

Ref No:

Office use only

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	Mr		
First name:	Rory	Rory		
Surname:	Joyce	Joyce		
Organisation:	Brunel Planning	Brunel Planning		
Address line 1:	51 Queens Road	51 Queens Road		

Ac	ddress line 2:	Tunbridge \	Nells		Tun	bridge Wells	
	Town/city: Kent				Kent		
	Postcode:	TN4 9LZ			TN	1 9LZ	
	Telephone:	077718983	15		077	71898315	
	Email:	roryjoyce@	brunelplanning.co	.uk	rory	rjoyce@brunelplannir	ng.co.uk
PAR	RT B – You	ur represe	ntation				
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: Policy ST4 - Safeguarding of a Search Corridor for a Crawley Western Link Road							
5. D	o you consi	der the Local	l Plan to be: (Plea	ase tick)			
5.	.1. Legally c	ompliant?		Ye	es		No 🗌
5.	.2. Sound?			Υe	es		No 🗌
5.	.3. Compliar	nt with the dut	y to co-operate?	Ye	es		No 🗌
	lease give d s possible.	etails explair	ning your respon	se to 5.1, 5.2	2, or	5.3 below. Please b	e as clear
V V	Part of the site falls within the designated 'Indicative Search Corridor for a Western Link Road' We have reviewed draft Policy ST4 – Safeguarding of a Search Corridor for a Crawley Western Link Road and the 'Crawley Transport Study – Transport Study of Strategic Development Options and Sustainable Transport Measures – Draft Crawley Local Plan 2021 – 2037.'						

	Policy ST4 states that: 'The design (a) its impact on (but not limited to			e account of			
	COIF Nominees Limited welcomes commercial development. There is designated 'Indicative Search Corradverse impact on the future deve site and its location within Manor Firequired, please continue years.	s no reason t ridor for a We lopment and Royal.	o object to the site's partial location estern Link Road' as long as there	on within the will be no of The Atrium			
7.	Please set out what modification have identified above. You need legally compliant or sound. It wo wording of any policy or text sho compliance with the duty to co-ope	to state why ould be helpfould be revis	this modification will make the ul if you are able to suggest ho ed. Please be as clear as possi	Local Plan w the ble. Any non-			
	N/A If required, please continue vi	our response on a	n additional piece of paper and securely attac	h it to this response			
	Your representation should cover information necessary to support/j there will not normally be a subsecting stage, further submissions will matters and issues s/he identification.	ustify the rep quent opportu only be at th	resentation and the suggested mo unity to make further representation e request of the Inspector, base	odification, as ons. After this			
8.	If your representation is seeking participate in the public examina			ry to			
	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 p consider this to be necessary:	ublic examii	nation hearings, please outline	why you			
	To best represent the owner of Th	e Atrium site,	London Road, Crawley.				
	The Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the public examination.						
	If you would like to make a representation on another policy or part of the Local Plan then please complete a separate PART B section of the form or securely attach an additional piece of paper. Copies of the representation form can also be downloaded from the council's website at: www.crawley.gov.uk/localplanreview						
	Signature		Date				
	Mr. Rory Joyce of Brunel Planning		29/06/202	1			

PART B – Your representation

3.	3. Please tick the document that you would like to make a representation on:							
	Crawley submission Local Plan							
	Crawley s	ubmission Local I	Plan Map					
	Crawley s	ubmission Sustai	nability Appraisal					
	Habitats F	Regulation Asses	sment Screening	Report				
4.	Which par	t of the Local Pl	an does this rep	resentation rela	te to?			
F	Paragraph:		Policy:	Designation: 'Indicative Search Corridor for a Western Link Road	Other:			
5.	Do you co	nsider the Loca	l Plan to be: (Plea	ase tick)				
	5.1. Legal	ly compliant?		Yes		No 🗆		
	5.2. Soun	d?		Yes		No 🗌		
	5.3. Comp	oliant with the dut	y to co-operate?	Yes		No 🗌		
	Please giv as possibl	•	ning your respon	se to 5.1, 5.2, o	r 5.3 below. Please I	oe as clear		
	Part of the site falls within the designated 'Indicative Search Corridor for a Western Link Road'							
	We have reviewed draft Policy ST4 – Safeguarding of a Search Corridor for a Crawley Western Link Road, the Proposals Map and the 'Crawley Transport Study – Transport Study of Strategic Development Options and Sustainable Transport Measures – Draft Crawley Local Plan 2021 – 2037.'							
					Link Road must take close to the route'	account of		
COIF Nominees Limited welcomes this reference within the policy to protecting for commercial development. There is no reason to object to the site's partial location designated 'Indicative Search Corridor for a Western Link Road' as long as there adverse impact on the future development and employment generating potential site and its location within Manor Royal.						within the vill be no		
	If required, ple	ease continue your resp	onse on an additional pi	ece of paper and secu	rely 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

wording	egally 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 respo	onse					
information there will stage, fu	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.							
	If your representation is seeking a modification, do you consider it necessary to participate in the public examination hearings? (Please tick)							
	not wish to participate in he examination hearings	Yes, I wish to participate in the examination hearings						
	sh to participate in the public example this to be necessary:	mination hearings, please outline why you						
To best r	epresent the owner of The Atrium s	ite, London Road, Crawley.						
	ector will determine the most appro I that they wish to participate at the	priate procedure to adopt to hear those who have public examination.	ve					
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Date

29/06/2021

8.

9.

Signature

Mr. Rory Joyce of Brunel Planning



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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	Mr		
First name:	Rory	Rory		
Surname:	Joyce	Joyce		
Organisation:	COIF Nominees LTD c/o CCLA	Brunel Planning		
Address line 1:	The Atrium, London Road	51 Queen's Road		

	Address line 2:	Langley Gre	een		Tu	nbridge Wells			
Town/city: Crawley				Kent					
	Postcode:	RH10 9SR			TN	4 9LZ			
	Telephone:	077718983	15		07	771898315			
	Email:	roryjoyce@	brunelplanning.co	.uk	ror	yjoyce@brunelplanni	ng.co.uk		
PA	ART B – You	r represe	ntation						
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 								
		the Local Pla	an does this repi		reia	te to?			
	Paragraph:		Policy:	EC2: Economi Growth i Main Employme Areas	n	Other:			
5.	Do you consid	ler the Local	Plan to be: (Plea	ase tick)					
	5.1. Legally co	ompliant?		Υ	es/		No		
	5.2. Sound?			Υ	es/		No		
	5.3. Compliant	t with the dut	y to co-operate?	Υ	es/		No		
6.	Please give de as possible.	etails explair	ning your respon	se to 5.1, 5	.2, o	r 5.3 below. Please I	oe as clea	ar	
	Employment A area and are d states that 'em Areas where it	reas make a lesignated as ployment gel makes for ar	significant contrib a focus for sustanerating developn	oution to the inable economent will be sand or buildi	ecor omic supp ings	eas states that 'Crawl nomy of the town and growth.' As such the orted in the Main Em and contributes positi	the wider policy ployment		
						e is an employment g future and Policy EC2	_		

	employment generating developm	ent which is t	herefore welcome.				
	COIF Nominees Limited supports paragraph 9.25 which confirms that Manor Royal 'represents a key economic location' and paragraph 9.28 which notes that Manor Royal is one of the largest Main Employment Areas and is 'the leading business destination in the Gatwick Diamond' This demonstrates the importance of Manor Royal, the Gatwick Diamond the employment generating role that The Atrium site has to play within these areas.						
	PLEASE REFER TO FULL ATTAC	CHED REPO	RT				
	If required, please continue y	our response on a	an additional piece of paper and	securely attach it	to this response		
7.	Please set out what modification have identified above. You need legally compliant or sound. It wo wording of any policy or text sho compliance with the duty to co-ope	to state why ould be helpf ould be revis	vithis modification will ul if you are able to su ed. Please be as clear	I make the L uggest how t r as possible	ocal Plan the		
	N/A	our rooponoo on c	an additional piece of paper and	pogurahy ottoch it	to this reasons		
	ii required, piease continue y	our response on a	an additional piece of paper and	securely allach il	to triis response		
	Your representation should cover information necessary to support/j there will not normally be a subsecstage, further submissions will matters and issues s/he identification.	ustify the rep quent opportu only be at th	resentation and the sug unity to make further rep ne request of the Inspe	ggested modi presentations	ification, as s. After this		
8.	If your representation is seeking participate in the public examina			t necessary	to		
	No, I do not wish to participate in the examination hearings		Yes, I wish to partic examination	ipate in the on hearings			
9.	If you wish to participate in the p consider this to be necessary:	oublic exami	nation hearings, pleas	se outline wl	ny you		
	To best represent the owner of Th	e Atrium site,	London Road, Crawle	y.			
	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.						
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	Signature		Date				
	Mr. Rory Joyce of Brunel Planning		;	22/02/2021			

PART B – Your representation

3.	Please tick	the document	that you would li	ke to make a re	presentation on:			
	Crawley su	ubmission Local	Plan					
Crawley submission Local Plan Map								
	Crawley su	ıbmission Sustai	nability Appraisal					
	Habitats R	egulation Assess	sment Screening I	Report				
4.	Which part of the Local Plan does this representation relate to?							
	Paragraph:	9.25	Policy:		Other:			
5.	Do you cor	nsider the Local	Plan to be: (Plea	ase tick)				
	5.1. Legall	y compliant?		Yes		No 🗆		
	5.2. Sound	i ?		Yes		No 🗆		
	5.3. Comp	liant with the dut	y to co-operate?	Yes		No 🗌		
6.	Please give as possible	•	ning your respon	se to 5.1, 5.2, o	r 5.3 below. Please	be as clear		
	Draft Policy EC2 – Economic Growth in Main Employment Areas states that 'Crawley's Main Employment Areas make a significant contribution to the economy of the town and the wider area and are designated as a focus for sustainable economic growth.' As such the policy states that 'employment generating development will be supported in the Main Employment Areas where it makes for an efficient use of land or buildings and contributes positively to sustainable economic growth in the Main Employment Area'							
	COIF Nominees Limited supports Policy EC2. The Atrium site is an employment generating site with the potential for expansion and intensification in the future and Policy EC2 promotes employment generating development which is therefore welcome.							
	COIF Nominees Limited supports paragraph 9.25 which confirms that Manor Royal 'represents a key economic location' and paragraph 9.28 which notes that Manor Royal is one of the largest Main Employment Areas and is 'the leading business destination in the Gatwick Diamond' This demonstrates the importance of Manor Royal, the Gatwick Diamond the employment generating role that The Atrium site has to play within these areas.							
	PLEASE R	EFER TO FULL	ATTACHED REP	ORT				
		If required, please of	continue your response o	n an additional piece o	of paper and securely attach	t to this response		

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	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 you	our response on a	n additional piece of paper and securely attach i	t to this response				
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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:							
	To best represent the owner of The Atrium site, London Road, Crawley.							
	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.							
	please complete a separate PART	B section of tion form can	nother policy or part of the Local Plathe form or securely attach an addinates also be downloaded from the cour	tional piece				
	Signature		Date					
	Mr. Rory Joyce of Brunel Planning		22/02/2021					
PA	ART B – Your representatio	on						
3.	Please tick the document that yo	u would like	to make a representation on:					
	Crawley submission Local Plan							
	Crawley submission Local Plan Ma	ар						

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

☐ Crawley submission Sustainability Appraisal

☐ Habitats Regulation Assessment Screening Report

Paragraph:	9.28	Policy:		Other:				
Do you con	Do you consider the Local Plan to be: (Please tick)							
5.1. Legally	5.1. Legally compliant? Yes No [
5.2. Sound	?		Yes		No 🗌			
5.3. Compl	iant with the dut	y to co-operate?	Yes		No 🗌			
_	•	ning your response to	5.1, 5.2, o	r 5.3 below. Please b	e as clear			
Employmer area and ar states that Areas wher sustainable COIF Nomi site with the employmer COIF Nomi 'represents of the large Diamond'	Please give details explaining your response to 5.1, 5.2, or 5.3 below. Please be as clear as possible. Draft Policy EC2 – Economic Growth in Main Employment Areas states that 'Crawley's Main Employment Areas make a significant contribution to the economy of the town and the wider area and are designated as a focus for sustainable economic growth.' As such the policy states that 'employment generating development will be supported in the Main Employment Areas where it makes for an efficient use of land or buildings and contributes positively to sustainable economic growth in the Main Employment Area' COIF Nominees Limited supports Policy EC2. The Atrium site is an employment generating site with the potential for expansion and intensification in the future and Policy EC2 promotes employment generating development which is therefore welcome. COIF Nominees Limited supports paragraph 9.25 which confirms that Manor Royal 'represents a key economic location' and paragraph 9.28 which notes that Manor Royal is one of the largest Main Employment Areas and is 'the leading business destination in the Gatwick Diamond' This demonstrates the importance of Manor Royal, the Gatwick Diamond the employment generating role that The Atrium site has to play within these areas.							
PLEASE R		ATTACHED REPORT		of paper and securely attach it	to this response			
	out what modif	ication(s) you consid	er necessa	ry to resolve the iss	ues you			

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

5.

6.

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)

	the	e examination he	arings	e	xamination hearings			
9.	•	If you wish to participate in the public examination hearings, please outline why you consider this to be necessary:						
	To best rep	present the owne	r of The Atrium sit	e, London Roac	I, Crawley.			
	•		e the most approp participate at the p	•	to adopt to hear thos on.	e who have		
	please con of paper. C	nplete a separate copies of the repr	PART B section of	of the form or se an also be down	or part of the Local Plecurely attach an add aloaded from the court	itional piece		
	Signature			Date				
	Mr. Rory Jo Planning	oyce of Brunel			22/02/2021			
	Please tick	the document to the document t	hat you would lik	ke to make a re	presentation on:			
	Crawley su	ıbmission Local F	Plan Map					
	Crawley su	ıbmission Sustair	nability Appraisal					
	Habitats R	egulation Assess	sment Screening F	Report				
4.	Which part	of the Local Pla	an does this repr	esentation rela	te to?			
	Paragraph:	9.29	Policy:		Other:			
5.	Do you cor	nsider the Local	Plan to be: (Plea	se tick)				
	5.1. Legall	y compliant?		Yes		No 🗌		
	5.2. Sound	! ?		Yes		No 🗌		
	5.3. Comp	liant with the dut	y 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.

Yes, I wish to participate in the

No, I do not wish to participate in

leading business district' and that 'The Locabusiness-led economic role of Manor Royal, s	tion that 'Manor Royal is the Gatwick Diamond's al Plan has a key role to play in supporting the supporting its key business focus, and setting in at will enable Manor Royal to go from strength to						
It is important that the Local Plan, through its framework for wider improvements to Manor F	policies and site designations, sets in place the Royal which includes The Atrium site.						
PLEASE REFER TO FULL ATTACHED REPO							
If required, please continue your response or	n an additional piece of paper and securely attach it to this response						
legally compliant or sound. It would be help	ny this modification will make the Local Plan oful if you are able to suggest how the ised. Please be as clear as possible. Any non-						
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No, I do not wish to participate in the examination hearings	Yes, I wish to participate in the examination hearings						
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Signature	Date						
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	Crawley su	ıbmission Local	Plan						
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	Habitats Re	egulation Assess	sment Screening	Report					
4.	Which part	of the Local Pl	an does this repr	esentation rela	te to?				
	Paragraph:		Policy:	EC3 – Manor Royal	Other:				
5.	Do you con	sider the Local	Plan to be: (Plea	ase tick)					
	5.1. Legally	compliant?		Yes		No [
	5.2. Sound	?		Yes		No [
	5.3. Compli	iant with the dut	y 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.								
	Draft Policy EC3 – Manor Royal states that:								
	'Manor Royal is the principal business location for Crawley, and instrumental to the success of the wider Gatwick Diamond. Development that is compatible with the area's economic function and role in the wider sub-region will be permitted where it falls within the business sectors of office, research and development, light industry, general industrial and storage or distribution and would result in the reuse, intensification, or change of use of the land or buildings.								
	demonstrate	ed that it is of a		n that supports, a	ermitted where it can and does not undermi				
		es listed as appropria pand and intensify the							
	facilitate bus	siness-led deve nd encourages b	opment in the are usiness growth; (I	ea through 'proviouilds) on the un	s that 'positive planni ding an environment t ique business and ph in attractive and desir	hat ysical			

working environment.' COIF Nominees Limited strongly supports this approach – it is vital that the Local Plan promotes positive planning to allow for the continuation and expansion of employment generating uses in Main Employment Areas such as Manor Royal.							
PLEASE REFER TO FULL ATTAC	CHED REPO	RT.					
If required, please continue y	our response on a	n additional piece of paper and securely attach i	t to this response				
Please set out what modification have identified above. You need legally compliant or sound. It wo wording of any policy or text sho compliance with the duty to co-ope	to state why uld be helpfould be revis	this modification will make the L ul if you are able to suggest how ed. Please be as clear as possibl	ocal Plan the				
N/A							
If required, please continue y	our response on a	n additional piece of paper and securely attach i	t to this response				
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If you wish to participate in the p consider this to be necessary:	ublic examii	nation hearings, please outline w	hy you				
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The Inspector will determine the mindicated that they wish to participate		ate procedure to adopt to hear those blic examination.	e who have				
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Signature		Date					
Mr. Rory Joyce of Brunel Planning		22/02/2021					

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	Crawley su	ubmission Local	Plan			
	Crawley su	ıbmission Local F	Plan Map			
	Crawley su	ıbmission Sustaiı	nability Appraisal			
	Habitats R	egulation Assess	sment Screening I	Report		
4.	Which part	of the Local Pla	an does this repr	esentation rela	te to?	
	Paragraph:	9.37	Policy:			Other:
5.	Do you cor	nsider the Local	Plan to be: (Plea	ase tick)		
	5.1. Legall	y compliant?		Yes		No 🗌
	5.2. Sound	: 1?		Yes		No 🗆
	5.3. Comp	liant with the dut	y to co-operate?	Yes		No 🗌
6.	Please give as possible	-	ing your respon	se to 5.1, 5.2, o	r 5.3 below. I	Please be as clear
	Draft Policy	y EC3 – Manor R	oyal states that:			
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COIF Nominees Limited notes that paragraph 9.39 recognises that 'positive planning' can facilitate business-led development in the area through 'providing an environment that supports and encourages business growth; (builds) on the unique business and physical attributes afforded by its location and history; and (enables) an attractive and desirable working environment.' COIF Nominees Limited strongly supports this approach – it is vital the Local Plan promotes positive planning to allow for the continuation and expansion of employment generating uses in Main Employment Areas such as Manor Royal.						
	PLEASE R	EFER TO FULL	ATTACHED REP	ORT.		
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	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.								
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	Signature	Date							
	Mr. Rory Joyce of Brunel Planning	22/02/2021							
PA	PART B – Your representation								
3.	Please tick the document that you would like	e 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	an does this rep	resentation rela	ite to?		
	Paragraph:	9.38	Policy:		Other:		
5.	Do you con	sider the Local	Plan to be: (Plea	ase tick)			
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	5.2. Sound	l?		Yes		No	
	5.3. Comp	liant with the dut	y to co-operate?	Yes		No	
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	Signature		Date							
	Signature Mr. Rory Joyce of Brunel Planning		Date	22/02/2021						
	Mr. Rory Joyce of Brunel									
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If required, please continue your response on an additional piece of paper and securely attach it to this response

N/A

	5.1.	Legally compliant?	Yes		No				
	5.2.	Sound?	Yes		No				
	5.3.	Compliant with the duty to co-operate?	Yes		No				
6.		se give details explaining your response to 5.1, ossible.	, 5.2, o	r 5.3 below. Please be as	clea	ar			
	Drat	ft Policy EC3 – Manor Royal states that:							
	of the fundament of the	'Manor Royal is the principal business location for Crawley, and instrumental to the success of the wider Gatwick Diamond. Development that is compatible with the area's economic function and role in the wider sub-region will be permitted where it falls within the business sectors of office, research and development, light industry, general industrial and storage or distribution and would result in the reuse, intensification, or change of use of the land or buildings.							
	Development outside of the sectors identified above will be permitted where it can be demonstrated that it is of a scale and function that supports, and does not undermine, the established business role and function of Manor Royal'								
	COIF Nominees Limited supports Policy EC3 and the land uses listed as appropriate for The Atrium site which is currently in office use but has plans to expand and intensify the employment generating use in the future.								
	COIF Nominees Limited notes that paragraph 9.39 recognises that 'positive planning' can facilitate business-led development in the area through 'providing an environment that supports and encourages business growth; (builds) on the unique business and physical attributes afforded by its location and history; and (enables) an attractive and desirable working environment.' COIF Nominees Limited strongly supports this approach – it is vital that the Local Plan promotes positive planning to allow for the continuation and expansion of employment generating uses in Main Employment Areas such as Manor Royal.								
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		ther submission nd issues s/he id				st of t	the Inspecto	or, based	on the	
8.		If your representation is seeking a modification, do you consider it necessary to participate in the public examination hearings? (Please tick)								
		ot wish to participe examination he			Yes,		to participat xamination h			
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	Mr. Rory Jo Planning	oyce of Brunel					22/0	02/2021		
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	Crawley su	ıbmission Local F	Plan							
	Crawley su	ubmission Local	Plan Ma	ар						
	Crawley su	ıbmission Sustair	nability	Appraisal						
	Habitats R	egulation Assess	sment S	Screening	Report					
4.	Which part	of the Local Pla	an does	s this rep	resentatio	n rela	te to?			
	Paragraph:			Policy:				Other:	Built Up Area Boundary	
5.	Do you cor	nsider the Local	Plan to	o be: (Plea	ase tick)					
	5.1. Legall	y compliant?				Yes			No 🗆	
	5.2. Sound] ?				Yes			No ■	

	5.3.	Complia	nt with the	duty to co-op	perate?	Yes ■		No [
6.		se give c ossible.	letails expl	aining your	response to	5.1, 5.2, or 5	.3 below. Please	e be as clear
	The	main froi	nt part of th	e site is loca	ted within the	'Built Up Area	a' as currently des	signated.
							g's car park on the Area boundary.	e rear part of
			•		oses to mainta uild Up Area.	in this split or	nly proposing to s	how the front
		F Nomine Area.	ees Limited	objects to th	ne site's propo	sed partial lo	cation within the o	defined Built
	The	Draft Loc	cal Plan 202	21 defines th	e Built Up Are	a as:		
				ound the are countryside		e Local Plan	as being built up,	
	impo	ortant em		enerating sit			ne Gatwick Diamo levelopment and	

This site therefore, should be fully located within the defined Built Up Area on the Draft Proposals Map 2021, as this site is not 'countryside' and is within an area that is 'built up.'

COIF Nominees Ltd strongly objects to the proposed Built Up Area boundary, and requests that the proposed Built Up Area boundary currently set out on the Draft Proposals Map 2021 be extended to include the entire site.

PLEASE SEE ATTACHED FULL REPORT.

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.

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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

	stage, furt	ot normally be a her submission nd issues s/he id	s will d	only be at	the requ	est of t			
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	If you would like to make a representation on another policy or part of the Local Plan then please complete a separate PART B section of the form or securely attach an additional piece of paper. Copies of the representation form can also be downloaded from the council's website at: www.crawley.gov.uk/localplanreview								
	Signature				Date				
	Mr. Rory Jo Planning	byce of Brunel					22/	02/2021	
PA	ART B – Y	our represe	ntatio	n					
3	Please tick	the document	that vo	u would li	ke to ma	ke a re	nresentatio	n on:	
		bmission Local F	•	a would ii	no to ma	ino a ro	prosontatio		
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4.	Which part	of the Local Pla	an doe	s this repr	esentati	on rela	te to?		
	Paragraph:			Policy:				Other:	Manor Royal Boundary
5.	Do you con	sider the Local	Plan to	o be: (Plea	ase tick)				
	5.1. Legally	y compliant?				Yes			No 🗌

information necessary to support/justify the representation and the suggested modification, as

5.2.	Sound?	Yes			No 🔳
5.3.	Compliant with the duty to co-operate?	Yes			No 🗌
	se give details explaining your response to 5.1, ossible.	, 5.2, o	or 5.3	3 below. Please be	e as clear
The	main front part of the site is located within 'Manor	Royal'	as o	currently designated	d.
	existing building on site falls within this area but the site is currently shown as adjoining but outside the		_	•	ear part of
	Draft Proposals Map 2021 proposes to maintain the of the site as being within Manor Royal.	nis spli	t onl	ly proposing to sho	w the front
	F Nominees Limited objects to the site's proposed ral boundary.	partial	l loca	ation within the defi	ned Manor
The	Draft Local Plan 2021 defines the Manor Royal as	s:			
	e principal business location for Crawley, and instruction wick Diamond.	umenta	al to	the success of the	wider
regi dev	relopment that is compatible with the area's econor on will be permitted where it falls within the busines elopment, light industry, general industrial and stor reuse, intensification, or change of use of the land	ss sect	tors dist	of office, research a ribution and would	and
imp	arly, the entire site and its location within Manor Roortant employment generating site with capacity for employment generating uses.				
	s site therefore should be shown as being fully loca Draft Proposals Map 2021, as the whole of this site				
that	IF Nominees Ltd strongly objects to the proposed North the proposed Manor Royal boundary set out on the ended to include the whole of The Atrium site and north the strong	e Draft	t Pro	posals Map 2021 b	
PLE	EASE SEE ATTACHED FULL REPORT.				
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Plea	se set out what modification(s) you consider no	ecessa	ary t	o resolve the issu	es you

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COIF Nominees Ltd strongly objects to the proposed Manor Royal boundary, and requests that the proposed Manor Royal boundary set out on the Draft Proposals Map 2021 be extended to include the whole of The Atrium site and not just part of the site.

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

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	Signature				Date			
	Mr. Rory Joyce of Brunel Planning				22/02/2021			
PART B – Your representation 3. Please tick the document that you would like to make a representation on:								
		mission Local P	•					
	Crawley sub	mission Local P	lan Map					
Crawley submission Sustainability Appraisal								
Habitats Regulation Assessment Screening Report								
4.	Which part o	of the Local Pla	n does th	is repre	sentation rela	te to?		
	Paragraph:		Р	olicy:		Other:	Boundary of Gatwick	

								Airport Safeguard ed Land		
5.	Do you cor	nsider the Local	Plan to be: (Plea	ase tick)						
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6.	Please give as possible	•	ning your respon	se to 5.1, 5.2	2, o	or 5.3 below. F	Please b	e as clear		
	The Gatwick Airport Safeguarded Land boundary as set out on the draft Proposals Map 2021 has been expanded further to the south and is proposed to cover a much larger area, than its position on the adopted Proposals Map 2015.									
			arded Land area n of The Atrium si			•		partially		
	Brief Back	ground								
	Earlier Cra	wley Acceptance	e of Safeguarded	Land						
			orough Council ha Estate and south	•						
But the Council always recognized that that a Strategic Emp Royal and Gatwick Airport would be welcome because 'th adjacent to Manor Royal'.										
However, the Council states in the current Local Plan that 'this area by safeguarding for a possible new runway at Gatwick' The Councassess opportunities in this area once the government has determine additional runways.						e Council state	ed that i	t would only		
	developme constructio	ent would be inco	ocal Plan Map wa mpatible with the Il wide spaced rur	expansion of						

The original requirement to safeguard land for a second runway at Gatwick was contained in the 2003 Aviation White Paper. The land originally shown as safeguarded for a second runway in the Local Plan Map reflected that shown in the 2012 Gatwick Airport Masterplan.

Airports Commission's Final Report

The Airports Commission Final Report considered the three shortlisted schemes, one of which was Gatwick Airport Ltd's Gatwick Second Runway Scheme (LGW-2R) proposal for a new full length runway to the south of and parallel to the existing runway at Gatwick.

The Airports Commission concluded that the best answer was to expand Heathrow's runway capacity, which would deliver the most '...substantial economic and strategic benefits...' than the other options, and would best boost the productivity of the UK economy.

Crawley Council fully recognized that the Airports Commission's Final Report came down on the side of recommending to the Government that a further runway should be provided by the expansion of Heathrow Airport.

However, the Council noted that this was a recommendation and stated at the time of the current Local Plan the area would continue to be safeguarded until a decision had been made by the Government, and depending on the Government's response the Local Plan may need to be reviewed.

The Council recognized that the review may need to include the future use of the currently Safeguarded Land '... if it is concluded at a national level that there is no requirement to safeguard it for additional runways...'

Government Agreement to Heathrow Expansion

The Government confirmed that it agreed with and accepted the Airports Commission recommendation to build a new runway at Heathrow, as the best way to deliver new runway capacity in the South East.

Crawley Council now have the opportunity to take advantage of the opportunity to remove their previously identified constraint and '...assess the opportunities in this area..' as the Government has clearly determined its approach towards an additional runway.

Gatwick Airport Master Plan 2019

Gatwick Airport Ltd (GAL) appeared to have accepted the Government's decision and reconsidered its approach to the provision of future runway capacity.

GAL presented three growth scenarios for the airport's longer-term future. These were:

Scenario 1: where Gatwick remains a single runway operation using the existing main runway;

Scenario 2: where the existing standby runway is routinely used together with the main runway;

Scenario 3: where GAL continue to safeguard Land for an additional runway to the south.

GAL has decided to pursue Scenario 2 which they stated would make best use of the existing runways, and provide additional operational resilience, whilst offering capacity benefits whilst

minimising development outside the existing airport boundary.

They stated that this scenario would have the potential for an increase in passenger numbers of greater than 10 million passengers per annum, and would assist in delivering '...unmet Department for Transport forecasted aviation demand to 2050.' That forecasted aviation demand was before the impact of the Covid pandemic.

GAL state in the latest Master Plan that they will apply for a Development Consent Order following the nationally Significant Infrastructure Project (NSIP) route under the Planning Act 2008, to gain planning permission for the Scenario 2 development of a second full runway.

However, GAL has also made the inconsistent statement that they '...would continue to safeguard land...' for another runway to the south of the airport.

Notwithstanding the Airports Commission's work and recommendations, and the subsequent decision by the Government, GAL is in effect proposing to make Gatwick a three-runway airport.

Rather than dramatically reducing or removing the previous Safeguarded Land for a potential second runway, as one might expect, GAL is suggesting this should remain in place, in effect to allow a potential third runway, and indeed that it should be expanded further cutting further into existing commercial development within Manor Royal.

This is clearly a perverse planning response in the light of the Government decisions.

It is of course open to GAL as a commercial operator to attempt to bring about their preferred commercial approach, it would clearly be irrational for Crawley Borough, as the Local Planning Authority, to also adopt such an approach.

In the Gatwick Master Plan 2019 GAL ask Crawley Council to accept their approach, stating that they 'recommend' to the Local Planning Authorities that they accept that their previous Safeguarded Land area is expanded, which would allow them to accommodate their third runway.

The rational response from Crawley Council as the Local Planning Authority would be to not accept this recommendation from the airport operator. There is now no need to safeguard land to the north of Manor Royal.

Draft Policy GAT2 – Safeguarded Land states that 'the Local Plan Map identifies land that is safeguarded from development which would be incompatible with expansion of the airport to accommodate the construction of an additional wide spaced runway together with a commensurate increase in facilities that contribute to the safe and efficient operation of the expanded airport...'

COIF Nominees Ltd strongly objects to draft Policy GAT2 and the Gatwick Airport Safeguarded Land boundary as set out on the Draft Proposals Map 2021 (extract above,

Figure 1 (ii)).

The Atrium site and its location within Manor Royal is recognised throughout the Draft Local Plan 2021 as a principal business location and this area has been identified as being critical to the function of Crawley and that of the wider sub-region.

In addition, the Draft Local Plan 2021 recognises that 'positive planning' and the Local Plan have a 'key role' to play in supporting the business led economic role of Manor Royal and must set 'a framework in place for wider improvements so that Manor Royal can go from strength to strength.'

The approach Crawley Borough Council has taken in setting out the Gatwick Airport Safeguarded Land boundary on the draft Proposals Map 2021 is irrational and is not sound and goes against the positive planning strategy for employment land set out in Section 9 – Economic Growth of the Draft Local Plan 2021.

As set out above, The Gatwick Master Plan 2019 confirms that Gatwick is no longer actively pursuing plans for an additional runway and that they will look to utilise the existing standby runway to the North for additional flights. There is therefore no need for safeguarded land to the south of Gatwick Airport.

It cannot be that GAL in deciding to use the existing standby runway as their seconds full runway, can reasonably propose to further increase the 'Safeguarded Land' boundary and not instead remove it, or dramatically reduce it from the adopted Local Plan position, so that they can pursue a third runway in the future.

This approach will blight the strategic employment land and good employment growth prospects in critical areas of Crawley including Manor Royal.

COIF Nominees Ltd have future plans to develop the Atrium site further for increased employment use. This accords with a key aim of both the Development Plan and the Draft Local Plan 2021.

The expanded Safeguarded Land approach set out on the draft Proposals Map 2021 is not sound for the reasons set out above and conflicts with other key parts of the Draft Local Plan 2021.

COIF Nominees Ltd therefore wish to see the Safeguarded Land boundary along the northern edge of Manor Royal, removed in light of the findings set out within the Gatwick Masterplan 2019 so that crucial employment land does not remain under this unnecessary constraint.

PLEASE REFER TO ATTACHED FULL REPORT.

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

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	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:								
	To best represent the owner of The	To best represent the owner of The Atrium site, London Road, Crawley.							
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	Signature	Date							
	Mr. Rory Joyce of Brunel Planning		22/02/2021						
PA	ART B – Your representatio	'n							
3.	Please tick the document that you	u would like	to make a representation on:						
	Crawley submission Local Plan								
	Crawley submission Local Plan Ma	ıр							
	Crawley submission Sustainability Appraisal								

Habitats Regulation Assessment Screening Report

4.	Which part	of the Local Pla	an does this repr	esentation rela	ite to?				
	Paragraph:		Policy:	GAT2 – Safeguarded Land		Other:			
5.	Do you cor	nsider the Local	Plan to be: (Plea	ase tick)					
	5.1. Legall	y compliant?		Yes			No [
	5.2. Sound	1?		Yes			No I		
	5.3. Comp	liant with the dut	y to co-operate?	Yes			No [
6.	Please give	•	ing your respon	se to 5.1, 5.2, o	r 5.3 below. P	lease be as	clear		
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runway in the Local Plan Map reflected that shown in the 2012 Gatwick Airport Masterplan.

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The Airports Commission Final Report considered the three shortlisted schemes, one of which was Gatwick Airport Ltd's Gatwick Second Runway Scheme (LGW-2R) proposal for a new full length runway to the south of and parallel to the existing runway at Gatwick.

The Airports Commission concluded that the best answer was to expand Heathrow's runway capacity, which would deliver the most '...substantial economic and strategic benefits...' than the other options, and would best boost the productivity of the UK economy.

Crawley Council fully recognized that the Airports Commission's Final Report came down on the side of recommending to the Government that a further runway should be provided by the expansion of Heathrow Airport.

However, the Council noted that this was a recommendation and stated at the time of the current Local Plan the area would continue to be safeguarded until a decision had been made by the Government, and depending on the Government's response the Local Plan may need to be reviewed.

The Council recognized that the review may need to include the future use of the currently Safeguarded Land '... if it is concluded at a national level that there is no requirement to safeguard it for additional runways...'

Government Agreement to Heathrow Expansion

The Government confirmed that it agreed with and accepted the Airports Commission recommendation to build a new runway at Heathrow, as the best way to deliver new runway capacity in the South East.

Crawley Council now have the opportunity to take advantage of the opportunity to remove their previously identified constraint and '...assess the opportunities in this area..' as the Government has clearly determined its approach towards an additional runway.

Gatwick Airport Master Plan 2019

Gatwick Airport Ltd (GAL) appeared to have accepted the Government's decision and reconsidered its approach to the provision of future runway capacity.

GAL presented three growth scenarios for the airport's longer-term future. These were:

Scenario 1: where Gatwick remains a single runway operation using the existing main runway;

Scenario 2: where the existing standby runway is routinely used together with the main runway;

Scenario 3: where GAL continue to safeguard Land for an additional runway to the south.

GAL has decided to pursue Scenario 2 which they stated would make best use of the existing runways, and provide additional operational resilience, whilst offering capacity benefits whilst minimising development outside the existing airport boundary.

They stated that this scenario would have the potential for an increase in passenger numbers of greater than 10 million passengers per annum, and would assist in delivering '...unmet Department for Transport forecasted aviation demand to 2050.' That forecasted aviation demand was before the impact of the Covid pandemic.

GAL state in the latest Master Plan that they will apply for a Development Consent Order following the nationally Significant Infrastructure Project (NSIP) route under the Planning Act 2008, to gain planning permission for the Scenario 2 development of a second full runway.

However, GAL has also made the inconsistent statement that they '...would continue to safeguard land...' for another runway to the south of the airport.

Notwithstanding the Airports Commission's work and recommendations, and the subsequent decision by the Government, GAL is in effect proposing to make Gatwick a three-runway airport.

Rather than dramatically reducing or removing the previous Safeguarded Land for a potential second runway, as one might expect, GAL is suggesting this should remain in place, in effect to allow a potential third runway, and indeed that it should be expanded further cutting further into existing commercial development within Manor Royal.

This is clearly a perverse planning response in the light of the Government decisions.

It is of course open to GAL as a commercial operator to attempt to bring about their preferred commercial approach, it would clearly be irrational for Crawley Borough, as the Local Planning Authority, to also adopt such an approach.

In the Gatwick Master Plan 2019 GAL ask Crawley Council to accept their approach, stating that they 'recommend' to the Local Planning Authorities that they accept that their previous Safeguarded Land area is expanded, which would allow them to accommodate their third runway.

The rational response from Crawley Council as the Local Planning Authority would be to not accept this recommendation from the airport operator. There is now no need to safeguard land to the north of Manor Royal.

Draft Policy GAT2 – Safeguarded Land states that 'the Local Plan Map identifies land that is safeguarded from development which would be incompatible with expansion of the airport to accommodate the construction of an additional wide spaced runway together with a commensurate increase in facilities that contribute to the safe and efficient operation of the expanded airport...'

COIF Nominees Ltd strongly objects to draft Policy GAT2 and the Gatwick Airport Safeguarded Land boundary as set out on the Draft Proposals Map 2021 (extract above, Figure 1 (ii)).

The Atrium site and its location within Manor Royal is recognised throughout the Draft Local Plan 2021 as a principal business location and this area has been identified as being critical to the function of Crawley and that of the wider sub-region.

In addition, the Draft Local Plan 2021 recognises that 'positive planning' and the Local Plan have a 'key role' to play in supporting the business led economic role of Manor Royal and must set 'a framework in place for wider improvements so that Manor Royal can go from strength to strength.'

The approach Crawley Borough Council has taken in setting out the Gatwick Airport Safeguarded Land boundary on the draft Proposals Map 2021 is irrational and is not sound and goes against the positive planning strategy for employment land set out in Section 9 – Economic Growth of the Draft Local Plan 2021.

As set out above, The Gatwick Master Plan 2019 confirms that Gatwick is no longer actively pursuing plans for an additional runway and that they will look to utilise the existing standby runway to the North for additional flights. There is therefore no need for safeguarded land to the south of Gatwick Airport.

It cannot be that GAL in deciding to use the existing standby runway as their seconds full runway, can reasonably propose to further increase the 'Safeguarded Land' boundary and not instead remove it, or dramatically reduce it from the adopted Local Plan position, so that they can pursue a third runway in the future.

This approach will blight the strategic employment land and good employment growth prospects in critical areas of Crawley including Manor Royal.

COIF Nominees Ltd have future plans to develop the Atrium site further for increased employment use. This accords with a key aim of both the Development Plan and the Draft Local Plan 2021.

The expanded Safeguarded Land approach set out on the draft Proposals Map 2021 is not sound for the reasons set out above and conflicts with other key parts of the Draft Local Plan 2021.

COIF Nominees Ltd therefore wish to see the Safeguarded Land boundary along the northern edge of Manor Royal, removed in light of the findings set out within the Gatwick Masterplan 2019 so that crucial employment land does not remain under this unnecessary constraint.

PLEASE REFER TO ATTACHED FULL REPORT.

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.

COIF Nominees Ltd therefore wish to see the Safeguarded Land boundary along the northern edge of Manor Royal, removed in light of the findings set out within the Gatwick Masterplan 2019 so that crucial employment land does not remain under this unnecessary constraint.

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	Your representation should cover sinformation necessary to support/juthere will not normally be a subseq stage, further submissions will commatters and issues s/he identified	ustify the rep quent opports only be at th	resentation and the sunity to make further receives to the Inspection in Inspection in the Inspection in Inspection in the Inspection in Inspection Inspection in Inspection	uggested mod epresentation	dification, as s. After this			
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	No, I do not wish to participate in the examination hearings		Yes, I wish to part examinat	icipate in the ion hearings				
9.	If you wish to participate in the public examination hearings, please outline why you consider this to be necessary:							
	To best represent the owner of The Atrium site, London Road, Crawley.							
	The Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the public examination.							
	If you would like to make a representation on another policy or part of the Local Plan then please complete a separate PART B section of the form or securely attach an additional piece of paper. Copies of the representation form can also be downloaded from the council's website at: www.crawley.gov.uk/localplanreview							
	Signature		Date					
	Mr. Rory Joyce of Brunel Planning			22/02/2021				
PÆ	ART B – Your representatio	n						
_	Please tick the document that you	u would like	to make a represen	tation on:				
	Crawley submission Local Plan							
	Crawley submission Local Plan Ma	n						

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.	4. Which part of the Local Plan does this representation relate to?								
	Paragraph:		Policy:			Other:			
5.	Do you con	sider the Local	Plan to be: (Plea	ase tick)					
	5.1. Legally	y compliant?		Yes			No		
	5.2. Sound	?		Yes			No		
	5.3. Compl	iant with the duty	/ to co-operate?	Yes			No		
6.	Please give as possible		ing your respon	se to 5.1, 5.2, o	r 5.3 below. P	lease be a	as clea	ar	
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	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 the examination hearings Yes, I wish to participate in the examination hearings
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Signature	Date				

Representations to Draft Crawley Borough Local Plan 2021 – 2037 (January 2021)

Submission Public Consultation January – February 2021

The Atrium (also known as 'Groundstar House'), London Road, Crawley, RH10 9TB



On behalf of COIF Nominees Ltd c/o CCLA February 2021

Contents

1.	Introduction	2
2.	The Site and Surroundings	3
3.	The Representations to Draft Local Plan 2021	4
4.	Conclusions	15

1. Introduction

- 1.1 These representations have been prepared on behalf of COIF Nominees Ltd c/o CCLA ('the client') to the 'Draft Crawley Borough Local Plan 2021 2037 January 2021 for Submission Public Consultation January February 2021' which is out for consultation by Crawley Borough Council until 31 March 2021.
- These representations have been prepared in particular, in relation to the client's land interest at The Atrium, London Road, Crawley, RH10 9TB which is a commercial building on a site within the Manor Royal Industrial Estate and at the heart of the Gatwick Diamond.
- 1.3 The Atrium has also historically been known as Groundstar House. For the purposes of these representations we refer to 'The Atrium' or 'the site.'
- 1.4 The rest of these representations are set out in the following sections:

Section 2. Site and Surroundings

Section 3. The Representations to the Draft Local Plan 2021

Section 4. Conclusions

2. The Site and Surroundings

- 2.1 The Atrium building is a ground plus five-storey modern office building located on London Road (A23) within the Borough of Crawley.
- 2.2 There is car parking to the front and rear of the site, able to accommodate 156 vehicles.
- 2.3 The site is located on the northern boundary of the Manor Royal Business District and falls within the Gatwick Diamond.
- 2.4 The wider area is a mix of commercial uses, with Crawley Town Centre 1.5 miles away.
- 2.5 The site is very well served by public transport with a bus stop located immediately in front of the site on London Road, Three Bridges railway station located two miles away, and to the nouth of the site is Gatwick Airport which is approximately three miles away.

3. The Representations to Draft Local Plan 2021

- 3.1 Set out below are the representation into the Draft Local Plan 2021 on behalf of COIF Nominees Ltd c/o CCLA ('COIF Nominees Ltd').
- 3.2 The online Crawley Council forms ask for separate representations to be made against each of the individual policies, paragraphs and plans. It also allows documents to be attached to those individual representations.
- 3.3 For convenience we have therefore set out a composite version of those representations in this document, which is attached to the representations.
- 3.4 We have clearly stated where the Client Supports particular policies and associated paragraphs, and where the client Objects to particular policies and paragraphs, and where these are considered to be Not Sound.

National Planning Policy Framework

- 3.5 The National Planning Policy Framework (NPPF) was published on 19 February 2019. This is a key part of the Government's reforms to make the planning system less complex and more accessible and promote sustainable growth.
- 3.6 Paragraph 15 states that 'The planning system should be genuinely plan-led. Succinct and up-to-date plans should provide a positive vision for the future of each area; a framework for addressing housing needs and other economic, social and environmental priorities and a platform for local people to shape their surroundings.'
- 3.7 Criterion a) of paragraph 16 states that 'Plans should: be prepared with the objective of contributing to the achievement of sustainable development...'
- 3.8 Paragraph 23 states that 'Broad locations for development should be indicated on a key diagram, and land-use designations and allocations identified on a policies map. Strategic policies should provide a clear strategy for bringing sufficient land forward, and at a sufficient rate, to address objectively assessed needs over the plan period, in line with the presumption in favour of sustainable development. This should include planning for and allocating sufficient sites to deliver the strategic priorities of the area...'

The Development Plan

- 3.9 The Development Plan relevant to the site comprises the following:
 - a. West Sussex Structure Plan 2001-2016;
 - b. Crawley Borough Local Plan 2015 2030, (December 2015).

Emerging Local Plan out for Consultation

- 3.10 Crawley Borough Council has published the latest version of its draft Local Plan, The Draft Crawley Borough Local Plan 2021 2037 January 2021 for Submission Public Consultation January February 2021.
- 3.11 The Consultation Period has been extended until 31 March 2021. We understand this is due to some of the underlying evidence base being unfinished and therefore not yet made available for public scrutiny and comment.
- 3.12 These representations relate to the published material. Our client reserves the right to submit a further representation once the unfinished material is completed, published and made available for public consulation.

Site Designations in Adopted and Draft Local Plans

3.13 The Atrium site has the following designations as set out in the adopted Proposals Map 2015 and the Draft Proposals Map 2021:

Adopted Proposals Map 2015

- (Partially within) Built-Up Area Boundary;
- (Partially within) Manor Royal.

Draft Proposals Map 2021

- (Partially within) Built-Up Area Boundary;
- (Partially within the expanded) Gatwick Airport Safeguarded Land;
- (Partially within) Manor Royal; and
- (Partially within) Indicative Search Corridor for a Western Link Road;

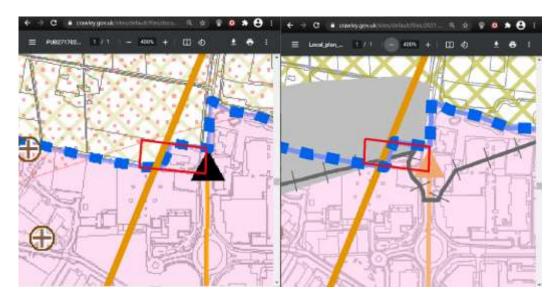


Figure 1: Extract from (i) Adopted Proposals Map 2015 & (ii) Draft Proposals Map 2021, with broad site location marked in red, to show the site designations including the expanded Gatwick Airport Safeguarded Land boundary.

The Importance of the site within Manor Royal and the Gatwick Diamond and the continued need for employment in the Borough

3.14 The Atrium is located within Manor Royal and is recognised as being at the heart of the Gatwick Diamond.

Support:

Policy EC2 – Economic Growth in Main Employment Areas Paragraph 9.25 Paragraph 9.28

- 3.15 Draft Policy EC2 Economic Growth in Main Employment Areas states that 'Crawley's Main Employment Areas make a significant contribution to the economy of the town and the wider area and are designated as a focus for sustainable economic growth.' As such the policy states that 'employment generating development will be supported in the Main Employment Areas where it makes for an efficient use of land or buildings and contributes positively to sustainable economic growth in the Main Employment Area…'
- 3.16 COIF Nominees Limited supports Policy EC2. The Atrium site is an employment generating site with the potential for expansion and intensification in the future and Policy EC2 promotes employment generating development which is therefore welcome.
- 3.17 COIF Nominees Limited supports paragraph 9.25 which confirms that Manor Royal 'represents a key economic location' and paragraph 9.28 which notes that Manor Royal is one of the largest Main Employment

Areas and is 'the leading business destination in the Gatwick Diamond...' This demonstrates the importance of Manor Royal, the Gatwick Diamond the employment generating role that The Atrium site has to play within these areas.

Support:

Paragraph 9.29 'Manor Royal: A premier location for business'

- 3.18 COIF Nominees Limited supports the recognition that 'Manor Royal is the Gatwick Diamond's leading business district...' and that 'The Local Plan has a key role to play in supporting the business-led economic role of Manor Royal, supporting its key business focus, and setting in place a framework for wider improvements that will enable Manor Royal to go from strength to strength.'
- 3.19 It is important that the Local Plan, through its policies and site designations, sets in place the framework for wider improvements to Manor Royal which includes The Atrium site.

Support:

Policy EC3 – Manor Royal Paragraph 9.37 Paragraph 9.38 Paragraph 9.39

3.20 Draft Policy EC3 – Manor Royal states that:

'Manor Royal is the principal business location for Crawley, and instrumental to the success of the wider Gatwick Diamond.

Development that is compatible with the area's economic function and role in the wider sub-region will be permitted where it falls within the business sectors of office, research and development, light industry, general industrial and storage or distribution and would result in the reuse, intensification, or change of use of the land or buildings.

Development outside of the sectors identified above will be permitted where it can be demonstrated that it is of a scale and function that supports, and does not undermine, the established business role and function of Manor Royal...'

- 3.21 COIF Nominees Limited supports Policy EC3 and the land uses listed as appropriate for The Atrium site which is currently in office use but has plans to expand and intensify the employment generating use in the future.
- 3.22 COIF Nominees Limited notes that paragraph 9.39 recognises that 'positive planning' can facilitate business-led development in the area through 'providing an environment that supports and encourages

business growth; (builds) on the unique business and physical attributes afforded by its location and history; and (enables) an attractive and desirable working environment.' COIF Nominees Limited strongly supports this approach – it is vital that the Local Plan promotes positive planning to allow for the continuation and expansion of employment generating uses in Main Employment Areas such as Manor Royal.

Built Up Area Boundary

Object:

Proposals Map 2021: Built-Up Area Boundary Not Sound

- 3.23 The main front part of the site is located within the 'Built Up Area' as currently designated.
- 3.24 The existing building on site falls within this area but the building's car park on the rear part of the site is currently shown as adjoining but outside the Built-Up Area boundary.
- 3.25 The Draft Proposals Map 2021 proposes to maintain this split only proposing to show the front half of the site as being within the Build Up Area.
- 3.26 COIF Nominees Limited objects to the site's proposed partial location within the defined Built Up Area.
- 3.27 The Draft Local Plan 2021 defines the Built Up Area as:
 - 'This is the boundary around the area defined in the Local Plan as being built up, distinguishing it from the countryside.'
- 3.28 Clearly, the entire site and its location within Manor Royal and the Gatwick Diamond is an important employment generating site with capacity for further development and intensification for employment generating uses.
- 3.29 This site therefore, should be fully located within the defined Built Up Area on the Draft Proposals Map 2021, as this site is not 'countryside' and is within an area that is 'built up.'
- 3.30 COIF Nominees Ltd strongly objects to the proposed Built Up Area boundary, and requests that the proposed Built Up Area boundary currently set out on the Draft Proposals Map 2021 be extended to include the entire site.

Manor Royal Boundary

Object:

Proposals Map 2021: Manor Royal Boundary Not Sound

- 3.31 The main front part of the site is located within 'Manor Royal' as currently designated.
- 3.32 The existing building on site falls within this area but the building's car park on the rear part of the site is currently shown as adjoining but outside the Manor Royal boundary.
- 3.33 The Draft Proposals Map 2021 proposes to maintain this split only proposing to show the front half of the site as being within Manor Royal.
- 3.34 COIF Nominees Limited objects to the site's proposed partial location within the defined Manor Royal boundary.
- 3.35 The Draft Local Plan 2021 defines the Manor Royal as:
 - "..the principal business location for Crawley, and instrumental to the success of the wider Gatwick Diamond.
 - Development that is compatible with the area's economic function and role in the wider sub-region will be permitted where it falls within the business sectors of office, research and development, light industry, general industrial and storage or distribution and would result in the reuse, intensification, or change of use of the land or buildings."
- 3.36 Clearly, the entire site and its location within Manor Royal and the Gatwick Diamond is an important employment generating site with capacity for further development and intensification for employment generating uses.
- 3.37 This site therefore should be shown as being fully located within the defined Manor Royal on the Draft Proposals Map 2021, as the whole of this site functions as part of the Manor Royal.
- 3.38 COIF Nominees Ltd strongly objects to the proposed Manor Royal boundary, and requests that the proposed Manor Royal boundary set out on the Draft Proposals Map 2021 be extended to include the whole of The Atrium site and not just part of the site.

Gatwick Airport Safeguarded Land

Object:

Proposals Map 2021: Boundary of Gatwick Airport Safeguarded Land Policy GAT2 – Safeguarded Land Not Sound

- 3.39 The Gatwick Airport Safeguarded Land boundary as set out on the draft Proposals Map 2021 has been expanded further to the south and is proposed to cover a much larger area, than its position on the adopted Proposals Map 2015.
- 3.40 The Gatwick Airport Safeguarded Land area on the draft Proposals Map 2021 now partially includes a significant portion of The Atrium site as shown above in Figure 1 (ii).

Brief Background

Earlier Crawley Acceptance of Safeguarded Land

- 3.41 For many years Crawley Borough Council has accepted having a safeguarded area north of the Manor Royal Industrial Estate and south of the Southern Perimeter Road of Gatwick Airport.
- 3.42 But the Council always recognized that that a Strategic Employment Location between Manor Royal and Gatwick Airport would be welcome because '...this area is sustainably located adjacent to Manor Royal...'.
- 3.43 However, the Council states in the current Local Plan that '...this area is currently constrained by safeguarding for a possible new runway at Gatwick...' The Council stated that it would only assess opportunities in this area once the government has determined its approach towards additional runways.
- 3.44 The area identified on the Local Plan Map was the area where it was considered that new development would be incompatible with the expansion of the airport to accommodate a the construction of an additional wide spaced runway.

2003 Aviation White Paper

3.45 The original requirement to safeguard land for a second runway at Gatwick was contained in the 2003 Aviation White Paper. The land originally shown as safeguarded for a second runway in the Local Plan Map reflected that shown in the 2012 Gatwick Airport Masterplan.

Airports Commission's Final Report

- 3.46 The Airports Commission Final Report considered the three shortlisted schemes, one of which was Gatwick Airport Ltd's Gatwick Second Runway Scheme (LGW-2R) proposal for a new full length runway to the south of and parallel to the existing runway at Gatwick.
- 3.47 The Airports Commission concluded that the best answer was to expand Heathrow's runway capacity, which would deliver the most '...substantial economic and strategic benefits...' than the other options, and would best boost the productivity of the UK economy.
- 3.1 Crawley Council fully recognized that the Airports Commission's Final Report came down on the side of recommending to the Government that a further runway should be provided by the expansion of Heathrow Airport.
- 3.2 However, the Council noted that this was a recommendation and stated at the time of the current Local Plan the area would continue to be safeguarded until a decision had been made by the Government, and depending on the Government's response the Local Plan may need to be reviewed.
- 3.3 The Council recognized that the review may need to include the future use of the currently Safeguarded Land '... if it is concluded at a national level that there is no requirement to safeguard it for additional runways...'

Government Agreement to Heathrow Expansion

- 3.4 The Government confirmed that it agreed with and accepted the Airports Commission recommendation to build a new runway at Heathrow, as the best way to deliver new runway capacity in the South East.
- 3.5 Crawley Council now have the opportunity to take advantage of the opportunity to remove their previously identified constraint and '...assess the opportunities in this area..' as the Government has clearly determined its approach towards an additional runway.

Gatwick Airport Master Plan 2019

3.6 Gatwick Airport Ltd (GAL) appeared to have accepted the Government's decision and reconsidered its approach to the provision of future runway capacity.

3.7 GAL presented three growth scenarios for the airport's longer-term future. These were:

Scenario 1: where Gatwick remains a single runway operation using the existing main runway;

Scenario 2: where the existing standby runway is routinely used together with the main runway;

Scenario 3: where GAL continue to safeguard Land for an additional runway to the south.

- 3.8 GAL has decided to pursue Scenario 2 which they stated would make best use of the existing runways, and provide additional operational resilience, whilst offering capacity benefits whilst minimising development outside the existing airport boundary.
- 3.9 They stated that this scenario would have the potential for an increase in passenger numbers of greater than 10 million passengers per annum, and would assist in delivering '...unmet Department for Transport forecasted aviation demand to 2050.' That forecasted aviation demand was before the impact of the Covid pandemic.
- 3.10 GAL state in the latest Master Plan that they will apply for a Development Consent Order following the nationally Significant Infrastructure Project (NSIP) route under the Planning Act 2008, to gain planning permission for the Scenario 2 development of a second full runway.
- 3.11 However, GAL has also made the inconsistent statement that they "...would continue to safeguard land..." for another runway to the south of the airport.
- 3.12 Notwithstanding the Airports Commission's work and recommendations, and the subsequent decision by the Government, GAL is in effect proposing to make Gatwick a three-runway airport.
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- irrational for Crawley Borough, as the Local Planning Authority, to also adopt such an approach.
- 3.16 In the Gatwick Master Plan 2019 GAL ask Crawley Council to accept their approach, stating that they 'recommend' to the Local Planning Authorities that they accept that their previous Safeguarded Land area is expanded, which would allow them to accommodate their third runway.
- 3.17 The rational response from Crawley Council as the Local Planning Authority would be to not accept this recommendation from the airport operator. There is now no need to safeguard land to the north of Manor Royal.

The Objection

Object:

Proposals Map 2021: Boundary of Gatwick Airport Safeguarded Land Policy GAT2 – Safeguarded Land Not Sound

- 3.18 Draft Policy GAT2 Safeguarded Land states that 'the Local Plan Map identifies land that is safeguarded from development which would be incompatible with expansion of the airport to accommodate the construction of an additional wide spaced runway together with a commensurate increase in facilities that contribute to the safe and efficient operation of the expanded airport...'
- 3.19 COIF Nominees Ltd strongly objects to draft *Policy GAT2* and the Gatwick Airport Safeguarded Land boundary as set out on the Draft Proposals Map 2021 (extract above, Figure 1 (ii)).
- 3.20 The Atrium site and its location within Manor Royal is recognised throughout the Draft Local Plan 2021 as a principal business location and this area has been identified as being critical to the function of Crawley and that of the wider sub-region.
- 3.21 In addition, the Draft Local Plan 2021 recognises that 'positive planning' and the Local Plan have a 'key role' to play in supporting the business led economic role of Manor Royal and must set 'a framework in place for wider improvements so that Manor Royal can go from strength to strength.'
- 3.22 The approach Crawley Borough Council has taken in setting out the Gatwick Airport Safeguarded Land boundary on the draft Proposals Map 2021 is irrational and is not sound and goes against the positive planning strategy for employment land set out in Section 9 Economic Growth of the Draft Local Plan 2021.

- 3.23 As set out above, The Gatwick Master Plan 2019 confirms that Gatwick is no longer actively pursuing plans for an additional runway and that they will look to utilise the existing standby runway to the North for additional flights. There is therefore no need for safeguarded land to the south of Gatwick Airport.
- 3.24 It cannot be that GAL in deciding to use the existing standby runway as their seconds full runway, can reasonably propose to further increase the 'Safeguarded Land' boundary and not instead remove it, or dramatically reduce it from the adopted Local Plan position, so that they can pursue a third runway in the future.
- 3.25 This approach will blight the strategic employment land and good employment growth prospects in critical areas of Crawley including Manor Royal.
- 3.26 COIF Nominees Ltd have future plans to develop the Atrium site further for increased employment use. This accords with a key aim of both the Development Plan and the Draft Local Plan 2021.
- 3.27 The expanded Safeguarded Land approach set out on the draft Proposals Map 2021 is not sound for the reasons set out above and conflicts with other key parts of the Draft Local Plan 2021.
- 3.28 COIF Nominees Ltd therefore wish to see the Safeguarded Land boundary along the northern edge of Manor Royal, removed in light of the findings set out within the Gatwick Masterplan 2019 so that crucial employment land does not remain under this unnecessary constraint.

Indicative Search Corridor for a Western Link Road designation

Reserve the right to comment – 'Indicative Search Corridor for a Western Link Road' – Proposals Map 2021

- 3.29 Part of the site falls within the designated 'Indicative Search Corridor for a Western Link Road' as shown on Figure 1 (ii) above.
- 3.30 We understand that Crawley Borough Council is currently preparing the Transport Modelling studies and these are not available at this stage (February 2021) for review.
- 3.31 COIF Nominees Limited reserves the right to submit further representations when the Transport Modelling studies have been released and any impact on The Atrium site has been considered.

4. Conclusions

- 4.1 These representations have been prepared on behalf of COIF Nominees Ltd c/o CCLA relating to the 'Draft Crawley Borough Local Plan 2021 2037 January 2021 for Submission Public Consultation January February 2021' which is out for consultation by Crawley Borough Council until 31 March 2021.
- 4.2 COIF Nominees Ltd own The Atrium, London Road within Crawley which is a ground plus five storey modern office building with car parking. The site falls within Manor Royal and the Gatwick Diamond.
- 4.3 The site is highly accessible with good public transport links.
- 4.4 The online Crawley Borough Council forms ask for separate representations to be made against each of the individual policies, paragraphs and plans. It also allows documents to be attached to those individual representations.
- 4.5 For convenience we have therefore set out a composite version of those representations in this document, which is attached to the representations.
- 4.6 We have clearly stated where the Client Supports particular policies and associated paragraphs, and where the client Objects to particular policies and paragraphs, and where these are not considered to be Not Sound.
- 4.7 On the draft Proposals Map 2021 the site is located partially within the Built Up Area Boundary, partially within the expanded Gatwick Airport Safeguarded Land, within Manor Royal and partially within the Indicative Search Corridor for a Western Link Road.
- 4.8 COIF Nominees Limited supports Policy EC2, The Atrium site is an employment generating site with the potential for expansion and intensification in the future and Policy EC2 promotes employment generating development.
- 4.9 COIF Nominees Limited supports paragraph 9.25 which confirms
 Manor Royal 'represents a key economic location' and paragraph 9.28
 which notes that Manor Royal is one of the largest Main Employment
 Areas.
- 4.10 COIF Nominees Limited supports paragraph 9.29 which recognises the Manor Royal as the Gatwick Diamond's leading business district.

- 4.11 COIF Nominees Limited supports Policy EC3 and the land uses listed as appropriate for The Atrium site and also supports paragraphs 9.37, 9.38 and 9.39 which recognises that 'positive planning' can facilitate business-led development in the area. It is vital that the Local Plan promotes positive planning to allow for the continuation and expansion of employment generating uses in Main Employment Areas such as Manor Royal.
- 4.12 COIF Nominees Limited strongly objects to the site's partial location within the defined 'Built Up Area' on the Draft Proposals Map 2021.

 The site in its entirety clearly forms part of the built up area and not countryside. The Built Up Area designation should be expanded to include the entire site.
- 4.13 COIF Nominees Limited strongly objects to the site's partial location within the defined 'Manor Royal' area on the Draft Proposals Map 2021. The site in its entirety clearly functions as part of the Manor Royal area. The proposed Manor Royal designation should be expanded to include the entire site, and not just part of the site.
- 4.14 COIF Nominees Limited strongly objects to Policy GAT2 and the Gatwick Airport Safeguarded Land boundary as set out on the draft Proposals Map 2021.
- 4.15 The approach Crawley Borough Council has taken in setting out the Gatwick Airport Safeguarded Land boundary on the draft Proposals Map 2021 is irrational and not sound and goes against the positive planning strategy for employment land set out in Section 9 Employment Growth of the Draft Local Plan 2021.
- 4.16 As set out in this report, The Gatwick Master Plan 2019 confirms that Gatwick is no longer actively pursuing plans for an additional runway and that they will look to utilise the existing standby runway to the North for additional flights. There is therefore no need for safeguarded land to the south of Gatwick Airport.
- 4.17 It cannot be that GAL in deciding to use the existing standby runway as their seconds full runway can reasonably propose to further increase the 'Safeguarded Land' boundary and not instead remove or dramatically reduce it from the adopted Local Plan position, so that they can pursue a third runway in the future.
- 4.18 This approach will blight the strategic employment land and good employment growth prospects in critical areas of Crawley including Manor Royal.
- 4.19 COIF Nominees Ltd therefore wish to see the Safeguarded Land boundary along the northern edge of Manor Royal, removed in light of

- the findings set out within the Gatwick Master Plan 2019 so that crucial employment land does not remain under this unnecessary constraint.
- 4.20 COIF Nominees Ltd wish to reserve the right to comment on the site location within the 'Indicative Search Corridor for a Western Link Road.' We understand that Crawley Borough Council is currently preparing the Transport Modelling studies and these are not available at this stage (February 2021) for review.