

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

Development and Requirements for Sustainable Transport

June 2021

Policy ST1



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

PART B – Your representation

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

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

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

Paragraph: Policy: Other:

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

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

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

Please see response and appendices attached

If required, please continue your response on an additional piece of paper and securely attach it to this response

7. Please set out what modification(s) you consider necessary to resolve the issues you have identified above. You need to state why this modification will make the Local Plan legally compliant or sound. It would be helpful if you are able to suggest how the wording of any policy or text should be revised. Please be as clear as possible. Any non-compliance with the duty to co-operate is incapable of modification at examination.

N/A

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 3.14 that where a representor supports a policy, the LPA has the discretion to include that representor as part of its team at the Hearings. On this basis, TWG could attend the Hearings, if requested by Crawley Borough Council.

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 ST1

June 2021



1.0 Introduction

Background

- 1.1 This representation is submitted on behalf of the Wilky Group (TWG), which has a long-standing interest in the promotion of strategic employment land within the Crawley Borough Council (CBC) area. This representation relates to Strategic Policy ST1 Development and Requirements for Sustainable Transport in the draft Crawley Borough Local Plan, 2021 (DCBLP).
- 1.2 TWG owns about 48 ha (119 acres) of land east of Gatwick Airport as shown the plan at **Appendix 1**. The land has been promoted by TWG as a strategic employment opportunity known as Gatwick Green (the Site). The Site is proposed for allocation as a Strategic Employment Location (SEL) of 47 ha (116 acres) in the DCBLP under Strategic Policy EC4 as a comprehensive industrial-led development of predominantly storage and distribution uses under use class B8. The extent of the SEL allocation is identified on the plan at **Appendix 1**.

Scope of representation

- 1.3 This representation sets out the evidence in support of the Crawley Transport Strategy¹ and Strategic Policy ST1 with reference to:
- National and Regional planning and transport policy.
 - Local transport strategies - Highway and Planning Authorities.
 - How Strategic Policy ST1 supports sustainable development within Crawley.
 - How Gatwick Green is aligned with the principles behind the Council's strategy and policies on transport, including Strategic Policy ST1.

2.0 Direction of National / Regional Transport Policy

- 2.1 The National Planning Policy Framework, (NPPF) confirms the purpose of the planning system is to contribute to the achievement of sustainable development.
- 2.2 Paragraph 102 of Section 9 of the NPPF sets out that transport issues should be considered from the earliest stages of plan-making and development proposals, so that:
1. The potential impacts of development on transport networks can be addressed.

¹ New Directions for Crawley, Transport and access for the 21st century, Crawley Borough Council, January 2020 and paras 2.52-2.54 of DCBLP

2. Opportunities from existing or proposed transport infrastructure, and changing transport technology and usage, are realised – for example in relation to the scale, location or density of development that can be accommodated.
3. Opportunities to promote walking, cycling and public transport use are identified and pursued.
4. The environmental impacts of traffic and transport infrastructure can be identified, assessed and taken into account – including appropriate opportunities for avoiding and mitigating any adverse effects, and for net environmental gains.
5. Patterns of movement, streets, parking and other transport considerations are integral to the design of schemes and contribute to making high quality places.

2.3 Paragraph 103 confirms this approach, stating that:

“The planning system should actively manage patterns of growth in support of these objectives. Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions and improve air quality and public health. However, opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and this should be taken into account in both plan-making and decision-making.”

2.4 The report titled *Gear Change – A bold vision for walking and cycling (DfT – July 2020)*, sets out the Government’s ambition for a future where half of all journeys in towns and cities are cycled or walked. With 58% of car journeys in 2018 being under 5 miles, and in urban areas, more than 40% of journeys being under 2 miles in 2017–18, many people would be able to walk or cycle to their destination.

2.5 The report provides nine key pledges to increase the level of walking and cycling, including:

- The delivery of thousands of miles of safe, continuous, direct routes for cycling in towns and cities, physically separated from pedestrians and volume motor traffic, serving the places that people want to go.
- Creating cycle, bus and walking corridors, closing a limited number of main roads to through traffic except for buses and access.
- Reducing rat-runs and delivering “school streets” which protect children.
- Improve the National Cycle Network, with higher design standards and creating more “Mini-Hollands”.

2.6 Transport for South East, (TfSE) comment in the introduction to their Transport Strategy published in 2020 that such strategies were typically devised on a “predict and provide” basis, with planners making forecasts about future transport demand based on past trends and investment focused on expanding capacity on road and rail networks.

2.7 The TfSE approach, (Transport Strategy, June 2020) going forward is to decide on the future people want for the region and plan a transport system that helps make it happen, putting people and places first, rather than vehicles. The vision stated in the TfSE strategy is that:

- *By 2050, the South East of England will be a leading global region for net-zero carbon, sustainable economic growth where integrated transport, digital and energy networks have delivered a step change in connectivity and environmental quality; and*
- *A high-quality, reliable, safe and accessible transport network will offer seamless door-to-door journeys enabling our businesses to compete and trade more effectively in the global marketplace and giving our residents and visitors the highest quality of life.*

3.0 Crawley's Transport Strategy

3.2 The Vision that Crawley Borough Council is proposing for transport and travel was clearly stated in the publication of a draft policy document in January 2020 entitled 'New Directions for Crawley'. The introductory section states that "*Crawley Borough Council aims to join those in the forefront of new thinking on transport and access to find sustainable solutions for Crawley*".

3.3 The means by which CBC will deliver its vision is set out on page 11 of New Directions, (January 2020), as follows:

"In the light of the climate emergency, health needs, developing technology, new policies and approaches for Crawley and the south-east as well as studies and experience across Europe, CBC aims to work in partnership with WSCC to meet the following aims:

1. *Improved sustainable travel infrastructure – prioritise walking and cycling network improvements and facilities, improving public transport access and services.*
2. *Smarter highway network management – managing demand, directions, speeds and inefficient road space allocation to address congestion and improve access and health of neighbourhoods and business districts.*
3. *Integrated transport and land use planning – ensure housing and business development centres on public transport links and walking and cycling networks as 'Transit Oriented Development' for improved access.*
4. *Effective travel planning – working with business and other organisations to improve commuter, visitor, shopping and leisure choices and reduce single-occupancy car use.*
5. *Shared mobility – develop facilities such as car clubs and shared bikes, with electric*

vehicle charging to broaden choices beyond conventional private car use”.

- 3.4 It is recognised that the strategy and policies enshrined in the Draft Crawley Borough Local Plan (DCBLP) attempt to balance the aspirations for growth and new development with the need to minimise carbon emissions and the impact of travel on climate change and air quality. The Plan states at paragraph 2.52:

“The emerging Crawley Transport Strategy seeks to identify opportunities for Crawley for developing a more attractive and practical transport infrastructure that works for everyone, whether or not they drive and whether or not they are able-bodied, and will look at developing access to work, education, shopping and leisure that is easier, more affordable and healthier.”

- 3.5 Crawley has a record of delivering genuine improvements in public transport through Fastway, which has helped achieve a shift from car to bus travel. It is also clear that recent sustainable transport measures proposed and under development as part of the Coast to Capital Growth Fund are an extension of a local commitment to innovation in transport. This includes significant investment in hydrogen powered buses with zero emissions. The DCBLP (para 2.39 to 2.41) sets out that:

- Crawley has excellent communications, lying adjacent to the M23, close to the M25 and is on the main railway line linking London to the south coast. Gatwick Airport is located within the borough.
- The town itself is served by a rapid guided bus service: Fastway, which provides attractive and effective public transport services, which are essential to facilitate and encourage a shift to sustainable modes of transport.
- There is a network of green corridors, providing attractive pedestrian and cycle routes through the neighbourhoods and into the town centre and out into the countryside.
- The identification and delivery of improved public transport needs to be focused on optimal routes and connecting the higher density neighbourhoods to Crawley’s three primary economic centres and its two regional transport nodes: Three Bridges station and Gatwick Airport and its station. This will help to provide a viable, dependable and sustainable transport alternative.
- Together with promoting active travel, cycling and walking, modal shift will lead to reduced carbon emissions, improved air quality, and a reduction in traffic volumes and the borough’s over-dependence and reliance on private vehicles for getting around.
- All new developments should be planned to maximise links in the transport network and opportunities for all forms of sustainable transport. A key priority area for the Plan period will be to build upon and improve the dependability, frequency, capacity and speed of the Fastway service in key areas of the borough, to encourage a viable and attractive alternative to car use, both for commuters, residents and visitors.

- 3.6 Paragraph 2.54 of the DCBLP refers to the Government's Cycle and Walking Investment Strategy, published in 2017. This forms a basis for the draft Crawley Local Cycle and Walking Infrastructure Plan, (LCWIP) which informs an approach to the sustainable transport in Strategic Policy ST1.

4.0 Crawley's policy response: Strategic Policy ST1

- 4.1 Strategic Policy ST1 sets out the requirements for development in relation to sustainable transport. The key aims of the policy are:

- That development should be located and designed to prioritise and encourage travel via the walking and cycling network and public transport routes, while reducing dependency on travel by private motor vehicle.
- That development should be phased so that walking and cycling infrastructure which forms part of the development is delivered at the earliest opportunity.
- 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.
- Development should provide an appropriate amount and type of parking in accordance with Policy.
- Developments should not cause an unacceptable impact in terms of increased traffic congestion or highway 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.

- 4.2 TWG consider that Strategic Policy ST1 is entirely consistent with and advances the aims and principles embodied in current and emerging national, and regional transport strategies and plans. The Crawley Transport Strategy (defined in Para 2.52 of the DCBLP) is also framed within the context of the West Sussex Local Transport Plan which states its objectives as;

- Promoting Economic Growth
- Tackling Climate Change
- Providing access to services, employment and housing
- Improving safety, security and health

- 4.3 TWG therefore support the Council's strategy and policy response under Strategic Policy ST1 and understands that the implementation of schemes to deliver the policy are underway in many parts of the borough. The need to afford priority to cyclists, pedestrians and public transport users is enshrined

in Strategic Policy ST1 and is in line with central and regional policy to improve connectivity for those travelling within and to destinations outside the Borough. TWG support this approach and briefly describe in the following section the way in which the proposed development at Gatwick Green will meet the aspirations for Sustainable Transport defined in Strategic Policy ST1.

- 4.4 A more detailed description of the transport measures is contained in Appendix 2 of EC4 submitted on behalf of TWG in response to consultation on the DCLP.

5.0 Approach for Gatwick Green

5.1 TWG has adopted the WSCC Local Transport Plan objectives along with the policy commitments contained within Strategic Policy ST1 of the DCBLP, forming principles to guide its approach to sustainable transport as follows:

- Provide employment opportunities that widen and deepen the skill base of residents in Crawley and its immediate neighbours. This will reduce levels of “out-commuting” and therefore the length of trips. Shorter journeys are made more easily by active modes, walking and cycling and potentially, personal electric transport.
- Link new and existing residential development with employment opportunities at Gatwick Green through supporting 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).
- Ensure a consistent approach to the delivery of new transport services and infrastructure across borough/county boundaries and to work in partnership with relevant agencies such as the Coast to Capital LEP and Transport for the South-East (TfSE).
- Achieve a high level of integration between carbon-neutral modes by providing strategically located and high quality interchange facilities (the concept of super-hubs is already established in Crawley).
- Establish a multi-modal, comprehensive and flexible Sustainable Transport Strategy which is phased in line with the development.
- Following completion of the Crawley Transport Model, consideration will be given to modest improvements to road junctions in line with the CBC policy of attracting a greater mode share for cyclists, pedestrians and bus users.

5.2 The overarching transport strategy for Gatwick Green is therefore to ensure people can reach the new facilities by appropriate transport modes, promoting sustainable travel as part of a lifestyle choice allowing employees and visitors to access the site by foot, cycle and public transport. The aim is to reduce the use of private cars for shorter journeys from the neighbouring residential areas and those further afield. At the heart of the

development philosophy will be a transport strategy which recognises the need to address climate change and the pledge by Crawley Borough Council to reduce carbon emissions generated by CBC activities by at least 45% by 2030, in line with the Inter-Governmental Panel on Climate Change.

- 5.3 The following sets out how development at Gatwick Green is consistent with and meets the requirements of Strategic Policy ST1:

Public Transport

- The ability to introduce several accesses onto Balcombe Road provides an opportunity to divert existing fastway/bus services to penetrate the site. This will incidentally benefit existing residents and businesses and other new development along the Balcombe Road Corridor.
- Public transport provision for the site will, in collaboration with CBC and Metrobus, be integrated into the Fastway Development Programme.
- Mobility transport hubs will be introduced within the site. These are already proposed for Manor Royal and will allow for seamless interchange between ride sharing, public transport and non-motorised modes of travel in line with existing initiative identified within the Crawley Growth Programme and Crawley New Directions.

Walking and cycling

- Alongside the public transport provision, the access strategy and internal layout will prioritise high quality, safe walking and cycling routes in line with latest guidance.
- In conjunction with CBC, improvements will be made to existing pedestrian and cycle routes, plugging gaps and connecting to the enhanced network specified in the Crawley Local Cycling and Walking Infrastructure Plan (CLCWIP).

Parking

- The development will deliver an appropriate amount of parking for both cars, light vehicles and heavy goods vehicles in line with parking standards and typical demand, to ensure that there is no adverse impact on the local highway network or neighbouring areas.
- Parking infrastructure will meet the standards and requirement at the time of any application(s) and would include meeting anticipated demand for Electric Vehicle (EV) Charging Infrastructure. The scale and type of parking will meet Local Plan Policy and West Sussex County Council's 2019 Guidance on Parking in New Developments, along with emerging EV Strategy and any appropriate guidance in respect to the development of Hydrogen recharging network.

6.0 Conclusions

- 6.1 The Strategic Policy ST1 is consistent with the NPPF and associated policy and guidance and as such is sound against the tests set out in paragraph 35 of the NPPF.

6.2 The Gatwick Green development satisfies the policy through explicitly meeting the following requirements:

- i. The development is designed to prioritise the needs of pedestrians, cyclists and public transport users over ease of access by the motorist.
- ii. Appropriate amount and type of parking is provided in accordance with Strategic Policy ST1 and Policy ST2.
- iii. The development will be phased to ensure infrastructure for pedestrians and cyclists is available from first occupation.
- iv. Contributions will be made to bus priority and LCWIP schemes, where appropriate.

6.3 A Transport Assessment will be produced for Gatwick Green which includes a Mobility Strategy or Travel Plan to meet the requirements of Strategic Policy ST1. Crawley Borough Council is at the forefront of the emerging national policy of Decide and Validate, recently adopted by Transport for South-East (TfSE). This will assist in meeting its aspiration to reduce carbon emissions and is consistent with West Sussex County Council objectives, defined in the Local Transport Plan.

Appendix 1

Site Plan



GatwickGreen

WHERE THE FUTURE WORKS

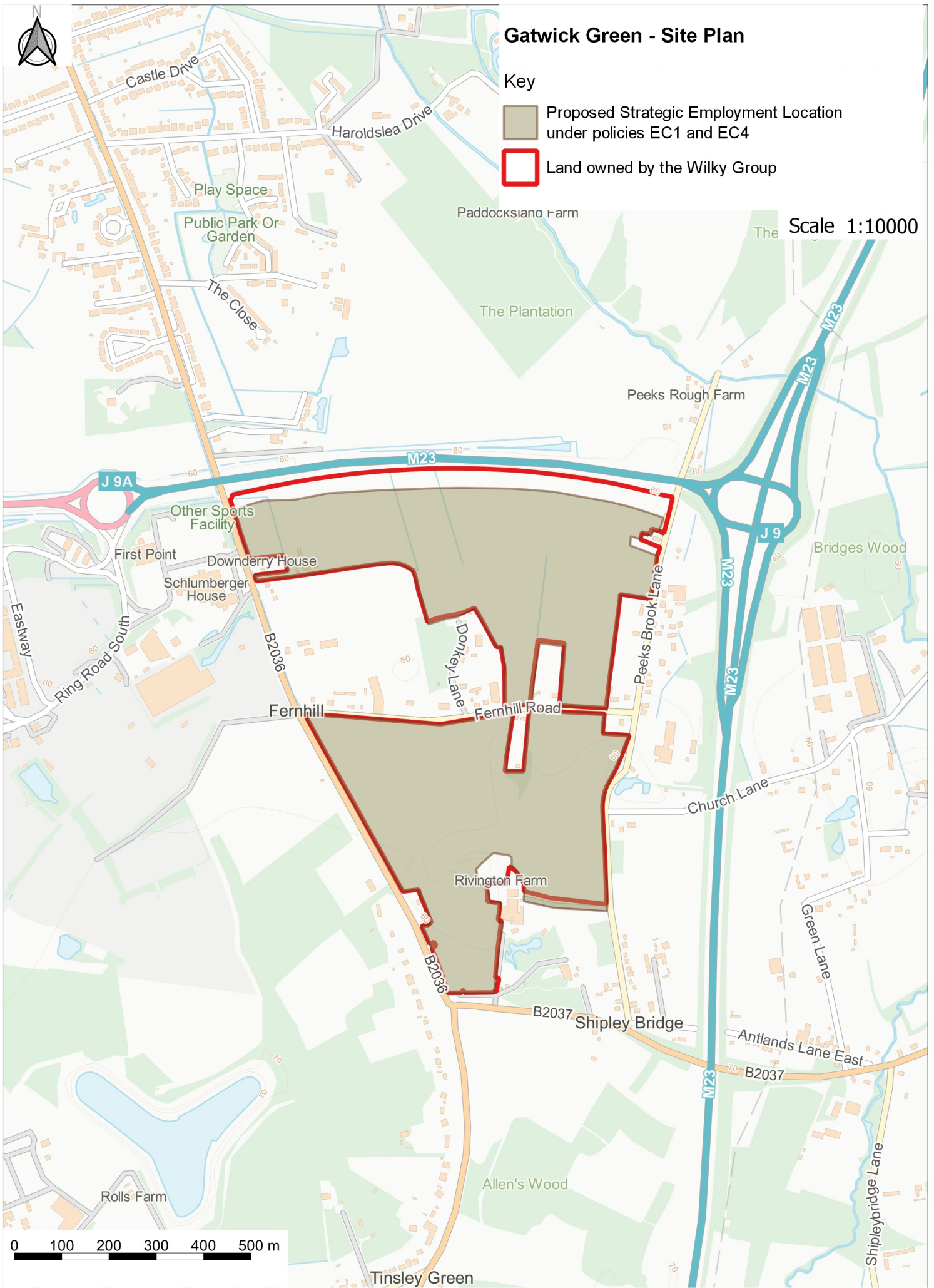


Gatwick Green - Site Plan

Key

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

Scale 1:10000



0 100 200 300 400 500 m