

# 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

**Draft Sustainability Appraisal / Strategic Environmental Assessment**

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](mailto: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](http://www.crawley.gov.uk/privacy). Specific reference to the Local Plan and planning policy related public consultation can be found [here](#).

### PART B – Your representation

Please fill in a separate sheet for each representation you wish to make. You may submit multiple "PART B" sections with a single "PART A" completed.

### PART A – Personal details

Please ensure that you complete all fields in 1. If a planning agent is appointed, please enter the Title, Name and Organisation in 1, and complete the full contact details of the agent in 2.

	1. Personal details	2. Agent's details
Title:	Ms	Mr
First name:	Sally	Simon
Surname:	Fish	Fife
Organisation:	Wilky Group	Savills
Address line 1:	Fetcham Park	Wessex House

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

## PART B – Your representation

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

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

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

Paragraph:		Policy:		Other:	Sustainability Appraisal
------------	--	---------	--	--------	--------------------------

### 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](http://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**

**Draft Sustainability Appraisal / Strategic Environmental  
Assessment**

**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 the draft Sustainability Appraisal / Strategic Environmental Assessment<sup>1</sup> (SA/SEA) that supports the draft Crawley Borough Local Plan, 2021 (DCBLP).
- 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 representation notes that the SA/SEA has been prepared in accordance with the advice in the Planning Practice Guidance (PPG), and that specifically its assessment in relation to Strategic Policies EC1 and EC4 and Policy GAT2 is sound.

## 2.0 Strategic Policy EC1

- 2.1 The Council has assessed the alternative options in relation to addressing the unmet economic and employment land needs of the Borough in its Sustainability Appraisal (SA/SEA). This evaluated three options: (1) rely on the NPPF to direct economic growth to the most appropriate locations, (2) adopt an employment land requirement based on Crawley's housing land supply and accommodate economic growth in existing employment areas and in neighbouring council areas, and (3) plan positively for growth in line with the role of Crawley and accommodate economic growth at the main employment areas and the allocation of Gatwick Green to meet industrial and warehouse requirements.
- 2.2 Option 3 was selected as the most sustainable option as it recognised Crawley as a key employment destination with a **minimum** land requirement of 38.7 ha to be met through development in the main employment areas, small extensions to Manor Royal and the allocation of Gatwick Green. This approach enabled (page 176):

*“...Crawley to respond to market signals, planning for the specific sectors where growth is identified, and support economic recovery from the current economic challenges posed by Covid-19. In identifying new business land, the*

---

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

*approach will help to retain and attract business and investment, both to Crawley and the wider functional economic market area. In doing so, the approach responds to NPPF requirements to plan positively for economic growth, and reinforcing and strengthening Crawley's economic role, and that of the wider area."*

- 2.3 This analysis was reflected in Topic Paper 5 (Employment Needs and Land Supply). Importantly, the assessment was predicated on the need to plan for a **minimum** of 38.7 ha of new employment land and a **minimum** of 77,800 sqm of employment floorspace – this underlines the positive policy response to planning for the future economic needs of the Borough, allowing for flexibility so as to future-proof the economy.
- 2.4 Applying the employment requirements as minima was a key part of the Council's SA/SEA, demonstrating that this approach was the most sound of the options considered. More detailed evidence contained in Savills' representation on behalf of TWG in relation to Strategic Policy EC1 demonstrates that the Council's analysis is correct such that there is a sound case in support of Strategic Policy EC1, subject to some minor adjustments as referred to in the representation.

### **3.0 Strategic Policy EC4**

- 3.1 The Council has assessed the alternative options for providing for an Strategic Employment Location (SEL) in its Sustainability Appraisal (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.
- 3.2 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 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).
- 3.3 More detailed evidence contained in Savills' representation on behalf of TWG in relation to Strategic Policy EC4 demonstrates that the Council's analysis is correct such that there is a sound case in support of Strategic Policy EC4, subject to some minor adjustments as referred to in the representation.

## 4.0 Policy GAT2

- 4.1 The Council has assessed the alternative options in relation to Safeguarded Land in its Sustainability Appraisal (SA/SEA). This evaluated three options: (1) safeguarding land as shown in the GAMP, (2) do not safeguard any land, and (3) safeguard land with an amended boundary to allow for strategic employment provision. Option 3 was selected as the most sustainable option as it responded to national policy to retain safeguarding, but with an amended boundary to accommodate Crawley's unmet employment land needs in the form of a SEL at Gatwick Green. This approach enabled land south of the airport required to accommodate the physical land take of a possible wide-spaced runway and its operations to be retained. The approach was based on the following analysis:

*“The council does not consider parking to represent an efficient use of the site, particularly given the significant employment needs of Crawley borough, and is of the view that the airport could accommodate parking more efficiently through decked and robotic parking and other efficiency measures, should it be demonstrated that additional on-airport parking is required having regard to the airport's surface access obligations stated in the S106 legal agreement.”*

- 4.2 This analysis was reflected in Topic Paper 2 on Gatwick Airport. More detailed evidence contained in Savills' representation on behalf of TWG in relation to Policy GAT2 demonstrates that the Council's analysis is correct such that there is an overwhelming and sound case in support of Policy GAT2, subject to some minor adjustments as referred to in the representation.

## 5.0 Other policies

- 5.1 The SA/SEA also contains comparative evaluations of the options with regard to sustainable transport and infrastructure provision (Strategic Policies ST1 and IN1). In relation to these evaluations, the SA/SEA concluded in favour of locally-specific policies on sustainable transport and infrastructure over relying on the NPPF (the 'do nothing' option). Both evaluations demonstrated significantly more benefits for a detailed locally-specific policy over the 'do nothing' option. More detailed evidence contained in Savills' representation on behalf of TWG in relation to Strategic Policy ST1 and IN1 demonstrates that the Council's analysis is correct such that there is an overwhelming and sound case in support of these policies.



## 6.0 Conclusions

- 6.1 Overall, TWG supports the Council's SA/SEA and specifically with regard to its evaluations and conclusions in relation to Strategic Policies EC1, EC4, ST1 and IN1, and Policy GAT2. TWG's representations on these policies put forward some minor changes to the policies in order to achieve greater consistency and clarification, and achieve some more sustainable outcomes. TWG's consultants have considered the proposed changes and have concluded that they would not materially affect the conclusions set out in the SA/SEA.