



# Crawley Local Plan

<p><b>Ref No:</b></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](mailto:strategic.planning@crawley.gov.uk) or sent via post to: Local Plan Consultation, Strategic Planning, Crawley Borough Council, Town Hall, The Boulevard, Crawley, RH10 1UZ. Alternatively, representations can be made online using the [eform](#) which allows attachments of documents.

This form has two parts:

### PART A – Personal details

By law, representations cannot be made anonymously. All representations will be published alongside your name, company name (if applicable), and your client’s name/company (if applicable). The Council will use the information you submit to assist with formulating planning policy.

Further information about Data Protection Rights in line with the provisions of the General Data Protection Regulations and Data Protection Act 2018, for example, how to contact the Data Protection Officer, how long information is held or how we process your personal information can be found at [www.crawley.gov.uk/privacy](http://www.crawley.gov.uk/privacy). Specific reference to the Local Plan and planning policy related public consultation can be found [here](#).

### PART B – Your representation

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

## PART A – Personal details

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

	1. Personal details	2. Agent’s details
Title:	<input type="text"/>	<input type="text" value="Mr"/>
First name:	<input type="text"/>	<input type="text" value="Michael"/>
Surname:	<input type="text"/>	<input type="text" value="Rees"/>
Organisation:	<input type="text" value="WT Lamb Properties,Dye Family and Elliot Metals / The Simmonds Family"/>	<input type="text" value="LRM Planning"/>
Address line 1:	<input type="text" value="c/o agent"/>	<input type="text" value="Nyewood Court"/>

Address line 2:

[Redacted]

Brookers Road

[Redacted]

Town/city:

[Redacted]

Billingshurst

[Redacted]

Postcode:

[Redacted]

RH14 9RZ

[Redacted]

Telephone:

[Redacted]

07788277150

[Redacted]

Email:

[Redacted]

michaelrees@lrmp planning.com

[Redacted]

## 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 checked="" 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.

Please refer to attached information

*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.*

Not applicable

*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:**

Due to the significant policy issues involved.

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

If you would like to make a representation on another policy or part of the Local Plan then please complete a separate PART B section of the form or securely attach an additional piece of paper. Copies of the representation form can also be downloaded from the council's website at: [www.crawley.gov.uk/localplanreview](http://www.crawley.gov.uk/localplanreview)

**Signature**

A rectangular box containing a handwritten signature in blue ink that reads "Michael Rees".

**Date**

20/6/2023

## VISION & STRATEGY

1. We are broadly supportive of the vision set out for Crawley in 2040, indeed it is unobjectionable that Crawley should be a place that people enjoy and want to live, work and visit. A key element of this is based on sustainable economic growth, accordingly we support the Council's approach which is that:

***Crawley will strive to be the premier town between London and the South Coast providing jobs, learning and development opportunities and a leisure and cultural offer that is attractive to residents and visitors. Crawley will continue to be an economic leader, with a diverse, resilient and productive economy that meets the needs of the borough and supports the overall prosperity of the region. Crawley will provide an environment that supports and encourages new and established businesses securing the supporting infrastructure, including telecommunications, to enable business to flourish. Crawley will be the first choice of business location for a variety of sectors and both domestic and international markets. Innovation, entrepreneurship and advanced technologies will thrive, and our community will benefit from access to high value, sustainable economic growth. Additional jobs will have been created for people living in and around the Crawley area across a diverse range of sectors, including creative industries. Access to jobs will be assisted by learning and development opportunities that support an empowered resident workforce giving people a real choice about the work they can and want to do.***

It is clear that a strong approach towards employment land is required more than ever in Crawley with over half of the borough's jobs falling into the vulnerable or very vulnerable sectors. In this regard, we strongly support the Council in seeking to dovetail the plan with its Economic Recovery Plan which ***presents a vision for the borough's future socio-economic prosperity, supporting continued economic recovery through a series of flagship interventions. This includes the unlocking of sufficient suitable land for new sites to provide for all Crawley's employment growth sectors and help boost jobs for residents, increasing economic resilience...***

2. The plan recognises that there are significant land supply constraints faced by the borough and that a positive approach is required to support economic recovery. We are strongly supportive of this approach given the implications of COVID 19 and the need to significantly increase economic diversification. We note that there is currently an opportunity to increase the supply of employment land to help diversify the economy of the Authority so that it is not so dependent upon the recovery of air travel. This approach underlies our clients position, the contribution that their land can make to the plan and forms the basis for our representations.
3. However we are seriously concerned however that the approach taken towards identification of sufficient employment land does not dovetail with the economic recovery plan rather it significantly underestimates the amount of employment land that is required despite there being a major opportunity to identify a comprehensive strategic site at Gatwick Green comprising a much larger area that would secure the long term ability of the Council to facilitate economic growth to match demand and ultimately diversification and recovery.
4. Work undertaken by HJA in respect of the updated EGA suggests significant methodological shortcomings in the report prepared that result in a major underestimation of land required for employment purposes. Previous concerns that we have raised have not been addressed and as a result of this along with the failure of the EGA to robustly assess need, unless increased provision of employment land is identified the plan cannot be found sound.