



Crawley Local Plan

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| <p>Ref No:</p> <p><i>Office use only</i></p> |
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Crawley Submission draft Local Plan Representation

Please return your completed representation form to Crawley Borough Council.

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: | Mr | |
| First name: | Tim | |
| Surname: | Norwood | |
| Organisation: | Gatwick Airport Ltd | |
| Address line 1: | Fifth Floor Destinations South Terminal, | |

| | | |
|-----------------|-------------------------------------|--|
| Address line 2: | London Gatwick Airport, London Road | |
| Town/city: | Langley Green, Crawley, West Sussex | |
| Postcode: | RH6 0NP | |
| Telephone: | 07887630352 | |
| Email: | tim.norwood@gatwickairport.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: | Representation covers support and objection to various Policies: GAT1, GAT2, GAT3, GAT4, EC1, EC2, EC4, EC7, DD5, DD7, IN1, IN2, EP4, Hsd, H8, ST1, ST3, ST4 |
|------------|--|---------|--|--------|--|

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

- 5.1. Legally compliant? Yes No
- 5.2. Sound? Yes No
- 5.3. Compliant with the duty to co-operate? Yes No

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

Please see the attached covering letter, representations and three supporting annexes

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 the attached covering letter, representations and three supporting annexes

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:

Matters of strategic importance to Gatwick Airport, particularly in relation to long safeguarding of land for second runway

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

Mr. Tim Norwood

Date

29/06/2021

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29TH JUNE 2021

Sallie Lappage
Forward Planning
Crawley Borough Council
Town Hall
The Boulevard
Crawley
West Sussex
RH10 1UZ.

by email to: planning.policy@crawley.gov.uk

Dear Sir / Madam

TOWN AND COUNTRY PLANNING (LOCAL PLANNING) (ENGLAND) (AMENDMENT) REGULATIONS 2012.

DRAFT SUBMISSION CRAWLEY BOROUGH LOCAL PLAN 2021 – 2037 (REGULATION 19 CONSULTATION) JANUARY 2021.

Gatwick Airport Limited (GAL) welcomes this further opportunity to comment on the updated Regulation 19 Draft Submission Crawley Local Plan (Jan 2021) ('2021 Reg19 DCLP').

We responded to the previous Regulation 19 Submission Local Plan ('2020 Reg19 DCLP') in March 2020 and we are pleased to see that a number of our representations have been reflected in changes to the Plan, in particular the reinstatement of the safeguarding of land for a second runway at Gatwick, amendments to Policy EC7 (Visitor Accommodation) and additions to policies related to technical aerodrome safeguarding (DD6) and improving rail stations (ST3).

We met with you earlier this year (4th March) to discuss our position in respect current Regulation 19 consultation. We now set out below our formal comments in respect of the amended plan, indicating where we can offer support and where we have objections.

In particular, we object strongly to the new proposal to allocate 24.1 hectares of land to the east of Gatwick as a strategic employment site (Draft Policies EC1 and EC4). For reasons set out in these representations we contend that the Council is wrong to have concluded that this allocation can be made without prejudicing the delivery of a 2nd Runway. There are also other deficiencies with this allocation, which further support our arguments that this allocation should be removed from the plan. These include serious shortcomings related to the acceptability of road access to what would become a major logistics facility, uncertainty about whether appropriate public transport access can be delivered, as well as serious doubts on the need for this employment allocation, taking into account the varying forecasts of employment land requirements from studies underpinning the plan, further uncertainty given current economic positions, and whether the Council has cooperated adequately with authorities on the functional economic market area. We consequently request that this allocation is deleted from the draft plan as we consider it to be 'unsound'.

For your assistance, Table 1 sets out our current representations compared to those we submitted on the Jan 2020 SLP. It also contains a summary of our new objections to policies

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EC1 and EC4. More detailed comments on the policies are set out at the end of this letter and, with regard to the Gatwick Green allocation, further justification for our comments is set out in the three attached Annexes comprising:

- 1) Review of the Employment Land Justification;
- 2) Review of Gatwick Green and Impact on Gatwick Airport Runway 2 (R2) Scheme;
- 3) Review of Gatwick Green Transport Modelling.

Table 1: Summary of GAL's representations and comparison with those made in March 2020 on Jan 2020 SLP.

| Policy in January 2021 Reg19 DCLP | Policy in January 2020 Reg19 DCLP | Status |
|---|--|---|
| GAT1: Development of the Airport with a Single Runway | GAT1 | We broadly supported this policy in 2020 Reg19 DCLP but objected to aspects of the wording of the policy and supporting text. We maintain our objections to aspects of the policy and supporting text. |
| GAT2: Safeguarded Land | - | We support the reinstatement of this policy from the Crawley 2015 Local Plan (and the revised wording) |
| GAT3: Gatwick Airport Related Parking | GAT2 | We maintain our support for this policy. |
| GAT4: Employment Uses at Gatwick | GAT3 | We maintain our support for this policy. |
| - | SD3: North Crawley Area Action Plan | We support that this policy of 2020 Reg19 DCLP has been removed. |
| EC1: Sustainable Economic Growth | EC1: | We objected to this policy in 2020 Reg19 DCLP. We wish to maintain objections to this policy insofar as it provides for the allocation of an industrial-led Strategic Employment Location at Gatwick Green, on land east of Balcombe Road and south of the M23 spur. We provide further comments in respect of this policy below. |
| EC2: Economic Growth in Main Employment Areas | EC2 | We objected to this policy in 2020 Reg19 DCLP but note that the policy has now been changed. However, it still allows for major employment development in Lowfield Heath despite its location in the reinstated R2 safeguarded land. We maintain our objection to this aspect of the policy. |
| EC4: Strategic Employment Location (Gatwick Green) | - | We object most strongly to the introduction of this new allocation for an industrial-led Strategic Employment Location at Gatwick Green which will have a significant impact on the ability to implement the Gatwick Masterplan. |
| EC7: Visitor Accommodation | EC6 | We objected to the policy in 2020 Reg19 DCLP but note that the policy has now been changed. We support the policy. |

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| | | |
|---|-----|--|
| DD5: Aerodrome Safeguarding | DD6 | We maintain our support for this policy. |
| DD7: Advertisements | DD7 | We maintain our support for this policy |
| IN1: Infrastructure Provision | IN1 | We maintain our support for this policy. |
| IN2: The Location and Provision of New Infrastructure | IN2 | We maintain our support for this policy. |
| EP4: Development and Noise (and Noise Annex) | EP4 | We broadly supported this policy in 2020 Reg19 DCLP but considered it and the supporting Noise Annex required changes. We continue to support the policy but continue to invite changes to the policy, supporting text. and Noise Annex in relation to the thresholds set for noise sensitive development from aviation sources. |
| H3d: Housing Typologies: Upward Extensions | | We supported the policy but suggested a minor revision. We note that the policy has been changed accordingly. We continue to support the policy. |
| H8: Gypsy, Traveller & Travelling Showpeople Sites | H8 | We objected to this policy in 2020 Reg19 DCLP. With the reintroduction of Safeguarded Land (Policy GAT2). We now have no objections to this policy. |
| ST1: Development and the Requirements for Sustainable Transport | ST1 | We supported the policy in 2020 Reg19 DCLP but suggested a minor revision. We note that the policy has not been changed. We continue to support the policy. |
| ST3: Improving Rail Stations | ST3 | We objected to the policy in 2020 Reg19 DCLP but note that the policy has now been changed. We support the policy. |
| ST4: Safeguarding a Search Corridor for Crawley Western Relief Road | ST4 | We maintain our objections to this policy. |

We would be pleased to engage further with the Planning Policy Team as the plan moves forward to examination stage.

If you have any further queries, please do not hesitate to contact me.

Yours faithfully



**Chief Planning Officer
Gatwick Airport Ltd**

**REPRESENTATIONS BY GATWICK AIRPORT LTD TO THE DRAFT
SUBMISSION CRAWLEY BOROUGH LOCAL PLAN 2021 – 2037
(REGULATION 19 CONSULTATION – JANUARY 2021).**

GAT1: Development of the Airport with a Single Runway

1. In our response to the 2020 Reg19 DCLP we broadly supported policy GAT1 but objected to a number of aspects of the detailed wording of the policy. We suggested some minor amendments to the wording of the policy and the supporting text to address these objections.
2. We note that no changes have been to the policy or supporting text, so we wish to maintain our earlier objections and invite the Council to make the changes we proposed at paras 2.1 and 2.2 of those representations for the reasons set out in paras 3.1 – 3.8.
3. In view of the fact that the 2021 Reg19 DCLP reinstates a policy for the safeguarding of land for a second runway (GAT2) the changes we suggested to the final paragraph of the policy are no longer required.

GAT2: Safeguarded Land

4. We support the new Policy GAT2.
5. We also support the detailed wording of the policy (compared to Policy GAT of the 2015 Crawley Local Plan). In particular the revised wording closes loopholes in the previous wording on temporary uses that some developers had sought to exploit.
6. However, as we object to the loss of safeguarded land through the new allocation of 24.1 hectares to the east of Gatwick as a strategic employment site (Draft Policies EC1 and EC4), for reasons set out later in these representations; we also contend that para 10.21 of the reasoned justification should be removed and the Local Plan Map and Figure on page 133 updated accordingly.

GAT3: Gatwick Airport Related Parking

7. We support Policy GAT3 for reasons set out in para 4.1 and 4.2 of our previous representations.

GAT4: Employment Uses at Gatwick

8. We support Policy GAT4 for reasons set out in para 5.1 and 5.2 of our previous representations.

**EC1(v): Sustainable Economic Growth and
EC4: Strategic Employment Location**

9. We objected to Policy EC1 of the 2020 Reg19 DCLP because it related the proposal to bring forward a North Crawley Area Action Plan on land safeguarded for second runway (2020 Reg19 DCLP Policy SD3). Whilst the revised plan has removed Policy SD3, the revised economic growth strategy now provides for the allocation of an industrial-led Strategic Employment Location at Gatwick Green, on land east of Balcombe Road and south of the M23 spur. This is referred to at para (v) of Policy EC1 with further detailed policy provision for this allocation at Policy EC4.

10. We object to this aspect of the economic growth strategy and therefore object to para (v) of Policy EC1 and to Policy EC4 as a whole. The reasons for our objections are set out below.

a) The allocation prejudices safeguarded land

11. Gatwick Green is proposed to be constructed on land that remains safeguarded for the expansion of Gatwick Airport. The Government's draft Aviation Strategy concludes "It is prudent to continue with a safeguarding policy to maintain a supply of land for future national requirements and to ensure that inappropriate developments do not hinder sustainable aviation growth". This stance is recognised in the National Planning Policy Framework (NPPF) which restates the government's commitment to "identify and protect, where there is robust evidence, sites and routes which could be critical in developing infrastructure to widen transport choice". The development of Gatwick Green for employment purposes would conflict with that safeguarding and the Gatwick Masterplan.

12. The matter of safeguarding was addressed in the Inspector's Notes of the PINS advisory video conference (April 2020) in respect of land 'North of Crawley'. The Inspector concluded that the removal of safeguarding cannot be regarded as certain, there is no known timescale for its removal and that GAL continues to object to its removal. Consequently, the proposal to remove safeguarded land was, in that case, as a consequence considered "...unlikely to be effective". We consider that the circumstances which lead to that conclusion apply in this case. Furthermore, the Inspector's conclusion treats safeguarded land as a whole and does not give any support for parts of it to be nibbled away in a piecemeal fashion.

b) The scale of the allocation is not justified

13. **Annex 1** examines the economic growth evidence base which includes two studies which produce a wide range of employment land requirements ranging from a negative requirement based on employment projections to a requirement of 38ha based upon one of the sets of forecasts. The wide disparity in the conclusions undermines confidence in their reliability.

14. The fact that the forecast level of need is of the same magnitude as that based upon past take up rates is cited as an indicator that the forecast is acceptable. The assessment itself nevertheless acknowledges that past take up rates have been inflated by two very recent completions. In addition, the Update report also examines the impact of Covid-19 on rates of employment growth. Whilst both the forecasters, Oxford Economics and Experian, both conclude there will be lower levels of employment growth for Crawley due to a fairly significant 'rebasin' of local employment levels which effectively reduces the scale of expected job growth. These findings are not taken into account in the conclusions. Consequently, rather than providing support for the forecast, the fact that the allocation is of the same scale as past trends indicates that it overstates the level of need.

15. The Update report acknowledges that the employment land requirements may need to be re-considered closer to the Local Plan examination, depending on how the economic situation changes. Given the dismissal of the conclusions on the impact of Covid-19 on job growth, the need for a review of the employment growth findings becomes even more apparent.

16. It is intended in the local plan that the Gatwick Green allocation of 47ha should provide, "as a minimum", 24.1ha new industrial land, predominantly for B8 storage and distribution use to meet the identified need. Any additional floorspace would have to be justified through appropriate evidence.

17. Gatwick Green is consequently very nearly twice the size of the employment land requirement of 24.1ha it is intended to meet. No justification or evidence is advanced for this larger scale of development, which is a significant omission, especially when the site is already protected for an alternative use.

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18. In the absence of any further employment development, it is unclear what happens to the remaining 22.9ha. There has been no investigation as to whether a smaller release, so as to minimise the impact on safeguarded land, would be a preferable solution.

c) The allocation will prejudice the delivery of a full second runway

19. The allocation of Gatwick Green is based upon a simple but ultimately uninformed assessment as to whether land shown in the Gatwick Masterplan for surface parking produces an 'efficient' use of land. This assumption was not based upon any discussions with GAL. The decision to make the allocation was made on the basis of an uninformed and incorrect assumption.

20. Arup have undertaken a more detailed review of the expected impact of the allocation of Gatwick Green and the resulting reduction of Safeguarded Land for a second runway. Their report and findings are attached hereto as **Annex 2**.

21. The assessment demonstrates that in order to achieve the required level of car parking, an efficient use of the existing safeguarded land was already required with a combination of decked and block parking. With the loss of the Gatwick Green safeguarded land, the remaining area would need to be developed with multi-storey car parks (MSCP) with at least ground plus four storeys across the whole of the remaining land. However, the area to the west of the A23 would be limited to providing up to one deck due to aerodrome safeguarding height constraints. This would mean that even higher density MSCPs, with a greater number of stories would be required in other parts of the residual land. It is not viable for long stay parking products to be provided through constructing multi storey car parks, given the added construction costs and lower financial returns from passenger charges for long stay parking. This is a substantial change from the R2 scheme in terms of construction and operation.

22. In addition, the configuration of the residual land does not produce an efficient layout for airport car parking provided as MSCPs. The configuration of the land will therefore further reduce the efficiency of the parking layout which can be achieved and consequently the capacity of the residual site.

23. The proposed allocation will also have a harmful impact on the access to the retained land. The primary access junction serving the presently safeguarded land to the east of the realigned A23 is a significant grade separated junction commensurate with the level of use expected. The Gatwick Green allocation disconnects this primary high capacity access from the remaining safeguarded land east of the A23 and creates segregation between the remaining parcels of land for parking. This would result in a substantial change from the R2 scheme in terms of access strategy, highway design, construction, and car park operation which has not been tested in the local plan evidence base.

d) There has been no assessment as to whether the employment land requirement could be met elsewhere

24. The PINS advice note also states that with the safeguarding of land at North Crawley still in place, the Council should be proactively seeking to accommodate unmet economic needs in nearby authority areas through the Duty to Cooperate. There is no evidence that this the council undertook such action post the April 2020 conference and prior to allocating Gatwick Green.

25. Similarly, there is no evidence that CBC investigated whether it was possible to meet the requirement by looking for other sites within the Borough. As a first step, we consider that an updated Built-Up Area Boundary Review should have been undertaken.

e) The Allocation cannot be accessed without severe detriment to highway network

26. Arup have reviewed the transport modelling for Gatwick Green and set out their analysis and conclusions at **Annex 3**. Their key areas of concern are:

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- (i) The quantum of Gatwick Green development assessed within the traffic model;
 - (ii) The assumptions made between the proportion of B8 warehouse and B8 parcel distribution for Gatwick Green and their effect on the traffic generated;
 - (iii) The lack of highway mitigation identified, with reference to (i) and (ii);
 - (iv) No clear allowance for Gatwick Airport growth having been made.
27. The Crawley Transport Study is calculated on the assumption that Gatwick Green will provide a total of 77,500 sq m of mixed employment floorspace across the 24.1ha development area. This is less than the 96,400 sq m that the Employment Update report assumed would be accommodated on this area (calculated at 4,000s sq m per ha which is the basis for the scale of the Gatwick Green allocation). The Transport Study is consequently failing to model the full quantum of floorspace intended for the Gatwick Green allocation under the employment policies.
28. Whilst the model correctly assumes that the site will be predominately for B8 storage and distribution use, within the Crawley Transport Study, it is acknowledged that the vehicle trip generation is sensitive to the type of the proposed B8 uses assumed (i.e. the B8 parcel distribution has much higher vehicle trip rates, around 10 times that of B8 warehousing). Therefore, the split assumed between these uses has great bearing on the overall vehicle generation and the assessment of the development impacts. The model assumes only a very low proportion of floor space (10%) will be for distribution. Consequently, the model does not test the worst-case scenario or even the sensitivity of the split between these uses which is important given the substantial difference in vehicle traffic generated.
29. Notwithstanding the assumptions could be significantly underestimating the Gatwick Green vehicle trips, the highway modelling work shows that a number of junctions will be overcapacity. This is both with and without sustainable travel mitigation measures.
30. For modelling scenario 2 with Gatwick Green, even with sustainable travel mitigation measures, six junctions are modelled as being overcapacity. This includes two junctions on A2011 Crawley Avenue to the south of Gatwick Green. For modelling scenario 3 with Gatwick Green and additional housing, further junctions are recorded as being overcapacity, including along Balcombe Road / Radford Road and along M23 Spur / A23 corridor. No specific highway mitigation measures are identified and a Manage and Monitor approach is proposed.
31. The Crawley Transport Study includes an explanation of the committed and consented schemes the traffic generation for which are included in the reference case and forecast models. The models also include an allowance for general background growth.
32. It is not clear, however, whether any account of Gatwick Airport passenger growth with the existing runway has been accounted for in the assessment and consequently the impacts understood and suitable mitigation, if required, provided.
33. We are concerned that the assumptions adopted in the Transport Modelling are not only inconsistent with the assumptions adopted elsewhere within the evidence base but, due to their sensitivity, could mean the vehicle trip generation of Gatwick Green is actually many times greater than assessed within the Crawley Transport Study. The inconsistency in terms of the plot ration assumption, also means that the 24.1ha allocation would not meet the floorspace requirement identified in the economic growth assessment.
- Conclusions**
34. The allocation of Gatwick Green is a reaction to the PINS advice on the unacceptability of the proposal to remove safeguarding for the North Crawley Action Area Plan. It is not an allocation informed by a comprehensive strategy review of how to meet employment requirements as part of boroughwide development strategy. There is no evidence that any analysis was undertaken to understand the impacts of that allocation or to investigate how the employment land requirement could have been met through alternative means.

35. We consequently conclude that the Gatwick Green allocation is unsound on the basis it:
- (i) It has not been positively prepared as the strategy of meeting employment land needs at Gatwick Green has not been informed through either an appropriate understanding or evidence base of the impact of the allocation nor has there has been any examination of whether the unmet employment space need could be accommodated elsewhere in the district or in other districts;
 - (ii) It is not justified as the size of the allocation is too large and the need for scale of the employment land requirement is not proven. Additionally, the impact of the removal of Gatwick Green from the safeguarded area on the ability to implement the Gatwick Masterplan has not been investigated or understood, and the transport modelling underestimates the potential highway impacts and fails to address the access impacts;
 - (iii) It would not be effective given the removal of safeguarding cannot be regarded as certain, there is no known timescale for its removal and that GAL continues to object to its total or partial removal;
 - (iv) Would not respect national policy in respect of safeguarding land for airport expansion.
36. We request that this allocation is deleted from the draft plan and that further work is undertaken, including through the Duty to Cooperate, to examine whether the allocation can be met elsewhere.

EC2: Economic Growth in Main Employment Areas

37. We objected to this policy in 2020 Reg19 DCLP because Lowfield Heath, which is within land safeguarded for a second runway, was included as one of the main employment areas where major economic related development would be allowed.
38. We recognise that Lowfield Heath is a main employment area. We note that, in line with new Policy GAT2, references to Lowfield Heath in the supporting text now refer to Policy GAT2. However, in view of the fact that Lowfield Heath is within the safeguarded land we consider that the policy should make it clear that the provisions of policy GAT2 would take precedent over Policy EC2 in respect of Lowfield Heath. This will ensure that a primary consideration in assessing any major employment development in Lowfield Heath would be the need to protect the safeguarded land from development that would add to the costs or complexity of the development of a second runway.
39. Further support for such additional control on development in Lowfield Heath derives from the inherent unsustainability of permitting major development only for it to subsequently have to be removed in the event a second runway is brought forward. This would not represent sustainable approach to development.
40. We therefore suggest inserting a new paragraph in the policy before the final paragraph that allows some scope for development and redevelopment in Lowfield Heath to enable modernisation and continued use of existing premises, but not to allow major development:
- “In Lowfield Heath, employment generating development, including extensions, improvements and redevelopment of existing premises will be permitted provide it would not lead to a significant intensification or increase of development.”*

EC7: Visitor Accommodation

41. We objected to Policy EC6 in 2020 Reg19 DCLP. We note that the policy has now been changed and specifically excludes the need for application for hotel development at Gatwick from the sequential test. We support the policy.

DD5: Aerodrome Safeguarding

42. We supported the inclusion of Policy DD6 in the 2020 Reg19 DCLP but suggested some minor revisions to the policy and supporting text. We note that the policy and supporting text has not been amended but we continue to support the policy.

DD6: Advertisements

43. We continue our support for this policy (previously Policy DD7 in the 2020 Reg19 DCLP), for reasons set out in para. 8.1 of our representations on the 2020 Reg19 DCLP.

IN1: Infrastructure Provision

44. We continue our support for this policy for reasons set out in para 10.1 of our representations on the 2020 Reg19 DCLP.

IN2: The Location and Provision of New Infrastructure

45. We continue our support for this policy for reasons set out in para 11.1 of our representations on the 2020 Reg19 DCLP.

EP4: Development and Noise (and Local Plan Noise Annex)

46. We broadly supported Policy EP4 in 2020 Reg19 DCLP. We considered that the policy is correct in its approach of:

- a. Avoiding noise sensitive development which would be exposed to “unacceptable” levels of noise
- b. Requiring mitigation measures where noise sensitive development would be exposed to noise levels above the Lowest Observed Adverse Effect Level.

47. We are pleased that minor amendments we suggested to the policy have been adopted.

48. However, in relation to aviation transport sources we consider the ‘unacceptable level’, defined in part A of the policy specifically for New Sensitive Development as 60dB LAeq (and reflected in Table 1 of the Noise Annex), is not appropriate for reasons stated in paras 9.4 to 9.8 of our previous representations.

49. Topic Paper 7 offers a justification of the LAeq 60dB level with reference to a single appeal decision for residential development, located very close to the extended centre line of Manchester Airport’s second runway. Given, however, the variety of developments that may be proposed in the Crawley area and their relative position to the runway infrastructure at Gatwick GAL does not consider that it should automatically follow that the LAeq 60dB level be adopted as ‘unacceptable’ for new noise sensitive development across the borough of Crawley.

50. In the 2015 Local Plan the unacceptable level for new housing was set at 66dB LAeq, reflecting planning guidance at that time and decisions on planning applications such as Forge Wood in 2011. With more recent studies showing sensitivity to noise having increased, we consider 63dB LAeq should be taken as the Significant Adverse Effect Level and this should be reflected in Table 1 of the Noise Annex instead of Leq 60dB.

51. We support the changes made to correct the Lowest Observed Adverse Effect Level (LOAEL) for aircraft noise is 51dB $L_{Aeq, 16 \text{ hour}}$ and 45dB $L_{Aeq, 8 \text{ hour}}$ night¹ and the requirement in EP4 to incorporate noise mitigation into new noise sensitive development in areas where noise levels are above this. That mitigation should be developed in line with the Pro-PG Planning and Noise; New Residential Development, as referred to in the Noise Annex.

H3d: Upward Extensions (to Houses)

52. We supported Policy H3d in the 2020 Reg19 DCLP, but suggested a minor revisions to criteria (i) of the policy (aerodrome safeguarding) in para 15.1 of our previous representations. We note that the policy and supporting text has been amended as suggested. We continue to support the policy.

H8: Gypsy, Traveller & Travelling Showpeople Sites

53. We objected to this policy in the 2020 Reg19 DCLP. However, in view of the fact that the 2021 Reg19 DCLP reinstates a policy (Policy GAT2) to safeguard land for a second runway, we no longer object to this policy.

ST1: Development and the Requirements for Sustainable Transport

54. We supported the policy in the 2020 Reg19 DCLP, but suggested a minor revision. We note that the policy has not been changed but we have no objections to the policy as worded.

ST3: Improving Rail Stations

55. We objected to the policy in the 2020 Reg19 DCLP. We note that the policy has been amended broadly in line with suggested changes we proposed. We therefore no longer object to the policy.

ST4: Safeguarding a Search Corridor for Crawley Western Relief Road

56. We objected to this policy in the in the 2020 Reg19 DCLP because the search corridor encroached into land safeguarded for future development of a second runway.

57. We note that despite the 2021 Reg19 DCLP reinstating a policy safeguarding land for a second runway (Policy GAT2), and furthermore accepting that the land to the south of Gatwick would be required to accommodate development associated with a southern runway (para 9.53), the search corridor has not been altered, but continues to be situated more or less wholly within the safeguarded land boundary. Our objection therefore still stands and is now strengthened by the inherent inconsistency between Policies GAT2 and ST4.

58. The boundary of the safeguarded land on the proposals map has rightly been taken from the boundary in GAL's 2019 Gatwick Airport Master Plan. That in turn reflected detailed master planning work undertaken by GAL during the period 2012 – 2015 as parts of its submissions to the Airports Commission, when the 2nd runway option was shortlisted for detailed studies. This included detailed consideration of the spacing required between the existing runway and new southern runway to enable fully independent runway operations, together with the land needed for a third passenger terminal and its associated piers / satellites, aprons and stands; connecting taxiways; and operational roads, all designed in accordance with established safety standards

¹ Consultation Response on UK Aviation Policy: A framework for balanced decisions on the design and use of airspace, October 2017, Section 2 Paragraph 2.72.

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and clearances to provide for safe and efficient operations. The southern alignment of the 2nd runway masterplan boundary also reflected well considered plans for:

- a. the diversion of the A23 to the east and south of the existing airport, and connecting into the existing roundabout at County Oak (including compliant footpaths and cycleways alongside it);
- b. the provision of a varying width corridor to accommodate the required diversion channels for the Crawters Brook and River Mole and to meet requirements of the Water Framework Directive and floodplain;
- c. a noise mitigation bund.

59. With a possible need to have to compulsory purchase land, the master plan, and therefore the extended airport boundary, has been carefully considered to minimise land take. There may be some scope for minor changes to the southern boundary, such as minor adjustments to the width of the river corridor in places, but the scope is likely to be minimal.

60. We also note that Homes England (HE) have prepared three options for alignment of the Western Relief Road. These have been prepared having regard to the need to safeguard land for R2. HE's northernmost alignment option extends marginally into parts of the R2 river diversion corridor. HE's southernmost option is aligned well to the south of the safeguarded search corridor shown on the Local Plan Map.

61. Given a second runway and associated / related facilities could not be delivered without the land included within the Western Relief Road search corridor, the search corridor is illogical and incompatible with safeguarding for R2. It would seem logical for the width of the corridor to be broadly based on the alignments of the southernmost and northernmost extents of the alignment options prepared by Homes England. In any event the boundaries of the search corridor should be revised so that any encroachment into safeguarded land for the second runway is minor given the limited opportunities to for the R2 boundary to be retracted.

62. It would also be logical for the eastern end of the search corridor to relate to the detailed R2 space and master planning undertaken by GAL, including how the relief road might connect into the diverted route for the A23 at County Oak.

63. At the present time, however, the proposed search corridor as shown on the Local Plan Proposals Map is not sound or justified.

Draft Crawley Borough Local Plan 2021 – 2037

Submission Publication Consultation: January – June 2021

Objections by Gatwick Airport Limited

Detailed Objection to Policies EC1(v) and EC4 Strategic Employment Allocation at Gatwick Green

Annex 1: Review of Employment Land Justification

The NPPF requires local authorities to “set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth, having regard to Local Industrial Strategies and other local policies for economic development and regeneration” (para 81.a).

Safeguarding

In the notes of the PINS Advisory Video Conference, the principle of safeguarding is dealt with directly in respect of the proposed removal of safeguarding for the Crawley North area. The Inspector advises that as the removal of safeguarding cannot be regarded as certain, there is no known timescale for the removal of the protection, and GAL objects to the removal of the safeguarding (the Gatwick Airport Masterplan stating that it is in the national interest to continue with the strategy of safeguarding), the proposal to remove the safeguarding was condemned as being ‘unlikely to be effective as things stand’. The strategy now adopted similarly conflicts with safeguarding policy. It has not been informed through discussions with GAL and an objection is maintained. The basis of the assumption is incorrect. GAL are making representations on this point.

The Definition of the Functional Economic Market Area

Crawley Borough Council commissioned Lichfields to undertake a study of the Northern West Sussex (NWS) area which encompasses three West Sussex local planning authorities - Crawley, Horsham and Mid Sussex.

Lichfields initially produced the 2020 Northern West Sussex Economic Growth Assessment (NWEGA) (dated January 2020) which was intended to provide a comprehensive evidence base for employment and economic development needs across the NWS area during the period up to 2036.

The report concluded that, looking at commercial, retail and housing activities, the NWS operates as a broad Functional Economic Market Area (FEMA) which is largely consistent with the authority boundaries of Crawley, Horsham and Mid Sussex. This conclusion does not seem justified by the evidence referenced in the report which demonstrated Crawley’s functional links with areas to the north, with the area covered by the adjoining district councils in Surrey and beyond. For example, the report examined commuting flows into and out of the area, identifying an inflow of 58,187 working people with the greatest quantities originating from Reigate and Banstead, the London Borough of Westminster, Tandridge and Mole Valley to the north and Brighton and Hove to the south.

Whilst the commercial property market was found to be relatively self-contained, local agents reported that the majority of enquiries for business space tend to originate from within a 15-20 mile radius, with the M25 generally providing the ‘cut off’ in terms of occupier movement north of the sub-region. Crawley continues to attract the strongest levels of demand from business occupiers, across both office and industrial sectors and from major multinational firms as well as local SMEs. Again, this finding indicates a strong linkage with areas to the north of the borough.

The latest retail study for Crawley showed that the Borough has a wide retail catchment area that extends north to the M25 and beyond (as far north as Warlingham, situated just south of Croydon), north west to Dorking, south west to Billingshurst, south to Burgess Hill, south east to Uckfield and north east to just west of Sevenoaks. This finding also demonstrates the borough’s functional economic links with areas to the north.

The housing market also points to an overlap with surrounding housing market areas, in particular in the southern parts of Horsham and Mid Sussex in and around Steyning, Hurstpierpoint and Hassocks (and potentially Burgess Hill) but also, in the northern part of the area, with parts of Surrey.

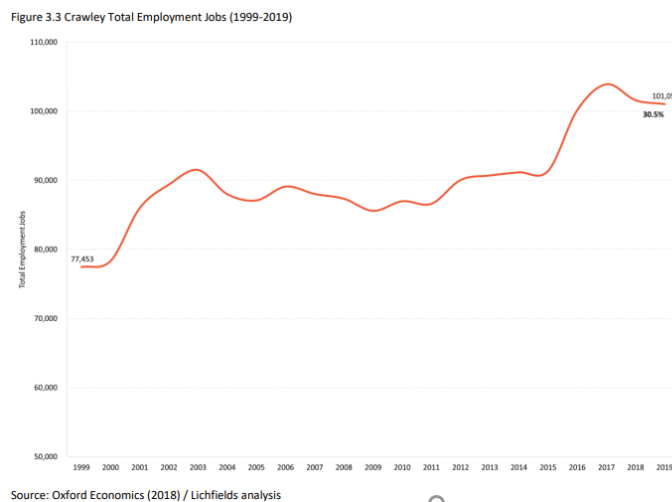
The NWEGA states that its conclusions on the FEMA do not take account of policy positions or approaches that maybe adopted by local planning authorities across NWS and neighbouring areas through the Duty to Cooperate. It is up to local planning authorities to determine how the conclusions from the study are taken forward in planning policy terms.

We consider the evidence clearly demonstrates the relationship of Crawley with the area to the north of the borough, in particular the three Surrey counties of Mole Valley, Reigate and Banstead, and Tandridge. Consequently, it is appropriate for these areas to be given equal weight in the application of the Duty to Cooperate with the other districts in NWS.

Employment Forecasts

1. The Northern West Sussex Economic Growth Assessment (NWEGA) - Jan 2020

The NWEGA assess employment growth in the borough over the period 1999 – 2019, based on data provided by Oxford Economics (OE), as shown in the figure below which is extracted from the report (Figure 3.3). The report notes that over the period Crawley experienced the greatest job growth in NWS, with the greatest increase in jobs occurring in 2000 (9.8%) and in 2015 (9.6%) but with a stagnant job growth period in between 2003 – 2015. We note the report is silent on the pre-COVID decrease in employment post 2017 and the downward trend indicated by the data.



The study looks at employment change by sector in Crawley over the same 20-year period, again based on data from OE. This shows that some sectors have seen a large proportional increase in employment (such as administrative and support services; transportation and storage (in part reflecting the growth in activity at Gatwick Airport) but that the manufacturing sector has experienced a significant decline in employment (5,097 jobs).

The study then assesses three different future economic growth scenarios for Crawley (and Horsham) based on:

- (i) Projections of employment growth in the main B class sectors (labour demand) derived from economic forecasts produced by OE (dated Q4 2018);
- (ii) Consideration of past trends in completions of employment space based on monitoring data collected by Crawley Borough Council, and how these trends might change in the future.
- (iii) Estimates of future growth of local labour supply based on demographic assumptions applied as part of the 2019 Northern West Sussex Strategic Housing Market Assessment (SHMA).

The OE employment projections indicate overall growth of 6,340 workforce jobs for Crawley over the period from 2019 to 2036, equivalent to around 373 jobs per year on average. Table 8.1 below, also extracted from the study, shows the changes on a sectorial basis. The key drivers of growth are admin and support, wholesale and retail trade whilst the manufacturing, transport and storage sectors will incur the largest employment losses.

Table 8.1 Fastest Growing and Declining Sectors in Crawley, 2019-2036

| Oxford Economics Sector | Use Class | Employment Change (2019-2036) | % Change (2019-2036) |
|---|-----------|-------------------------------|----------------------|
| Admin and support services | Orange | +3,660 | +19.1% |
| Wholesale and retail trade | Orange | +1,240 | +9.4% |
| Professional, scientific and technical activities | Green | +995 | +14.7% |
| Human health and social work activities | Red | +725 | +16.3% |
| Construction | Orange | +625 | +16.8% |
| Accommodation and food services | Red | +530 | +7.3% |
| Electricity, gas, steam and air conditioning supply | Orange | -150 | -11.4% |
| Public admin and defence | Orange | -200 | -8.5% |
| Transport and storage | Orange | -565 | -2.5% |
| Manufacturing | Green | -1,530 | -23.0% |

Source: Oxford Economics 2018 / Lichfields analysis

Key: GREEN = B class sector

ORANGE = Part B class sector

RED = Non B class sector

In comparison with past trends, the baseline employment projections for Crawley imply a significant slowdown in job growth over the study period between 2019 and 2036 compared with recent patterns of job change in the Borough going back to 2011 (paragraph 8.18).

Converting the jobs change forecast into a floorspace requirement, the study identifies a need for employment floorspace of 6,790sqm in Crawley. However, as shown by Table 8.5 below extracted from the study, the need for both manufacturing and distribution is negative.

Table 8.5 Net Employment Space Requirements in Crawley and Horsham (Baseline Job Growth)

| | Floorspace (GEA sqm) 2019 to 2036 | |
|------------------------|-----------------------------------|---------------|
| | Crawley | Horsham |
| Offices (B1a/B1b) | 33,890 | 22,610 |
| Manufacturing (B1c/B2) | -24,065 | -7,850 |
| Distribution (B8) | -2,855 | 25,970 |
| Total B Class | 6,970 | 40,730 |

Source: MSDC analysis

Note: Totals rounded

The study then looks at past completion rates on the assumption that past development rates carry on in the future at the long-term average. On this basis, the floorspace requirement equates to 130,900 sqm for Crawley by 2036, comprising 27,200 sqm offices and 103,700 sqm industrial and warehousing.

The labour supply assessment is based on an annual housing supply target of 752 dwellings per annum. As the draft plan proposes a lower annual housing target, we do not consider the results of this assessment further.

The study then converts the jobs and floorspace requirements to a land requirement for Class B floorspace* which ranges from minus 1.1 ha for the employment projections to plus 33ha for the continuation of past trends.

2. The Northern West Sussex Economic Growth Assessment Focussed Update for Crawley - Sept 2020

CBC subsequently commissioned Lichfields' to undertake a focused update to provide supplementary and updated economic evidence specifically to inform the approach to economic growth and employment land policies within the new Crawley Local Plan. The focussed report is dated September 2020.

The scope of the update study is set out below with all other aspects of the NWEGA remaining unchanged.

- 1 Re-visit future economic growth forecasts for Crawley set out in the 2020 EGA – prepared by Oxford Economics, which implied a fairly modest level of future growth – and undertake some further interrogation to identify the extent to which any specific macro sector or other assumptions had a determining effect on the outputs for Crawley, set in the context of the long-term historical growth rate for the Borough and the structure of its economy;
- 2 Update the economic forecasts to reflect Covid-19 and revised macroeconomic assumptions for the UK economy more widely;
- 3 Given the added uncertainties associated with forecasting at this time and also what appeared to be a pessimistic outlook associated with the 2020 OE economic forecasts, benchmark these against equivalent contemporary figures sourced from Experian(E) to inform the 'triangulation' judgement about the most appropriate and positive basis for long-term planning in Crawley;
- 4 Prepare new estimates of future employment land requirements for the range of Class B uses in terms of floorspace and land areas for all updated growth scenarios;
- 5 Assess the updated demand/supply balance of employment land in Crawley over the new Local Plan period, to consider the potential need to provide additional capacity through the new Local Plan.

The report acknowledges that it is inevitably a point-in-time assessment and that whilst it has incorporated the latest data and other evidence available at the time of preparation (i.e. July/August 2020), the accuracy and sources of data derived from third party sources has not been checked or verified.

Projections of employment growth in the main Class B uses (labour demand) are derived from economic forecasts produced by OE and E in 2018 and 2020. In addition, a consideration of past trends in completions of employment space based on the latest monitoring data collected by Crawley Borough Council; and estimates of future growth of local labour supply based on the Council's latest housing delivery trajectory and demographic assumptions consistent with the 2019 Northern West Sussex Strategic Housing Market Assessment (SHMA).

The 2018 forecasts produce different levels of employment land requirements ranging between 2.9ha and 38.7ha. These figures include a 10% buffer to cater for factors such as a delay in development sites coming forward.

Table 2.4 Employment Land Requirements

| | Employment Land (ha) 2019 to 2036 | |
|------------------------|-----------------------------------|---------------|
| | Oxford Economics 2018 | Experian 2018 |
| Offices (B1a/B1b) | 5.6 | 5.9 |
| Manufacturing (B1c/B2) | -6.0 | -0.6 |
| Distribution (B8) | 3.3 | 33.4 |
| Total B Class | 2.9 | 38.7 |

Source: Lichfields analysis

The 2020 forecasts examine the potential impact of the Covid-19 pandemic on the Borough’s economy in both the short term and the longer-term Plan period. It is noted that these may need to be re-considered closer to the Local Plan examination stage depending on how the economic situation changes. The 2020 forecasts imply much lower levels of growth, and therefore employment land requirements, for Crawley overall. The OE forecasts are more pessimistic than the Experian.

OE reduce Crawley’s total job growth by over 50%, from 6,300 jobs to 2,900 jobs over the Plan period. This reduction is largely caused by the ‘rebasings’ of jobs in 2019, with workforce jobs expected to reach the same level by 2036 as implied by pre-Covid forecasts. B-class jobs reverse from growth of 1,600 jobs to a decline of 527 jobs;

E also reduce Crawley’s total job growth by about 40%, from 14,800 jobs to 8,900 jobs over the 2019-2036 Plan period and imply that the local economy supports a smaller employment base by the end of the Plan period. B-class job growth remains positive but reduces by nearly 60%.

Tables A.4.4 and A.4.6 are extracted from the study below and summarise the two forecasts which range from -9.8 ha to +13.4 for all B Class uses.

| Table A.4.4 Employment Floorspace and Land Requirements: Oxford Economics 2020 | | | Table A.4.6 Employment Floorspace and Land Requirements: Experian 2020 | | |
|--|-------------------------------------|----------------------|--|-------------------------------------|----------------------|
| | Change 2019-2036 | | | Change 2019-2036 | |
| | Net Employment Floorspace (GEA sqm) | Employment Land (ha) | | Net Employment Floorspace (GEA sqm) | Employment Land (ha) |
| Offices (B1a/B1b) | 27,385 | 4.5 | Offices (B1a/B1b) | 25,362 | 4.2 |
| Manufacturing (B1c/B2) | -44,449 | -11.1 | Manufacturing (B1c/B2) | -16,362 | -4.1 |
| Distribution (B8) | -12,849 | -3.2 | Distribution (B8) | 48,400 | 13.3 |
| Total B Class | -29,913 | -9.8 | Total B Class | 57,400 | 13.4 |

Source: Oxford Economics 2020 / Lichfields analysis

Source: Experian 2020 / Lichfields analysis

We comment that in comparison with past trends, the 2018 forecasts already imply a slower job growth trajectory for the Crawley economy over the new Plan period and the level of growth is even more subdued in the 2020 Covid-19 affected forecasts.

In comparison, the trend-based data reveals average net completions of 2,220sq m office floorspace and 7,150 sq m industrial and distribution floorspace per annum over the period 2011-2019. This trend is extrapolated across the plan period (2019-2036) and converted to a land requirement of 39ha. This conclusion is in part based on the fact that gross and net completions of B-class space were considerably higher in 2018/19 than in recent years (driven largely by two developments at Space Gatwick (B8) and the Former Thales site (B1 offices) which have had the effect of increasing the historic annual average take-up rate and therefore the resulting employment floorspace and land requirement under this scenario for the Local Plan period to 2036.

Issues

In the light of our analysis we have identified the following broad issues:

(i) The failure to properly protect safeguarded land

The note of the PINS Advisory Video Conference sets out the Inspector's advice that the NPPF requires local plan policies to positively and proactively encourage sustainable economic growth. It goes on to state explicitly that with the safeguarding of land at North Crawley still in place, the Council should be proactively seeking to accommodate unmet economic needs in nearby authority areas through the Duty to Cooperate. It treats the safeguarded land as a single entity and does not envisage that parts of it can or should be nibbled away.

(ii) The reliability and interpretation of the economic land forecasts

The employment land review undertaken for CBC across 2 studies produces a very broad range of employment land requirements. Even the Update report produces a range between 21.7ha and 56.9 ha. The 2018 OE and the 2020 OE and E assessments seem to be dismissed on the basis the conclusions did not provide employment land forecasts which were high enough, and in relation to the latter, that the conclusions on the impact of Covid 19 were too uncertain. Support for the 2018 E forecasts was advanced on the basis that the past take up rates indicate an employment land need of about the same magnitude. This justification overlooks the admission in the report (paragraph 2.37) that the additional 2018/19 data included the completions of two large developments which had the effect of increasing the historic annual average take-up and consequently the employment land requirement for the new local plan period.

All of the evidence in the two employment land assessments points to a reduction of the level of employment growth in Crawley in the forthcoming local plan period. The employment forecast adopted was the highest of the various forecasts, with the exception of the future labour supply scenario which assumes that the whole of the West of Crawley housing allocation is completed within the plan period (which will clearly not be the case).

The fact that the forecast level of need is of the same magnitude as that based upon past take up rates is cited as an indicator that the forecast is acceptable. The assessment itself nevertheless acknowledges that past take up rates have been inflated by two very recent completions and so, rather than providing support for the forecast, it indicates that the forecast overstates the level of need. This conclusion is further supported by the forecasts of the impact of Covid-19 on the employment position, which all forecast much lower levels of growth, and therefore employment land requirements but which are not taken into account by the Update Report.

(iii) The oversize scale of the allocation

Policy EC4 indicates that the Gatwick Green allocation of 47ha should provide "as a minimum", 24.1ha new industrial land, predominantly for B8 storage and distribution use. Any additional floorspace would need to be justified through appropriate evidence.

Gatwick Green is consequently very nearly twice the size of the employment land requirement (24.1ha) it is intended to meet. Furthermore, there is no evidence in the local plan, as is inherent from the wording of the policy itself, of any need for the larger allocation.

It is unclear what happens to the remaining 22.9ha or why such a large release of surplus land is required and/or justified to meet the employment land requirement, even as identified by the council, especially in contravention of Gatwick Airport safeguarding.

(iv) The lack of understanding of the impact of Gatwick Green on the GAL masterplan

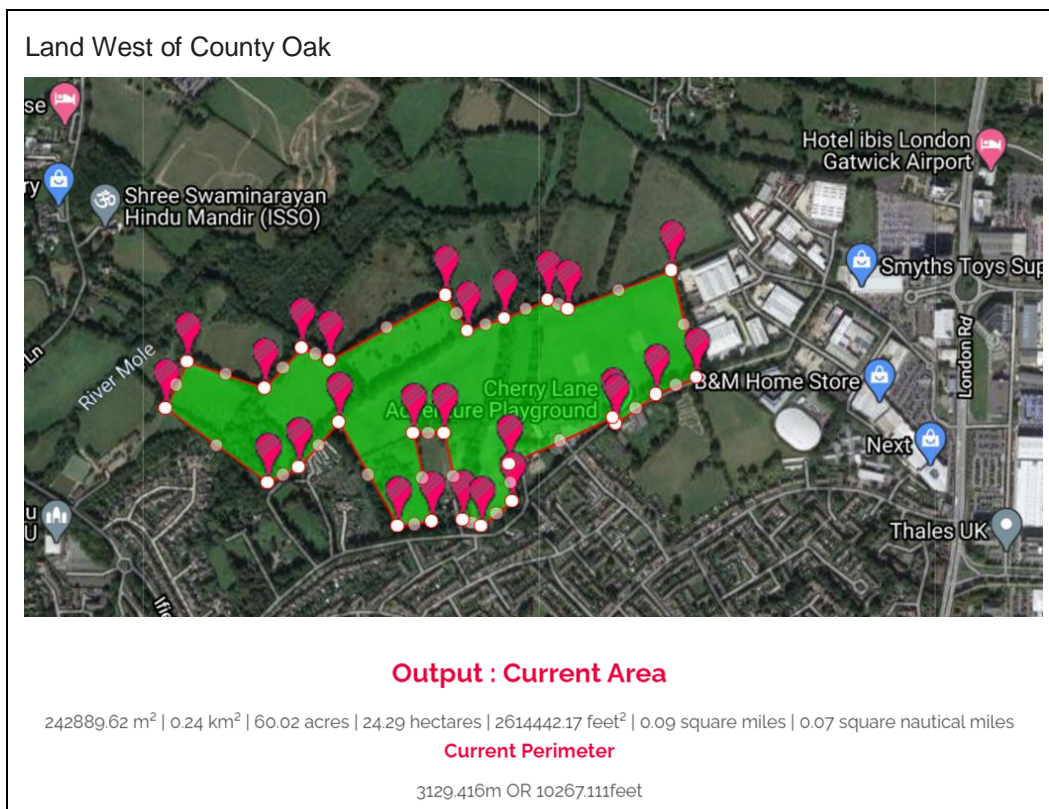
The allocation of Gatwick Green is based upon a simple but ultimately uniformed assessment as to whether land shown in the Gatwick Masterplan for surface parking produces an ‘efficient’ use of land. Justified on the basis that GAL are investigating the use of decked car parks, it is concluded that 47ha of land can be excluded from the safeguarding area.

The opinion of GAL on the impact of removing this amount of land from the safeguarded area was not sought by CBC. It was a view reached unilaterally by CBC. The basis for the conclusion that it would not have an unacceptable impact on the Gatwick Masterplan is not set out nor is there any evidence as to what analysis was undertaken by CBC on which to base this opinion.

(v) The failure to examine alternative solutions

The strategy adopted by CBC fails to look at the alternative scenarios for providing employment land either within the borough or in surrounding districts on the edge of the urban area, or elsewhere, through the Duty to Cooperate.

A ‘Built-Up Area Boundary Review’ was undertaken in connection with the 2015 Local Plan. As a minimum, this exercise should have been repeated to allow an informed and balanced assessment of whether the objectively assessed employment needs could be met elsewhere in the borough. One possible location which has simply not been considered is Land West of County Oak which lies outside of the safeguarded area and adjacent to existing employment locations. By our assessment, this area extends to about 24ha (see below).



(vi) The failure in the duty to co-operate post April 2020

Additionally, there needs to be further work with authorities within the Gatwick Diamond to determine the scope for additional land allocations beyond CBC boundaries – in particular along the M23 corridor – as part of the Duty to Cooperate. The discussions should not be restricted just to the authorities within Northern West Sussex Economic Growth Area as this is an artificial designation which does not reflect the location of Crawley on the northern boundary of the County; the primary road access to the town along the M23 which runs down from the north, or the town’s Travel to Work Area which recognises that the economic influence of the town also extends to the north to encompass areas in Surrey.

There was an opportunity to work with Mid Sussex DC on its Site Allocations DPD which was submitted in December 2020 and which includes employment allocations along the M23:

| | | |
|-----|---------------------------|-------|
| SA4 | Land North of Junction 10 | 2.7ha |
| SA7 | Cedars | 2.3ha |
| SA8 | Pease Pottage Nurseries | 1.0ha |

There was an opportunity to consider the extent to which these allocations could have been extended further, or indeed other sites brought forward, to help meet the employment needs of Crawley. Whilst the opportunity might have been missed in respect of this draft of the plan, there remain opportunities for Crawley to engage with the immediately neighbouring Surrey authorities, including Reigate and Banstead, Mole Valley and Tandridge.

Conclusions

In the light of our analysis of the evidence base for the proposed Gatwick Green allocation, we have reached the following conclusions:

1. Gatwick Green is proposed to be constructed on land that remains safeguarded for the expansion of Gatwick Airport;
2. The Government’s draft Aviation Strategy concludes “It is prudent to continue with a safeguarding policy to maintain a supply of land for future national requirements and to ensure that inappropriate developments do not hinder sustainable aviation growth”. This stance is recognised in the National Planning Policy Framework (NPPF) which restates the government’s commitment to “identify and protect, where there is robust evidence, sites and routes which could be critical in developing infrastructure to widen transport choice” (paragraph 104).
3. The development of Gatwick Green for employment purposes would conflict with that safeguarding and the Gatwick Masterplan;
4. The matter of safeguarding was addressed in the Inspector’s Notes of the PINS advisory video conference (April 2020) in respect of land ‘North of Crawley’. The Inspector concluded that the removal of safeguarding cannot be regarded as certain, there is no known timescale for its removal and that GAL continues to object to its removal. Consequently, the proposal to remove safeguarded land was, in that case, as a consequence considered “...unlikely to be effective”. We consider that the circumstances which lead to that conclusion apply in this case;
5. The Inspector’s conclusion treats safeguarded land as a whole and does not give any support for parts of it to be nibbled away in a piecemeal fashion;
6. The evidence base includes two studies which produce a wide range of employment land requirements ranging from a negative requirement based on employment projections to a requirement of 38ha based upon one of the sets of forecasts. The wide disparity in the conclusions undermines confidence in their reliability;
7. The fact that the forecast level of need is of the same magnitude as that based upon past take up rates is cited as an indicator that the forecast is acceptable. The assessment itself nevertheless acknowledges that past take up rates have been inflated by two very recent completions.
8. In addition, the Update report also examines the impact of Covid on rates of employment growth. Whilst both OE and E both conclude there will be lower levels of employment growth for Crawley

- due to a fairly significant ‘rebasings’ of local employment levels which effectively reduces the scale of expected job growth. These findings are not taken into account in the conclusions;
9. Consequently, rather than providing support for the forecast, the fact that the allocation is of the same scale as past trends indicates that it overstates the level of need;
 10. The Update report acknowledges that the employment land requirements may need to be re-considered closer to the Local Plan examination, depending on how the economic situation changes. Given the dismissal of the conclusions on the impact of Covid-19 on job growth, the need for a review of the employment growth findings becomes even more apparent;
 11. The note of the PINS Advisory Video Conference with CBC in respect of the draft plan (2 April 2020) makes direct reference to the approach to be adopted in respect of employment land stating they will not “...necessarily be predicted by extrapolating past trends”.
 12. The Gatwick Green allocation is 47ha – very nearly twice the identified employment land requirement. It is unclear what happens to the remaining 22.9ha or why such a large release of surplus land is required and/or justified to meet the employment land requirement when there is no evidence of need for any greater level of development and when the site is already protected for an alternative use.
 13. There has been no investigation as to whether a smaller release, so as to minimise the impact on safeguarded land, would be a preferable solution. The lack of this analysis is a significant omission.
 14. The PINS note also states that with the safeguarding of land at North Crawley still in place, the Council should be proactively seeking to accommodate unmet economic needs in nearby authority areas through the Duty to Cooperate. There is no evidence that this the council undertook such action post the April 2020 conference and prior to allocating Gatwick Green;
 15. That engagement should include neighbouring authorities in Surrey as these are clearly part of Crawley’s economic area;
 16. Similarly, CBC did not seek to meet the requirement by looking for other sites within the Borough and as a first step it should have done so through an updated Built-Up Area Boundary Review.
 17. The allocation of Gatwick Green is based upon a simple but ultimately uninformed assessment as to whether land shown in the Gatwick Masterplan for surface parking produces an ‘efficient’ use of land. This assumption was not based upon any discussions with GAL. The decision to make the allocation was made on the basis of an uninformed and incorrect assumption;
 18. The allocation of Gatwick Green is a reaction to the PINS advice on the unacceptability of the proposal to remove safeguarding for the North Crawley Action Area Plan. There is no evidence that any analysis was undertaken to understand the impacts of that allocation or to investigate how the employment land requirement could have been met through alternative means.

In the light of these findings, we conclude that the allocation of Gatwick Green is ‘unsound’ on the basis:

- (i) It has not been positively prepared as the strategy of meeting employment land needs at Gatwick Green has not been informed through either an appropriate understanding or evidence base of the impact of the allocation nor has there been any examination of whether the unmet employment space need could be accommodated elsewhere in the district or in other districts;
- (ii) It is not justified as the size of the allocation is too large and the need for scale of the employment land requirement is not proven;
- (iii) Would not be effective given the removal of safeguarding cannot be regarded as certain, there is no known timescale for its removal and that GAL continues to object to its total or partial removal;
- (iv) Would not respect national policy in respect of safeguarding land for airport expansion.

GAL have sought to amplify these conclusions through two technical studies prepared by Arup Transportation which assess in detail the impact of the Gatwick Green allocation on the Gatwick Airport

Runway 2 Masterplan and of the traffic modelling associated with the proposed employment development.

Subject Gatwick Green and Impact on R2 Scheme

Date June 2021

Job No/Ref 279019-10

Gatwick Airport Limited (GAL)

Review of Gatwick Green and Impact on Gatwick Airport Runway 2 (R2) Scheme

Ove Arup & Partners Limited (“Arup”) has been appointed by Gatwick Airport Limited (GAL) to review the proposed Gatwick Green development as set out in the Draft Crawley Borough Local Plan. The Draft Crawley Borough Local Plan 2021-2037 (Submission Publication Consultation) seeks to revise the currently adopted Crawley 2030 Local Plan.

This note outlines the key concerns with the proposed land allocation for Gatwick Green as a Strategic Employment Location (Policy EC4), and the resulting impact of the reduced Safeguarded Land for Second Runway (Policy GAT2).

Paragraph 9.53 of the Draft Local Plan states:

“...land at Gatwick Green does not form part of the land take that would be required to accommodate a southern runway and the diversion of the A23, and is shown in the Gatwick Airport Master Plan as being utilised for a large area of surface car parking. 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 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. Therefore, the Local Plan retains safeguarding but amends its boundary to exclude land to the east of Balcombe Road and south of the M23 spur, which represents the only site within Crawley that can be allocated for strategic employment growth without prejudicing the possible delivery of a southern runway at Gatwick Airport.”

The allocation of Gatwick Green is therefore based on the assumption that the car parking for Gatwick Airport Master Plan for Runway 2 (R2) could be provided more efficiently and the allocation of Gatwick Green would therefore not prejudice the ability of delivering the R2 scheme. Feasibility work has therefore been undertaken to understand the impact of Gatwick Green on R2 car parking.

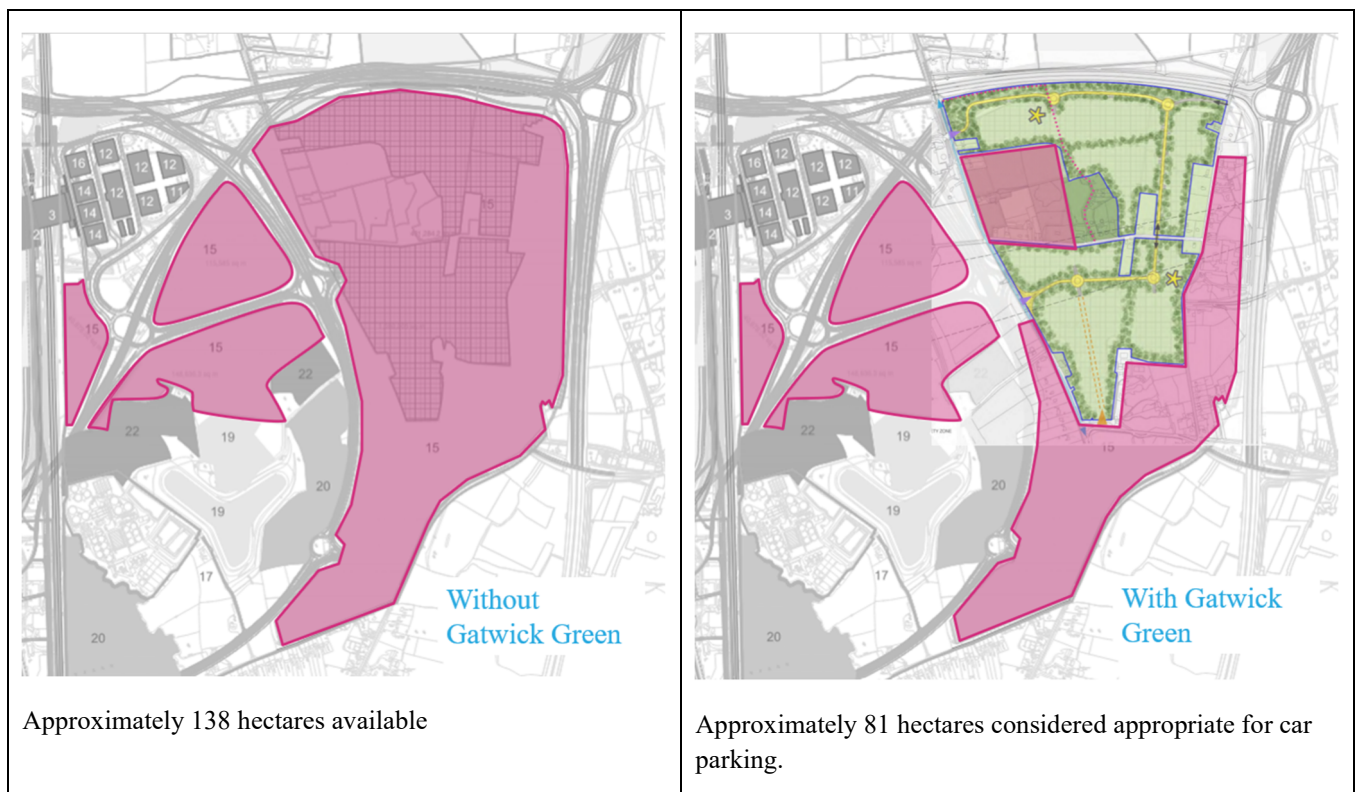
Gatwick Airport Master Plan R2 Car Parking Demand

GAL’s *Second Runway Operational Efficiency - Master Plan* is Appendix A5 of the Updated Scheme Design Submission (May 2014). Section 3.7 of this report sets out the car parking that would be provided to the east of the railway lines. Short stay car parking will be located within the multi-story car parks (MSCPs) and long stay and staff car parking are expected to be located within Zone 15 in the Master Plan. This zone is proposed to provide 95,750 spaces and includes land proposed for the Gatwick Green allocation.

Land Available for Car Parking

A review of the land available for 95,750 spaces has been undertaken with and without Gatwick Green. For the purposes of this note, “Without Gatwick Green” refers to the situation where the full R2 safeguarded land is available (i.e. no Gatwick Green development) and “With Gatwick Green” assumes the Gatwick Green allocation and development are successful. The land available is illustrated in Figure 1. Consideration is given on the likely remaining areas with the Gatwick Green development which would be appropriate to provide car parking.

Figure 1 – Land available for Master Plan car parking



Typical car parking densities, based on the experience at Gatwick Airport, are shown in Table 1. These have been considered against the land shown in Figure 1.

Table 1 – Typical car parking densities

| Car park type | Car park density |
|---------------|--|
| Surface level | 1 space per 20 sqm |
| Single deck | 1 space per 31 sqm (15.6 sqm of ground floor area) |
| MSCP | 1 space per 42 sqm (density by ground floor area subject to the number of floors) |

Without Gatwick Green

- Around 138 hectares. The average car parking density required to provide 95,750 spaces equates to around 1 space per 14.5 sqm of ground floor area, which demonstrates that the R2 Master Plan, already required an efficient arrangement with a combination of single decked and block parking.

Subject Gatwick Green and Impact on R2 Scheme

Date June 2021

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With Gatwick Green

- Around 81 hectares. The average car parking density required to provide 95,750 spaces is 1 space per 8.5 sqm of ground floor area.
- This level of density means surface level and single decked parking across the whole area will be insufficient to meet requirements. To provide the required number of spaces, MSCPs with an average arrangement of ground plus 4 storeys would be required across the whole area. However, it should be noted that the area to the west of the A23 would be limited to providing up to one deck due to aerodrome safeguarding height constraints, and the general configuration of the residual land does not produce as efficient a layout for the airport car parking provided as MSCPs. These constraints and restrictions would mean that even higher density MSCPs, with a greater number of storeys would be required in other parts of the residual land. GAL notes that it is not viable for long stay products to be provided through constructing MSCPs, given the added construction costs and lower financial returns from passenger charges for long stay parking. This is a substantial change from the R2 scheme in terms of construction and operation.

Highway Access to Land East of the A23

As illustrated on Figure 1, the primary access junction presently serving the safeguarded land to the east of the realigned A23 is a significant grade separated junction commensurate with the level of use expected. The suggested land allocation for Gatwick Green (Policy EC4), and the resulting impact of the reduced Safeguarded Land for Second Runway (Policy GAT2) disconnects this primary high capacity access from the remaining safeguarded land east of the A23 and creates segregation between the remaining parcels of land for parking. This would result in a substantial change from the R2 scheme in terms of access strategy, highway design, construction, and car park operation.

Summary and Conclusions

The Gatwick Green allocation in the Draft Crawley Borough Local Plan identifies the site to be a Strategic Employment Location and removes the land from being safeguarded for a second runway. The justification of this is that GAL could accommodate car parking more efficiently. We are not aware of any technical design exercise undertaken by or on behalf of CBC to test this assumption.

On behalf of GAL, we have consequently undertaken a study which demonstrates that with R2, an efficient use of the land was already assumed with a combination of decked and block parking. With the loss of safeguarded land to allow for the Gatwick Green development, MSCPs (at least ground plus four storeys) across the whole of the remaining land would be required. This is not considered to be feasible and therefore Gatwick Green limits the ability for the R2 Master Plan to come forward.

Subject Review of Gatwick Green Transport Modelling

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Gatwick Airport Limited (GAL)

Review of Gatwick Green Transport Modelling

Ove Arup & Partners Limited (“Arup”) has been appointed by Gatwick Airport Limited (GAL) to review the proposed Gatwick Green development as set out in the Draft Crawley Borough Local Plan.

The Draft Crawley Borough Local Plan 2021-2037 (Submission Publication Consultation) seeks to revise the current adopted Crawley 2030 Local Plan. The Crawley Transport Study (dated December 2020 and published May 2021) reports on the transport modelling undertaken to inform the potential impacts of three Draft Crawley Local Plan scenarios for the period 2020 to 2035.

The Local Plan period has since been extended to 2037 and the report considered that the modelling is sufficiently robust to be representative of impacts to 2037. It is stated that the quantum of development tested matches that proposed in the Local Plan period to 2037.

This note outlines the key areas of concern with the modelling work in relation to Gatwick Green which are:

1. The quantum of Gatwick Green development assessed within the traffic model.
2. The assumptions made between the proportion of B8 warehouse and B8 parcel distribution for Gatwick Green and their effect on the traffic generated.
3. The lack of highway mitigation identified, with reference to (1) and (2).
4. No clear allowance for Gatwick Airport growth having been made.

Summary

In summary, our concern is that a series of assumptions or decisions feeding the Crawley Transport Study, have resulted in an assessment of Gatwick Green (Strategic Policy EC4) that is optimistic and does not adequately consider the effects of the Draft Local Plan development local to Gatwick Airport.

The first assessment assumption is to consider an area of land, which is only 50% of the land removed from safeguarding (24.1 hectares of the 47.3 hectares of Gatwick Green). The Crawley Transport Study notes that the development area equates to 77,500sqm or around 32% of this reduced land area, rather than the 40% ratio used as a key assumption in both the Northern West Sussex Economic Growth Assessment and the subsequent Focussed Update for Crawley. The Crawley Transport Study then equates the reduced floor area (on the reduced land area) to vehicle trips based upon an assumption that only a very small proportion of the land use (10%) would be B8 parcel distribution, which is the higher vehicle generating B8 use (around 10x that of the predominant B8 warehousing used in the assessment).

Our concern is therefore that the vehicle trip generation of Gatwick Green allocation site could reasonably be multiples of that assessed within the Crawley Transport Study. An assessment of

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part of the land, part occupied by a very specific mix of development, could lead to an optimistic assessment of the impacts of the land allocation.

This assessment with a reduced level of development and vehicle trip generation, with the benefit of additional sustainable travel mitigation measures, still resulted in six junctions modelled as being overcapacity, including two junctions on A2011 Crawley Avenue to the south of Gatwick Green. No specific highway mitigation measures are identified.

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1. Quantum of Gatwick Green Development

The quantum of development tested for Gatwick Green in the Crawley Transport Study is considered a low proportional use of the land identified in the Draft Crawley Borough Local Plan (32% of the minimum land area used as development area). It is noted that in the Local Plan's evidence base, the employment land assessment undertaken by Lichfields (both the Northern West Sussex Economic Growth Assessment and the subsequent Focussed Update for Crawley) apply a plot ratio of 40% (i.e. a one hectare site could accommodate a footprint of 4,000 sqm for industrial and storage or distribution uses) to reflect the pattern of development in Crawley. On this basis, we are concerned that the quantum tested in the Crawley Transport Study would lead to an optimistic assessment of the impacts of the land allocation.

The development quantum assessed is also a substantially lower development area than the Gatwick Green Transport Strategy anticipates the development could comprise (circa 29% of 265,000 sqm of development). Again, our concern is that an assessment of part of the land, part occupied by development, could lead to an optimistic assessment of the impacts of the land allocation.

The above is summarised in Table 1 below.

Table 1 – Quantum of Gatwick Green Development

| Source | Policy / Assumptions | Quantum of development |
|--|--|---|
| Draft Crawley Borough Local Plan (2021) Submission Publication Consultation | Strategic Policy EC4 identifies “ <i>Gatwick Green as a Strategic Employment Location. The policy states a minimum of 24.1 hectares of new industrial land, predominately for B8 storage and distribution use, demonstrating through appropriate evidence the justification for any further industrial floorspace beyond this amount.</i> ” Paragraph 9.53 recognises that the Gatwick Green site is 47 hectares. The Gatwick Green land removed from Policy GAT2: Safeguarded Land for Second Runway exceeds 24.1 hectares and appears to be the full 47 hectares. | A minimum of 24.1 hectares |
| Gatwick Green Transport Strategy (2020) Draft Crawley Borough Local Plan, Consultation Statement Appendix 4b Wilky Group appendices | Paragraph 1.2.1: The Wilky Group proposes to bring forward an integrated mixed-use development and co-ordinated infrastructure solution to deliver the 47.3 ha (117 acre) site. Paragraph 1.2.2: “ <i>Whilst still at an early stage, it is anticipated that the development could comprise the following:</i> ” <ul style="list-style-type: none">• <i>Circa 160,000sqm GEA of B8 (Warehousing, distribution and logistics)</i>• <i>Circa 52,500sqm GEA of B1 (Office / employment use)</i>• <i>Circa 52,500sqm GEA of C1 (Hotel use)”</i> | 47.3 hectares 265,000 sqm of development together with ancillary uses. Development area represents around 56% of the land. |
| Crawley Transport Study (2020/21) | Paragraph 4.2.1: “ <i>Development quanta assumptions provided by CBC were used for the Gatwick Green site. The Gatwick Green assumptions comprise 77,500 square metres (SQM) (GFA) split into:</i> ” <ul style="list-style-type: none">• <i>B8 Parcels Distribution (10%) or 7,750 SQM</i>• <i>B8 Commercial Warehousing (60%) or 46,500 SQM</i>• <i>B2 Industrial estate (30%) or 23,250 SQM”</i> | 77,500 sqm of development Development area represents around 32% of the minimum allocated land (24.1 hectares), or 16% of the 47 hectares. |

The implications are considered follows:

- On the above basis, it is suggested that the Transport Study assessment has considered a low proportional area of development on the identified land, which in turn would give an optimistic assessment of its impacts. The Local Plan employment land assessment uses a higher plot ratio of 40%.

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- As the land area is a minimum (24.1 hectares), within a much larger Gatwick Green site identified within EC4 (circa 47 hectares), only a small proportion of the likely development on the Gatwick Green is currently being assessed.
- Strategic Policy EC4 identifies “*Gatwick Green as a Strategic Employment Location. Proposals for development of the Strategic Employment Location will be required to provide as a minimum 24.1 hectares of new industrial land, predominately for B8 storage and distribution use, demonstrating through appropriate evidence the justification for any further industrial floorspace beyond this amount.*” This appears to confuse land area and floorspace. It is not clear at what additional floorspace amount the appropriate justification would be required as the only area given is a land area. If the tested floorspace, 77,500 sqm, is the limit this should be stated.
- We therefore have concerns as to whether the Transport Study is testing the full effects of the Draft Local Plan development local to Gatwick Airport, or whether the policy reflects the quantum of development considered.

2. Land Use and Traffic Generation

Strategic Policy EC4 identifies that proposals for development will be required to provide ‘*predominately for B8 storage and distribution use*’. Within the Crawley Transport Study, it is acknowledged within the study trip rates (see Table 2) that vehicle trip generation is sensitive to the proposed B8 uses, i.e. the B8 parcel distribution has much higher vehicle trip rates, around 10 times that of B8 warehousing. Therefore, the split assumed between these uses has great bearing on the overall vehicle generation and the assessment of the development impacts.

Table 2 – Crawley Transport Study trip rates

| Development Type | Unit Rate | Origin-Rate (AM) | Destination Rate (AM) | Total Rate (AM) | Origin Rate (PM) | Destination Rate (PM) | Total Rate (PM) |
|--------------------------------|----------------|------------------|-----------------------|-----------------|------------------|-----------------------|-----------------|
| B8, Parcel Distribution Centre | per 100sqm GFA | 0.466 | 1.042 | 1.508 | 1.082 | 0.623 | 1.705 |
| B8, Warehousing Commercial | per 100sqm GFA | 0.049 | 0.121 | 0.170 | 0.076 | 0.017 | 0.093 |
| B2, Industrial estate (02/D) | per 100sqm GFA | 0.153 | 0.436 | 0.589 | 0.407 | 0.119 | 0.526 |

Extract from Table 3.1 of the Crawley Transport Study,

The assumption in the Crawley Transport Study for Gatwick Green is that the highest generating use, B8 parcel distribution, is a very small proportion of the overall floor space, at 10%. B8 warehousing, with the lowest trip rates, is assumed to occupy the greatest amount of floor space (60%). In total, 333 vehicle trips in the AM peak, and 298 vehicle trips in the PM peak are estimated for Gatwick Green on this basis. If however, an equal split was used between the two B8

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uses, the number of vehicle trips would have doubled in each peak hour to around 600 (noting that with a higher proportion of parcel and distribution this could increase further).

At this stage, if the split of B8 parcel distribution and B8 warehousing is neither restricted or known, it is a concern that the sensitivity of the split between these uses has not been tested, given the substantial difference in vehicle traffic generated.

We therefore have concerns as to whether the Crawley Transport Study is testing the full effects of the Draft Local Plan development local to Gatwick Airport, or whether the policy reflects the limitations in the development uses considered.

3. Lack of Highway Mitigation

As noted above, we have concerns as to whether the Transport Study is testing the full effects of the Draft Local Plan development local to Gatwick Airport, or whether the policy reflects the quantum of development considered.

Notwithstanding the assumptions above which could be significantly underestimating the Gatwick Green vehicle trips, the highway modelling work shows that a number of junctions will be overcapacity. This is both with and without sustainable travel mitigation measures.

For modelling scenario 2 with Gatwick Green, even with sustainable travel mitigation measures, six junctions are modelled as being overcapacity. This includes two junctions on A2011 Crawley Avenue to the south of Gatwick Green. For modelling scenario 3 with Gatwick Green and additional housing, further junctions are recorded as being overcapacity, including along Balcombe Road / Radford Road and along M23 Spur / A23 corridor. No specific highway mitigation measures are identified and a Manage and Monitor approach is proposed.

4. No Clear Allowance for Gatwick Airport Growth

The Crawley Transport Study includes an explanation of the committed and consented schemes included in the reference case and forecast models. The models also include an allowance for background growth using growth factors from NTEM / TEMPro. This growth is considered to take into account the committed and other planned growth of dwellings and jobs in the borough.

As noted in *Crawley Borough Local Plan Topic Paper 2: Gatwick Airport (2021)*, the growth of Gatwick Airport with a single runway, in terms of the number of flights and passengers, is not restricted by any extant planning permission. Gatwick Airport have set out their expectations for passenger and flight growth with the existing main runway in their 2019 Master Plan. It is not clear from the Crawley Transport Study whether any account of Gatwick Airport passenger growth with the existing runway has been accounted for in the assessment and therefore whether the Draft Local Plan highway impacts are fully understood.