **Appendix 1** – it provides for a minimum of 24.1 ha of industrial development.

The 2020 report provided a preliminary assessment of various environmental and infrastructure considerations pertaining to the proposed allocation of the Site for employment purposes. The 2020 report did not cover transport, biodiversity/ecology, heritage and landscape/visual considerations – these topics were addressed in separate reports. This Addendum provides an update to the 2020 report in response to the Site’s proposed allocation for employment development and in respect of certain infrastructure requirements where some additional assessment is needed to confirm the deliverability of Gatwick Green in this regard.

The basis of this Addendum is the revised planning status of the Site under the DCBLP as compared to the policy framework in the January 2020 version of the Plan and what was being promoted by TWG at that time. Consequently, the following sections of 2020 report are no longer valid and are superseded by this report. The table below indicates the sections from the 2020 report that have been superseded and the replacement sections in this report.

Table 1.1.1- Superseded sections of the 2020 report

| 2020 report sections - superseded | 2021 report sections – replacements |
|-----------------------------------|-------------------------------------|
| 1.1 Overview | 2 Overview |



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| | |
|---|--|
| 1.2 The Proposed Development/Concept | 2.1 The Development Concept and the Draft Crawley Borough Council Local Plan |
| 2.0 Site Description and Land Use | 2.2 Site Description and Land Use |
| 2.2 Profile of the Proposed Development Concept for Gatwick Green | 2.3 Proposed Development Concept for Gatwick Green |
| 3.2 Submission Crawley Local Plan 2020 - 2035 (2019) | 2.4 Draft Crawley Borough Local Plan 2021 - 2037 (January 2021) |

The other sections of the 2020 report remain valid – the data and assessments contained in these sections and related recommendations remain valid and part of TWG’s evidence base and that of the DCBLP.

In addition to the above, this report provides supplementary assessments / information on the following matters:

- Sustainable surface water drainage considerations and opportunities (Sections 3 to 5).
- Consideration of the capacity within the existing foul drainage network and infrastructure (including the Crawley sewage treatment) works to accommodate the current proposal being promoted by TWG with a near-term 2022-26 delivery timeframe (Section 6).
- An update on the Air Quality Assessment in the 2020 report based on the development being promoted by TWG now.

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2 Overview

Gatwick Green is a proposal to develop a sustainable mixed-use development on land east of Gatwick Airport, as proposed by TWG.

2.1 The Development Concept and the Draft Crawley Borough Council Local Plan

The proposed Gatwick Green development is envisaged to be a comprehensive industrial-led development to deliver B8/B2 industrial / logistics / storage uses on land currently allocated for the comprehensive development of an industrial-led Strategic Employment Location in Strategic Policy EC4 – Strategic Employment Location of the latest Draft Crawley Borough Council Local Plan (DCBLP) 2021-2037. The targeted programme is based on a near-term 2022-26 delivery timeframe. **Figure 2.1.1** shows the proposed Development Framework Plan.



Figure 2.1.1: Proposed Development Framework Plan

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2.2 Site Description and Land Use

The Proposed Gatwick Green Site is on predominantly undeveloped Greenfield land, located approximately 800m east of Gatwick Airport and at National Grid Reference (NGR) TQ 29992 41345. The area defined by the red-line plan that represents TWG land is shown in **Figure 2.2.1**, which is different from the red-line site boundary of the development layout in the 2020 report.

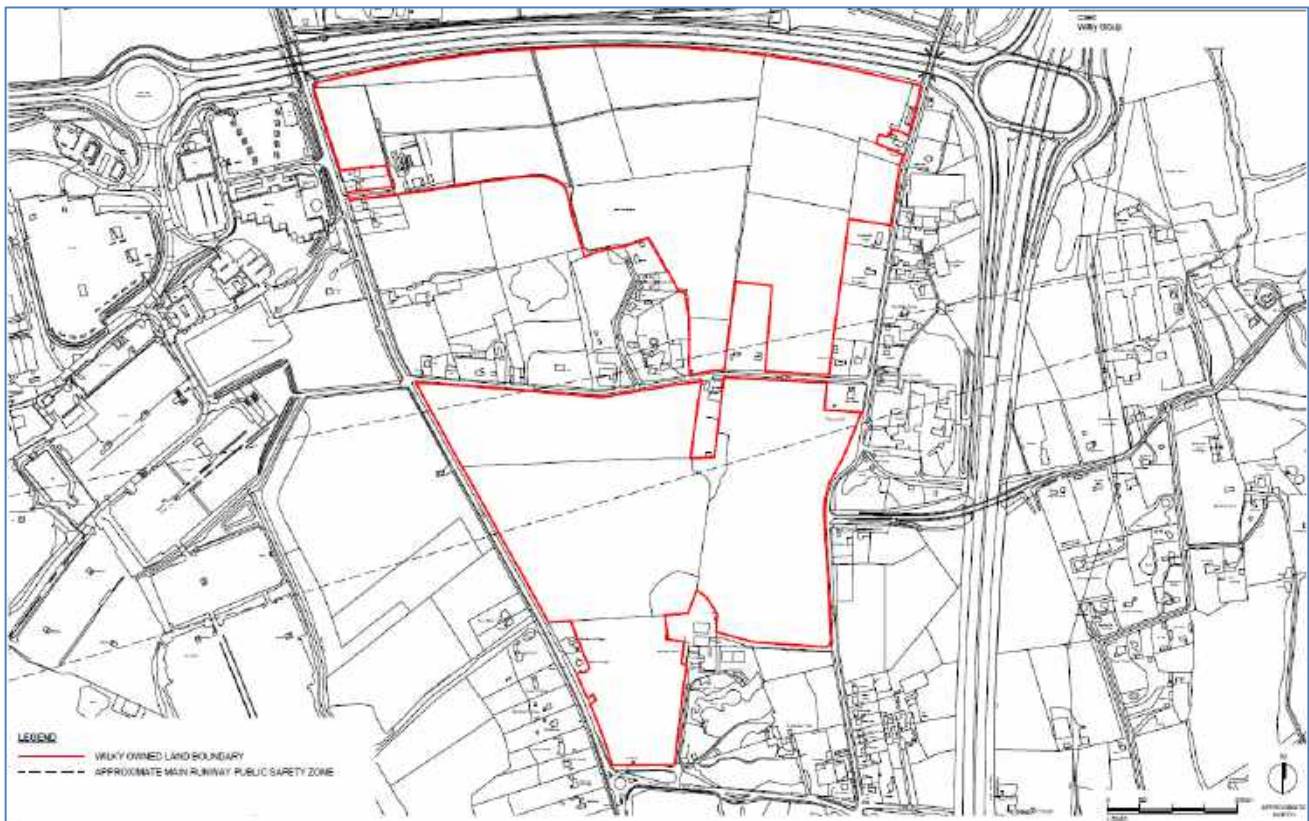


Figure 2.2.1: Red-line Plan Representing TWG land

Most of the Site is bounded to the west by Balcombe Road, beyond which is Gatwick Airport South Terminal Long Stay car park, Gatwick Airport train station and other Gatwick Airport support facilities. Gatwick Airport South Terminal is approximately 1000m west of the Site. The Gatwick Stream is located approximately 800m to the west and the Crawley Sewage Treatment Works is approximately 935m southwest of the southern boundary of the Site.



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The northern boundary is the M23 spur road between junctions 9 and 9a. North of the spur road lies the residential area of Horley, with the Burstow Stream and further Greenfield land located to the north-east. The east of the Site is bounded by Peaks Brook Lane, beyond which are a mix of residences on larger plots and some small businesses. The M23 is approximately 180m to the east, and the south is bounded by further greenfield land. There are listed buildings on the proposed Site as well as in the local surrounding areas.

The town of Crawley is approximately 3.5km south-west of the Site, the town of Horley is approximately 1.7km to the north-west, and the village of Cophthorne is approximately 1.7km to the south-east.

The Site itself is mainly undeveloped agricultural land, which is roughly bisected by a minor road (Fernhill Road) near the centre.

2.3 Proposed Development Concept for Gatwick Green

The development profile is envisaged to comprise:

- 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 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.

Refer to Site Plan and Developing Framework Plan in **Appendix 1**.

2.4 Draft Crawley Borough Local Plan 2021 - 2037 (January 2021)

2.4.1 Description of the shift in policy between the 2020 and 2021 Regulation 19 DCBLP

The 2020 Regulation 19 DCBLP removed blanket safeguarding for the additional wide-spaced runway at Gatwick Airport, replacing it with a commitment to prepare an Area Action Plan (AAP) under Policy SD3 over



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the former safeguarded land and within which a temporary safeguarding arrangement was proposed. The AAP would be advanced via a separate Development Plan Document to address Crawley’s unmet needs for employment, housing and community uses alongside any legitimate long-term development needs of Gatwick Airport. Following advice from the Planning Inspectorate, the Council revised its strategy by reviewing the extent of safeguarding, that in turn allowed for the identification of a Strategic Employment Location at Gatwick Green. The 2021 Regulation 19 DCBLP therefore allocates Gatwick Green as an industrial-led development site under policies EC1 and EC4, with safeguarded land retained outside the allocation to accommodate an additional wide-spaced runway and associated airport infrastructure.

2.4.2 Description of the new policy framework

Gatwick Green is allocated as an industrial-led Strategic Employment Location for a minimum of 24.1 ha under policies EC1 and EC4. Policy EC4 makes provision, where evidenced, for additional industrial land beyond this amount. Limited complementary ancillary uses are provided for, such as offices and small-scale convenience retail and leisure facilities that would support the industrial-led function. Policy EC4 also sets out a range of development management provisions relating to transport and access, sustainable design and construction, digital technology and character and design, with further requirements related to the assessment of economic impacts and arrangements for delivery.

These provisions establish the scope and nature of the associated infrastructure requirements and environmental considerations, which combined with other policies in the DCBLP, are designed to ensure that the site is developed in a sustainable manner.



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3 Sustainable Surface Water Drainage Opportunities

3.1.1 Objectives

This additional Section highlights the potential constraints and opportunities which need to be considered in assessing the suitability of the various sustainable drainage system (SuDS) techniques that could be implemented at the Site. It has been undertaken following the approach set out in the relevant standards and guidance (see Section 3.1.4) to inform the Development Framework Plan and the conceptual drainage strategy.

3.1.2 Why it is Important to Consider SuDS Early

SuDS are designed to reduce the potential impact of a development with respect to surface water drainage on both the development itself and the wider area. It also provides opportunities to remove pollutants from urban runoff at source, and combines water management with green space, with benefits for amenity, recreation and wildlife.

To fully gain the benefits from a SuDS system it should be considered as early as possible in the design process so that it can be integrated into the master planning for a development to ensure drainage systems are effectively delivered. Consideration of the movement of water and its interaction with space is crucial to the success of SuDS and allows the designer and developer to maximise wider benefits and pre-empt or reduce the issues that could later arise that conflict with the ability of development proposals to incorporate SuDS. Development proposals progressed without undertaking this early stage risk the possibility that the proposed layout would not be capable of being drained in a sustainable way to meet national and local policy.

When designed well, SuDS can increase property value, mitigate local flood risk, moderate microclimate, benefit ecology, provide new sources of water and create valuable amenity spaces for communities to enjoy.

3.1.3 SuDS Policies, Best Practice Standards & Guidance

The Flood and Water Management Act 2010 provides the legislative intention to require all new developments to incorporate SuDS. The National Planning Policy Framework (NPPF) is also a key driver, stating that development should give “priority to the use of sustainable drainage systems”. The NPPF also sets out key priorities for planning to address, including climate change, flood risk, water quality and biodiversity - all challenges that SuDS will help to address.



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Draft Crawley Borough Council Local Plan 2021 – 2037 (January 2021)

The key policies relating to SuDS within the Draft Crawley Borough Council Local Plan are:

Strategic Policy G11: Green Infrastructure

“Large development proposals will be required to provide new and/or create links to green infrastructure as well as take into consideration the use of SuDS and methods that incorporate blue infrastructure into development designs to improve the visual amenity of the development, to account for Policy EP1 and to aid in reducing surface water run-off.”

Policy EP1: Development and Flood Risk

“Development must avoid areas which are exposed to an unacceptable risk from flooding and must not increase the risk of flooding elsewhere. To achieve this, development will demonstrate that peak surface water run-off rates and annual volumes of run-off will be reduced through the effective implementation, use and maintenance of SuDS, unless it can be demonstrated that these are not technically feasible or financially viable.”

Lead Local Flood Authority (LLFA) Guidance

“Water. People. Places – A guide for master planning sustainable drainage into developments”, prepared by AECOM for the Lead Local Flood Authorities of South East of England, complements existing guidance on SuDS design, maintenance and operation which should be used to inform detailed design and delivery of SuDS.

The South East Lead Local Flood Authorities expect this guidance to be used as part of the initial planning and design process for all types of residential, commercial and industrial development. It has been developed through a partnership of South East Authorities and it intends to provide a consistent approach to best practice design of SuDS at the master planning stage. Specific local requirements for SuDS design and adoption may also be set by the Lead Local Flood Authorities.

DEFRA Standards for Sustainable Drainage Systems

This document recommends peak flow and volume control of off-site discharge and the requirements of the drainage system to limit on-site flood risk.



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For previously developed sites, the 1 in 100-year runoff volume should be as close as reasonably practicable to the Greenfield runoff volume for the same event and should never exceed the runoff volume of the site prior to redevelopment nor adversely affect flood risk downstream.

The runoff rates for the 1 in 1 year and 1 in 100-year rainfall events should also be as close as reasonably practicable to the Greenfield runoff rates for the same events and should never exceed the runoff rates of the present land use.

Construction Industry Research and Information Association (CIRIA): The SuDS Manual (C753)

This publication covers the planning, design, construction and maintenance of Sustainable Drainage Systems (SuDS) to assist with their effective implementation within both new and existing developments. It looks at how to maximise amenity and biodiversity benefits, and deliver the key objectives of managing flood risk and water quality. There is also supporting information covering topics such as materials, landscape design, maintenance, community engagement and costs and benefits.

The guidance provides the framework for designing SuDS with confidence and to maximise benefits.

Building Regulations (2010) Hierarchy of Surface Water Discharge

The hierarchy of how surface water disposal should be managed is also discussed in Part H of the Building Regulations (2010) document. It highlights infiltration of surface water to groundwater using soakaways as the most sustainable and preferred drainage strategy. If this isn't feasible then the next consideration should be discharge of water directly into a surface water body, followed by discharge into a surface water sewer/other drainage system and finally discharge into a combined sewer. Where infiltration is not possible it is expected that attenuation techniques are adopted.

3.1.4 SuDS 'Treatment Train'

SuDS are not individual items, but rather an interconnected system where water slowly flows from where it falls to a soakage area or discharge point through a series of features that help to treat, store, re-use, convey and celebrate water. An important concept for the SuDS designer to follow is known as the 'treatment train'. By passing water through several stages of treatment, sediment and other pollutants will be removed more effectively, and maintenance costs are reduced as this minimises the risk of downstream SuDS features

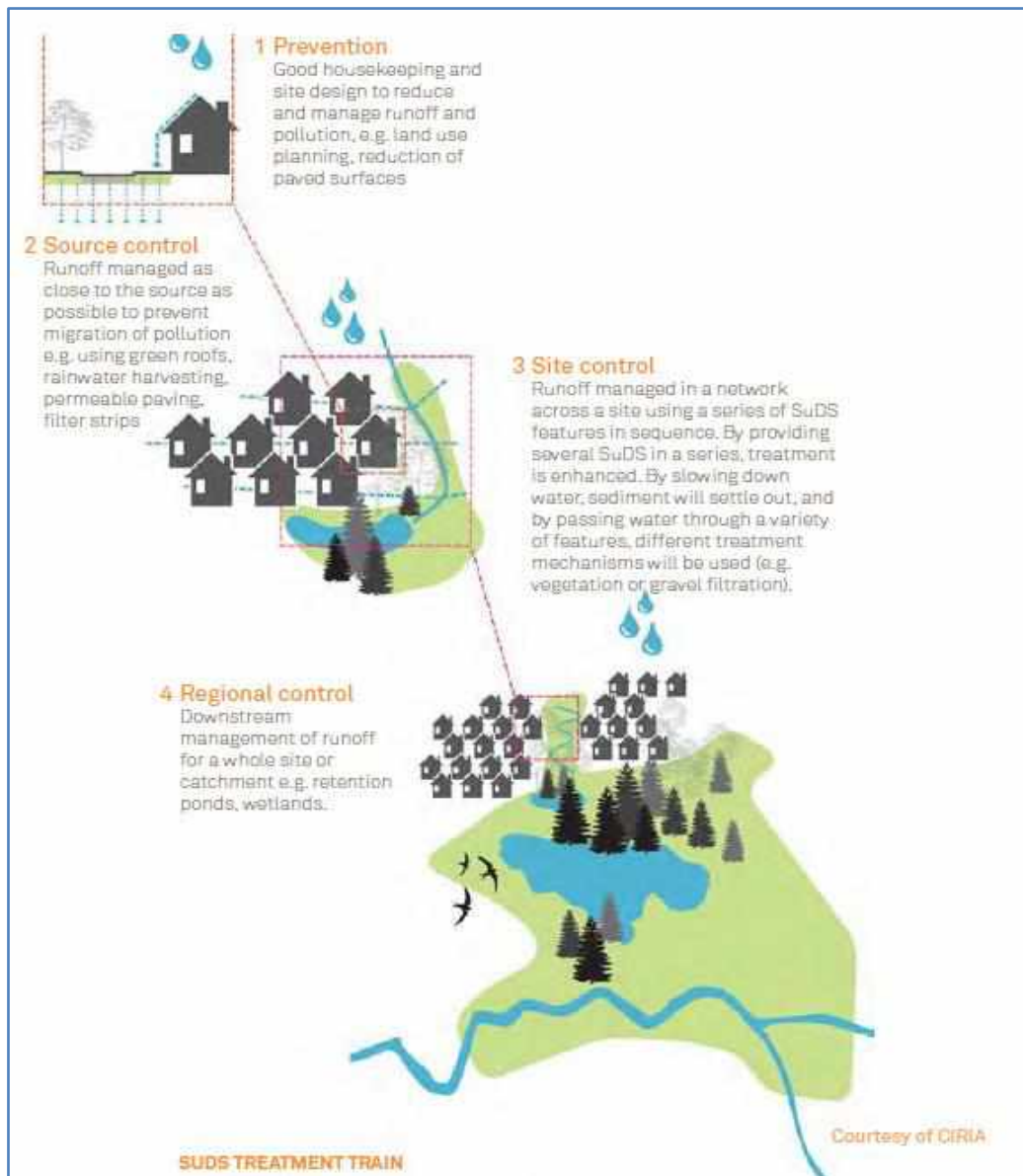
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becoming clogged or blocked. The designer can use the treatment train to create green corridors and links, add opportunities for engagement and education and to match delivery of SuDS to phasing of development.

Figure 3.1.1: The SuDS Treatment Train





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3.1.5 Application of SuDS Guidance to Conceptual Site Development and Drainage Strategy

Both the Site conceptual masterplan and drainage strategy have sought to follow these concepts and standards, considering the site-specific conditions and constraints as outlined in Section 4 and Section 5 of this report.

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4 Assessment of Site Constraints

Refer to the summary of results from the site constraints analysis in **Appendix 2**.

4.1.1 Possible Constraint from the Floodplain of Fluvial & Surface Water Sources

There are no “main rivers” within the Site boundary.

The Site is in Flood Zone 1, which means that the risk of fluvial flooding at the Site is less than a 1 in 1000 year or 0.1% probability each year. This is the lowest classification of flood risk and therefore flooding from fluvial source is not a constraint to development at the Site or to the implementation of SuDS methods. The Environment Agency indicative flood risk map is shown in **Figure 4.1.1**.

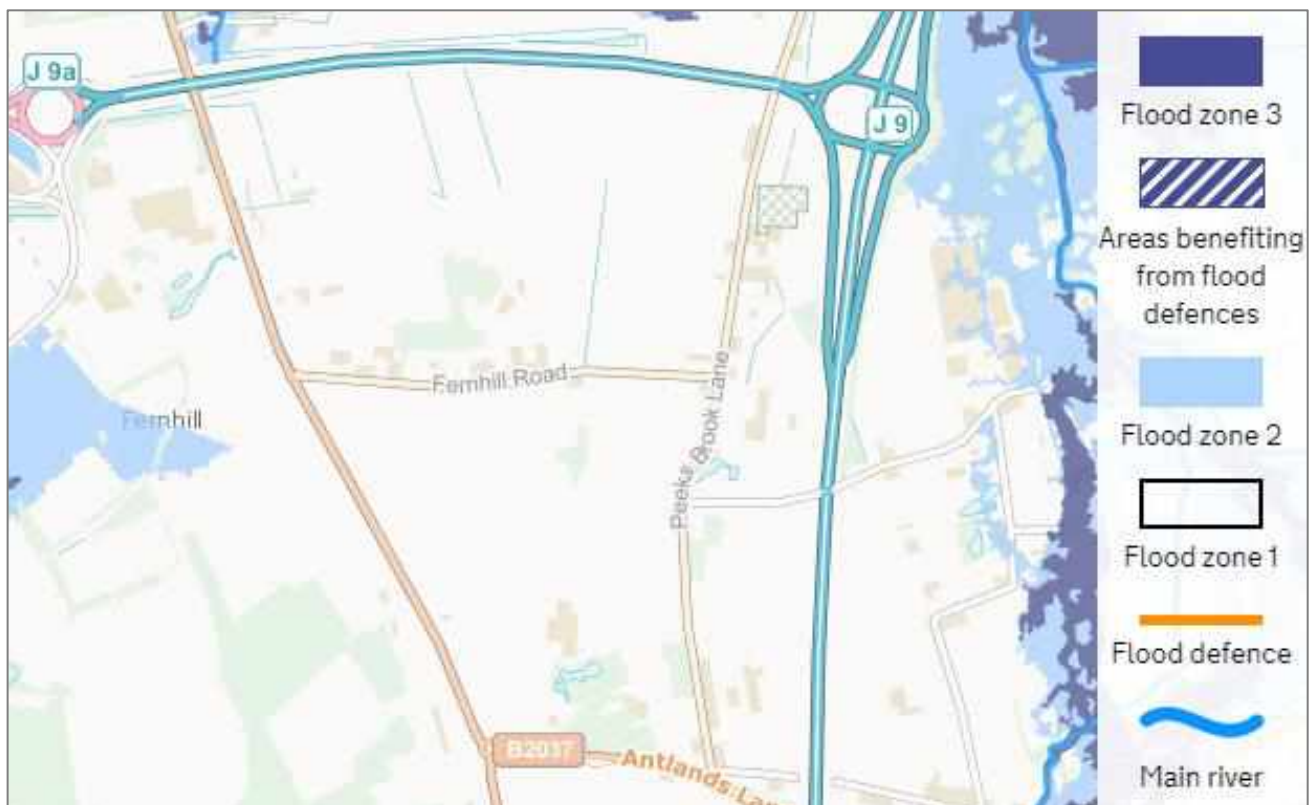


Figure 4.1.1: EA Flood Map for Planning

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As can be seen from the EA surface water flood map (Figure 4.1.2), most of the Site is at very low risk of surface water flooding (i.e., less than 0.1% annual probability of occurrence). There are some pockets of low risk (0.1 – 1% annual probability), medium risk (1 – 3.3% annual probability) and high risk (>3.3% annual probability) on the west and north parts of the site – typically in topographically low areas and along the routes of existing minor ditches and drains.

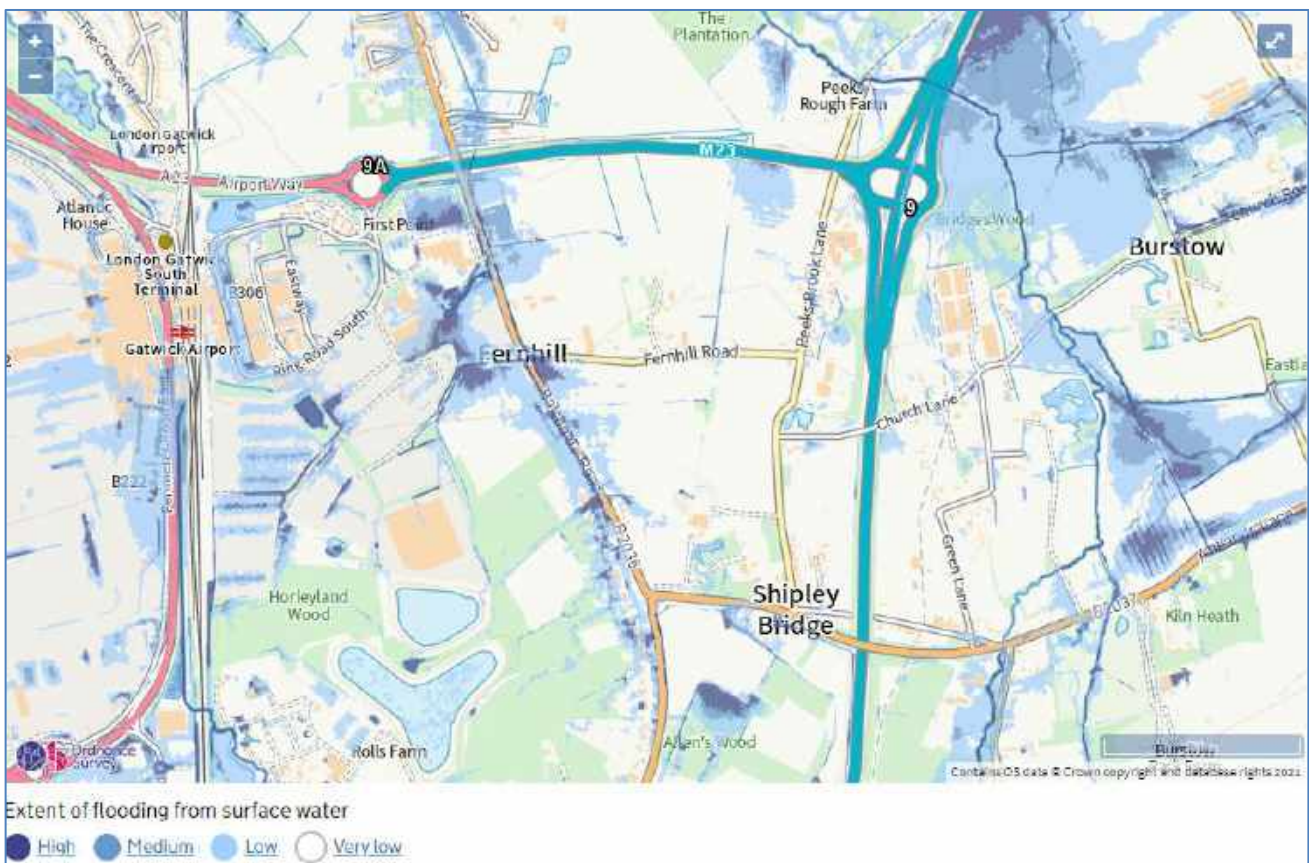


Figure 4.1.2: EA Surface Water Flood Map

The proximity of the Site to Gatwick Airport means that there is a large impermeable surface area just to the west. There is a need for flood risk to be managed at Gatwick Airport particularly in times of heavy rainfall and balancing ponds are used to regulate the rate at which surface runoff is discharged into the River Mole and other watercourses, in accordance with the EA discharge requirements. This does not pose a risk of surface water flooding to Gatwick Green because the drainage catchment area for Gatwick Airport is toward the Gatwick Stream which flows in a north westerly direction away from the Gatwick Green site.



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Based on the above, the floodplains of fluvial and surface water sources do not pose any material restrictions to the implementation of SuDS at the Site.

4.1.2 Possible Constraint from Groundwater

The Site is not within a Groundwater Source Protection Zone (SPZ), and the nearest SPZ is located approximately 8km north. A review of historic borehole data from the BGS website states that groundwater was encountered as seepage at 0.80m depth at the north-west of the Site.

While this does not pose a risk of contamination to important water resources, care will need to be exercised in the consideration of infiltration-based SuDS methods due to the potential for a high water-table locally in some areas of the Site.

4.1.3 Possible Constraint from Soils & Geology

Infiltration to ground is influenced by the following factors:

- Soil being free-draining and underlying strata having a suitable permeability;
- The presence of important groundwater bodies (receiving water) which are vulnerable to contamination;
- Presence of contaminants on site;
- Availability of adequate land space to satisfy BRE infiltration specification and design requirements.

A review of the Site geology from British Geological Survey (BGS) viewer indicates superficial deposits comprising River Terrace Deposits (undifferentiated) – i.e., sand and gravel underlying the north, east and south-east of the site. The bedrock geology comprises Weald Clay Formation with Mudstone underlying most of the Site, and Weald Clay Formation – i.e., clay-ironstone approximately east-west across the centre of the site.

LandIS ‘Soilscapes’ data indicates that most of the Site falls within ‘Soilscape 22: i.e., loamy soils with naturally high groundwater’. The south-west of the Site is of ‘Soilscape 18: slowly permeable seasonally wet slightly acid but base-rich loamy and clayey soils.’ This is known to have impeded drainage.



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An appraisal of the geology would indicate that the ground conditions at the Site would not be able to facilitate certain types of infiltration drainage methods. However, this will need to be confirmed by BRE Digest 365 Soakaway Tests. This does not rule out the use of infiltration-based SuDS methods with liner and underdrain.

4.1.4 Possible Constraint from Contaminated Land

A Preliminary Risk Assessment was undertaken by Clarkebond for the 2020 report (refer to Section 4.5 – Land Contamination), which identified the following potential sources of contamination at the Site:

- A large above ground oil storage tank was observed to the north of Fernhill Lane. The integrity of the tank is unknown and therefore it may have leaked into the underlying soil. Several other, domestic size oil storage tanks were observed across the site.
- Current land uses of contiguous and surrounding areas include metal merchants and light industrial works. Therefore, there is the potential of hydrocarbon impact from fuel oils/lubricant leakage from these existing land uses.
- It’s possible that the Made Ground beneath the site might be contaminated by asbestos and other materials.
- Areas of present and historical land use may have elevated levels of residual pesticides, herbicides and insecticides.

It was assessed that the general risk of significant contamination is low. The potential impact to the local environment should however be assessed in the future by appropriate analysis of the soils and groundwater together with a risk assessment based on the site-specific criteria.

The above assessment does not limit the use of most SuDS methods; however, care will need to be exercised in the consideration of infiltration-based SuDS methods due to the potential low risk of contamination.

4.1.5 Possible Constraint from Surface Runoff Features and Requirements

There are minor watercourses and drains within the Site boundary which eventually discharge into the Burstow Stream north of the M23 spur road. It is therefore feasible for surface runoff from the proposed development to be discharged at controlled rates into these receiving watercourses although some channel improvement works, and upgrades may be required.

Discharge Requirements



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In accordance with the NPPF and DEFRA guidance, development on existing Greenfield sites should restrict runoff to Greenfield rates to ensure the increased impermeable area as a result of development mitigates any impact on the downstream drainage network.

The Draft Local Plan also requires the demonstration that peak surface water run-off rates and annual volumes of run-off will be reduced through the effective implementation, use and maintenance of SuDS.

The above conclusions do not limit the use of most SuDS methods at the Site, and it is recommended that the proposed drainage strategy restricts runoff post-development to current greenfield rates.

4.1.6 Possible Constraint from Site Topography

Topographic data was obtained from the LiDAR composite Digital Terrain Model (DTM), produced by the Environment Agency at a spatial resolution of 1m.

The lowest ground levels are in the north-west adjacent to Balcombe Road, at approximately 57.1m AOD. The highest level is at the south-east at approximately 61.5m AOD. From the contours shown, natural gradients range from mild slopes to relatively flat areas. The topography also indicates that levels generally decrease towards the 'main rivers' north-west and north-east of the M23 spur road – both tributaries of the Burstow Stream. This also indicates the general direction of flow which surface runoff may take.

The topographic review indicates that there is enough land gradient and depth of ground cover to suggest that drainage via gravity is achievable.

4.1.7 Possible Constraint (Easement/Buffer Requirements etc.) from Existing Infrastructure

Foul and Surface Water Sewers

Asset records show that there are no existing surface water sewers on the Site. There are 2 separate public foul sewers on Peeks Brook Lane, which cross the Site and connect to the pump station located adjacent to the eastern boundary. The pump station discharges foul sewage, via a rising main, to the south western corner, near Rose Cottage. There will be easements for the sewers and rising main subject to confirmation with Thames Water.

Power

The closest UK Power Networks grid substation (275kV to 132kV) is in Smallfield, 3km north-east of the Site. The HV cables from Smallfield run to the north of the Site boundary.



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Multiple 33kV primary distribution cable routes cross the Site boundary in the north. 11kV underground and over-ground cables also cross the Site and are assumed to supply 4 HV’LV substations, where a low voltage (LV) network serves local properties via underground and over-ground service lines. LV underground cables and overhead lines are also present within the Site boundary.

Any required excavation work would need to be away from installation, plant and cable routes to avoid damage. Easement and buffer areas will need to be confirmed with the power network provider, but these are not determined to pose any material constraints to the choice of SuDS methods that can be applied at the Site.

Gas Network

Southern Gas Networks (SGN) owns and operates the gas main network in the area of the site. An 18” medium pressure main runs to the west and south of the Site. This is a significant piece of infrastructure which SuDS should avoid. A 125mm low pressure main is located along the existing east-west road that crosses the Site. Because these utilities are beneath a public highway, they are unlikely to be directly affected by the proposed development. Therefore, the local gas network should not affect the choice of SuDS at the Site.

Water Supply

Distribution mains border the Site to the west and the east, running parallel with the B2036 and Peaks Brook Lane respectively, as well as along Fernhill Road. Multiple distribution mains extend away from the Site in the south-west, as well as west towards Gatwick Airport and North towards Horley.

In conclusion the location of these utilities will not pose a material constraint to the use of most types of SuDS due to the availability of space that can be utilised.

4.1.8 Space Constraints

SuDS are often associated with large green spaces; however, there are a range of SuDS features which can be easily designed into tight urban settings. Design forethought is required to build SuDS into multi-functional spaces (such as incorporating them in as part of the public open space requirement) and build up a network of SuDS that manage runoff close to its source to avoid the need for large storage areas.

The space available does not limit the types of SuDS that can be used. ‘Land-hungry’ SuDS methods are also feasible at the Site. Similarly, space efficient SuDS, such as green roofs, lined permeable paving, rills, rainwater harvesting, hardscape storage are equally viable.



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However, the proximity of Gatwick Airport and the associated flight paths limit the use of large areas of open water such as ponds and wet drainage basins as they can attract birds and pose a risk to aircraft through bird strikes. These types of SuDS features should therefore be avoided at the Site.

4.1.9 Possible Constraint from Protective Species or Habitat

According to Defra’s ‘Magic Maps’, the Site does not fall within an area designated as a protective habitat, including any grassland, heathland, inland rock, wetland or woodland. Therefore, this does not pose a constraint to the use of SuDS.

The area falls within an area outlined as ‘Priority Species for CS Targeting – Brown hairstreak (butterfly) and lapwing (bird)’. Although it does not fall within a protected area for any bird, mammal or plant species. Therefore, it is assessed that protective species and habitats will not pose a constraint to any SuDS considered for the Site.

4.1.10 Possible Ownership & Maintenance Constraint

Adoption discussions should be held early in the design process to ensure that SuDS are designed to the standards required by the adoption authority. Depending on the local provisions and context, the adopter could be the SuDS Approval Body (SAB) under the Flood and Water Management Act, a local authority, a highways authority, a landowner or a water company. Where adoption is uncertain, it is beneficial to ensure that design accommodates flexibility and favours simple solutions with low maintenance needs.

SuDS features can be designed for adoption, ownership and maintenance therefore, this does not act as a constraint to the use of SuDS at the site.

4.1.11 Recommended Sustainable Drainage Principles & Masterplan Considerations

Based on the constraints identified, it is recommended to discharge surface water runoff by gravity to the local watercourses on and near the Site at a controlled greenfield runoff rate as the preferred strategy.

There are additional “source and site control” SuDS measures that are recommended as suitable given the constraints identified and the land space available. Warehousing typically present a low pollutant hazard and



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uncontaminated runoff can then be directed to the local watercourses or infiltrate in a greenfield area. Key impermeable surfaces that will generate runoff should be distributed around the site.

4.1.12 Additional Sustainable Drainage Principles

The following additional techniques can also be considered if viable:

Source control

- Green roofs & rainwater harvesting are both suitable for the large warehouse roofs
- Landscaping (trees and planters) & bioretention areas could be utilised around the perimeter of the Site, which along with the green roof will promote integration of the development with its greenfield surroundings.
- Underground storage, which can store filtered water from a bioretention area for redistribution around the Site.

Site control

- Lined permeable paving where HGVs access is not required.
- Filter strips and swales which can be utilised around the perimeter of the Site to filter runoff and intercept potential runoff from off-site.

Planters, wet woodlands, and trees can be an effective method of water storage and would provide amenity value and there is space available for landscaping within the Site layout.

The use of surface water attenuation ponds & open wetlands is unlikely to be acceptable due to the risk of birds-strike at Gatwick Airport. Therefore, these types of SuDS are not proposed.



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5 Drainage Design Principles and Parameters

5.1.1 Design Considerations and Requirements

The drainage design principles and parameters proposed in this report for the proposed development follow the concepts, considerations and constraints from **Section 4**.

Greenfield Run-off rates

Gross site area measures 47ha. Using micro-drainage and based upon FSR rainfall data, the greenfield run-off rates are calculated as follows:

Table 5.1.1- Summary of Greenfield Runoff Rates Calculated

| Return Period (years) | 1-year | QBAR | 30-year | 100-year | 100 year + 40% |
|-------------------------|--------|-------|---------|----------|----------------|
| Greenfield Runoff (l/s) | 216.6 | 254.9 | 577.6 | 813.0 | 1138.2 |

Qbar discharge rate equates to 5.4 l/sec/Ha.

Refer to green-field run-off calculation in **Appendix 3**.

For the purposes of testing the ability of the site to be drained through a SuDS system, the site has been divided into notional plots as a basis for testing a high-level scenario; these are as follows:

Table 5.1.2- Site Area Broken Down by Plots

| Plot Numbers (North of Fernhill Road) | A | B | C | | |
|---------------------------------------|------|------|------|---|---|
| Areas (Ha) | 2.93 | 8.40 | 4.48 | - | - |



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| | | | | | |
|--|---|---|---|------|------|
| Plot Numbers (South of Fernhill Road) | - | - | - | D | E |
| Areas (Ha) | - | - | - | 5.69 | 6.73 |

Total Area 28.23 Ha

Based upon the total area of 28.23 Ha and discharge rate being restricted to Qbar, the total discharge rate for the plot areas is 152.4 l/sec, and total volume of storage required is 27200m³.

For those plots North of Fernhill Road

| | |
|--|---------------------|
| The Sub-Total Area | 15.81 Ha |
| Combined discharge rate | 85.4 l/sec |
| Approximate volume of attenuation required | 15300m ³ |

For plots South of Fernhill Road

| | |
|--|---------------------|
| Sub-Total Area | 12.42 Ha |
| Combined discharge rate | 67.0 l/sec |
| Approximate volume of attenuation required | 11900m ³ |

If on plot attenuation is taken forward the discharge rates and volumes would be as follows:

Table 5.1.3- Summary of Key Drainage Design Parameters by Plot

| Plots | Areas (Ha) | Greenfield Discharge Rates (l/s) | Storage Volume Requirement (m ³) |
|-------|------------|----------------------------------|--|
|-------|------------|----------------------------------|--|



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| | | | |
|---------------|------|------|------|
| Site A | 2.93 | 15.9 | 2840 |
| Site B | 8.40 | 45.4 | 8110 |
| Site C | 4.48 | 24.2 | 4320 |
| Site D | 5.69 | 30.8 | 5500 |
| Site E | 6.73 | 36.3 | 6430 |

5.1.2 Principles of Land Drainage Proposal

It is proposed to re-profile the existing ditch to the point of the existing culvert crossing. An ecological survey will be required to ascertain if any wildlife will be affected by the reprofiling. It is also proposed to extend the existing ditch located in the middle of the Site (north side of Fernhill road) so that it crosses Fernhill Road. The route of the proposed onsite access road will provide the optimal route for this extended ditch, which will assist with the proposed surface water drainage for plots D & E.

There will be a requirement to get approvals for any changes to the existing ditches, which will require Land Drainage Consents (LDC).

5.1.3 Proposed Drainage Attenuation

Based upon micro-drainage quick storage estimates (QSE) and incorporating flood studies report rainfall data, the storage requirement for the whole Site will be 27,200m³.

Refer to QSE calculations in **Appendix 3**.

The proposed attenuation and water treatment can be provided by the following methods:

Tanked permeable pavement



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Note because of the land uses being put forward, there will be a requirement to improve the water quality prior to discharging from the Site. The option of using tanked permeable paving will provide means of attenuating the hard-standing run-off as well as providing a means of improving the water quality. Tanked permeable pavement negates the requirement for full retention interceptors.

Dry Swales

Due to proximity of Gatwick Airport and the risk bird strike the methods of open storage need to be considered carefully. Dry swales could be effective if they are located close to existing/proposed tree lines. The swales will provide a means of attenuation and improving water quality. The extent of the use of swales will need to be further assessed when more details of the Proposal are known.

Dry Basin

Based upon the proximity of Gatwick airport and the issue of bird strike, this option is not considered viable.

Cellular Tanks

Use of cellular tanks provide another means of attenuation. Cellular storage can provide up to 95% by void ratio as a means of attenuation.

Oversized pipework/culverts

There may be a requirement to provide this, though this is to be reviewed at as part of the planning stage.



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6 Foul Drainage Considerations

6.1.1 Position Statement on Foul Drainage in DCBLP

Thames Water are supportive of growth within the LPA boundary based on Policy IN1 and paragraph 8.10 of the Draft Local Plan, but consider that there should be specific mention in the Policy of wastewater/sewerage infrastructure to ensure that growth is aligned with delivery of additional capacity at Crawley wastewater treatment works. Please refer to Clarkebond’s letter and pre-planning enquiry application, and the response from Thames Water (**Appendix 4**).

TWG Ltd fully recognise that water and wastewater infrastructure is essential to any development and that failure to ensure that any required upgrades to the infrastructure network are delivered alongside development, could result in adverse impacts in the form of internal and external sewer flooding and pollution of land and watercourses and/or low water pressure.

Under the Water Industry Act 1991 (amended by the Water Industry Act 1999), developers have an automatic right to connect to the sewer network, but it is generally acknowledged that Thames Water cannot reserve capacity for a particular development in advance; although based on our combined experience and knowledge we understand that it is very rare that sufficient capacity is not available, as regular adjustments are made to existing plant.

6.1.2 Consultation with Thames Water

In order to ensure delivery of the planned growth in the Local Plan and the longer lead-in times that improvements to the sewerage and water network assets for the planning and delivery of any upgrade require, Thames Water encourage developers to contact the water/wastewater company as early as possible to discuss their development proposals and intended delivery programme to assist with identifying any potential water and wastewater network reinforcement requirements.

Clarkebond has therefore consulted with Thames Water on behalf of TWG in March and April 2021 about the availability of foul drainage capacity at the Gatwick Green site in Crawley, West Sussex.

Please refer to Clarkebond’s letter and pre-planning enquiry application, and the response from Thames Water (**Appendix 4**).

6.1.3 Foul Drainage Implications for Gatwick Green



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Thames Water indicated in their response that as proposed, the minimal discharge from industrial, logistics, storage units domestic load, would not be of concern, as the minimal flow would not be a problem to their sewer network or treatment capacity. Thames water further indicated that should the proposals progress in line with the details provided, they would confirm that there will be enough sewerage capacity in the adjacent foul water sewer network to serve the development.



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7 Air Quality Update

7.1.1 Further Air Quality Considerations from Initial investigations

Initial air quality analysis and investigations for the latest conceptual development proposed by TWG at Gatwick Green indicate that the air quality impacts of HGVs on Balcombe Road will require further investigation to be undertaken at the planning application stage. It is however believed that these impacts can be satisfactorily addressed with a range of potential mitigation measures. This detailed air quality assessment would normally be submitted as part of the planning application.

7.1.2 Possible Way Forward

The approach for Gatwick Green would likely be consistent with the emerging approach that is being trialled by existing businesses and operators in the local industrial environment. Hauliers, online and food retailers, delivery companies and even Royal Mail are trialling and actively implementing the use of delivery vehicles which run on hydrogen gas or electricity. Amazon has started a rollout of electric delivery vehicles this year and UPS, DHL and FedEx have all started to change the ways in which their vehicle fleet is powered. There is also the proposed hydrogen dump at Manor Royal which MetroBus will be making available to 3rd parties. These innovations in approach to sustainability also present an opportunity for Gatwick Green to manage air quality emissions going forward.



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8 Conclusions

The topics outlined and examined within this Addendum indicate that there are no significant and preventable constraints to the development.



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Appendix 1

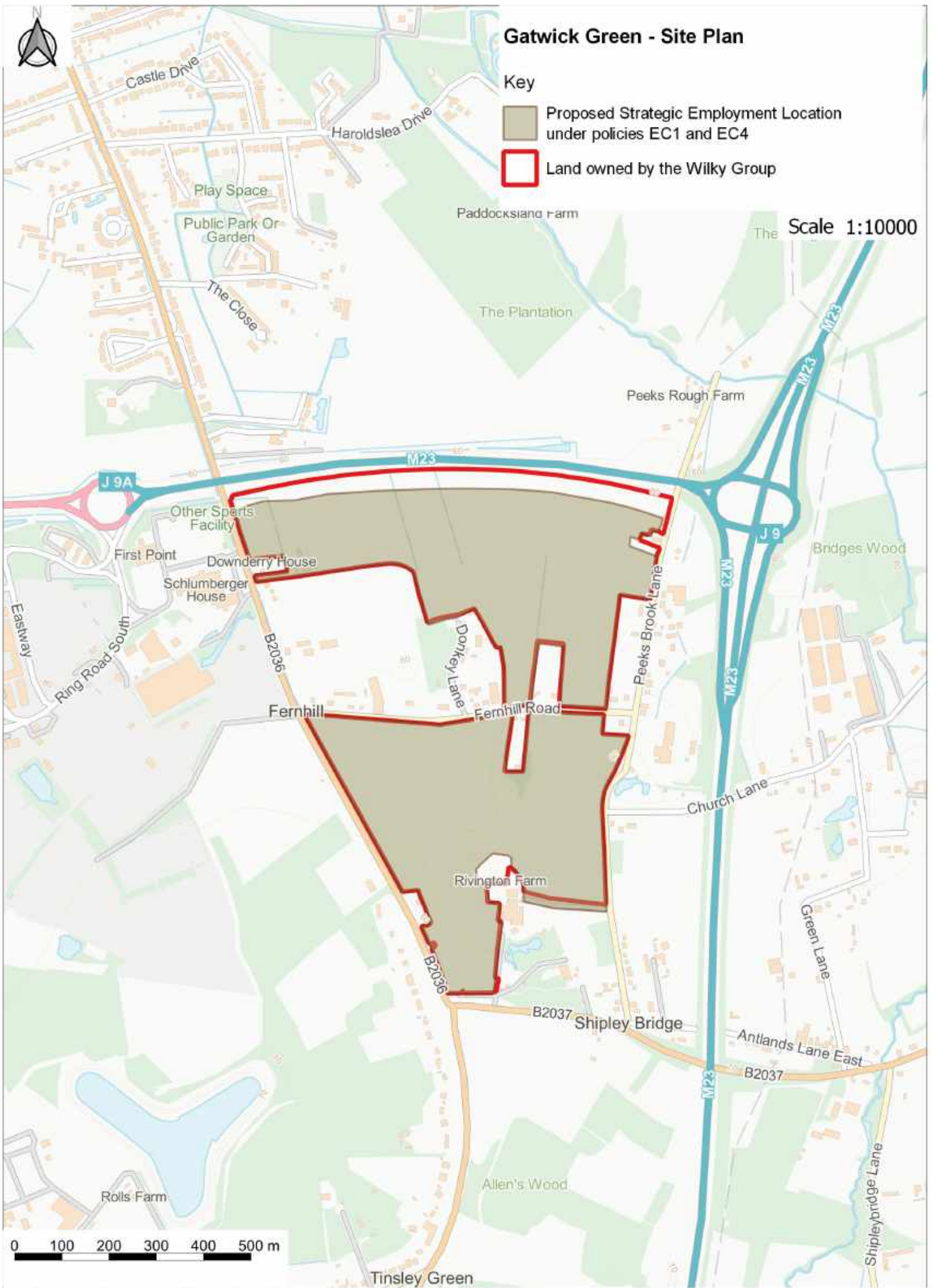


Gatwick Green - Site Plan

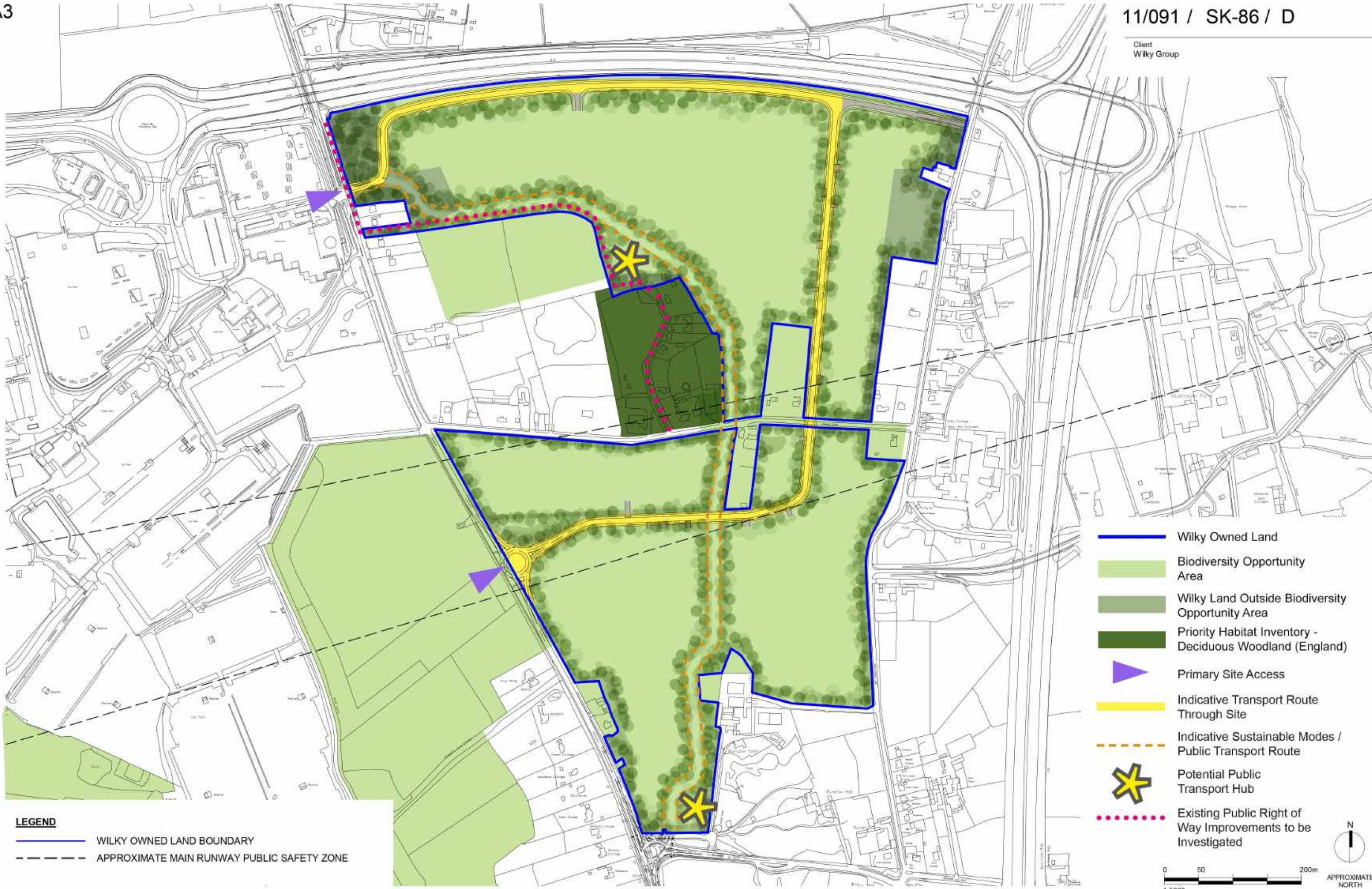
Key

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

Scale 1:10000



Client
Wilky Group



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



LYONS+SLEEMAN+HOARE | Architects

Nero Brewery, Cricket Green, Hartley Wintney, Hants RG27 8QA
tel: 01252 844144 www.lsharchitects.co.uk

| | | | | |
|----------------|----------|----------|------------------|-----------------------------------|
| 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 & 100016453

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.



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Appendix 2

Summary of Results from Site Constraints Analysis

| Suitable  | | Green Roof | Rainwater Harvesting | Soakaway | Permeable Paving | Filter Strip | Bioretention Area | Swale | Hardscape Storage | Underground Storage |
|--|--|---|---|--|---|---|---|---|---|--|
| Floodplain | Located in the Floodplain? |  |  |  |  |  |  |  |  |  |
| Groundwater | Groundwater less than 3 metres below ground surface? |  |  | |  With liner and underdrain (no treatment) |  With liner and underdrain (no treatment) |  With liner and underdrain (no treatment) |  With liner |  If aboveground |  In some areas |
| Topography | Sited on a flat site (<5% gradient) |  Source Control |  Source Control |  Source Control |  Source Control |  Source Control |  With short Kerb or rill length |  Careful to provide some gradient |  If terraced | |
| Soils and Geology | Impermeable soil type (e.g. clay-based type) |  |  | |  With underdrain (no treatment) |  |  |  |  |  |
| Contaminated Land | Are there contaminated soils on site? |  |  | |  With underdrain (no treatment) |  With liner |  With liner and underdrain |  With liner |  With Liner |  With Liner |
| Existing Infrastructure | Are there underground utilities in the SuDS area? |  |  |  |  |  |  Possible with structural grid in soil over utilities |  |  |  |
| Space Constraints | Limited space for SuDS components? |  |  |  |  |  |  |  |  |  |
| Runoff Characteristics | Suitable for inclusion in high risk contamination areas? |  Source Control |  Source Control |  |  |  |  |  |  |  |
| Protected Species or Habitat | Proximity to designated sites |  |  |  |  |  |  |  |  |  |

| Suitable  | | Green Roof | Rainwater Harvesting | Soakaway | Permeable Paving | Filter Strip | Bioretention Area | Swale | Hardscape Storage | Underground Storage |
|--|---|---|----------------------|----------|------------------|--------------|-------------------|-------|-------------------|---------------------|
| | and priority habitats? | | | | | | | | | |
| Ownership and Maintenance | Can the feature be designed for adoption? |  | | | | | | | | |



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Appendix 3

| | | |
|---|---|---|
| Clarke Bond UK Ltd | | Page 1 |
| 129 Cumberland Road Bristol BS1 6UY | B05268-001 Gatwick Green Greenfield Run-off Rates |  |
| Date 12/04/2021 11:23 File | Designed by DH Checked by | |
| Micro Drainage | Source Control 2020.1 | |

ICP SUDS Mean Annual Flood

Input

| | | | |
|-----------------------|--------|---------------|----------|
| Return Period (years) | 100 | Soil | 0.450 |
| Area (ha) | 47.000 | Urban | 0.000 |
| SAAR (mm) | 838 | Region Number | Region 6 |

Results l/s

| | |
|------------|-------|
| QBAR Rural | 254.9 |
| QBAR Urban | 254.9 |
| Q100 years | 813.0 |
| Q1 year | 216.6 |
| Q30 years | 577.6 |
| Q100 years | 813.0 |

Quick Storage Estimate

Micro Drainage

Variables

FSR Rainfall

Return Period (years)

Region

Map

Ratio R

Cv (Summer)

Cv (Winter)

Impermeable Area (ha)

Maximum Allowable Discharge (l/s)

Infiltration Coefficient (m/hr)

Safety Factor

Climate Change (%)

Analyse OK Cancel Help

Quick Storage Estimate

Micro Drainage

Results

Global Variables require approximate storage of between 19277 m³ and 27126 m³.

These values are estimates only and should not be used for design purposes.

Analyse OK Cancel Help



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Appendix 4

Thames Water
 Developer Services
 Clearwater Court
 Vastern Road
 Reading
 RG1 8DB

B05268/SD1

12th March 2021

Dear Thames Water,

Re: Thames Water Foul Drainage Capacity/Infrastructure Enquiry, Crawley, West Sussex

Clarkebond (UK) Ltd (CB) has been requested by our client “The Wilky Group Ltd.” (TWG) to consult with Thames Water about the availability of foul drainage capacity at their Gatwick Green site in Crawley, West Sussex.

The Gatwick Green Proposal is a mixed-use development to deliver c.178,590sqm of B8/B2 industrial / logistics / storage uses on land currently allocated for the comprehensive development of an industrial-led Strategic Employment Location in Policy EC4 – Strategic Employment Location of the latest Draft Crawley Borough Council Local Plan (CBLP) 2021-2037. The Gatwick Green site is on predominantly undeveloped Greenfield land, located approximately 800m east of Gatwick Airport, West Sussex and at National Grid Reference (NGR) TQ 29992 41345.

We understand that Thames Water are supportive in principle of Policy IN1 and paragraph 8.10 of the Draft Local Plan, but consider that there should be specific mention in the Policy of wastewater/sewerage infrastructure to ensure that growth is aligned with delivery of additional capacity at Crawley wastewater treatment works. We also understand that in order to ensure delivery of the planned growth in the Local Plan and the longer lead-in times that improvements to the sewerage and water network assets for the planning and delivery of any upgrade require, that it is your wish to encourage developers to contact the water/wastewater company as early as possible to discuss their development proposals and intended delivery programme to assist with identifying any potential water and wastewater network reinforcement requirements.

TWG Ltd fully recognise that water and wastewater infrastructure is essential to any development and that failure to ensure that any required upgrades to the infrastructure network are delivered alongside development, could result in adverse impacts in the form of internal and external sewer flooding and pollution of land and watercourses and/or low water pressure. We also understand that upgrades to STWs etc are funded through customers’ bills and the 5 yearly Asset Management Plans (AMPs).

Under the Water Industry Act 1991 (amended by the Water Industry Act 1999), developers have an automatic right to connect to the sewer network, but it is generally acknowledged that Thames Water cannot reserve capacity for a particular development in advance; although based on our combined experience and knowledge we understand that it is very rare that sufficient capacity is not available, as regular adjustments are made to existing plant.

The purpose of this letter is therefore to open this early initial dialogue with Thames Water as the wastewater infrastructure provider to confirm the following:

Bristol, Exeter, London



clarkebond

- Whether there is enough capacity within the existing foul drainage network and infrastructure including the Crawley sewage treatment works to accommodate the above Proposal based on a near-term 2022-26 delivery timeframe, which is our targeted programme.
- Whether Thames Water have planned foul drainage capacity/infrastructure upgrade or new infrastructure investment planned for this area of interest and the delivery timeframe.
- Whether there are any other significant issues, constraints or limiting factors that are currently adversely impacting on the performance and effective delivery of foul drainage in the Crawley Area that will or can impact on our delivery.

We look forward to hearing from you soon on these and any other related matter that you believe we should to be aware of.

Thank you.

Yours faithfully

For and on behalf of Clarkebond (UK) Limited



Seymour D'Oyley

Associate Director (Hydrology & Flood Risk)



Seymour D'Oyley
The Cocoa House
129 Cumberland Road
Bristol
BS1 6UY

DS6082484

06 April 2021

Pre-planning enquiry: Confirmation of sufficient capacity

Dear Seymour

Thank you for providing information on your development: DS6082751 PDEV RH6 9SZ
GATWICK GREEN

We acknowledge the likely split of flow to the 3 connection points proposed, we have 150mm diameter foul gravity networks in this area, and no likely effluent discharge needing a license, the minimal discharge from industrial, logistics, storage units domestic load, would not be of concern to us, as the minimal flow would not be a problem to our sewer network or treatment capacity as proposed.

Just confirming pre-planning enquiry foul water discharge to Thames Water foul water sewer gravity discharge for industrial, logistics, storage units domestic load properties and Surface water not to our sewer.

We have completed the assessment of the foul water flows based on the information submitted in your application with the purpose of assessing sewerage capacity within the existing Thames Water sewer network.

If your proposals progress in line with the details you've provided, we're pleased to confirm that there will be sufficient sewerage capacity in the adjacent **foul water** sewer network to serve your development.

This confirmation is valid for 12 months or for the life of any planning approval that this information is used to support, to a maximum of three years.

You'll need to keep us informed of any changes to your design – for example, an increase in the number or density of homes. Such changes could mean there is no longer sufficient capacity.

Surface Water

In accordance with the Building Act 2000 Clause H3.3, positive connection of surface water to a public sewer will only be consented when it can be demonstrated that the hierarchy of disposal methods have been examined and proven to be impracticable. Before we can consider your surface water needs, you'll need written approval from the lead local flood authority that you have followed the sequential approach to the disposal of surface water and considered all practical means.

The disposal hierarchy being:

1. store rainwater for later use.

2. use infiltration techniques where possible.
3. attenuate rainwater in ponds or open water features for gradual release.
4. attenuate rainwater by storing in tanks or sealed water features for gradual release.
5. discharge rainwater direct to a watercourse.
6. discharge rainwater to a surface water sewer/drain.
7. discharge rainwater to the combined sewer.
8. discharge rainwater to the foul sewer

Where connection to the public sewerage network is still required to manage surface water flows we will accept these flows at a discharge rate in line with CIRIA's best practice guide on SuDS or that stated within the sites planning approval.

If the above surface water hierarchy has been followed and if the flows are restricted then Thames Water would not have any objections to the proposal.

Please see the attached 'Planning your wastewater' leaflet for additional information.

What happens next?

Please make sure you submit your connection application, giving us at least 21 days' notice of the date you wish to make your new connection/s.

If you've any further questions, please contact me on 020 3577 9228.

Yours sincerely

Many Thanks

Kind Regards

Geoff Nokes

Adoption Engineer

Developer Services – Adoptions Engineer, Sewer Adoptions Team

Office: 0800 0093921

geoff.nokes@thameswater.co.uk

Get advice on making your sewer connection correctly at connectright.org.uk Find us online at developers.thameswater.co.uk



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Appendix 4

Addendum: Updated Preliminary Ecological Appraisal



GatwickGreen

WHERE THE FUTURE WORKS

**GATWICK GREEN, CRAWLEY, WEST
SUSSEX**

**ADDENDUM TO UPDATED PRELIMINARY
ECOLOGICAL APPRAISAL**

A Report to: Savills

Report No: RT-MME-154978-01

Date: June 2021



Triumph House, Birmingham Road, Allesley, Coventry CV5 9AZ

Tel: 01676 525880 Fax: 01676 521400

E-mail: admin@middlemarch-environmental.com Web: www.middlemarch-environmental.com

REPORT VERIFICATION AND DECLARATION OF COMPLIANCE

| Report Version | Date | Completed by: | Checked by: | Approved by: |
|----------------|------------|---|---|--|
| Final | 17/06/2021 | Hannah Train ACIEEM (Principal Consultant) | Tom Docker CEcol MCIEEM (Managing Director) | Colin Bundy MCIEEM (Associate Director) |

The information which we have prepared is true, and has been prepared and provided in accordance with the Chartered Institute of Ecology and Environmental Management's Code of Professional Conduct. We confirm that the opinions expressed are our true and professional bona fide opinions.

DISCLAIMER

The contents of this report are the responsibility of Middlemarch Environmental Ltd. It should be noted that, whilst every effort is made to meet the client's brief, no site investigation can ensure complete assessment or prediction of the natural environment.

Middlemarch Environmental Ltd accepts no responsibility or liability for any use that is made of this document other than by the client for the purposes for which it was originally commissioned and prepared.

1. INTRODUCTION

- 1.1 This Note is an Addendum to the report by Middlemarch Environmental Ltd (MEL) entitled 'Gatwick Green, Crawley, West Sussex: Updated Preliminary Ecological Appraisal' dated 27 February 2020 (2020 PEA) on behalf of the Wilky Group (TWG). TWG has a long-standing interest in the promotion of strategic employment land within the Crawley Borough Council (CBC) area; a site known as Gatwick Green. Gatwick Green is proposed for a comprehensive industrial-led development of predominantly storage and distribution uses.

2. SITE AND PROJECT BACKGROUND

- 2.1 The allocated site extends to 47 ha (116 acres) of land east of Gatwick Airport as shown on the plan at **Appendix 1** (Gatwick Green / the Site). Gatwick Green is allocated as an industrial-led Strategic Employment Location for a minimum of 24.1 ha under policies EC1 and EC4. Policy EC4 makes provision, where evidenced, for additional industrial land beyond this amount. Limited complementary ancillary uses are provided for such as offices and small scale convenience retail and leisure facilities that would support the industrial-led function. Policy EC4 goes on to set out a range of development management provisions relating to transport and access, sustainable design and construction, digital technology and character and design, with further requirements related to the assessment of economic impacts and arrangements for delivery. These provisions establish the scope and nature of the associated infrastructure requirements and environmental considerations, which combined with other policies in the DCBLP, are designed to ensure that the site is developed in a sustainable manner.
- 2.2 The 2020 Regulation 19 DCBLP removed blanket safeguarding for the additional wide-spaced runway at Gatwick Airport, replacing it with a commitment to prepare an Area Action Plan (AAP) under Policy SD3 over the former safeguarded land and within which a temporary safeguarding arrangement was proposed. The AAP would be advanced via a separate Development Plan Document to address Crawley's unmet needs for employment, housing and community uses alongside any legitimate long term development needs of Gatwick Airport. Following advice from the Planning Inspectorate, the Council revised its strategy by reviewing the extent of safeguarding, that in turn allowed for the identification of a Strategic Employment Location at Gatwick Green. The 2021 Regulation 19 DCBLP therefore allocates Gatwick Green as an industrial-led development site under policies EC1 and EC4, with safeguarded land retained outside the allocation to accommodate an additional wide-spaced runway and associated airport infrastructure.

3. REVIEW OF 2020 PRELIMINARY ECOLOGICAL APPRAISAL

- 3.1 The 2020 PEA provided an assessment of the ecology on the Site to inform its promotion for employment purposes by TWG. This Addendum provides an update to the 2020 PEA in response to the changed planning policy status of the Site, being its proposed allocation for employment development in the DCBLP.

- 3.2 Based on the changed planning policy status of the site, MEL has reviewed the scope and nature of the ecological investigations / surveys undertaken to inform the 2020 PEA. The 2020 PEA was informed by a desk study exercise and survey work (Phase 1 Habitat Survey) undertaken in November 2019: the survey covered broadly the same area of land now being proposed as an allocation.
- 3.3 At the time of the Phase 1 Habitat Survey in November 2020, the site comprised multiple fields of improved and semi-improved grassland, which were bound by a network of hedgerows, ditches and trees. Small areas of semi-natural broad-leaved woodland and scrub were also present.
- 3.4 The key ecological features identified within or surrounding the site include the 'Gatwick Green' Biodiversity Opportunity Area, ancient woodland sites, Habitats of Principal Importance for Nature Conservation in England (woodland and hedgerows), and other valuable habitats (semi-mature and mature trees and ditches). The habitats on site have the potential to support a range of protected/notable species, including bats, terrestrial mammals, amphibians, reptiles and birds.

4. CONCLUSION

- 4.1 MEL confirms that the survey work remains in date and that consequently, the conclusions and recommendations in the 2020 PEA remain valid as a basis for the consideration of the proposed allocation of Gatwick Green in the DCBLP through the forthcoming Examination. Consequently, the 2020 PEA remains a valid part of TWG's evidence base and that of the DCBLP, supplemented by this Addendum.

APPENDICES

Appendix 1 Gatwick Green – Site Plan

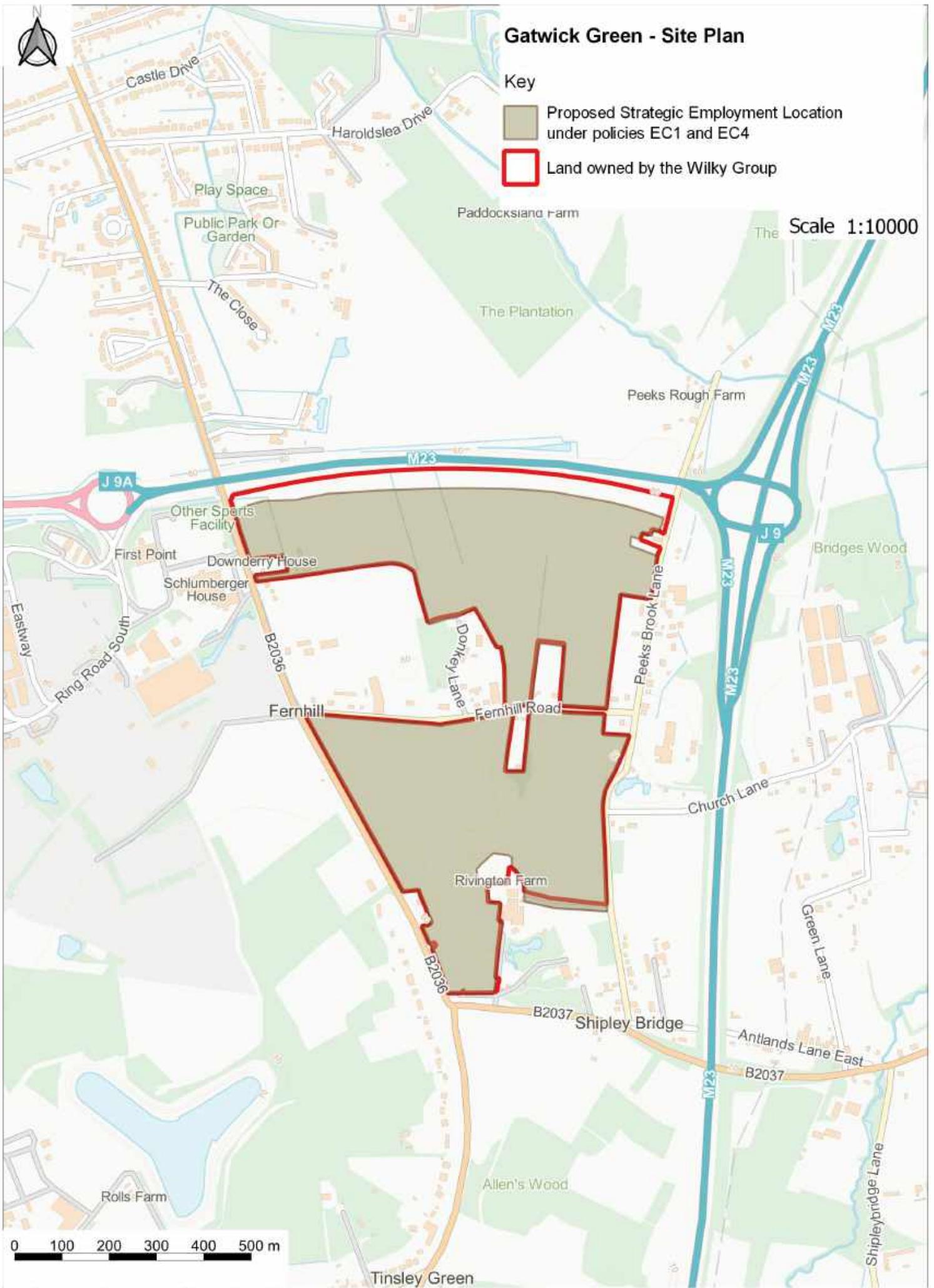


Gatwick Green - Site Plan

Key

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

Scale 1:10000



Appendix 5

Addendum: Hedgerow Regulations (1997) Assessment



GatwickGreen

WHERE THE FUTURE WORKS

**GATWICK GREEN, CRAWLEY, WEST
SUSSEX**

**ADDENDUM TO HEDGEROW REGULATIONS
(1997) ASSESSMENT**

A Report to: Savills

Report No: RT-MME-154978-02

Date: June 2021



Triumph House, Birmingham Road, Allesley, Coventry CV5 9AZ
Tel: 01676 525880 Fax: 01676 521400

E-mail: admin@middlemarch-environmental.com Web: www.middlemarch-environmental.com

REPORT VERIFICATION AND DECLARATION OF COMPLIANCE

| Report Version | Date | Completed by: | Checked by: | Approved by: |
|----------------|------------|---|---|--|
| Final | 17/06/2021 | Hannah Train ACIEEM (Principal Consultant) | Tom Docker CEcol MCIEEM (Managing Director) | Colin Bundy MCIEEM (Associate Director) |

The information which we have prepared is true, and has been prepared and provided in accordance with the Chartered Institute of Ecology and Environmental Management's Code of Professional Conduct. We confirm that the opinions expressed are our true and professional bona fide opinions.

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The contents of this report are the responsibility of Middlemarch Environmental Ltd. It should be noted that, whilst every effort is made to meet the client's brief, no site investigation can ensure complete assessment or prediction of the natural environment.

Middlemarch Environmental Ltd accepts no responsibility or liability for any use that is made of this document other than by the client for the purposes for which it was originally commissioned and prepared.

1. INTRODUCTION

- 1.1 This Note is an Addendum to the report by Middlemarch Environmental Ltd (MEL) entitled 'Gatwick Green, Crawley, West Sussex: Hedgerow Regulations (1997) Assessment' dated 27 February 2020 (2020 HRE) on behalf of the Wilky Group (TWG). TWG has a long-standing interest in the promotion of strategic employment land within the Crawley Borough Council (CBC) area; a site known as Gatwick Green. Gatwick Green is proposed for a comprehensive industrial-led development of predominantly storage and distribution uses.

2. SITE AND PROJECT BACKGROUND

- 2.1 The allocated site extends to 47 ha (116 acres) of land east of Gatwick Airport as shown on the plan at **Appendix 1** (Gatwick Green / the Site). Gatwick Green is allocated as an industrial-led Strategic Employment Location for a minimum of 24.1 ha under policies EC1 and EC4. Policy EC4 makes provision, where evidenced, for additional industrial land beyond this amount. Limited complementary ancillary uses are provided for such as offices and small scale convenience retail and leisure facilities that would support the industrial-led function. Policy EC4 goes on to set out a range of development management provisions relating to transport and access, sustainable design and construction, digital technology and character and design, with further requirements related to the assessment of economic impacts and arrangements for delivery. These provisions establish the scope and nature of the associated infrastructure requirements and environmental considerations, which combined with other policies in the DCBLP, are designed to ensure that the site is developed in a sustainable manner.
- 2.2 The 2020 Regulation 19 DCBLP removed blanket safeguarding for the additional wide-spaced runway at Gatwick Airport, replacing it with a commitment to prepare an Area Action Plan (AAP) under Policy SD3 over the former safeguarded land and within which a temporary safeguarding arrangement was proposed. The AAP would be advanced via a separate Development Plan Document to address Crawley's unmet needs for employment, housing and community uses alongside any legitimate long term development needs of Gatwick Airport. Following advice from the Planning Inspectorate, the Council revised its strategy by reviewing the extent of safeguarding, that in turn allowed for the identification of a Strategic Employment Location at Gatwick Green. The 2021 Regulation 19 DCBLP therefore allocates Gatwick Green as an industrial-led development site under policies EC1 and EC4, with safeguarded land retained outside the allocation to accommodate an additional wide-spaced runway and associated airport infrastructure.

3. REVIEW OF 2020 HEDGEROW REGULATIONS (1997) ASSESSMENT

- 3.1 The 2020 HRE provided an assessment of the hedgerows on the Site to inform its promotion for employment purposes by TWG. This Addendum provides an update to the 2020 HRE in response to the changed planning policy status of the Site, being its proposed allocation for employment development in the DCBLP.

- 3.2 Based on the changed planning policy status of the site, MEL has reviewed the scope and nature of the hedgerow surveys undertaken to inform the 2020 HRE. The 2020 HRE was informed by survey work undertaken in November 2019: the survey covered broadly the same area of land now being proposed as an allocation.
- 3.3 At the time of the survey in November 2020, a total of 14 hedgerows considered suitable for assessment under the Hedgerow Regulations (1997) were identified on site. The majority of these hedgerows were frequently managed and species-poor, typical of arable field boundaries or roadsides. The hedgerows tended to have an impoverished hedge ground flora, often as a result of nutrient enrichment from agricultural and highways runoff. Following an assessment against the wildlife and landscape criteria detailed in the Hedgerow Regulations (1997), two hedgerows (H1 and H2) were deemed to be 'important'. Both hedgerows satisfied the criteria relating to the number of woody species recorded and the criteria for associated features.

4. CONCLUSION

- 4.1 MEL confirms that the survey work remains in date and that consequently, the conclusions and recommendations in the 2020 HRE remain valid as a basis for the consideration of the proposed allocation of Gatwick Green in the DCBLP through the forthcoming Examination. Consequently, the 2020 HRE remains a valid part of TWG's evidence base and that of the DCBLP, supplemented by this Addendum.



APPENDICES

Appendix 1 Gatwick Green – Site Plan

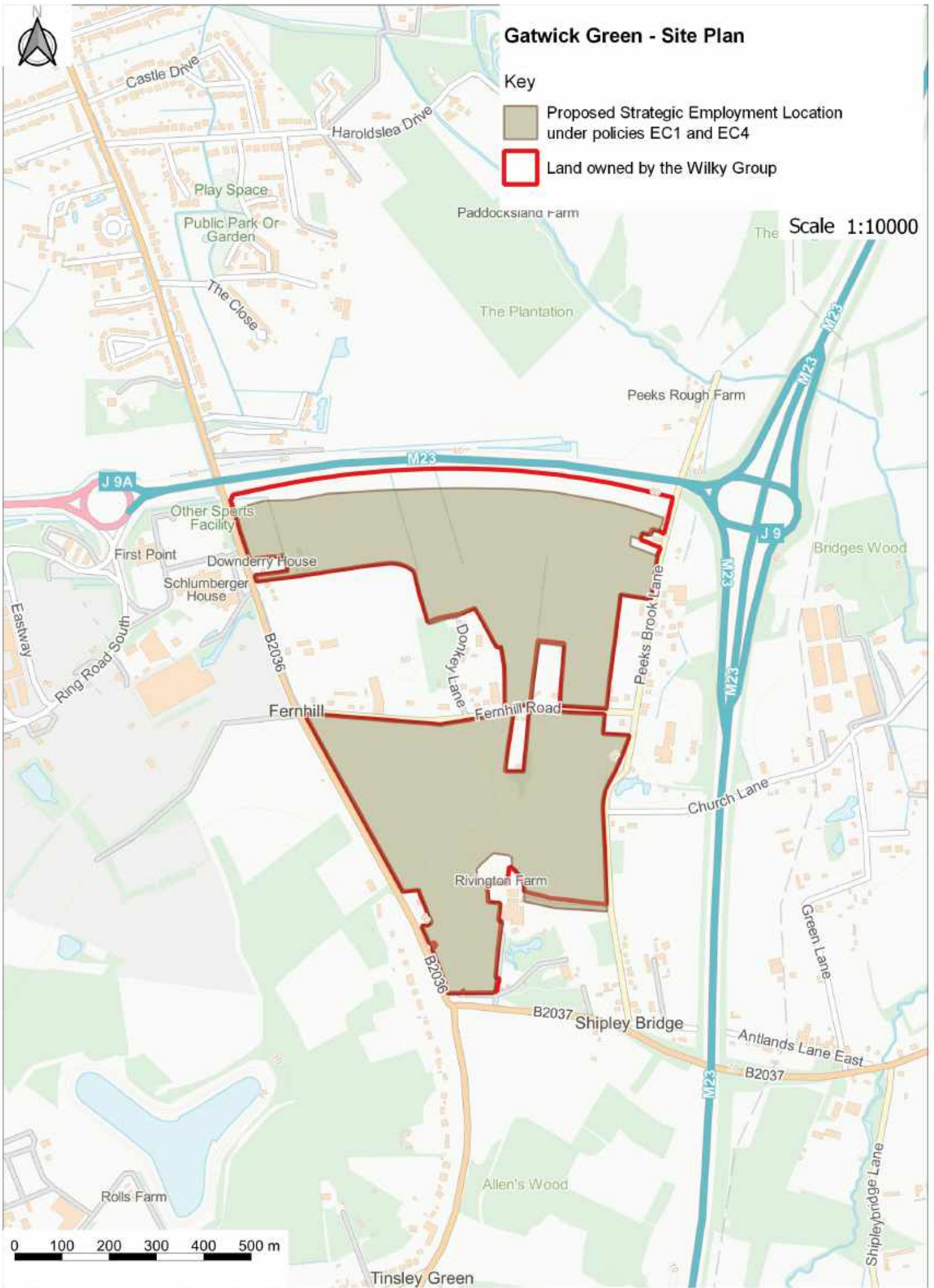


Gatwick Green - Site Plan

Key

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

Scale 1:10000



Appendix 6

Addendum: Landscape Character & Visual Appraisal



GatwickGreen

WHERE THE FUTURE WORKS



Landscape Addendum

(To the Landscape Character & Visual Appraisal of January 2020)

Gatwick Green, Land off Balcombe Road & Fernhill Road, Crawley

**Prepared on behalf of:
The Wilky Group**

Ref: 2893-RE-02C-DACR

Date: June 2021

GATWICK GREEN, LAND OFF BALCOMBE ROAD & FERNHILL ROAD, CRAWLEY
ADDENDUM TO THE LANDSCAPE CHARACTER & VISUAL IMPACT ASSESSMENT

1. INTRODUCTION

- 1.1 This document has been prepared by landscape consultants Allen Pyke Associates (APA) to update, and identify, any changes to the baseline information and result conclusions reached in their report entitled 'Landscape Character and Visual Appraisal: Gatwick Green, Land off Balcombe Road & Fernhill Road, Crawley' dated January 2020 (2020 LCVA) produced on behalf of the Wilky Group (TWG).
- 1.2 TWG has a long-standing interest in the promotion of strategic employment land within the Crawley Borough Council (CBC) area. The site extends to about 47 ha (116 acres) of land east of Gatwick Airport - the site known as Gatwick Green (as shown on the plan at **Appendix 1**). The Site is proposed for allocation as a Strategic Employment Location (SEL) in the draft Crawley Borough Local Plan, January 2021 (DCBLP) and is identified under Policy EC1 and Policy EC4 as an industrial-led scheme, predominantly for B8 use (strategic storage and distribution). The extent of the allocation for Gatwick Green provides for a minimum of 24.1 ha of industrial development.
- 1.3 The 2020 LCVA provided an assessment of the landscape and visual considerations relating to the Site to inform the promotion of Gatwick Green for employment purposes. The 2020 version of the DCBLP identified the Site as part of a wider area proposed for an Area Action Plan (AAP) to address the Borough's future urban growth and community needs alongside the future needs of Gatwick Airport.
- 1.4 The basis for this Addendum is the revised planning status of the Site under the DCBLP as compared to the policy framework in the January 2020 version of the Plan and what was being promoted by TWG at that time. TWG is now promoting a development for predominately storage and distribution uses in line with policies EC1 and EC4 of the DCBLP.
- 1.5 Based on the changed planning policy status of the site, APA has reviewed the scope and nature of the landscape and visual investigations/surveys undertaken for the 2020 LCVA, which was informed by survey work undertaken in November 2019. The original baseline landscape studies covered broadly the same area of land now being proposed as an allocation. APA confirms that the survey work remains up to date. Consequently, the conclusions and recommendations in the 2020 LCVA remain valid as a basis for the consideration of the proposed allocation of Gatwick Green in the DCBLP though the forthcoming Examination. The 2020 LCVA, supplemented by this Addendum, therefore remains a valid part of TWG's evidence base for their DCBLP submissions.

2. CHANGE IN PLANNING POLICY

Change in Policy between the 2020 and 2021 Regulation 19 DCBLP

- 2.1 The 2020 Regulation 19 DCBLP removed blanket safeguarding for the additional wide-spaced runway at Gatwick Airport, replacing it with a commitment to prepare an Area Action Plan (AAP) under Policy SD3 over the former safeguarded land and within which a temporary safeguarding arrangement was proposed.
- 2.2 The AAP would have been advanced via a separate Development Plan Document to address Crawley's unmet needs for employment, housing and community uses alongside any legitimate long term development needs of Gatwick Airport. Following advice from the Planning Inspectorate, the Council revised its strategy by reviewing the extent of safeguarding, which in turn allowed the identification of a Strategic Employment Location at Gatwick Green.
- 2.3 The 2021 Regulation 19 DCBLP therefore allocates Gatwick Green as an industrial-led development site under policies EC1 and EC4, with safeguarded land retained outside the allocation to accommodate an additional wide-spaced runway and associated airport infrastructure.

New Crawley BC Policy Framework

- 2.4 Gatwick Green is allocated as an industrial-led Strategic Employment Location for a minimum of 24.1 hectares under policies EC1 and EC4.
- 2.5 Policy EC4 makes provision for additional industrial land beyond this amount. Limited complementary ancillary uses, such as offices and small scale convenience retail and leisure facilities, may be included where they would support the industrial-led function.
- 2.6 Policy EC4 goes on to set out a range of development management provisions, such as access, sustainable design and construction, character and design, and arrangements for delivery. These provisions establish the scope and nature of the associated infrastructure requirements and environmental considerations, which combined with other policies in the DCBLP to ensure the site is developed in a sustainable manner.

3. METHODOLOGY

- 3.1 The methodology used for the review in this Addendum follows the same principles as those used in the 2020 LCVA. These are taken from the recognised Landscape Institute & IEMA publication 'Guidelines for Landscape & Visual Impact Assessment, 3rd Edition of 2013 (GLVIA3).

4. REVISED PROPOSALS

- 4.1 The amended proposals and development principles are broadly similar to those assessed in the 2020 LCVA. The principal difference being the substitution of a mixed B1,B2, B8 development for a scheme consisting predominantly of B8 units.

5. LANDSCAPE & OTHER CONSIDERATIONS

Landscape Character & Visual Amenity [LCVA 3.34 to 3.49]

- 5.1 The overall massing of the storage and distribution units within the site will be similar for the surrounding visual receptors and other viewpoints identified in the 2020 LCVA. The only significant change will be more uniform building heights compared to the mixed business proposal TWG promoted via its Reg 19 representations to the DCBLP 2020. The 2020 LCVA therefore considered a greater potential range in unit heights that included landmark buildings of greater height.

- 5.2 The more uniform building heights will assist the landscape mitigation principles recommended in the 2020 LVCA [4.1 to 4.7] and bring forward the effectiveness of the screening proposals and assimilation of the development into the landscape. Therefore, the new proposals will have no greater visual impact on the neighbouring visual receptors or impact on the character of the various adjacent rural and urban landscapes.

Landscape Designations [LVIA 3.26 to 3.28]

- 5.3 The 2020 LCVA demonstrated that the site was not subject to any statutory or local landscape designations, that it was located outside the London Metropolitan Green Belt but was identified as a Biodiversity Opportunity Area. These circumstances remain unchanged in April 2021.

Local Planning Policies [LCVA 3.16 to 3.25]

- 5.4 The landscape related planning policies in the adopted and emerging Local Plans identified in the 2020 LCVA have not changed and the conclusions reached on these policies therefore remain valid.

6. CONCLUSION



- 6.1 The landscape and visual conclusions and recommendations included in the 2020 LCVA [5.1 to 5.17] remain valid as a basis for consideration of the proposed allocation of Gatwick Green in the DCBLP and, with the support of this Addendum, remain a valid part of the TWG evidence base for their DCBLP submissions.

APPENDIX 1

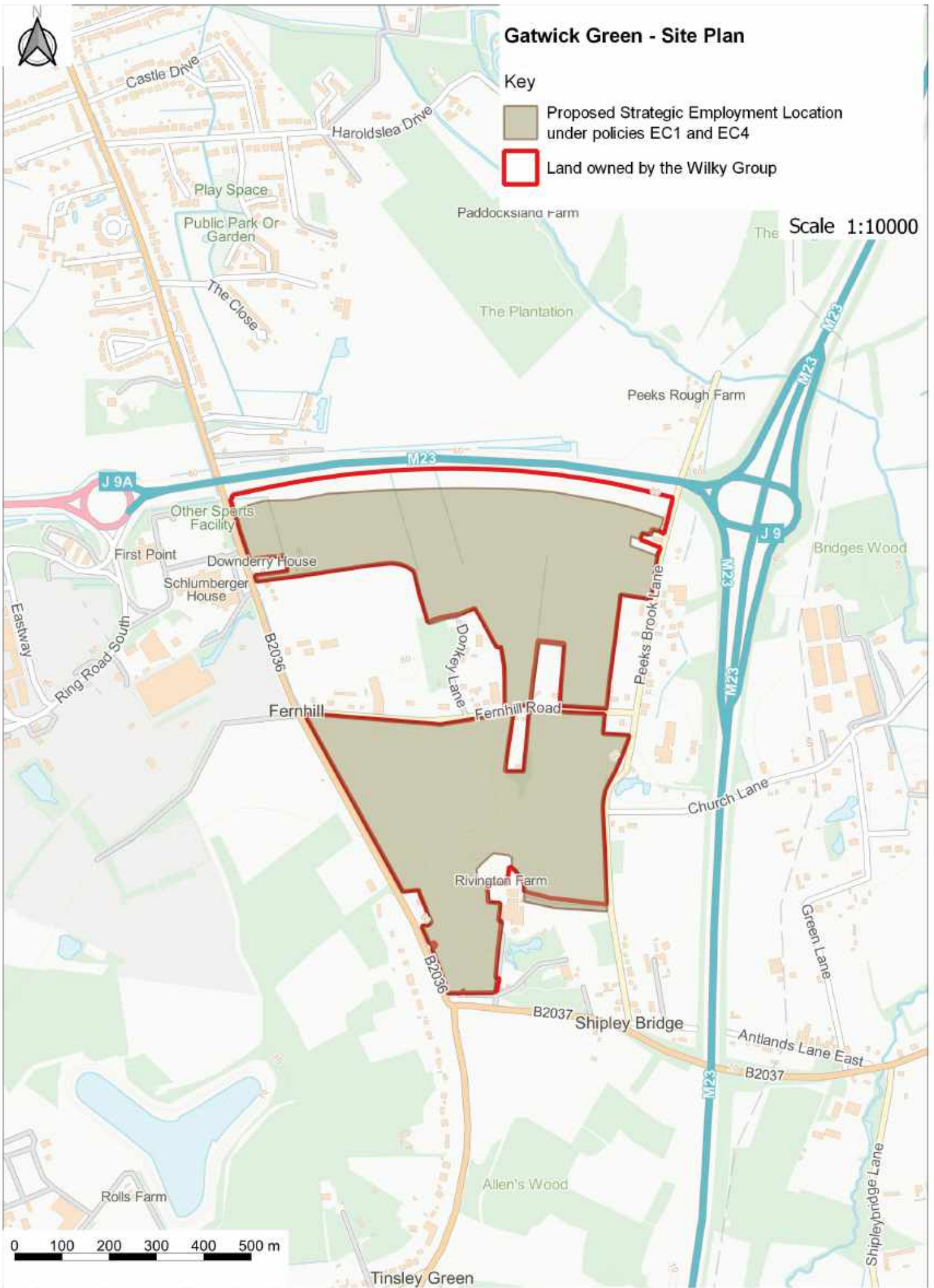


Gatwick Green - Site Plan

Key

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

Scale 1:10000



Appendix 7

Addendum: Heritage Constraints Appraisal



GatwickGreen

WHERE THE FUTURE WORKS

Gatwick Green

Heritage Constraints Appraisal Addendum



Gatwick Green
Heritage Constraints Appraisal Addendum



Project: Gatwick Green - Heritage Constraints Appraisal Addendum

Client: The Wilky Group Limited

Revision: 002 (Second issue – following client comments)

File Origin: 2. National\West Sussex\Gatwick Green

Document Checking:

Prepared by: Harry Clarke
Associate, Heritage Planning

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Approved by: Juan Jose Sarralde, PhD
Associate Director, Heritage Planning

Signed:

A handwritten signature in black ink, appearing to be "JJSarralde".



Contents

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| 1.0 | Project background | - 5 - |
| 2.0 | Planning context | - 6 - |
| 3.0 | Conclusion | - 13 - |

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| Abbreviations and Conventions used in the text | | |
|--|-----------------------------|--|
| c. | circa | km kilometres |
| CA | Conservation Area | LB Listed Building |
| ha | hectares | LPA Local Planning Authority |
| HA | Heritage Asset | m metres |
| HE | Historic England | NGR National Grid Reference |
| HER | Historic Environment Record | NHLE National Heritage List for England |
| | | NPPG National Planning Practice Guidance |
| | | NPPF National Planning Policy Framework |

Assumptions and Limitations

This report is compiled using primary and secondary information derived from a variety of sources, only some of which have been directly examined. The assumption is made that this data, as well as that derived from other secondary sources, is reasonably accurate.

Compliance

This document has been prepared in accordance with the requirements stated within the National Planning Policy Framework (NPPF; (Ministry of Housing, Communities & Local Government, 2019) National Planning Practice Guidance (NPPG; (Ministry of Housing, Communities & Local Government, 2019) and the Chartered Institute for Archaeologists' Standard and guidance for historic environment desk-based assessment, and Standard and guidance for commissioning work on, or providing consultancy advice on, archaeology and the historic environment (Chartered Institute for Archaeologists, December 2017).

1.0 Project background

- 1.1.1 Savills Heritage and Townscape was commissioned by The Wilky Group Limited to carry out a Heritage Constraints Appraisal (HCA) in regard to the potential development of a Site at Gatwick Green, Crawley.
- 1.1.2 This Note is an Addendum to the report by Savills Heritage entitled 'Gatwick Green: Heritage Constraints Appraisal' dated January 2020 (2020 HCA) on behalf of The Wilky Group (TWG). TWG has a long-standing interest in the promotion of strategic employment land within the Crawley Borough Council (CBC) area; a site known as Gatwick Green. The original HCA constituted a preliminary scoping report for the client, outlining the likely considerations to future scheme options in terms of buried heritage assets (archaeological remains) and above ground assets (standing buildings of historic interest and their setting). Such assets, whether designated or not, are afforded protection and can represent a planning constraint to future development.
- 1.1.3 TWG owns about 47 ha (116 acres) of land east of Gatwick Airport as shown on the plan attached to this Addendum (along with the original HCA). The Site is a proposed allocation as a Strategic Employment Location (SEL) in the draft Crawley Borough Local Plan, January 2021 (DCBLP) under Policy EC1 and Policy EC4 for an industrial-led scheme, predominantly for B8 use (strategic storage and distribution). The extent of the allocation for Gatwick Green is identified on the attached plan – it provides for a minimum of 24.1 ha of industrial development.
- 1.1.4 The 2020 HCA provided an assessment of the hedgerows on the Site to inform its promotion for employment purposes by TWG. The 2020 version of the DCBLP identified the Site as part of a wider area proposed for an Area Action Plan (AAP) to address future urban growth and community needs alongside the future needs of Gatwick Airport. This Addendum provides an update to the 2020 HCA in response to the changed planning policy status of the Site, being its proposed allocation for employment development in the DCBLP.
- 1.1.5 The basis of this Addendum is the revised planning status of the Site under the DCBLP as compared to the policy framework in the January 2020 version of the Plan and what was being promoted by TWG at that time. TWG is now promoting a development for predominately storage and distribution uses in line with policies EC1 and EC4 of the DCBLP.

2.0 Planning context

- 2.1.1 The Site is located in West Sussex, in the borough of Crawley (and the current local planning policy context is covered in Appendix 1: Section 5.3 of the original HCA). The Development Plan for the area containing the Site comprises the adopted Crawley Borough Local Plan 2015 (CBLP), the Joint Minerals Local Plan (JMLP, July 2018) and the Waste Local Plan (WLP, April 2014).
- 2.1.2 The purpose of this Heritage Constraints Appraisal Addendum is to review the findings of the original Appraisal (Savills 2020) and report on whether the recommendation remain valid in the context of the Site's revised planning policy status as a proposed allocation for industrial uses, predominately B8 (storage and distribution).
- 2.1.3 The Reg 19 Draft Crawley Local Plan Regulation 19 consultation has been extended to 30 June 2021 and includes the following Strategic Policy in relation to Heritage Assets, which is reproduced in full below:

Strategic Policy HA1: Heritage Assets

Crawley's designated and non-designated heritage assets include:

- *Listed Buildings (see also Policy HA4);*
- *Scheduled Monuments (see also Policy HA7);*
- *Non-designated archaeological assets of equivalent significance to scheduled monuments (see also Policy HA7);*
- *Conservation Areas (see also Policy HA2);*
- *Locally Listed Buildings (see also Policy HA5)*
- *Areas of Special Local Character (see also Policy HA3);*
- *Historic Parks and Gardens (see also Policy HA6);*
- *Other non-designated assets with archaeological interest (see also Policy HA7).*

All development should respond to these as a finite resource, providing a distinctive combination of social, economic and environmental benefits. Proposals should seek to ensure that heritage assets' key features or significance are conserved and enhanced as a result of development.

Where a designated heritage asset is affected by a proposal, great weight will be given to its conservation, while harm to, or loss of, its significance will require justification according to the importance of the asset and the degree of loss or harm, in line with local and national policy.

Proposals affecting the significance of a non-designated heritage asset will be considered according to the scale of any harm or loss, and the asset's significance, in line with local and national policy. Where a development affects a heritage asset or the setting of a heritage asset, a Heritage Impact Assessment will be required. This should:

- i. for development proposals meeting criteria set out in the council's Local List of Planning Requirements: include, and be informed by, the findings of a search of the Historic Environment Record (HER) and/or an Archaeological Desk-based Assessment;*
- ii. in all cases: describe, with reference to relevant sources (such as the National Heritage List for England and Conservation Area Appraisals), the significance of any heritage assets affected and the contribution made by their setting, the impact of the development, and any measures adopted to ensure the heritage asset is respected, preserved or enhanced or, for exceptionally significant development, relocated.*

The loss or replacement of a heritage asset may be appropriate in exceptional circumstances, where justified in line with local and national policy on loss or harm, and where it has been demonstrated that:

- the site is essential to the development's success;*
- the benefits of the entire scheme outweigh the loss of the asset; and*
- any replacement scheme makes an equal contribution to local character and distinctiveness.*

In cases where a heritage asset is considered to be suitable for loss or replacement in accordance with local and national policy, and it has been demonstrated that its site is essential to the development's success, proposals will be subject to a requirement to record the asset(s) concerned. The scheme of investigation, including the Historic England Recording Level, is to be agreed with the council in advance of its implementation and will reflect the importance and nature of the asset and the impact of the proposal.

Applicants in such cases will also be required to notify any relevant parties including Historic England and submit their recording to the Historic Environment Record. Regeneration proposals that make sensitive use of heritage assets, particularly where these bring redundant or under used buildings or areas, especially any on Historic England's At Risk Register, into appropriate use will be encouraged.

2.1.4 The key heritage constraint on the Site is the Grade II statutory listed buildings (Old House and Lilac House), and the effects development might have on the setting of these building. The proposals must be sensitive to the context of the setting of the listed buildings in line with local and national policy and historic England guidance on setting.

2.1.5 In regards to archaeological remains here may be below-ground non-designated heritage assets associated with the previous historic farmsteads (which are visible on the historic OS maps). The LPA archaeological advisor is likely to require site based archaeological fieldwork, dependant on the

expected scheme impacts, in order to identify the nature and extent of any below ground non-designated heritage assets.

2.1.6 Also of relevance is Crawley Borough Council's recent consultation on 'Conservation areas and locally listed buildings', which is reflected in the Council's Heritage Assets Review, which forms part of the evidence base to the DCBLP. Overall, the Council propose to update the Local Heritage List (locally listed buildings) by the inclusion of around 60 additional buildings and the removal of 2 buildings currently on the list. The changes to Conservation Areas were not relevant to Gatwick Green. There are two locally listed buildings in Appendix A of the Heritage Assets Review which were not included in the explicit 'scoping out' of locally listed buildings in the 2020 HCA - these assets are some distance from the site and not considered to be relevant. However, there is one additional locally listed building which was not addressed in the 'scoping out' of locally listed buildings in the 2020 HCA because it wasn't listed at that time, namely Hamon Lodge (associated with Burstow Hall and north of Antlands Lane). Insofar as Burstow Hall was 'scoped out' in the 2020 HCA, the same would apply to the Lodge. Furthermore, Toovies Cottage, which was 'scoped out' in the 2020 HCA (as being too far from the site), has now been removed from the list of locally listed buildings.

2.1.7 There are no identified Areas of Special Local Character (Policy HA2) or conservation areas (Policy HA3) within the vicinity of the site, however, Policy HA4 concerns listed buildings and is reproduced in full below:

Policy HA4: Listed Buildings and Structures

To recognise the value of Listed Buildings (including Listed Structures) within Crawley, the council will ensure that any proposed works to them are consistent with the character, appearance and heritage interest of any statutory Listed Building/Structure, in line with national legislation, policy and guidance.

Any changes must preserve or enhance the design and character of the Listed Building and have regard to its historic and architectural significance. A Heritage Impact Assessment is required to be submitted demonstrating how proposals will protect the significance of the listed building, including its setting and its key features. Harm to, or loss of, the significance of a Listed Building will require clear and convincing justification, taking account of the grading of the building, and the degree of harm or loss, in line with national policy.

Substantial harm to, or total loss of, the significance of a Listed Building will require exceptional justification, including benefits that outweigh the harm or loss, and further demonstration of either:

a. the public and substantial nature of the benefits concerned; or,

b. the absence of an alternative use which averts the loss or harm and is consistent with:

- i. the nature of the Listed Building; or*
- ii. medium-term viability; or*
- iii. the extent of potential opportunities for grant-funding, or not-for-profit ownership.*

In cases where substantial loss or harm is justified, the council will require the building to have been recorded according to an agreed scheme of investigation which is proportionate to the importance of the Listed Building and the impact of the proposal. The record shall be submitted to the Historic Environment Record. Any development on the site of a demolished Listed Building must have regard to the character, form and heritage significance of the original building.

Development proposals involving ground works adjacent to or within the curtilage of a Listed Building will also need to respond to the site's archaeological potential in accordance with Policy HA7.

2.1.8 The LPA is likely to require a Heritage Statement as part of a planning application (the DCBLP refers to this as a Heritage Impact Assessment). The Heritage Statement will provide a detailed understanding of the heritage significance of the assets and assess the impact of the proposed scheme on that significance.

2.1.9 It is anticipated that the forthcoming development proposals will not physically impact any known built heritage assets, either statutory listed buildings or locally listed buildings. Therefore it is judged that the only potential development impact to the identified assets will be to a change in their setting. Upon reviewing the significance of heritage assets in the vicinity of the site based on statutory designation the key heritage constraint on the Site is the Grade II statutory listed buildings (Old House and Lilac House), and the effects development might have on the setting of these buildings.

2.1.10 Following the policy regarding listed buildings, Policy HA5 concerns locally listed buildings and is reproduced below:

Policy HA5: Locally Listed Buildings

All development will seek to secure the retention of Locally Listed Buildings. Development should also maintain features of interest, and respect or preserve the character or setting of the building.

Development proposals affecting a Locally Listed Building must demonstrate in the Heritage Impact Assessment that the proposals take account of its heritage significance, including its setting and any heritage interest falling within the following categories:

- i) Age;*
- ii) Authenticity;*
- iii) Aesthetic/Architectural Value;*

- iv) *Historic Value;*
- v) *Social/communal Value;*
- vi) *Group Value;*
- vii) *Landmark/Townscape Value;*
- viii) *Archaeological Interest.*

Proposals seeking the demolition or partial demolition of a Locally Listed Building may be acceptable in exceptional circumstances if the development proposals:

- a) reflect or retain the key features of the original building; and*
- b) significantly outweigh the merit of retaining of the original building with regard to social, economic and environmental benefit to the wider area.*

If demolition is seen to be acceptable, the building must first be recorded according to an agreed scheme of investigation which is proportionate to the importance of the Locally Listed Building and the impact of the proposal. The record must be submitted to the Historic Environment Record in consultation with the Local Authority.

- 2.1.11 There are several locally listed buildings in the immediate vicinity of the Site. Local listing is a way of acknowledging to owners and decision makers that the building is of value to the local scene, character or history. Whilst this designation holds less heritage significance than statutorily listed buildings it can nevertheless represent a constraint to future development.
- 2.1.12 The DCBLP states, in relation to locally listed buildings that “*take account of its heritage significance, including its setting and any heritage interest*”. Any forthcoming Heritage Statement (or Heritage Impact Assessment) must demonstrate that any proposed development has taken into account the historic, architectural, townscape and communal interest of any buildings that are likely to be affected (in line with DCBLP HA4).
- 2.1.13 There are no historic parks or gardens within the vicinity of the site (Policy HA6: Historic Parks and Gardens). However the site does have potential for remains of archaeological interest to be present below ground. Policy HA7 of the DCBLP relates to archaeological remains.

Policy HA7: Heritage Assets of Archaeological Interest

Development proposals in the vicinity of a Scheduled Monument, or any heritage asset with archaeological interest which is demonstrably of equivalent significance (i.e. 'designated' archaeological assets), will be expected to preserve or enhance the asset and its setting, including through the protection of the asset from disturbance associated with development activity, and through the avoidance of patterns of movement or land use which may cause harm to, or loss of, the significance of an asset over time. Development should identify and pursue opportunities to better reveal the significance of such assets.

Development proposals affecting designated archaeological assets should be supported by a Heritage Impact Assessment demonstrating an understanding of the asset's significance, and how this has informed compliance with the requirements identified above.

Any harm to, or loss of, the significance of any designated or non-designated archaeological heritage asset involved in a development proposal will be considered in line with national and local policy, according to the significance of the asset and the degree of loss or harm.

This consideration will extend to cover heritage assets which are identified, or whose significance is re-evaluated, during the planning and development processes. In order to facilitate this, applications meeting the following thresholds should be supported by an Archaeological Desk-Based Assessment:

- *ground works adjacent to or in the curtilage of a Listed Building;*
- *any activity within a Scheduled Monument;*
- *ground works within a Red Archaeological Notification Area;*
- *five or more residential units OR non-residential/mixed use development of over 0.2ha within an Amber Archaeological Notification Area;*
- *development outside an Archaeological Notification Area comprising 10 or more new units OR over 0.5ha of non-residential/mixed use development.*

Subject to the findings of a Desk-Based Assessment, the council may require field evaluation and the recording and publication of results. In some cases, the council may require assets to be preserved in situ or excavated.

2.1.14 No past archaeological investigations have been carried out within the Site and a total of seven archaeological investigations have been conducted within the study area, comprising both desk-based assessments along with archaeological fieldwork investigations. Having assessed the Historic Environment Record (HER) data it is considered that there is a low archaeological potential within the Site for buried remains dating from the prehistoric period to be present.

2.1.15 Through the assessment of previous archaeological investigations in the vicinity of the Site, it is deemed there is a moderate potential for Romano-British to post-medieval remains to be present, these are likely to comprise agricultural features which would only be of minor local significance. Overall these investigations in the vicinity of the site highlight varying levels of archaeological potential and it is

possible that finds of a later date may also be located within the proposed development area, possibly associated with the previous historic farmsteads (which are visible on the historic OS maps).

- 2.1.16 The LPA archaeological advisor is likely to require an full Archaeological Desk-based Assessment (ADBA) as part of a planning application. Moreover, due to the Site being located in a recognised historic landscape, the local authority may require an archaeological fieldwork evaluation which would assess the below ground potential for archaeological remains. Any archaeological work would need to be undertaken in accordance with an approved Written Scheme of Investigation (WSI) and could be carried out under the terms of a staged archaeological planning condition set out under the granting of planning consent.

3.0 Conclusion

3.1.1 This addendum confirms the overall conclusions and recommendations of the original HCA which has identified the key heritage considerations for the site in line with the DCBLP policies. The original HCA concluded that:

“There are two statutory listed buildings within the Site (Lilac cottage and Old cottage), there are several locally listed buildings in the immediate vicinity of the Site. The Historic Environment Record (HER) identifies several historic farmsteads to the south of the Site which may constitute undesignated heritage assets.

The statutory listed buildings of Lilac cottage and Old cottage are predominantly surrounded by mature vegetation with limited views looking south west across the open land to the north east. The locally listed buildings of the Poplars and Royal Oak House are also surrounded by mature vegetation; these assets have less weight in planning decisions than statutory protected assets, but nonetheless remain a consideration.

It is anticipated that future development would not materially impact these assets. However, any future development proposals would have to be sensitive to the setting of the statutory listed buildings as well as the Locally listed buildings in close proximity to the development area. The LPA may view the agricultural land surrounding these assets as a contributor to their significance.”

3.1.2 Embedded design mitigation is expected to be incorporated around and throughout the development and it is considered that any perceived harm to heritage significance via a change in setting of these statutory and locally listed buildings could be avoided or minimised by the subsequent detailed design, or outweighed by the public benefits of the scheme (in line with the NPPF).

3.1.3 Furthermore, in regards to archaeological considerations the original Appraisal concluded that :

“due to the Site being located in a recognised historic landscape, the local authority may require an archaeological fieldwork evaluation which would assess the below ground potential for archaeological remains.

It is proposed that any archaeological work would need to be undertaken in accordance with an approved Written Scheme of Investigation (WSI) and could be carried out under the terms of a staged archaeological planning condition set out under the granting of planning consent.”

3.1.4 As the Site is located in a recognised historic agricultural landscape, the local authority may require a preliminary archaeological evaluation of the Site, which would further assess the below ground potential for archaeological remains.

3.1.5 Overall, the LPA is likely to require a Heritage Statement (Heritage Impact Assessment) and a full Archaeological Desk-based Assessment as part of a planning application. An archaeological field

evaluation may be required by the LPA pre-determination of a planning application, but this will be based on the results of the full Archaeological Desk-based Assessment and will be the decision of the local authority archaeological advisors.

- 3.1.6 In regards to the DCBLP, the findings and recommendations of the original HCA remain valid in the context of the proposed consultation changes. The revisions to Conservation Areas are not within the vicinity of the Site and the locally listed buildings have already been captured in the 2020 HCA.
- 3.1.7 Savills Heritage and Townscape has reviewed its 2020 HCA in the context of the changed planning policy status of the site and the recent revisions contained in the Council's Heritage Assets Review. The 2020 HCA was informed by desk-based investigations undertaken in November 2019: the investigations covered broadly the same area of land now being proposed as an allocation. Savills Heritage confirms that the investigations in the 2020 HCA, updated in this Addendum with respect to the Heritage Assets Review, result in no changes to the findings and recommendations in the 2020 HCA.
- 3.1.8 The 2020 HCA therefore remains a valid basis for the consideration of the proposed allocation of Gatwick Green in the DCBLP though the forthcoming Examination. Consequently, the 2020 HCA remains a valid part of TWG's evidence base and that of the DCBLP, supplemented by this Addendum.

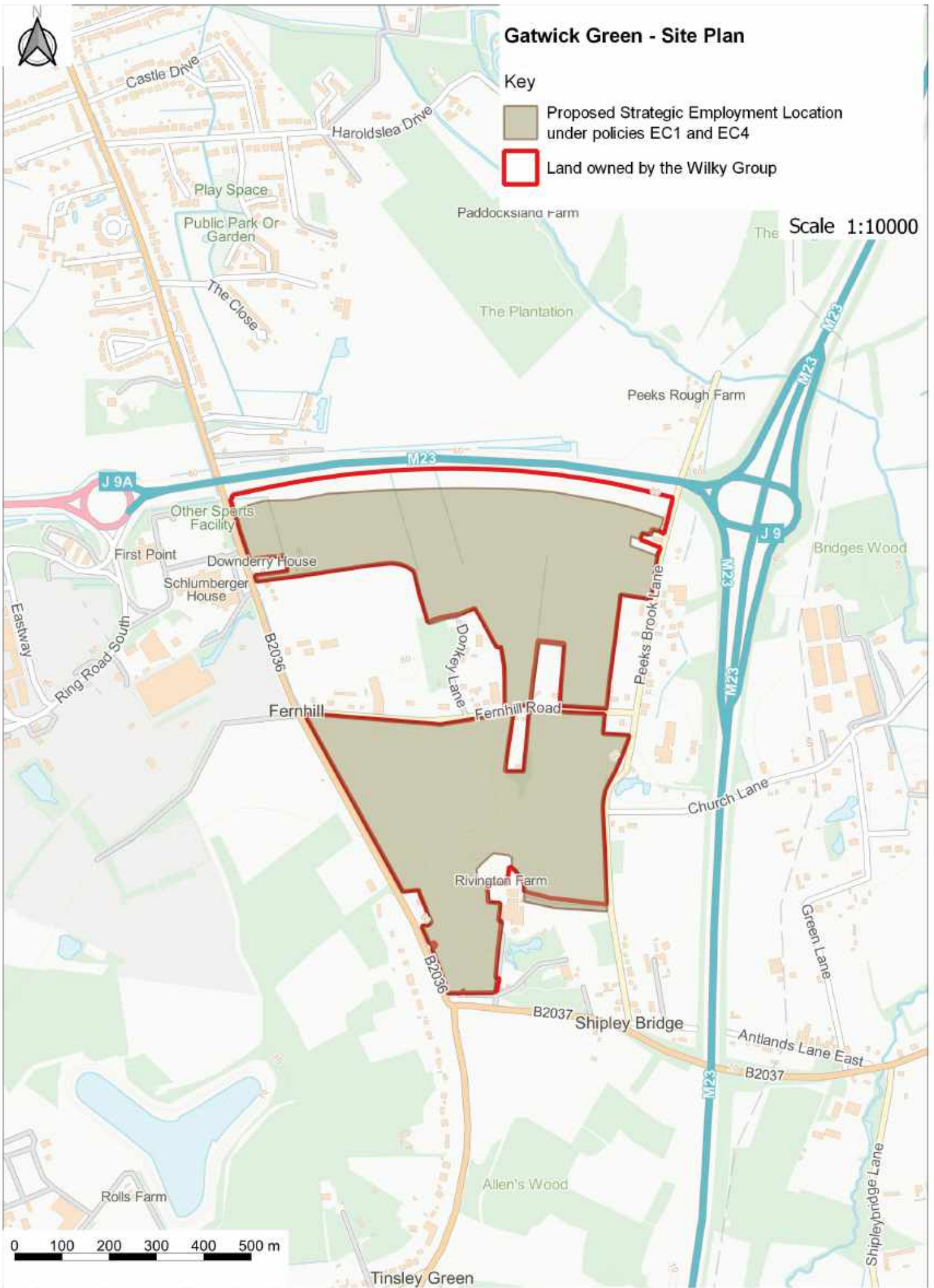


Gatwick Green - Site Plan

Key

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

Scale 1:10000





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London
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Appendix 8

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 11/091 / SK-86 | Rev D | Scale 1 : 5000 | Status WORK IN PROGRESS |
| Date 19/02/2021 | Director JA | Author AH | Check JA |

Job
GATWICK GREEN
 Drawing
Development Framework Plan (2021)

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Appendix 9

Gatwick Green Viability Note



GatwickGreen

WHERE THE FUTURE WORKS

Appendix 9 – 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 Needs**¹ 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 10

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








GatwickGreen

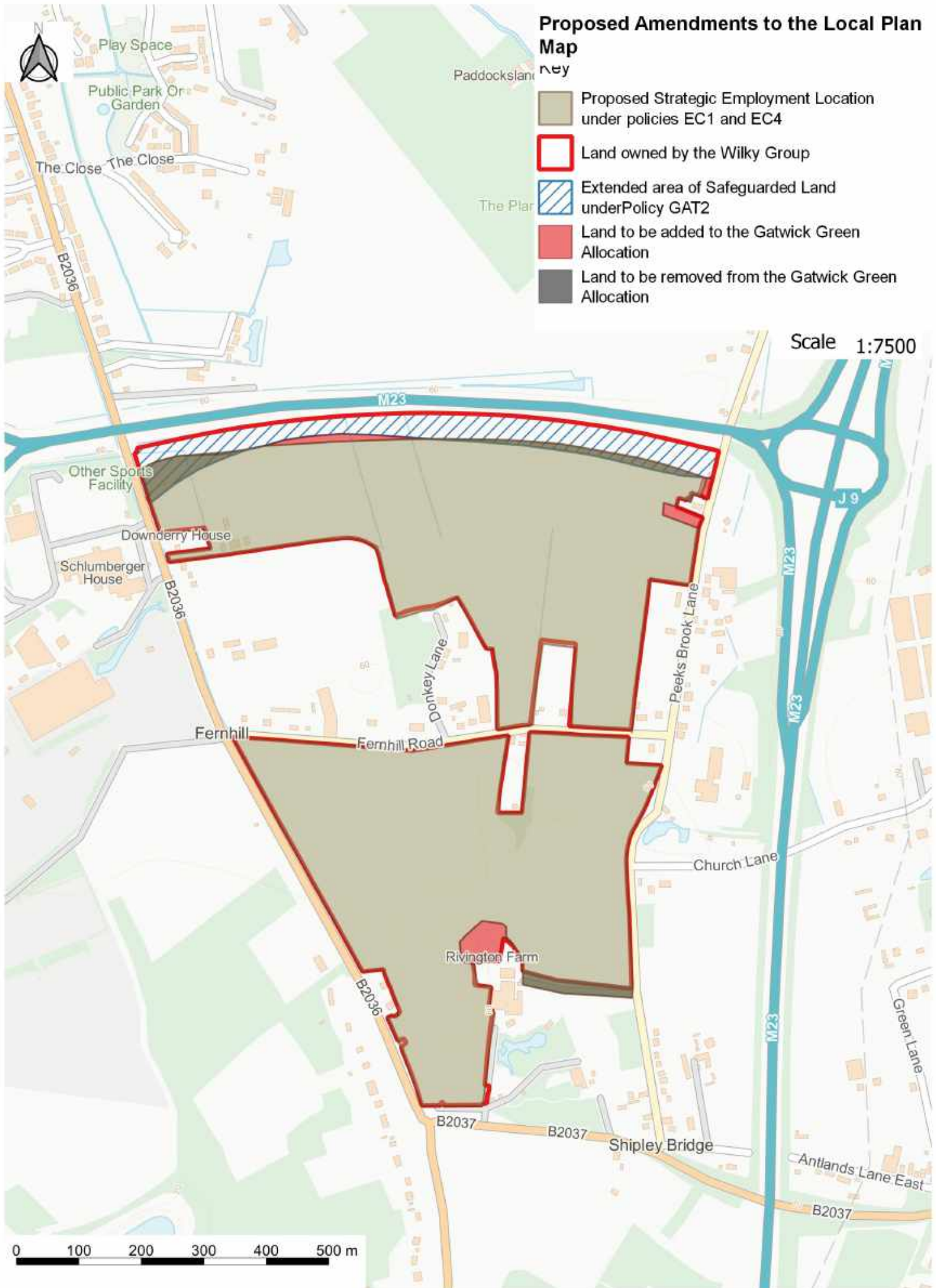
WHERE THE FUTURE WORKS

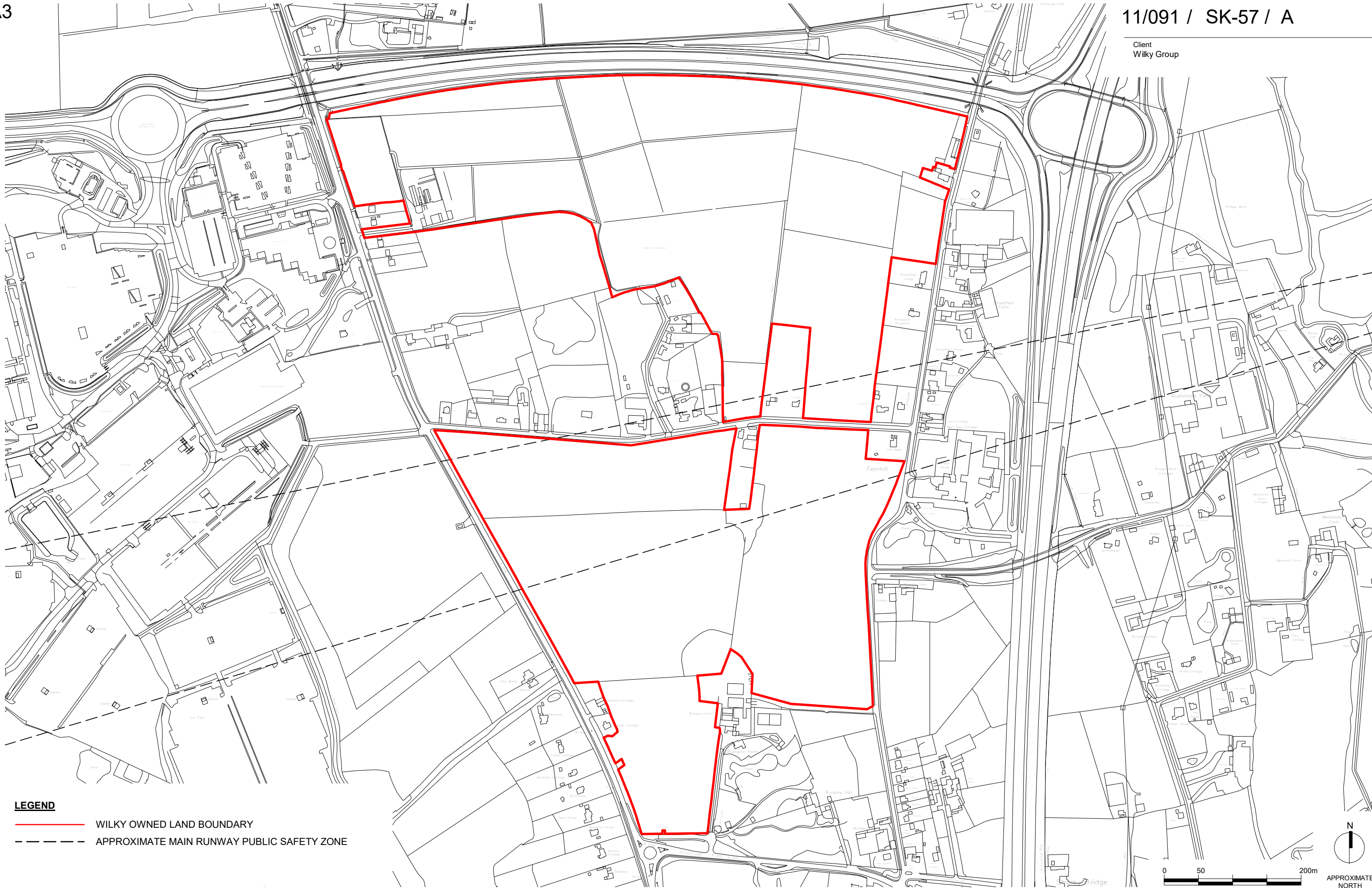
Proposed Amendments to the Local Plan Map

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

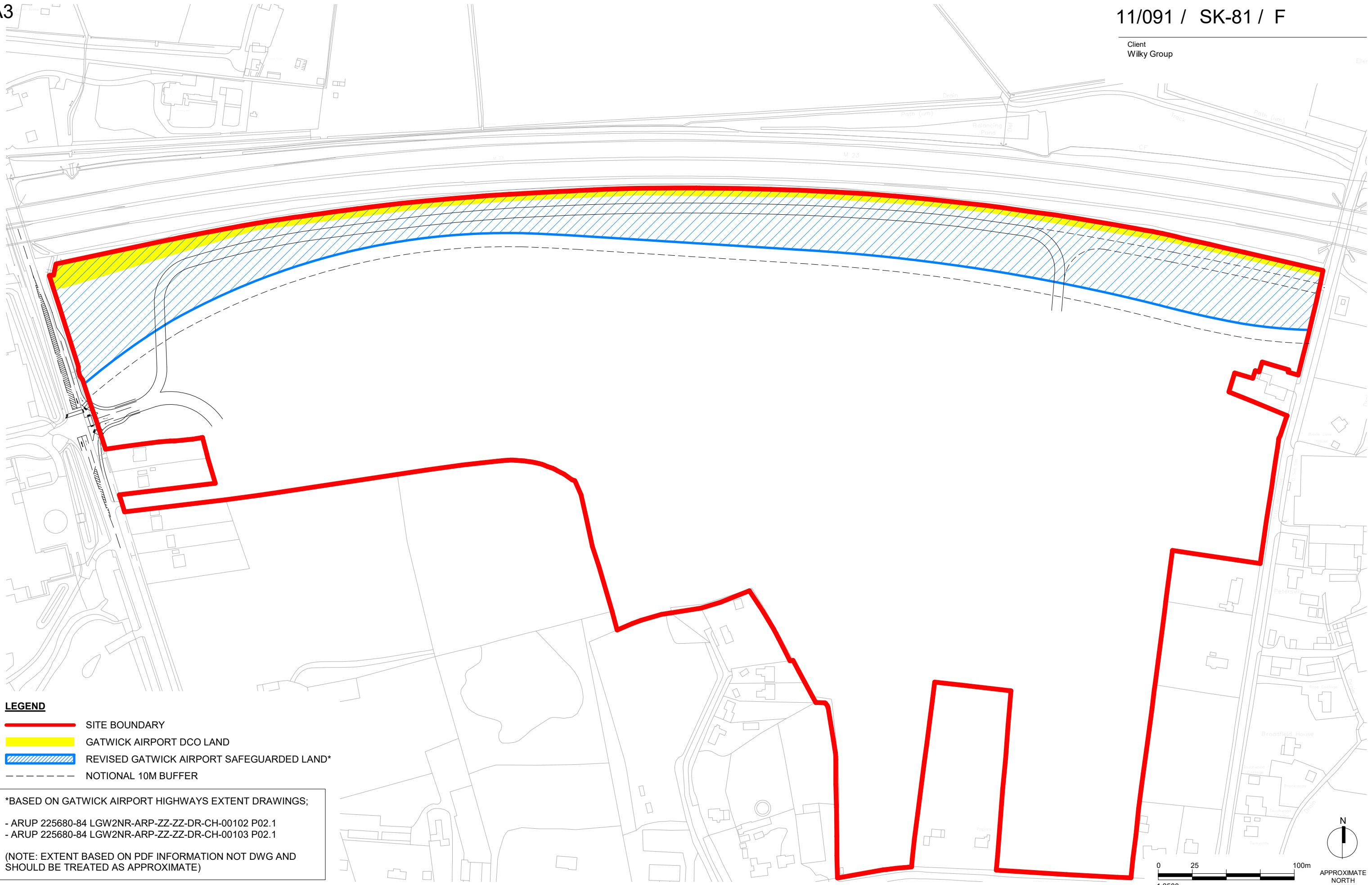
Appendix 11

Revised Gatwick Airport Safeguarded Land



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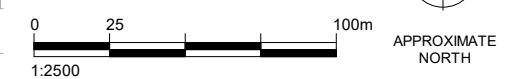
WHERE THE FUTURE WORKS



LEGEND

- SITE BOUNDARY
- GATWICK AIRPORT DCO LAND
- REVISED GATWICK AIRPORT SAFEGUARDED LAND*
- NOTIONAL 10M BUFFER

*BASED ON GATWICK AIRPORT HIGHWAYS EXTENT DRAWINGS;
 - ARUP 225680-84 LGW2NR-ARP-ZZ-ZZ-DR-CH-00102 P02.1
 - ARUP 225680-84 LGW2NR-ARP-ZZ-ZZ-DR-CH-00103 P02.1
 (NOTE: EXTENT BASED ON PDF INFORMATION NOT DWG AND SHOULD BE TREATED AS APPROXIMATE)



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

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Appendix 12

Proposed changes to Strategic Policy EC4 and supporting text



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 policy / 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

Strategic Policy EC4

“Land east of Balcombe Road and south of the M23 spur, referred to as Gatwick Green, is allocated for the comprehensive development of an industrial-led Strategic Employment Location.

Requirements

Proposals for development of the Strategic Employment Location will be required to address the following strategic infrastructure requirements:

Employment Uses

- a. provide as a minimum 24.1ha new industrial land, predominantly for B8 storage and distribution use, demonstrating through appropriate evidence the justification for any further industrial floorspace beyond this amount;*
- b. justify any limited complementary ancillary uses such as office floorspace, small-scale convenience retail and small-scale leisure facilities that would support the principal industrial-led storage and distribution function....*
- d. Demonstrate through a comprehensive Mobility Strategy how the development will include measures and improvements to maximise sustainable access to the site, focusing on how the development will optimise the usage of sustainable modes of transport as opposed to the private vehicle, and detailing infrastructure improvements that will be required to adequately mitigate the development impacts on the highways network, detailing how these improvements will be delivered and operated. Highways infrastructure and improvements that are required as a result of impacts arising from the development must be funded, secured or delivered as part of the development. On the basis that the development will be required to address its own highways impact, a S106 sustainable transport contribution will not be sought.....*

Delivery

Planning conditions and obligations to control delivery of the development, the use of the site and appropriate off- site considerations will be required, including for infrastructure, open space and social commitments. These will include:

- Requirement for ongoing economic impacts testing;*
- Contribute to delivering objectives of the Crawley Employment and Skills Programme, demonstrating through an Employment and Skills Plan (to be agreed by the council) how the development, through its construction and end user phases, will contribute to addressing the local skills gap. This may include, use of local labour,*

local supply chain procurement and similar skills/capacity support (in conjunction with local education and training providers);

- *The provision of supporting access/highway infrastructure within the Safeguarded Land between the allocation and the M23 spur road in such a manner that is consistent with the requirements of Policy GAT2 Safeguarded Land.*

Supporting Text

“9.48 As identified by Strategic Policy EC1, over the period to 2036 there is need for provision of a minimum of up to 38.7 hectares new business land in Crawley. Of the total business land requirement, office needs account for 5.9ha, which, taking account of the identified office land supply pipeline of 8.8ha, can be accommodated at sites identified in the Employment Land Trajectory. As such, the business land supply shortfall relates purely to industrial land, substantially within the storage & distribution (Class B8) sectors, where there is a total need for a minimum of 32.8ha of land. With the Employment Land Trajectory identifying an existing supply pipeline of 8.7ha land within these sectors, this results in an outstanding need of ~~around~~ for a minimum of 24.1ha industrial land.

.....

Reasoned Justification

9.50 Local Plan Policy EC1 identifies an overall need for a minimum of 38.7ha business land over the Plan period, of which the majority (32.8ha) is for industrial land, predominantly B8 storage & distribution warehousing. With an existing industrial land supply pipeline of 8.8ha, there is outstanding need for at least 24.1ha new industrial land in the borough over the period to 2036.

...

9.54 Land at east of Balcombe Road and south of the M23 spur, known as Gatwick Green, is allocated for an industrial-led Strategic Employment Location that will provide a minimum of 24.1ha industrial land, predominantly within the B8 use class. The site identified on the Local Plan Map is larger because Policy EC4 acknowledges that the allocation could accommodate additional the significant quantum of industrial floorspace where there is evidence of need and could be supported by complementary uses where justified by evidence, including ancillary uses such as a limited provision of offices and supporting amenity uses that will cater for the needs of employees. Also, there is a need for the strategic development to provide comprehensive supporting infrastructure, appropriate landscaping and to protect the amenity of neighbouring properties. Anticipated to be built out over a seven to ten year period, completed by 2035, the Gatwick Green allocation will meet Crawley’s economic needs in the latter part of the Plan period.

...

9.59 The Strategic Employment Location is surrounded by strategic transport links, but it has no immediate access to the strategic road network or Gatwick Airport railway station. A Strategic Employment Location of the scale proposed at Gatwick Green will generate surface access demands that will impact upon the existing highways network. The focus will be to maximise opportunities to access the site by sustainable transport modes, particularly for employees. However, given the scale and industrial nature of the proposed development,

development must cater for its operational requirements, particularly HGV movements, demonstrating through the Transport Assessment and Mobility Strategy how this will be achieved without an adverse impact upon the highways network and residential amenity. It is vital that surface access demands arising from the development are appropriately catered for through the delivery of new infrastructure and/or improvements to existing infrastructure as part of the development. The outcomes of the Crawley Local Plan Transport model are at the time of writing being finalised, and will form the basis for more detailed modelling to be undertaken by the site promoter at the planning application stage. Given the requirement to provide the physical infrastructure to support the Strategic Employment Location as part of the development itself, impacts arising from the development must be funded, secured or delivered as part of the development. Therefore, a S106 sustainable transport contribution as provide for in the Planning Obligations Annex will not be sought.