



Homes  
England

The Housing and Regeneration Agency

Crawley Borough Council  
The Boulevard  
Crawley  
West Sussex  
RH10 1UZ

16 June 2023

Dear Sir / Madam

### **Crawley Borough Council Local Plan Review Regulation 19 Representations June 2023 – Rowley Farm**

Please see below Homes England's Representations to Crawley Borough Council's (CBC) Draft Local Plan Review 2024 - 2040 (Regulation 19 2023) (the **Draft Crawley Local Plan**) in relation to Rowley Farm, Crawley, RH10 9SL (the **Site**) only. Homes England has submitted separate representations addressing other land in our ownership (i.e. West of Ifield).

We are responding in our capacity as the landowner / promoter of the Site.

#### **Introduction**

Homes England is an executive non-departmental public body, sponsored by the Department of Levelling Up, Housing and Communities, and the governments' Housing and Regeneration Agency. Homes England has the aspiration, influence, expertise and resource to drive positive market change. By releasing more land to developers who want to make homes happen, Homes England assists in the delivery of the new homes England needs and helps to improve neighbourhoods and grow communities. Homes England works in collaboration with partners who share our ambition, including local authorities, private developers, housing associations, lenders and infrastructure providers.

As set out in our new Strategic Plan 2023-28, our mission is to drive regeneration and housing delivery to create high-quality homes and thriving places. This will support greater social justice, the levelling up of communities across England and the creation of places people are proud to call home. A key focus for Homes England is the quality of what is being delivered, including championing environmental sustainability, design and beauty in homes and places that we support to create distinctive places and spaces that are designed for people to use and thrive. We also recognise that mixed-use regeneration to deliver housing alongside employment, retail and leisure space helps to create vibrant and successful places.

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This includes Homes England delivering a greater amount of employment and commercial space to support the governments levelling up agenda and to support local economies. In this respect, our land holdings at Rowley Farm provides a great opportunity to support Crawley in achieving their Vision within the Draft Crawley Local Plan to improve job opportunities and develop the local economy.

Further to the above, our Strategic Plan highlights the importance of working with our local partners with a focus on building and maintaining strong delivery partnerships, to help the council achieve the above Vision, and support the local economy through unlocking the delivery of sustainable development.

### Previous Representations

Homes England has submitted previous representations to the Regulation 18 (2019) and Regulation 19 (2020 & 2021) consultations which relate to the promotion of the Site for employment use across the various B Class and Ec (i.e. the office/professional services floorspace) uses which are compatible and offer a natural extension of Manor Royal.

Our representations set out below build upon our previous Regulation 19 response dated 29 June 2021 made in relation to the previous iteration of the Draft Crawley Local Plan which was published for consultation in June 2021. Many of the issues discussed in these representations are still pertinent to the policies discussed below.

### Purpose of the Representations

Pursuant to Regulation 19 of the Town and Country Planning Act (Local Planning) (England) Regulation 2012 these representations are made in respect of the Draft Local Plan to confirm our position in respect of the land interests described within this representation.

### Documents Reviewed

In preparing these representations, the following documents have been reviewed:

- Crawley Borough Council's (CBC) Draft Local Plan Review 2024 - 2040 (Regulation 19 2023)
- Economic Growth Assessment of Crawley (2020)
- Crawley Land Availability Assessment (2023)
- Gatwick 360 Strategic Economic Plan (2018)





## Homes England Land Interests.

Homes England owns key sites which fall within the Draft Crawley Local Plan area. These landholdings comprise Land West of Ifield, Land at Rowley Farm and Land at Tinsley Lane.

These Representations are written only regarding Homes England's interests at Rowley Farm and therefore other landholdings are not described, and separate representations for those sites have been submitted where necessary.

### Rowley Farm

Rowley Farm, located immediately to the south of Gatwick airport and abutting Manor Royal to the east and south, should be considered as a logical extension of the Manor Royal. Please see **Annex 1** for a red edge of our ownership.

The Site is currently agricultural in use. There are several trees/ areas of hedgerow present and two established woodland areas, one in the north-eastern corner and Rowley Wood in the southwest. Both are of these areas are designated as Ancient Woodland with the latter also a Site of Nature Conservation Importance.

The Site contains two listed buildings, namely Rowley Farmhouse (Grade II\*) and Crown Post Barn (Grade II). All land except for the immediate areas of adjacent to Crawter's Brook are within Flood Zone 1. The Site can be accessed via either London Road to the north or James Watt Way to the south and there is potential to access the site from Gatwick Road.

The Site was previously considered for development as part of the preparation of the Draft Crawley Local Plan (2021), but it was discounted because of "safeguarding for the possible development of an additional runway at Gatwick". Homes England's comments on the safeguarding is set out below. The relationship of the Site to Manor Royal results in it being a logical extension of the existing employment area which is of regional importance. We also understand that Crawley is constrained in terms of employment floorspace, which is evidenced in the Lichfield's Economic Growth Assessment of Crawley<sup>1</sup>, which lists between a 10.8 Ha and a 42.2 ha shortfall in employment land space. The total site allocated outside of the Gatwick Green site in the Crawley Land Availability assessment<sup>2</sup> is 14.49ha deliverable in the next 5 years. It is forecast that

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<sup>1</sup> <https://crawley.gov.uk/sites/default/files/2020-10/Economic%20Growth%20Assessment%20-%20focussed%20update%20for%20Crawley.pdf>

<sup>2</sup> <https://crawley.gov.uk/sites/default/files/2023-05/22.%20Employment%20Land%20Availability%20Assessment%20-%28Base%20Date%2031%20March%202023%29.pdf>



Rowley would be capable of delivering around 24.3 ha of land which would support economic development within Crawley.

Allocating the Site for employment would allow high quality employment floorspace to come forward and contribute the Crawley Strategic Objectives, namely their demand for sustainable economic growth (EC1). Crawley Policy EC3: Manor Royal details the lack of employment space, a situation wherein the release of this site could contribute to expanding Manor Royal. As set out further below, we give support to the following policy EC3 wording and consider that the Site can support the delivery of this policy to meet the local employment needs.

*“Manor Royal is the principal business location for Crawley and is instrumental to the economic success of the Gatwick Diamond. Its core business function is a key strength that should be retained and enhanced.*

*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.”*

The Site would also strengthen the Gatwick 360 Strategic Economic Plan<sup>3</sup> to deliver eight economic priorities, one of which seeks to develop business infrastructure and support. There is already a known demand for new, high-quality business space and the Site would create a logical extension to Manor Royal, providing the ideal opportunity to encourage further economic growth, building on existing infrastructure allowing the cluster of economic activity to grow.

Notwithstanding the continued safeguarding for the expansion of Gatwick Airport as set by national aviation policy framework 2013<sup>4</sup> and Policy GAT2: Safeguarded Land, Homes England confirms that the Site is available for development if, as per the supporting text to Policy GAT2, the national aviation policy were to fall away or a Local Plan Review were to commence to remove or amend Policy GAT2 and support additional employment land in this location. The Site satisfies all the criteria found within Policy EC3, which deals with development within Manor Royal, and as such Homes England considers the Site to be suitable and sustainable for the expansion of Manor Royal subject to the above.

The case for the Site’s development and inclusion within the Draft Crawley Local Plan as an allocation for employment is compelling. The Site is well connected to hard and soft infrastructure already in place, including nearby public transport links at Gatwick Airport, Crawley Train and Three Bridges Train stations

<sup>3</sup> [https://www.coast2capital.org.uk/storage/downloads/coast\\_to\\_capital\\_strategic\\_economic\\_plan\\_2018-2030\\_pdf-1535099447.pdf](https://www.coast2capital.org.uk/storage/downloads/coast_to_capital_strategic_economic_plan_2018-2030_pdf-1535099447.pdf)

<sup>4</sup> [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/153776/aviation-policy-framework.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/153776/aviation-policy-framework.pdf)





and the soft infrastructure that has been developed through the success of Manor Royal. The Site could also be developed in a phased manner alongside the delivery of Western Multi-Modal Transport Link and support the priorities of Crawley Borough Council found in both the Strategic Economic Plan and Policy EC1 of the Draft Local Plan.

## Relevant Policies

### CL8: Development Outside the Built-Up Area

In relation to the Site, we are supportive of Policy CL8. We recognise the importance of managing land at the boundary of Crawley and in the Upper Mole Farmland Rural Fringe in particular. This location lies within the proposed safeguarding area for Gatwick Second Runway, just as our sites does. In policy CL8, it is suggested that land could be used for extensions of Manor Royal, just as we propose for the Site.

Homes England agrees with supporting text paragraph 4.70 which states "*sites immediately adjacent to Manor Royal, which fall outside of the area subject to safeguarding through Policy GAT2, will be considered for minor extensions to the Main Employment Area where these would support the delivery of new business land*". We consider the Site to be available to meet this Policy CL8 and the criteria i-vii to enable Rowley Farm to be developed as an extension to Manor Royal, if the safeguarding falls away or changes during the following adoption of the Local Plan.

### EC3: Manor Royal

We support the principles of this policy. It highlights the importance of the Manor Royal to the economic growth of Crawley and the Gatwick Diamond more generally. We welcome the policy direction that this business district should be enhanced through development. We also note that the policy welcomes development that is compatible with the area's economic function and that any development over a certain size will require a contribution to public realm improvements in Manor Royal. Within the supporting text paragraph 9.46 of this policy, it is highlighted that land is in short supply around Manor Royal, and the Draft

Crawley Local Plan should take a positive approach to the growth of the industrial area, which is supported.

As discussed further under Policy GAT2 below, if Rowley Farm is removed from the Gatwick Safeguarding Zone following a change in national aviation policy, the Site would present a prime location for the expansion of Manor Park to the North. The Site is suitable for several employments uses and would present a prime opportunity for the growth of Manor Royal.



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## GAT2: Safeguarded Land

We continue to recognise the national policy drivers for the continued safeguarding area proposed for the potential southern runway of Gatwick Airport and support the progress made within the revised policy wording and evidence relating to the areas of search for the Crawley Western Multi-Modal Transport Link found within Policy ST4, with reference and support for the text of paragraph 17.29. The amendments made aligns with our previous recommendations made in the West of Ifield 2021 representations.

Given the importance of the Western Multi-Modal Transport Link to address cumulative development impacts across Crawley and the wider area, the flexible approach at the eastern (A23) end of the proposed link that seeks to balance the risk of safeguarding conflict against the potential loss of employment land and ability to deliver the Western Multi-Modal Transport Link as a strategic transport link is supported. The supporting feasibility study shows alternative options that could be deployed in the event a southern runway does come forward which is considered a sound approach given the uncertainty around a southern runway at this time and the need for wider land use impacts to be considered as part of any runway proposal at that time.

Homes England supports the wording within supporting text paragraph 10.18 for the trigger of a Local Plan Review should a change in National Aviation Policy come forward and we will welcome engagement in any future Local Plan Review, however in the interim, should safeguarding fall away Policy CL8 should be applied to this site.

Homes England looks forward to working positively with the Council and other stakeholders in the development of the Local Plan.

Yours faithfully

**Kate McBride MRICS MRTPI**

Interim Regional Director – South

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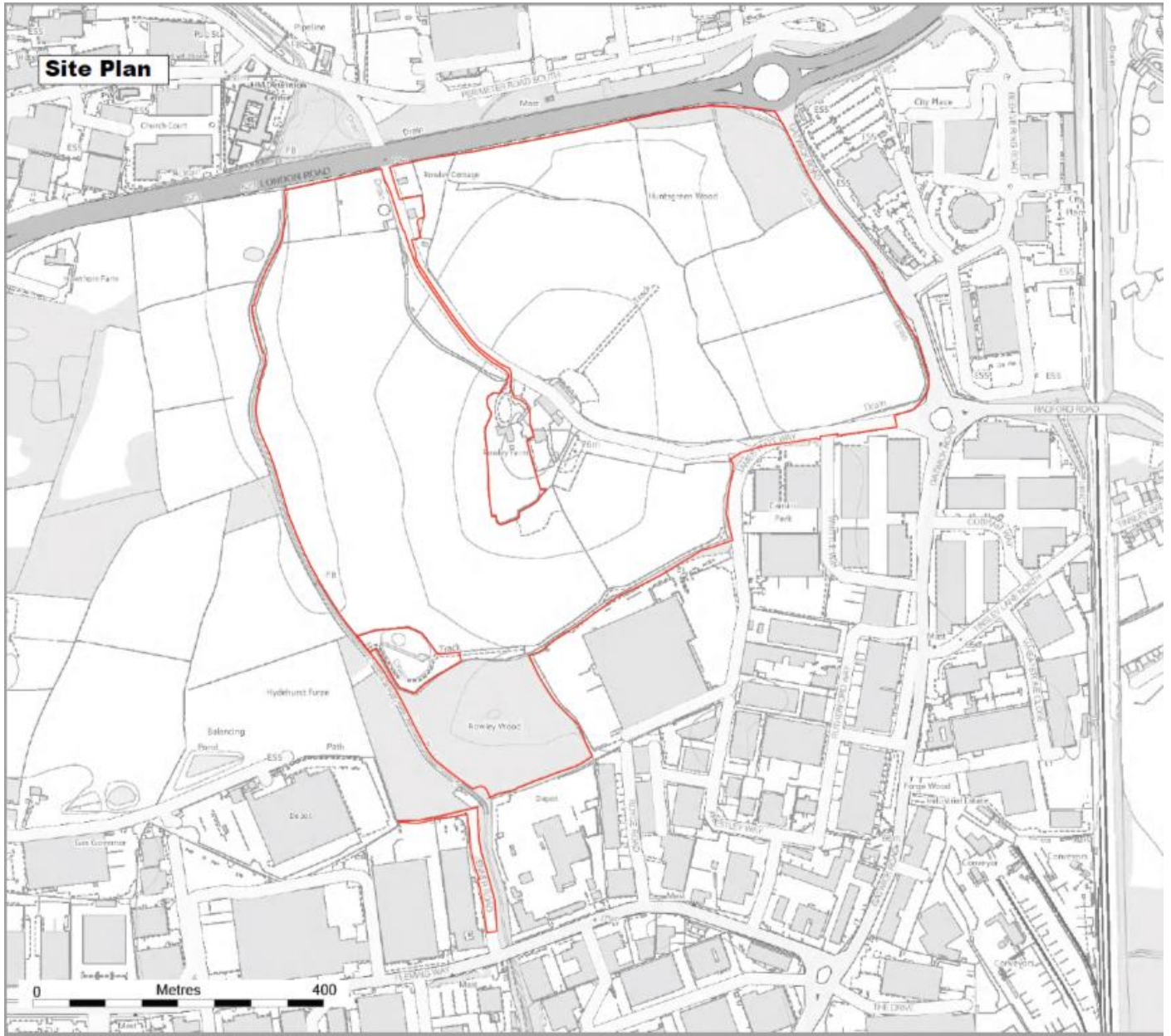
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Annex 1 – Annex 1 Homes England's Red Edge Ownership at Rowley Farm



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