



Crawley Local Plan

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

Address line 2:	Tunbridge Wells	Tunbridge Wells
Town/city:	Kent	Kent
Postcode:	TN4 9LZ	TN4 9LZ
Telephone:	07771898315	07771898315
Email:	roryjoyce@brunelplanning.co.uk	roryjoyce@brunelplanning.co.uk

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:	Policy ST4 - Safeguarding of a Search Corridor for a Crawley Western Link Road	Other:	
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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.

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 and route of the Western Link Road must take account of (a) its impact on (but not limited to): ... commercial properties close to the route'

COIF Nominees Limited welcomes this reference within the policy to protecting future commercial development. There is no reason to object to the site's partial location within the designated 'Indicative Search Corridor for a Western Link Road' as long as there will be no adverse impact on the future development and employment generating potential of The Atrium site and its location within Manor Royal.

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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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.

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Signature

Date

Mr. Rory Joyce of Brunel
Planning

29/06/2021

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Policy:

Designation:
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Other:

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	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 Green	Tunbridge Wells
Town/city:	Crawley	Kent
Postcode:	RH10 9SR	TN4 9LZ
Telephone:	07771898315	07771898315
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Paragraph:		Policy:	EC2: Economic Growth in Main Employment Areas	Other:	
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5. Do you consider the Local Plan to be: (Please tick)

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

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

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 REFER TO FULL ATTACHED REPORT

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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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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:**

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Signature

Mr. Rory Joyce of Brunel
Planning

Date

22/02/2021

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

Paragraph: Policy: Other:

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- 5.2. Sound? Yes No
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Paragraph: 9.28

Policy:

Other:

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

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Paragraph: 9.29

Policy:

Other:

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

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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.

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.'

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.

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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...’

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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22/02/2021

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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: 9.38

Policy:

Other:

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.

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...’

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.

PLEASE REFER TO FULL ATTACHED 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.

N/A

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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:

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Signature

Date

Mr. Rory Joyce of Brunel
Planning

22/02/2021

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Paragraph: 9.39

Policy:

Other:

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

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- 5.3. Compliant with the duty to co-operate? Yes No

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Draft Policy EC3 – Manor Royal states that:

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Planning

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

Paragraph:

Policy:

Other:

Built Up
Area
Boundary

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.

The main front part of the site is located within the 'Built Up Area' as currently designated.

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.

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.

COIF Nominees Limited objects to the site's proposed partial location within the defined Built Up Area.

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.'

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.

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

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To best represent the owner of The Atrium site, London Road, Crawley.

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Mr. Rory Joyce of Brunel
Planning

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PART B – Your representation

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- Crawley submission Sustainability Appraisal
- Habitats Regulation Assessment Screening Report

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

Paragraph:

Policy:

Other:

Manor
Royal
Boundary

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

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The main front part of the site is located within 'Manor Royal' as currently designated.

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.

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.

COIF Nominees Limited objects to the site's proposed partial location within the defined Manor Royal boundary.

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."

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.

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.

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.

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- 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.

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.

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

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.

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...’.

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.

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

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 second 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.

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Planning

Date

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Paragraph:	<input type="text"/>	Policy:	GAT2 – Safeguarded Land	Other:	<input type="text"/>
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5. Do you consider the Local Plan to be: (Please tick)

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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.

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.

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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 second 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.

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:

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

PART B – Your representation

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

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

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

Paragraph: Policy: Other:

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

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

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

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.

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

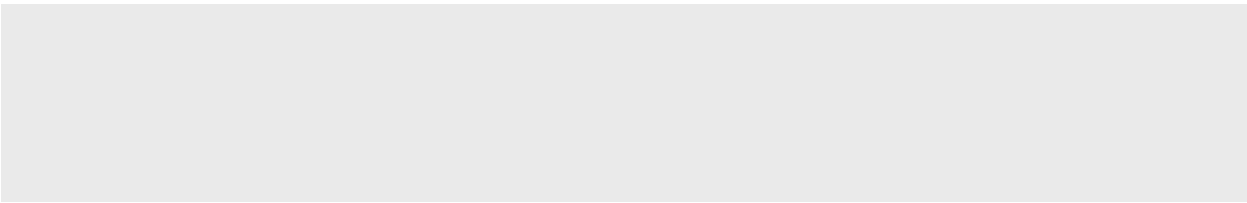
*Your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further representations. **After this stage, further submissions will only be at the request of the Inspector, based on the matters and issues s/he identifies for examination.***

8. If your representation is seeking a modification, do you consider it necessary to participate in the public examination hearings? (Please tick)

No, I do not wish to participate in the examination hearings

Yes, I wish to participate in the examination hearings

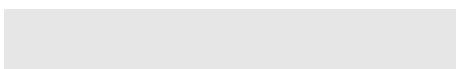
9. If you wish to participate in the public examination hearings, please outline why you consider this to be necessary:



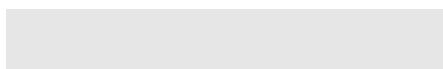
The Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the public examination.

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



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**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**

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- 3. The Representations to Draft Local Plan 20214
- 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.
- 1.2 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 south 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 consultation.

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;

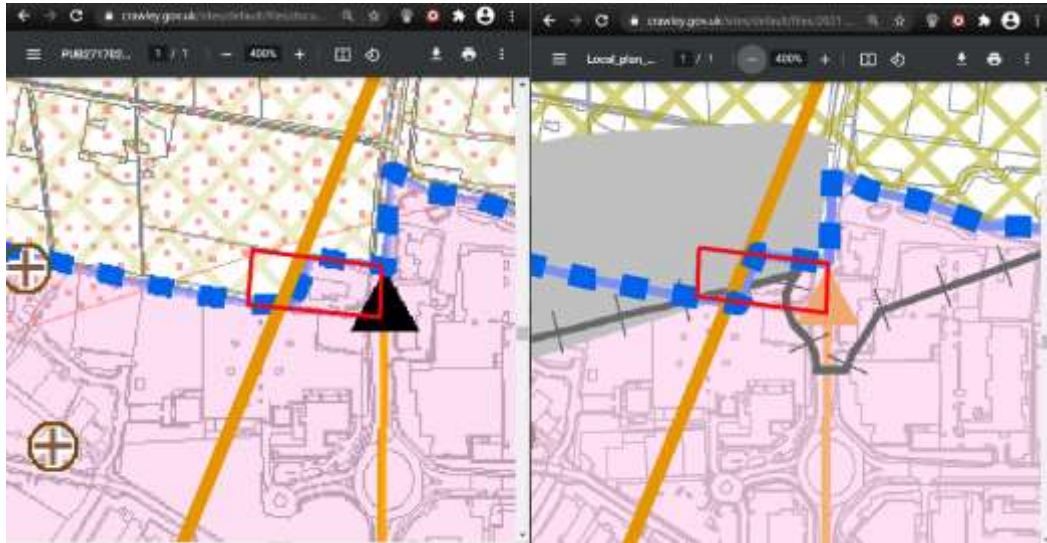


Figure 1: Extract from (i) Adopted Proposals Map 2015 & (ii) Draft Proposals Map 2021, with broad site location marked in red, to show the site designations including the expanded Gatwick Airport Safeguarded Land boundary.

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

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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.

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- 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.
- 3.13 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.
- 3.14 This is clearly a perverse planning response in the light of the Government decisions.
- 3.15 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.

- 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.

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- 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 second 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.

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- 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 second 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

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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.