

# Crawley 2040

Draft Crawley Borough Local Plan 2023 – 2040

June 2023

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Regulation 19 Consultation  
Representation on behalf of  
Gatwick Green Limited



**GatwickGreen**

WHERE THE FUTURE WORKS

**Vision**  
June 2023



# Crawley

Local Plan

Ref No:

Office use only

## Crawley Submission draft Local Plan Representation

Please return your completed representation form to Crawley Borough Council.

Representations can be made via this form and emailed to [strategic.planning@ Crawley.gov.uk](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.

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### 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:	Ms	Mr
First name:	Sally	Simon
Surname:	Fish	Fife
Organisation:	Gatwick Green Limited	Savills
Address line 1:	Fetcham Park	Wessex House

Address line 2:	Lower Road	Priors Walk
Town/city:	Leatherhead	Wimborne
Postcode:	KT22 9HD	BH21 1PB
Telephone:	01483 230320	01202 856912
Email:	<a href="mailto:Sally.fish@wilky.co.uk">Sally.fish@wilky.co.uk</a>	<a href="mailto:sfife@savills.com">sfife@savills.com</a>

## 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 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.

Please see attached response

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

### 7. Please set out what modification(s) you consider necessary to resolve the issues you have identified above. You need to state why this modification will make the Local Plan legally compliant or sound. It would be helpful if you are able to suggest how the wording of any policy or text should be revised. Please be as clear as possible. Any non-compliance with the duty to co-operate is incapable of modification at examination.

Please see attached response

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

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

Yes, I wish to participate in the examination hearings

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

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**Signature**



**Date**

19/06/2023

**Draft Crawley Borough Local Plan 2024 - 2040  
May 2023**

**Regulation 19 Consultation**

**Representation on behalf of Gatwick Green Limited**

**Crawley: A Vision**

**June 2023**



## 1.0 Introduction

- 1.1 This representation is submitted on behalf of Gatwick Green Limited (GGL). For clarification, Gatwick Green Limited is a wholly owned subsidiary of The Wilky Group (TWG), which has a long-standing interest in the promotion of strategic employment land within the Crawley Borough Council (CBC) area. Previous representations were submitted by TWG, but the land is now vested in Gatwick Green Limited. This representation relates to the Vision for Crawley contained in the Draft Crawley Borough Local Plan, 2023 (DCBLP).
- 1.2 GGL owns about 48 ha (119 acres) of land east of Gatwick Airport. The land has been promoted by GGL as a strategic employment opportunity known as Gatwick Green, most of which forms a proposed allocation as a Strategic Employment Location (SEL) of 44 ha (108.7 acres) under Strategic Policy EC4 in the DCBLP. The proposed allocation is for a comprehensive industrial-led development of predominantly storage and distribution uses under use class B8.
- 1.3 This representation outlines GGL's strong support for the Vision for Crawley (DCBLP, page 18) and outlines its vision for Gatwick Green and how this will play a significant role in advancing the Vision for the town. The representation therefore focuses on that part of the Vision related to 'Improving Job Opportunities and Developing the Local Economy; Economic Growth and Social Mobility'.

## 2.0 Crawley: A Vision

- 2.1 The DCBLP Vision is for Crawley to be a modern, vibrant and sustainable town with strong and diverse communities and sustainable economic growth to make a place that people enjoy and want to live, work and visit. There are five key themes to the Vision relating to ensuring high-quality leisure and cultural facilities to support health and wellbeing; creating strong and diverse communities; improving job opportunities and developing the local economy to foster social mobility; delivering housing to meet local needs and reduce homelessness, and protecting the environment alongside sustainability. In relation to the economy, the Vision provides a blueprint for a socially-sustainable, healthy and inclusive community in Crawley in line with the advice in the National Planning Policy Framework (NPPF) and which underpins the policies in the Plan.
- 2.2 The Vision sets out a forward thinking and ambitious prospectus for Crawley over the next 17 years. The key elements for the economy for Crawley are to (Savills emphasis):

- Strive to be the premier town between London and the South Coast providing jobs and learning opportunities and a leisure and cultural offer that is attractive to residents and visitors.
- Be an economic leader with a diverse, resilient and productive economy that meets local needs and supports the prosperity of the region.
- Have an environment that supports and encourages new and established businesses to grow and flourish, supported by the necessary infrastructure to enable businesses to flourish.
- Be the first choice of business location for domestic and international markets.
- Enable the community to benefit from access to high value and sustainable economic growth through thriving innovation, entrepreneurship and advanced technologies.
- Create additional jobs across a diverse range of sectors, supported by learning and development opportunities.
- Redevelop / revitalise the Town Centre and Manor Royal Business District.
- Identify land for a new industrial-led Strategic Employment Location to reinforce the status of Crawley as the place to do business in the South East.

2.3 GGL fully supports the Vision for Crawley and all the above elements aimed at delivering a vibrant and world-class business location that also complements and supports the recovery and growth of the UK's second-largest airport at Gatwick. In addition to the policies on Economic Growth in the DCBLP, the Council is advancing its Vision for the town by putting in place a number of important initiatives – these include the regeneration of the Manor Royal Business District and the revitalisation of the Town Centre. These are key areas of investment to raise the quality of these key business quarters and will be supported by ambitious plans to improve the town's walking, cycling, bus and telecommunications infrastructure.

2.4 Whilst these initiatives will significantly enhance the quality of the business environment and related communication networks, the scope to expand and diversify the local economy has in the past been limited by the lack of any significant employment allocations, specifically of a strategic scale in a highly sustainable location. Overcoming this constraint has been a key objective for the Council, the importance of which was emphasised by the Planning Inspector at the Advisory Panel in April 2020. The Council's response has been both proactive and positive by allocating 44 ha for an industrial-led Strategic Employment Location (SEL) at Gatwick Green east of the Airport.

2.5 Gatwick Green, therefore, represents an important part of the Council's Vision for Crawley with the ability to deliver on a range of critical success factors within the Vision.



### 3.0 Conclusion

- 3.1 Gatwick Green Limited is a wholly owned subsidiary of the Wilky Group: the land is vested in Gatwick Green Limited. The Wilky Group is a family-owned and run company that has a 70-year track record of successful market-led development and property innovation across the UK. Their dedication to creating brand new places that help fulfil the true potential of those they serve has resulted in more than 80 successful development projects, all of which have led to a diverse range of job and training opportunities.
- 3.2 Gatwick Green is being delivered by Gatwick Green Limited, and their team of industry experts, whose collective commitment to the project since 2015 will help support Crawley's ambition to become an economic leader by providing businesses and their staff a premium business location served by high-quality infrastructure.
- 3.3 Gatwick Green provides Crawley and the wider region with a unique and timely opportunity to catalyse diversification, investment and economic growth; one that is perfectly placed to help power recovery with a next generation of logistics infrastructure, jobs, and training.
- 3.4 The diverse business and employment opportunities planned on-site, supported by high-quality education and training, will create a much-needed complementary offer to aviation, supporting future prosperity and resilience for Crawley and the wider region, with little displacement for existing employers at Manor Royal and other industrial areas.
- 3.5 Through the provision of future-proofed infrastructure, sustainable transport and digital connectivity, and renewable energy provision, Gatwick Green will become a leading logistics destination where green space, the natural environment and technology are integral to its design.
- 3.6 GGL's long-term commitment to supporting local business, education and skills communities is evidenced by leadership and participation in numerous initiatives including: Business South, (previously Enterprise First), Enterprise M3 Local Enterprise Partnership and the CBI's South East Council and SME Council. Through this, the Group has a proven record of supporting start-up and small businesses.
- 3.7 With a track record of successful partnership and collaboration, GGL is keen to support communities by working closely with Crawley Borough Council, the Gatwick Diamond and local colleges to deliver the education and skills agenda through Gatwick Green.



Gatwick**Green**

WHERE THE FUTURE WORKS

GatwickGreen

# Where the Future Works

Welcome To Gatwick Green

Capacity To Deliver

For Growth & Recovery

Sustainability Matters

Better Together

Perfectly Located



WHERE THE FUTURE WORKS

# Welcome to Gatwick Green

**One of the most significant commercial developments in the South East, Gatwick Green will be a brand-new logistics hub designed with the future in mind.**

A timely catalyst for diversification, investment and economic growth, Gatwick Green offers a unique opportunity for Crawley and the wider region; one that is perfectly placed to help power recovery with a next generation of logistics infrastructure, jobs, and training.



On the doorstep of Crawley and the UK's second largest airport, Gatwick Green will be a pioneering and sustainable place that offers forward-thinking occupiers and their staff a scale of brand-new logistics property and employment opportunities unavailable elsewhere south of the M25.

Its strategic location also offers both domestic and international businesses an exceptional quality of multi-modal connectivity, as well as direct access to a wide range of local skills and talent.

Designed to complement and enhance neighbouring economic anchors in and around Crawley, Gatwick Green will provide the essential foundations on which more productive, prosperous, and sustainable communities can be built.

Gatwick Green is being delivered by an experienced team whose long-term investment in the site, and record of successful property development and innovation across the UK, demonstrates their dedication to creating a brand-new place that will play a crucial role in Crawley's future success.



**47**  
hectares allocated



**2,000+**  
new jobs



**24.1**  
hectares (minimum)



**£79m+**  
GVA per annum



**77,800+**  
(GIA) sq m total floor space



**£55 million**  
business rates over 20 years

# Capacity to Deliver

With the pandemic reinforcing the growing importance of the logistics sector to the U.K. economy, market evidence demonstrates there is continued and strong demand for a scale and quality of prime logistics space currently unavailable in Crawley and the wider region.



This lack of available supply, developable strategic sites of scale and current safeguarding restrictions, all mean this significant occupier demand is a lost opportunity for the local economy. Uniquely placed to meet this demand is Gatwick Green, which provides the perfect blank canvas upon which the increasing need for high-specification, sustainable and hyper-connected logistics infrastructure can be met.

Sitting outside the Greenbelt and offering an unconstrained quantum of shovel-ready opportunities, Gatwick Green is an early-mover that has the capacity to deliver over 77,800 (GIA) sq m of floor space and more than 2,000 jobs.



**630**

on and off-site construction jobs over 2 years

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**£115 million**

estimated construction cost

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**£30 million**

(GVA) generated during construction

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**£127,000**

social value of apprenticeships during construction

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# For Growth & Recovery

**Gatwick Green is part of a wider solution for Crawley and the surrounding region. Not only will it complement and enhance neighbouring economic anchors, including Manor Royal, Crawley Town Centre and a recovering Gatwick Airport, it will help diversify the local economy and provide the necessary foundations on which a range of commercial, employment-focussed, facilities can be successfully delivered.**





Creating a minimum of 2,000 brand-new and well-paid logistics jobs within a high-growth sector, Gatwick Green will also open up the opportunity to reskill and upskill the local work force; helping address skills gaps and improving social mobility and inclusion in an area affected greatly by recent job losses.

The diverse business and employment activity planned on-site will also create a complementary offer to aviation, supporting future prosperity and resilience with little displacement for existing employers at Manor Royal and other industrial areas.



**1,470**

permanent on-site jobs (initial phase)

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**1,290**

permanent on and off-site jobs for residents of Crawley

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**£79 million**

GVA associated with the additional number of jobs per annum

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**645**

director, management, professional and technical jobs up to £48,230

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**454**

skilled trade occupations, process, plant, and machine operatives up to £31,712

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**367**

admin, sales, service, and elementary occupations up to £26,891

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# Sustainability Matters

**Designed to support green growth and sustainable businesses, Gatwick Green will provide an exceptional quality of infrastructure and accommodation, all specified to achieve a BREEAM Excellent rating, as well as delivering Net Zero emissions and carbon neutrality by 2050.**



WHERE THE FUTURE WORKS

# Better Together

**Gatwick Green is being delivered by The Wilky Group, and their team of industry experts, whose long-term investment in the site, and over 70-year track record of successful development and property innovation across the UK, demonstrates their dedication to creating brand new places that help fulfil the true potential of those they serve.**

The Wilky Group is committed to engaging with local authorities and key stakeholders to unlock the extraordinary potential at Gatwick Green, at a time when public and private sector collaboration had never been more needed to drive forward economic recovery and diversification.

Ready and able to promote the site for development, as part of achieving a long-term vision for the area, The Wilky Group and their professional team have the capability and experience to harness our collective ambition to deliver a 21st Century logistics hub for the benefit of Crawley and the wider region.



**£4.3 million**

business rates income per annum

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**£55 million**

business rates income over 20 years

---



**£15.8 million**

corporation tax per annum

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**£49 million**

private tax per annum

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# Perfectly Located

**On the doorstep of Crawley town centre and the UK's second largest airport, Gatwick Green will offer both domestic and international businesses an exceptional quality of multi-modal connectivity, as well as direct access to a wide range of local skills and talent.**



## PERFECTLY LOCATED

One of the UK's best connected logistics hubs, Gatwick Green's strategic location will provide occupiers with seamless access to the M23 and wider M25 motorway network, as well as flights to over 230 international destinations.

Once complete, it will provide a truly unique opportunity for 21st Century businesses and their staff to prosper in a place where integrated transport networks, high-speed digital connectivity and futureproofed utilities come as standard.



### M23

adjacent to junction 9

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### 15 mins

to Crawley Town Centre

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### 27 mins

to London

---



### 2nd

largest airport in UK next door

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### 230+

international flights from Gatwick

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PERFECTLY LOCATED





For more information, please contact:

**Sally Fish BSc MRICS**

**Property Director**

**The Wilky Group**

T: 01483 230 320

[www.wilky.co.uk](http://www.wilky.co.uk)

WILKY

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GROUP

# Crawley 2040

Draft Crawley Borough Local Plan 2023 – 2040

June 2023

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Regulation 19 Consultation  
Representation on behalf of  
Gatwick Green Limited



**GatwickGreen**

WHERE THE FUTURE WORKS

**Policy CL7**

Important and Valued Views

June 2023



# Crawley Local Plan

<p><b>Ref No:</b></p>  <p><i>Office use only</i></p>
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Surname:	Fish	Fife
Organisation:	Gatwick Green Limited	Savills
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Address line 2:	Lower Road	Priors Walk
Town/city:	Leatherhead	Wimborne
Postcode:	KT22 9HD	BH21 1PB
Telephone:	01483 230320	01202 856912
Email:	<a href="mailto:Sally.fish@wilky.co.uk">Sally.fish@wilky.co.uk</a>	<a href="mailto:sfife@savills.com">sfife@savills.com</a>

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Paragraph:

Policy:

Other:

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- |   |   |                             |
|---|---|-----------------------------|
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**Date**

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**Regulation 19 Consultation**

**Representation on behalf of Gatwick Green Limited**

**Policy CL7: Important and Valued Views**

**June 2023**



## **1.0 Introduction**

- 1.1 This representation is submitted on behalf of Gatwick Green Limited (GGL). For clarification, Gatwick Green Limited is a wholly owned subsidiary of The Wilky Group (TWG), which has a long-standing interest in the promotion of strategic employment land within the Crawley Borough Council (CBC) area. Previous representations were submitted by TWG, but the land is now vested in Gatwick Green Limited. This representation relates to Policy CL7 Important and Valued Views in the Draft Crawley Borough Local Plan, 2023 (DCBLP).
- 1.2 GGL owns about 48 ha (119 acres) of land east of Gatwick Airport. The land has been promoted by TWG/GGL as a strategic employment opportunity known as Gatwick Green, most of which forms a proposed allocation as a Strategic Employment Location (SEL) (the Site) under Strategic Policy EC4 of the DCBLP. The proposed allocation is for a comprehensive industrial-led development of predominantly storage and distribution uses under use class B8.
- 1.3 This representation notes that Policy CL7 is broadly in accordance with the advice in the National Planning Policy Framework (NPPF, 2021) and the Planning Practice Guidance (PPG). It also confirms that Gatwick Green can be masterplanned and designed so as to be in accordance with the key objectives contained in Policy CL7.

## **2.0 Policy CL7 – intent of policy and compliance**

### **Intention of the policy**

- 2.1 The purpose of Policy CL7 is to protect and/or enhance important views across the Borough. The change in levels from the High Weald to the Low Weald allow views across the area, contributing to its character.
- 2.2 Policy CL7 has three sections identifying Linear Contained Views, Long Distance Views and Valued Landscape and Views. It also sets out that Area Based Character Assessments will further identify valued localised views and valued landscape, and that the visual impact of proposals affecting Important and Valued Views must be clearly and accurately demonstrated.

### **National planning policy and guidance**

- 2.3 The policy is considered to be in accordance with the policy and guidance contained in the National Planning Policy Framework (NPPF) and Planning Practice Guidance (PPG).



The NPPF sets out the objectives of the planning system with regard to achieving well-designed places (paras 130 and 133-134), and specifically with regard to the need for development to be sympathetic to the landscape setting of a site (para 130(c)). Policy CL7 embodies these national planning policy objectives, tailored to the local circumstances pertaining to the High Weald and the Low Weald and locally defined long distance and linear contained views on the Local Plan Map.

- 2.4 The NPPF policy is supplemented by more detailed guidance in Planning Practice Guidance (PPG) on planning for well-designed places<sup>1</sup>. PPG sets out more detailed design guidance on processes and tools that can be used through the planning system and how to engage local communities effectively. In relation to landscape considerations, it states that these are key matters for masterplans, design-codes and parameter plans so as to achieve well-designed places.
- 2.5 It is considered that Policy CL7 provides appropriate and proportionate protection for important and valued views in the Borough, consistent with national planning policy and guidance. Policy CL7 has been constituted to ensure that these matters are addressed in the planning process – in relation to Gatwick Green, this will include the preparation of the masterplan, and an outline planning application with a supporting landscape and visual assessment in accordance with the requirements in Strategic Policy EC4.

### 3.0 Implications for Gatwick Green

- 3.1 A Long Distance View Splay crosses the north western half of the proposed Gatwick Green allocation. The overall mastelanning of the Site under Strategic Policy EC4 will have regard to this view splay and any other landscape / visual considerations that arise from more detailed work. There will be a range of landscape and visual considerations taken into account in the design and operation of the proposals for the Site. These will include:

- A layout and design that respects the interface between the surrounding residences and countryside areas within the North East Crawley Rural Fringe landscape character area.
- The inclusion of landscape buffers and open space to address separation of Gatwick Green from Gatwick Airport, Horley and the wider countryside.
- The integration of trees, hedgerows and biodiversity into the layout and design and enhance blue/green infrastructure in the context of the Gatwick Woods Biodiversity Opportunity Area.
- Minimising the impacts of lighting on neighbouring residences.

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<sup>1</sup> <https://www.gov.uk/guidance/design>

- 3.2 The Appendices to GGL's representation on Policy EC1 of the DCBLP (2020) (2020 Appendices) form part of the Council's evidence base (Consultation appendix 4b: Wilky Group appendices combined). The environmental considerations relating to landscape / visual matters are addressed in the 2020 Appendices and subject to Addenda / a new report contained at Appendices A – E of Appendix 3 to GGL's representation on Strategic Policy EC4. These Addenda confirm that the original recommendations remain valid in the context of the proposed allocation of Gatwick Green under Strategic Policies EC1 and EC4 and any other changes in circumstances.
- 3.3 More especially, the Addendum to the Landscape Character and Visual Appraisal confirms that the Site can be developed whilst respecting the various landscape and visual values in and around it, and includes recommendations on appropriate avoidance and mitigation measures. These matters will be addressed at the planning application stage and set out in a Design and Access Statement.

## **4.0 Conclusions**

- 4.1 GGL acknowledges the need for the Gatwick Green proposals to address the landscape and visual amenity considerations relating to the Site and referenced in Policy CL7. All feasibility investigations to date indicate that Gatwick Green can be delivered in accordance with these requirements. The masterplan proposals for the Site required under Strategic Policy EC4 will have regard to these considerations in achieving a sustainable and well-designed scheme for the Site.
- 4.2 It is considered that Policy CL7 provides appropriate and proportionate requirements for addressing landscape and visual matters, consistent with national policy. Development at Gatwick Green as allocated in Strategic Policy EC4 will be designed to incorporate landscaping to provide visual buffers, enhance amenity and ensure the proposals can be accommodated in the wider landscape.

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**GatwickGreen**

WHERE THE FUTURE WORKS

**Policy HA1**  
Heritage Assets  
June 2023



# Crawley Local Plan

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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:	Ms	Mr
First name:	Sally	Simon
Surname:	Fish	Fife
Organisation:	Gatwick Green Limited	Savills
Address line 1:	Fetcham Park	Wessex House

Address line 2:	Lower Road	Priors Walk
Town/city:	Leatherhead	Wimborne
Postcode:	KT22 9HD	BH21 1PB
Telephone:	01483 230320	01202 856912
Email:	<a href="mailto:Sally.fish@wilky.co.uk">Sally.fish@wilky.co.uk</a>	<a href="mailto:sfife@savills.com">sfife@savills.com</a>

## 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 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.

Please see attached response

*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:**

The Planning Inspectorate's procedure guide for Local Plan Examinations (Feb 2023) states at para 3.14 that where a representor supports a policy, the LPA has the discretion to include that representor as part of its team at the Hearings. On this basis, GGL could attend the Hearings, if requested by Crawley Borough Council.

*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**

19/06/2023

**Draft Crawley Borough Local Plan 2024 - 2040  
May 2023**

**Regulation 19 Consultation**

**Representation on behalf of Gatwick Green Limited**

**Policy HA1: Heritage Assets**

**June 2023**





## 1.0 Introduction

- 1.1 This representation is submitted on behalf of Gatwick Green Limited (GGL). For clarification, Gatwick Green Limited is a wholly owned subsidiary of The Wilky Group (TWG), which has a long-standing interest in the promotion of strategic employment land within the Crawley Borough Council (CBC) area. Previous representations were submitted by TWG, but the land is now vested in Gatwick Green Limited. This representation relates to Policy HA1 Heritage Assets in the Draft Crawley Borough Local Plan, 2023 (DCBLP).
- 1.2 GGL owns about 48 ha (119 acres) of land east of Gatwick Airport. The land has been promoted by GGL as a strategic employment opportunity known as Gatwick Green, most of which forms a proposed allocation as a Strategic Employment Location (SEL) of 44 ha (108.7 acres) under Strategic Policy EC4 in the DCBLP. The proposed allocation is for a comprehensive industrial-led development of predominantly storage and distribution uses under use class B8.
- 1.3 This representation notes that Policy HA1 is broadly in accordance with the advice in the National Planning Policy Framework (NPPF, 2021) and the Planning Practice Guidance (PPG). It also confirms that Gatwick Green can be masterplanned and designed so as to be in accordance with the key objectives contained in Policy HA1.

## 2.0 Policy HA1 – intent of policy and compliance

### Intention of the policy

- 2.1 The purpose of Policy HA1 is to identify the list of designated and non-designated heritage assets, and set out the key considerations for any development that may affect them. The core guidance is that the key features or significance of heritage assets are conserved and enhanced as a result of development. Great weight is given to the conservation of designated heritage assets pursuant to the statutory requirements of the Listed Building Act 1990; harm to, or the loss of, their significance will require justification in accordance with the importance of the asset and the degree of loss or harm, in line with local and national policy.
- 2.2 Separate guidance is set out on the approach to addressing harm to non-designated heritage assets, taking account of the scale of harm and the asset's significance, including any harm to an asset's setting. Further guidance is provided on the scope of, and matters to be addressed in Heritage Impacts Assessments required at the planning application stage.

## National planning policy and guidance

- 2.3 Chapter 16 of the NPPF sets out how planning policy should provide a positive strategy for the conservation and enjoyment of the historic environment and how development affecting heritage assets should be assessed. In relation to designated assets, the policy guidance places much emphasis on determining if harm represents a total loss, or is substantial or less than substantial, with guidance on how to decide on the impacts of development proposals. In relation to proposals that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset. The policy guidance is broadly reflected in the wording of Policy HA1.
- 2.4 The NPPF is supplemented by more detailed guidance in Planning Practice Guidance (PPG) on the heritage environment<sup>1</sup>. The PPG sets out more detailed guidance on the historic environment, including the approach to plan-making and guidance on decision-making, including the meaning of significance of an asset.
- 2.5 It is considered that Policy HA1 provides appropriate and proportionate protection for heritage assets in the Borough, consistent with national planning policy and guidance. Policy HA1 has been designed to ensure that these matters are addressed in the planning process – in relation to Gatwick Green, this will include the preparation of the masterplan, and an outline planning application with a supporting Heritage Impact Assessment in accordance with the requirements in Strategic Policy EC4.

## 3.0 Implications for Gatwick Green

- 3.1 Based on the Council's review in 2020 of its heritage assets<sup>2</sup>, there are a number of Listed and Locally Listed Buildings near the boundaries of the Gatwick Green allocation, but no Conservation Areas would be affected. The overall masterplanning of the Site under Strategic Policy EC4 will need to have regard to these assets and any other heritage features that arise from more detailed work. There will therefore be a range of heritage considerations taken into account in the design and operation of the proposals for the Site. These will include respecting the setting of these Listed Buildings and Locally Listed Buildings and conserving, though appropriate means, any archaeology within the Site.
- 3.2 The Appendices to GGL's representation on Policy EC1 of the DCBLP (2020) (2020 Appendices) form part of the Council's evidence base (Consultation appendix 4b: Wilky

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<sup>1</sup> <https://www.gov.uk/guidance/conserving-and-enhancing-the-historic-environment>

<sup>2</sup> Heritage Assets Review, Place Services, Crawley Borough Council, December 2020

Group appendices combined). The environmental considerations relating to heritage matters are addressed in the 2020 Appendices and subject to Addenda / a new report contained at Appendices A - E of Appendix 3 to GGL's representation on Strategic Policy EC4. These Addenda confirm that the original recommendations remain valid in the context of the proposed allocation of Gatwick Green under Strategic Policies EC1 and EC4 and any other changes in circumstances.

- 3.3 The Addendum to the Heritage Constraints Appraisal confirms that the Site can be developed whilst respecting the various heritage assets adjacent to the Site, and includes recommendations on appropriate avoidance and mitigation measures. These matters will be addressed at the planning application stage and set out in a Heritage Impact Assessment and a Design and Access Statement.

## **4.0 Conclusions**

- 4.1 GGL acknowledges the need for the Gatwick Green proposals to address the heritage considerations relating to the Site and referenced in Policy HA1. All feasibility investigations to date indicate that Gatwick Green can be delivered in accordance with these requirements. The masterplan proposals for the Site required under Strategic Policy EC4 will have regard to these considerations in achieving a sustainable and well-designed scheme for the Site.
- 4.2 It is considered that Policy HA1 provides appropriate and proportionate requirements for addressing heritage and matters, consistent with national policy. Development at Gatwick Green as allocated in Strategic Policy EC4 will be designed in a way so as to avoid or mitigate any harmful impacts on the setting of the heritage assets in the area.

# Crawley 2040

Draft Crawley Borough Local Plan 2023 – 2040

June 2023

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Regulation 19 Consultation  
Representation on behalf of  
Gatwick Green Limited



**GatwickGreen**

WHERE THE FUTURE WORKS

**Policy HA4**  
Listed Buildings and Structures  
June 2023



# 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:	Ms	Mr
First name:	Sally	Simon
Surname:	Fish	Fife
Organisation:	Gatwick Green Limited	Savills
Address line 1:	Fetcham Park	Wessex House

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Email:	<a href="mailto:Sally.fish@wilky.co.uk">Sally.fish@wilky.co.uk</a>	<a href="mailto:sfife@savills.com">sfife@savills.com</a>

## 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 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.

Please see attached response

*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:**

The Planning Inspectorate's procedure guide for Local Plan Examinations (Feb 2023) states at para 3.14 that where a representor supports a policy, the LPA has the discretion to include that representor as part of its team at the Hearings. On this basis, GGL could attend the Hearings, if requested by Crawley Borough Council.

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**Signature**



**Date**

19/06/2023



**Draft Crawley Borough Local Plan 2024 - 2040  
May 2023**

**Regulation 19 Consultation**

**Representation on behalf of Gatwick Green Limited**

**Policy HA4: Listed Buildings and Structures**

**June 2023**



## **1.0 Introduction**

- 1.1 This representation is submitted on behalf of Gatwick Green Limited (GGL). For clarification, Gatwick Green Limited is a wholly owned subsidiary of The Wilky Group (TWG), which has a long-standing interest in the promotion of strategic employment land within the Crawley Borough Council (CBC) area. Previous representations were submitted by TWG, but the land is now vested in Gatwick Green Limited. This representation relates to Policy HA5 Locally Listed Buildings in the Draft Crawley Borough Local Plan, 2023 (DCBLP).
- 1.2 GGL owns about 48 ha (119 acres) of land east of Gatwick Airport. The land has been promoted by GGL as a strategic employment opportunity known as Gatwick Green, most of which forms a proposed allocation as a Strategic Employment Location (SEL) of 44 ha (108.7 acres) (the Site) under Strategic Policy EC4 in the DCBLP. The proposed allocation is for a comprehensive industrial-led development of predominantly storage and distribution uses under use class B8.
- 1.3 This representation notes that Policy HA4 is broadly in accordance with the advice in the National Planning Policy Framework (NPPF, 2021) and the Planning Practice Guidance (PPG). It also confirms that Gatwick Green can be masterplanned and designed so as to be in accordance with the key objectives contained in Policy HA4.

## **2.0 Policy HA4 – intent of policy and compliance**

### **Intention of the policy**

- 2.1 The purpose of Policy HA4 is to ensure that any proposed works to Listed Buildings must preserve or enhance the design and character of the Listed Building and have regard to its historic and architectural significance. This extends to the Listed Building's setting and key features. The policy goes on to state that any harm to, or loss of, the significance of a Listed Building will need convincing justification in line with national policy – this means that public and substantial benefits will be required to outweigh any harm or loss.

### **National planning policy and guidance**

- 2.2 Chapter 16 of the NPPF sets out how planning policy should provide a positive strategy for the conservation and enjoyment of the historic environment and how development affecting heritage assets should be assessed. Proposals that would directly or indirectly cause harm to, or loss of, the significance of a designated heritage asset would require

clear and convincing justification – harm to, or loss of, grade II Listed Buildings should be exceptions, and to grade I or II\*, wholly exceptional. The policy guidance is broadly reflected in the wording of Policy HA4.

- 2.3 The NPPF policy is supplemented by more detailed guidance in Planning Practice Guidance (PPG) on the heritage environment<sup>1</sup>. The PPG sets out more detailed guidance on the historic environment, including the approach to plan-making and guidance on decision-making, including that Listed Buildings are identified heritage assets of significance.
- 2.4 It is considered that Policy HA4 sets out an appropriate basis for assessing any proposals that could directly or indirectly affect Listed Buildings in the Borough, consistent with national planning policy and guidance. Policy HA4 has been designed to ensure that these matters are addressed in the planning process – in relation to Gatwick Green, this will include the preparation of the masterplan, and an outline planning application with a supporting Heritage Impact Assessment in accordance with the requirements in Strategic Policy EC4 and Policy HA4.

### **3.0 Implications for Gatwick Green**

- 3.1 Based on the Council's review in 2020 of its heritage assets<sup>2</sup>, there are a number of Listed Buildings near the boundaries of the Gatwick Green allocation. The overall masterplanning of the Site under Strategic Policy EC4 will need to have regard to these assets and any other heritage features that arise from more detailed work. There will therefore be a range of heritage considerations taken into account in the design and operation of the proposals for the Site. These will include respecting the setting of these Listed Buildings near the Site.
- 3.2 The Appendices to GGL's representation on Policy EC1 of the DCBLP (2020) (2020 Appendices) form part of the Council's evidence base (Consultation appendix 4b: Wilky Group appendices combined). The environmental considerations relating to heritage matters are addressed in the 2020 Appendices and subject to Addenda / a new report contained at Appendices A - E of Appendix 3 to GGL's representation on Strategic Policy EC4. These Addenda confirm that the original recommendations remain valid in the context of the proposed allocation of Gatwick Green under Strategic Policies EC1 and EC4 and any other changes in circumstances.

---

<sup>1</sup> <https://www.gov.uk/guidance/conserving-and-enhancing-the-historic-environment>

<sup>2</sup> Heritage Assets Review, Place Services, Crawley Borough Council, December 2020

- 3.3 More especially, the Addendum to the Heritage Constraints Appraisal confirms that the Site can be developed whilst respecting the various heritage assets adjacent to the Site, and includes recommendations on appropriate avoidance and mitigation measures. These matters will be addressed at the planning application stage and set out in a Heritage Impact Assessment and a Design and Access Statement.

## **4.0 Conclusions**

- 4.1 GGL acknowledges the need for the Gatwick Green proposals to address the statutory Listed Buildings near the Site in accordance with Policy HA4. All feasibility investigations to date indicate that Gatwick Green can be delivered in accordance with these requirements. The masterplan proposals for the Site required under Strategic Policy EC4 will have regard to these considerations in achieving a sustainable and well-designed scheme for the Site.
- 4.2 It is considered that Policy HA4 provides appropriate and proportionate requirements for addressing heritage and matters, consistent with national policy. Development at Gatwick Green as allocated in Strategic Policy EC4 will be designed in a way so as to avoid or mitigate any harmful impacts on the setting of the statutory heritage assets in the area.

# Crawley 2040

Draft Crawley Borough Local Plan 2023 – 2040

June 2023

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Regulation 19 Consultation  
Representation on behalf of  
Gatwick Green Limited



**GatwickGreen**

WHERE THE FUTURE WORKS

**Policy HA5**  
Locally Listed Buildings  
June 2023



# Crawley Local Plan

<p><b>Ref No:</b></p>   <p><i>Office use only</i></p>
--

## Crawley Submission draft Local Plan Representation

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Town/city:	Leatherhead	Wimborne
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## PART B – Your representation

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

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### 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 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"/> |

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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:**

The Planning Inspectorate's procedure guide for Local Plan Examinations (Feb 2023) states at para 3.14 that where a representor supports a policy, the LPA has the discretion to include that representor as part of its team at the Hearings. On this basis, GGL could attend the Hearings, if requested by Crawley Borough Council.

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**Signature**



**Date**

19/06/2023

**Draft Crawley Borough Local Plan 2024 - 2040  
May 2023**

**Regulation 19 Consultation**

**Representation on behalf of Gatwick Green Limited**

**Policy HA5: Locally Listed Buildings**

**June 2023**



## **1.0 Introduction**

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- 1.3 This representation notes that Policy HA5 is broadly in accordance with the advice in the National Planning Policy Framework (NPPF, 2021) and the Planning Practice Guidance (PPG). It also confirms that Gatwick Green can be masterplanned and designed so as to be in accordance with the key objectives contained in Policy HA5.

## **2.0 Policy HA5 – intent of policy and compliance**

### **Intention of the policy**

- 2.1 The purpose of Policy HA5 is to ensure that development seeks to retain any Locally Listed Buildings, including maintaining features of interest and preserving the character and setting of the building. Development proposals must demonstrate that they take account of the heritage significance of the building and its setting in relation to a number of defined heritage attributes.

### **National planning policy and guidance**

- 2.2 Chapter 16 of the NPPF sets out how planning policy should provide a positive strategy for the conservation and enjoyment of the historic environment and how development affecting heritage assets should be assessed. In relation to proposals that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset. The policy guidance is broadly reflected in the wording of Policy HA5.

- 2.3 The NPPF policy is supplemented by more detailed guidance in Planning Practice Guidance (PPG) on the heritage environment<sup>1</sup>. The PPG sets out more detailed guidance on the historic environment, including the approach to plan-making and guidance on decision-making, including the meaning of significance of an asset.
- 2.4 It is considered that Policy HA5 provides appropriate and proportionate protection for non-designated heritage assets in the Borough, consistent with national planning policy and guidance. Policy HA5 has been designed to ensure that these matters are addressed in the planning process – in relation to Gatwick Green, this will include the preparation of the masterplan, and an outline planning application with a supporting Heritage Impact Assessment in accordance with the requirements in Strategic Policy EC4.

### **3.0 Implications for Gatwick Green**

- 3.1 Based on the Council’s review in 2020 of its heritage assets<sup>2</sup>, there are a number of Locally Listed Buildings near the boundaries of the Gatwick Green allocation. The overall masterplanning of the Site under Strategic Policy EC4 will need to have regard to these assets and any other heritage features that arise from more detailed work. There will therefore be a range of heritage considerations taken into account in the design and operation of the proposals for the Site. These will include respecting the setting of these Locally Listed Buildings near the Site.
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- 3.3 More especially, the Addendum to the Heritage Constraints Appraisal confirms that the Site can be developed whilst respecting the various heritage assets adjacent to the Site, and includes recommendations on appropriate avoidance and mitigation measures. These matters will be addressed at the planning application stage and set out in a Heritage Impact Assessment and a Design and Access Statement.

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<sup>1</sup> <https://www.gov.uk/guidance/conserving-and-enhancing-the-historic-environment>

<sup>2</sup> Heritage Assets Review, Place Services, Crawley Borough Council, December 2020

## **4.0 Conclusions**

- 4.1 GGL acknowledges the need for the Gatwick Green proposals to address the non-designated heritage considerations relating to the Site and referenced in Policy HA5. All feasibility investigations to date indicate that Gatwick Green can be delivered in accordance with these requirements. The masterplan proposals for the Site required under Strategic Policy EC4 will have regard to these considerations in achieving a sustainable and well-designed scheme for the Site.
- 4.2 It is considered that Policy HA5 provides appropriate and proportionate requirements for addressing heritage and matters, consistent with national policy. Development at Gatwick Green as allocated in Strategic Policy EC4 will be designed in a way so as to avoid or mitigate any harmful impacts on the setting of the non-designated heritage assets in the area.

# Crawley 2040

Draft Crawley Borough Local Plan 2023 – 2040

June 2023

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Regulation 19 Consultation  
Representation on behalf of  
Gatwick Green Limited



**GatwickGreen**

WHERE THE FUTURE WORKS

**Policy IN1**  
Infrastructure Provision  
June 2023



# 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:

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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.

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### 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:	Ms	Mr
First name:	Sally	Simon
Surname:	Fish	Fife
Organisation:	Gatwick Green Limited	Savills
Address line 1:	Fetcham Park	Wessex House

Address line 2:	Lower Road	Priors Walk
Town/city:	Leatherhead	Wimborne
Postcode:	KT22 9HD	BH21 1PB
Telephone:	01483 230320	01202 856912
Email:	<a href="mailto:Sally.fish@wilky.co.uk">Sally.fish@wilky.co.uk</a>	<a href="mailto:sfife@savills.com">sfife@savills.com</a>



## 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 checked="" type="checkbox"/> | No <input type="checkbox"/> |
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### 6. Please give details explaining your response to 5.1, 5.2, or 5.3 below. Please be as clear as possible.

Please see attached response

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

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

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

Yes, I wish to participate in the examination hearings

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

Policy IN1 is an important policy that sets out the requirements for development to be supported by infrastructure and the means by which such infrastructure is to be delivered through the planning process. In the context of the proposed allocation of Gatwick Green, GGL is seeking a change to the supporting text to the policy to provide for some flexibility in the means by which such infrastructure is to be delivered. It is therefore considered that the representation raises important and significant planning matters relating to the need for some flexibility in the delivery of infrastructure related to new development, which justify the attendance of GGL at the Hearings.

*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**

19/06/2023

**Draft Crawley Borough Local Plan 2024 - 2040  
May 2023**

**Regulation 19 Consultation**

**Representation on behalf of Gatwick Green Limited**

**Strategic Policy IN1: Infrastructure Provision**

**June 2023**



## 1.0 Introduction

### Background

- 1.1 This representation is submitted on behalf of Gatwick Green Limited (GGL). For clarification, Gatwick Green Limited is a wholly owned subsidiary of The Wilky Group (TWG), which has a long-standing interest in the promotion of strategic employment land within the Crawley Borough Council (CBC) area. Previous representations were submitted by TWG, but the land is now vested in Gatwick Green Limited. This representation relates to the Planning Obligations Annex in the Daft Crawley Borough Local Plan, 2023 (DCBLP).
- 1.2 GGL owns about 48 ha (119 acres) of land east of Gatwick Airport. The land has been promoted by TWG/GGL as a strategic employment opportunity known as Gatwick Green, most of which forms a proposed allocation as a Strategic Employment Location (SEL) of 44 ha (108.7 acres) (the Site) under Strategic Policy EC4 in the DCBLP. The proposed allocation is for a comprehensive industrial-led development of predominantly storage and distribution uses under use class B8..

### Scope of representation

- 1.3 This representation sets out the evidence in support of Strategic Policy IN1 with reference to:
- The National Planning Policy Framework (NPPF, 2021).
  - The Planning Practice Guidance (PPG).

## 2.0 Strategic Policy IN1

### Intention of policy

- 2.1 The purpose of Strategic Policy IN1 is to ensure that development on specific sites and across Crawley is accompanied by the delivery and maintenance of on-site and off-site infrastructure, including any infrastructure provided outside the Borough. 'Infrastructure' is defined in the DCBLP glossary and covers a wide range of physical public facilities<sup>1</sup>, but does not include services, although this is referenced in the Reasoned Justification

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<sup>1</sup> Includes transport facilities; such as roads, rail stations and bus stations; utility services, including water supply and wastewater and its treatment; waste management and disposal; telecommunications infrastructure; social and community infrastructure such as educational facilities and health facilities, cultural facilities, sports and recreational facilities and open space, parks and play space, libraries, cemeteries, and places of worship; emergency services; and flood defences.

at paragraph 8.7 – for consistency, the definition ought to be adjusted. The policy has four parts:

1. Development will be permitted where it is supported by, and coordinated with, the delivery and maintenance of infrastructure on or off-site or outside Crawley Borough, including the need to address any cumulative effects of development.
2. Protects existing infrastructure facilities and services from loss to development, unless there is sufficient alternative provision or an equivalent replacement can be provided.
3. Community Infrastructure Levy (CIL) applies to certain development as required in the Council’s adopted CIL charging schedule.
4. Where appropriate, developer contributions will be sought in the form of Planning Obligations to address site-specific issues in accordance with the tests in the CIL Regulations – the anticipated contributions are set out in the Planning Obligations Annex associated with policies in the DCBLP.

2.2 The cross-reference to the Planning Obligations Annex (the Annex) is important – the policy must be read and interpreted as an integrated policy with the Annex to ensure development within Crawley is served by, and helps provide, infrastructure of a suitable scale, quality and location so as to avoid harmful impacts. The Annex sets out the basis for planning obligations under various policies in the form of works, derived from contribution amounts based on formulas or generic approaches. This includes a formula for a sustainable transport contribution, which applies to all residential and commercial developments outside of the Gatwick Airport Boundary.

### **National planning policy and guidance**

2.3 Strategic Policy IN1 is considered to be in accordance with the policy and guidance contained in the National Planning Policy Framework (NPPF) and Planning Practice Guidance (PPG). The need to plan for and protect infrastructure features throughout the NPPF. In relation to strategic infrastructure related to strategic land use policies such as Strategic Policies EC1 and EC4, it requires strategic policies to make sufficient provision for, *inter alia*, infrastructure to serve strategic development; such infrastructure includes transport, telecommunications, security, waste management, water supply, wastewater, flood risk and coastal change management, the provision of minerals and energy (including heat), and community facilities (such as health, education and cultural infrastructure) (para 20). The NPPF requires joint working between strategic policy-making authorities and relevant bodies to determine where additional infrastructure is necessary (para 26).

2.4 Local Plans should set out the contributions expected from development, including for infrastructure such as that needed for education, health, transport, flood and water

management, green and digital infrastructure. Such policies should not undermine the deliverability of the Plan (para 34). Paragraphs 55 – 58 deal with planning obligations to bring about the delivery of infrastructure related to new development. The policy guidance states that planning authorities should use conditions on a planning permission where possible, or otherwise, where a condition is not appropriate, use planning obligations. Where planning obligations must be secured, they must only be sought where they meet the tests set out in Regulation 122(2) of the Community Infrastructure Levy Regulations (CIL) 2010, i.e. they are necessary to make the development acceptable in planning terms, directly related to the development and fairly and reasonably related in scale and kind to the development.

- 2.5 NPPF paragraph 57 goes on to confirm the importance of up-to-date policies that identify contributions expected from development – planning applications in accordance with such policies will be treated as being viable in line with the viability assessment of the Local Plan. The weight to be given to scheme-specific viability assessments at the application stage will depend on how up-to-date the Plan and related viability assessment are and any changes in the circumstances of the site since the Plan was adopted.
- 2.6 The importance of providing infrastructure features throughout the NPPF in relation to achieving sustainable development (para 8a); building a strong and competitive economy (para 81); promoting healthy and safe communities (para 92c); promoting sustainable transport (Section 9); supporting high quality communications (Section 10), and meeting the challenges of climate change (Section 14).
- 2.7 The NPPF policy is supplemented by more detailed guidance in Planning Practice Guidance (PPG) on planning obligations<sup>2</sup>. PPG sets out guidance on the scope, nature and use of planning obligations under CIL or developer contributions. The PPG states that policies for planning obligations should be set out in plans and examined in public and informed by evidence of infrastructure needs and a proportionate assessment of viability (Paragraph: 004 Reference ID: 23b-004-20190901).
- 2.8 It is considered that Strategic Policy IN1 provides an appropriate basis for securing reasonable and proportionate planning obligations from new development. It is therefore consistent with national policy and guidance on infrastructure and planning obligations, and so represents a sound policy in the context of the tests at paragraph 35 of the NPPF.

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<sup>2</sup> <https://www.gov.uk/guidance/planning-obligations>

## The need to retain flexibility in application

2.9 PPG states that the evidence of need for infrastructure can be standardised or formulaic, and plan-makers should consider how needs and viability may differ between site typologies and may choose to set differential requirements. Policy requirements should be clear so that they can be accurately accounted for in the price paid for land. PPG also states that developers may be asked to provide contributions for infrastructure in several ways (Paragraph: 003 Reference ID: 23b-003-20190901), implying that there should be flexibility in how that is achieved, such as through planning obligations of contributions under CIL.

2.10 PPG goes on to state that “...if a formulaic approach to developer contributions is adopted, the levy can be used to address the cumulative impact of infrastructure in an area, while planning obligations will be appropriate for funding a project that is directly related to that specific development”. Whilst this guidance implies a binary approach to the funding and delivery of infrastructure, in reality the picture will be somewhat less clear. Some infrastructure ‘projects’ may be clearly required, whilst others may in part/full be triggered by past/future underlying growth or other development; in such cases, this may require a more nuanced approach. This therefore implies that the DCBLP should include some text that reflects the need for a flexible approach to the application of Policy IN1 and the Annex. This supports the wording in Strategic Policy IN1 that:

- Developer contributions will be sought ‘where appropriate’.
- That contributions should be in accordance with the tests in the CIL Regulations.
- That the Planning Obligations Annex collates the ‘anticipated’ planning obligations associated with the DCBLP policies.

2.11 The policy therefore offers suitable room for reasonable and flexible application in the context of the tests in the CIL Regulations and other factors relevant at the time a planning application is made.

2.12 However, this flexibility is not reflected in the reasoned justification for Strategic Policy IN1. Paragraph 8.9 of the DCBLP sets out the approach to planning obligations and CIL, but it is considered that the Plan would benefit from some text to summarise the core of the Council’s approach and its role in working with developments to bring infrastructure forward. Aligned with the need for some flexibility, GGL has made representations to Strategic Policy EC4, Policy EC5 and the Planning Obligations Annex variously seeking adjustments to policy/supporting text to provide more flexibility in the means by which infrastructure is to be secured, and the need for the developer and the Council to work together in that regard.

### **3.0 Proposed changes to Reasoned Justification to Strategic Policy IN1**

- 3.1 In order to reflect the need to ensure a flexible approach to the identification of the most appropriate form of planning obligations and the Council's role in that regard, it is proposed that the following text be added to the end of paragraph 8.9 of the DCBLP:

*“In summary, infrastructure will be funded via CIL or development contributions under s106, or otherwise provided as works undertaken by developers so as to make development acceptable in planning terms. Crawley Borough Council will work with developers to secure the delivery of infrastructure.”*

- 3.2 Consistent with the above change, it is considered that the Infrastructure Plan (May 2023) (IP - part of the Council's evidence base) should contain the text noted above under the section headed 'How will infrastructure be delivered?'. The IP should also be updated with regard to any specific infrastructure projects required to make Gatwick Green acceptable in planning terms.



# Crawley 2040

Draft Crawley Borough Local Plan 2023 – 2040

June 2023

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Regulation 19 Consultation  
Representation on behalf of  
Gatwick Green Limited



**GatwickGreen**

WHERE THE FUTURE WORKS

**Policy GI1**

Green Infrastructure

June 2023



# Crawley

Local Plan

Ref No:

Office use only

## Crawley Submission draft Local Plan Representation

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Paragraph:

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| 5.2. Sound?                                 | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> |
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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:**

The Planning Inspectorate's procedure guide for Local Plan Examinations (Feb 2023) states at para 3.14 that where a representor supports a policy, the LPA has the discretion to include that representor as part of its team at the Hearings. On this basis, GGL could attend the Hearings, if requested by Crawley Borough Council.

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**Signature**



**Date**

19/06/2023

**Draft Crawley Borough Local Plan 2024 - 2040  
May 2023**

**Regulation 19 Consultation**

**Representation on behalf of Gatwick Green Limited**

**Policy GI1: Green Infrastructure**

**June 2023**



## **1.0 Introduction**

- 1.1 This representation is submitted on behalf of Gatwick Green Limited (GGL). For clarification, Gatwick Green Limited is a wholly owned subsidiary of The Wilky Group (TWG), which has a long-standing interest in the promotion of strategic employment land within the Crawley Borough Council (CBC) area. Previous representations were submitted by TWG, but the land is now vested in Gatwick Green Limited. This representation relates to Policy GI1 Green Infrastructure in the Draft Crawley Borough Local Plan, 2023 (DCBLP).
- 1.2 GGL owns about 48 ha (119 acres) of land east of Gatwick Airport. The land has been promoted by GGL as a strategic employment opportunity known as Gatwick Green, most of which forms a proposed allocation as a Strategic Employment Location (SEL) of 44 ha (108.7 acres) under Strategic Policy EC4 in the DCBLP. The proposed allocation is for a comprehensive industrial-led development of predominantly storage and distribution uses under use class B8.
- 1.3 This representation notes that Policy GI1 is broadly in accordance with the advice in the National Planning Policy Framework (NPPF, 2021) and the Planning Practice Guidance (PPG). It also confirms that Gatwick Green can be masterplanned and designed so as to be in accordance with the key objectives contained in Policy GI1.

## **2.0 Policy GI1 – intention of policy and compliance**

### **Intention of the policy**

- 2.1 The purpose of Policy GI1 is to conserve and enhance the multi-functional green infrastructure network in Crawley so as to mitigate stress on the natural environment.
- 2.2 Development within the Borough should protect and enhance the existing green infrastructure and take a positive approach to design and integration of new green infrastructure networks. Large-scale development is required to provide new links and incorporate blue infrastructure into the development design.

### **National planning policy and guidance**

- 2.3 The NPPF sets out the objectives of the planning system with regard to contributing to enhancing the natural and local environment (para 174).

- 2.4 The NPPF policy is supplemented by more detailed guidance in Planning Practice Guidance (PPG) on Green Infrastructure<sup>1</sup>. PPG sets out what planning goals green infrastructure can achieve, including building a strong and competitive economy, achieving well-deigned places, promoting healthy and safe communities, mitigating climate change, flooding and coastal change and conserving and enhancing the natural environment.
- 2.5 It is considered that Policy GI1 provides appropriate and proportionate protection for green infrastructure in the Borough, consistent with national planning policy and guidance. Policy GI1 has been designed to ensure that these matters are addressed in the planning process – in relation to Gatwick Green, this will include the preparation of a masterplan, and an outline planning application supported by an assessment of green infrastructure in accordance with the requirements in Strategic Policy EC4.

### 3.0 Implications for Gatwick Green

3.1 Most of the Gatwick Green allocation forms part of the Gatwick Woods Biodiversity Opportunity Area (BOA) to which Policy GI1 applies. The overall masterplanning of the Site under Strategic Policy EC4 will need to have regard to the BOA and any other green infrastructure considerations that arise from more detailed work. These considerations are reflected in the Development Framework Plan (DFP – Appendix 5 to GGL’s representation on Strategic Policy EC4) and will be taken into account in the design and operation of the proposals for the Site. These will include:

- The inclusion of landscape buffers and public open space to address separation of Gatwick Green from Gatwick Airport, Horley and the wider countryside.
- The integration of trees, hedgerows and biodiversity into the layout and design and enhance blue/green infrastructure in the context of the Gatwick Woods Biodiversity Opportunity Area.
- The integration of ‘important’ hedgerows and retaining a green buffer along Balcombe Road.

3.2 The Appendices to GGL’s representation on Policy EC1 of the DCBLP (2020) (2020 Appendices) form part of the Council’s evidence base (Consultation appendix 4b: Wilky Group appendices combined). The environmental considerations relating to green infrastructure are addressed in the 2020 Appendices and subject to Addenda / a new report contained at Appendices A – E of Appendix 3 to GGL’s representation on Strategic Policy EC4. These Addenda confirm that the original recommendations remain valid in

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<sup>1</sup> <https://www.gov.uk/guidance/natural-environment>



the context of the proposed allocation of Gatwick Green under Strategic Policies EC1 and EC4 and any other changes in circumstances.

- 3.3 The Addenda to the Landscape Character and Visual Appraisal, the updated Preliminary Ecological Appraisal and the Hedgerows Assessment confirm that the Site can be developed whilst respecting the green infrastructure in and around it, and include recommendations on appropriate avoidance and mitigation measures. These matters will be addressed at the planning application stage and set out in reports on biodiversity, ecology and landscape matters and a Design and Access Statement.

## **4.0 Conclusions**

- 4.1 GGL acknowledges the need for the Gatwick Green proposals to address the green infrastructure considerations relating to the Site and referenced in Policy GI1. All feasibility investigations to date indicate that Gatwick Green can be delivered in accordance with these requirements. The masterplan proposals for the Site required under Strategic Policy EC4 will have regard to these considerations in achieving a sustainable and well-designed scheme for the Site.
- 4.2 It is considered that Policy GI1 provides appropriate and proportionate requirements for the provision of green and blue infrastructure, consistent with national policy. Development at Gatwick Green as allocated in Strategic Policy EC4 will be designed to incorporate green infrastructure which interlinks with the existing network and will incorporate innovative drainage solutions appropriate for the Site's location in proximity to an airport.

# Crawley 2040

Draft Crawley Borough Local Plan 2023 – 2040

June 2023

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Regulation 19 Consultation  
Representation on behalf of  
Gatwick Green Limited



**GatwickGreen**

WHERE THE FUTURE WORKS

**Policy G12**  
Biodiversity Sites  
June 2023



# Crawley Local Plan

<p><b>Ref No:</b></p>  <p><i>Office use only</i></p>
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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**

19/06/2023

**Draft Crawley Borough Local Plan 2024 - 2040  
May 2023**

**Regulation 19 Consultation**

**Representation on behalf of Gatwick Green Limited**

**Policy GI2: Biodiversity Sites**

**June 2023**



## **1.0 Introduction**

- 1.1 This representation is submitted on behalf of Gatwick Green Limited (GGL). For clarification, Gatwick Green Limited is a wholly owned subsidiary of The Wilky Group (TWG), which has a long-standing interest in the promotion of strategic employment land within the Crawley Borough Council (CBC) area. Previous representations were submitted by TWG, but the land is now vested in Gatwick Green Limited. This representation relates to Policy GI2 Biodiversity Sites in the Draft Crawley Borough Local Plan, 2023 (DCBLP).
- 1.2 GGL owns about 48 ha (119 acres) of land east of Gatwick Airport. The land has been promoted by GGL as a strategic employment opportunity known as Gatwick Green, most of which forms a proposed allocation as a Strategic Employment Location (SEL) of 44 ha (108.7 acres) under Strategic Policy EC4 in the DCBLP, The proposed allocation is for a comprehensive industrial-led development of predominantly storage and distribution uses under use class B8.
- 1.3 This representation notes that Policy GI2 is broadly in accordance with the advice in the National Planning Policy Framework (NPPF, 2021) and the Planning Practice Guidance (PPG). It also confirms that Gatwick Green can be masterplanned and designed so as to be in accordance with the key objectives contained in Policy GI2.

## **2.0 Policy GI2 – intention of policy and compliance**

### **Intention of the policy**

- 2.1 The purpose of Policy GI2 is to identify the hierarchy of biodiversity sites; establish a sequential approach to addressing impacts on these with reference to the hierarchy of sites, and require planning applications to address these through surveys and assessments.
- 2.2 In the hierarchy of biodiversity sites, international sites and SSSIs are afforded the highest level of protection, followed by Ancient Woodland and aged or veteran trees, and finally a number of locally designated sites including Biodiversity Opportunity Areas. Biodiversity Opportunity Areas have been identified throughout Sussex and are identified as areas that present the best opportunity for enhancing biodiversity, often being buffers around existing reserves or linkages between existing sites, and delivering Biodiversity Action Plan (BAP) targets.



## National planning policy and guidance

- 2.3 Paragraph 174 of the NPPF requires planning policies and decisions to enhance the local and natural environment, including through net gains in biodiversity. The NPPF also requires plans to distinguish between the hierarchy of international, national and locally designated sites.
- 2.4 The NPPF policy is supplemented by more detailed guidance in Planning Practice Guidance (PPG) on biodiversity<sup>1</sup>. PPG sets out guidance on the natural environment, the statutory basis for conserving and enhancing the natural environment and the approach to planning policies to achieve these objectives.
- 2.5 It is considered that Policy GI2 provides appropriate and proportionate protection for biodiversity sites in the Borough, consistent with national planning policy and guidance. Policy GI2 has been designed to ensure that these matters are appropriately addressed in the planning process – in relation to Gatwick Green, this will include the preparation of the masterplan, and an outline planning application supported by ecological assessments in accordance with the requirements in Strategic Policy EC4.

## 3.0 Implications for Gatwick Green

- 3.1 Most of the Gatwick Green allocation forms part of the Gatwick Woods Biodiversity Opportunity Area (BOA) to which Policy GI2 applies. The overall masterplanning of the Site under Strategic Policy EC4 will need to have regard to the BOA and any other biodiversity and ecology considerations that arise from more detailed work. These considerations are reflected in the Development Framework Plan (DFP – Appendix 5 to GGL's representation on Strategic Policy EC4) and will be taken into account in the design and operation of the proposals for the Site. These will include:
- The integration of trees, hedgerows and biodiversity into the layout and design and enhance blue/green infrastructure in the context of the Gatwick Woods Biodiversity Opportunity Area.
  - The integration of 'important' hedgerows and retaining a green buffer along Balcombe Road.
- 3.2 The Appendices to GGL's representation on Policy EC1 of the DCBLP (2020) (2020 Appendices) form part of the Council's evidence base (Consultation appendix 4b: Wilky Group appendices combined). The environmental considerations relating to biodiversity are addressed in the 2020 Appendices and subject to the updated Preliminary Ecological

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<sup>1</sup> <https://www.gov.uk/guidance/natural-environment>

Appraisal (PEA) contained at Appendices A – E of Appendix 3 to GGL’s representation on Strategic Policy EC4. The updated PEA confirms that the original recommendations remain valid in the context of the proposed allocation of Gatwick Green under Strategic Policies EC1 and EC4 and any other changes in circumstances.

- 3.3 The updated PEA confirms that the Site can be developed whilst respecting the biodiversity in and around it, and includes recommendations on appropriate avoidance and mitigation measures. These will be designed in accordance with the sequential approach to addressing harm contained in Policy GI2. These matters will be addressed at the planning application stage and set out in a report on biodiversity and ecology and a Design and Access Statement.

## **4.0 Conclusions**

- 4.1 GGL acknowledges the need for the Gatwick Green proposals to address the biodiversity considerations relating to the Site and referenced in Policy GI2. All feasibility investigations to date indicate that Gatwick Green can be delivered in accordance with these requirements. The masterplan proposals for the Site required under Strategic Policy EC4 will have regard to these considerations in achieving a sustainable and well-designed scheme for the Site.
- 4.2 It is considered that Policy GI2 provides appropriate and proportionate requirements for addressing biodiversity, consistent with national policy. Development at Gatwick Green as allocated in Strategic Policy EC4 will be designed to incorporate biodiversity, which interlinks with that on adjoining land, where appropriate.

# Crawley 2040

Draft Crawley Borough Local Plan 2023 – 2040

June 2023

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Regulation 19 Consultation  
Representation on behalf of  
Gatwick Green Limited



**GatwickGreen**

WHERE THE FUTURE WORKS

**Policy G13**

Biodiversity and Net Gain

June 2023



# Crawley

Local Plan

Ref No:

Office use only

## Crawley Submission draft Local Plan Representation

Please return your completed representation form to Crawley Borough Council.

Representations can be made via this form and emailed to [strategic.planning@crawley.gov.uk](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:	Ms	Mr
First name:	Sally	Simon
Surname:	Fish	Fife
Organisation:	Gatwick Green Limited	Savills
Address line 1:	Fetcham Park	Wessex House

Address line 2:	Lower Road	Priors Walk
Town/city:	Leatherhead	Wimborne
Postcode:	KT22 9HD	BH21 1PB
Telephone:	01483 230320	01202 856912
Email:	<a href="mailto:Sally.fish@wilky.co.uk">Sally.fish@wilky.co.uk</a>	<a href="mailto:sfife@savills.com">sfife@savills.com</a>

## 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 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.

Please see attached response

*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

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**Signature**



**Date**

19/06/2023

**Draft Crawley Borough Local Plan 2024 - 2040  
May 2023**

**Regulation 19 Consultation**

**Representation on behalf of Gatwick Green Limited**

**Policy GI3: Biodiversity and Net Gain**

**June 2023**





## **1.0 Introduction**

- 1.1 This representation is submitted on behalf of Gatwick Green Limited (GGL). For clarification, Gatwick Green Limited is a wholly owned subsidiary of The Wilky Group (TWG), which has a long-standing interest in the promotion of strategic employment land within the Crawley Borough Council (CBC) area. Previous representations were submitted by TWG, but the land is now vested in Gatwick Green Limited. This representation relates to Policy GI3 Biodiversity and Net Gain in the Draft Crawley Borough Local Plan, 2023 (DCBLP).
- 1.2 GGL owns about 48 ha (119 acres) of land east of Gatwick Airport. The land has been promoted by GGL as a strategic employment opportunity known as Gatwick Green, most of which forms a proposed allocation as a Strategic Employment Location (SEL) of 44 ha (108.7 acres) under Strategic Policy EC4 in the DCBLP. The proposed allocation is for as a comprehensive industrial-led development of predominantly storage and distribution uses under use class B8.
- 1.3 This representation notes that Policy GI3 is broadly in accordance with the advice in the National Planning Policy Framework (NPPF, 2021) and the Planning Practice Guidance (PPG). It also confirms that Gatwick Green can be masterplanned and designed so as to be in accordance with the key objectives contained in Policy GI3.

## **2.0 Policy GI3 – intention of policy and compliance**

### **Intention of the policy**

- 2.1 The purpose of Policy GI3 is to ensure a net gain in biodiversity, with development proposals expected to incorporate features to encourage biodiversity and enhance existing features of nature conservation value. In line with the Environment Act 2021, the policy also requires development proposals to make provision for a 10% net gain in biodiversity.
- 2.2 Policy GI3 contains some more detailed guidance with regard to provision for pollination, green roofs / walls, landscape proposals and tree planting.
- 2.3 Larger development proposals, such as Gatwick Green, must also provide an Ecological Management Plan/Biodiversity Offset Management Plan. Trees and soft landscaping would normally be expected within the development site, although off-site mitigation may be acceptable.

## **National planning policy and guidance**

- 2.3 Paragraph 174 of the NPPF requires planning policies and decisions to enhance the local and natural environment, including through net gains in biodiversity. The NPPF also requires plans to distinguish between the hierarchy of international, national and locally designated sites.
- 2.4 The NPPF policy is supplemented by more detailed guidance in Planning Practice Guidance (PPG) on biodiversity<sup>1</sup>. PPG sets out guidance on the natural environment, the statutory basis for conserving and enhancing the natural environment and the approach to planning policies to achieve these objectives.
- 2.5 It is considered that Policy GI3 provides appropriate and proportionate guidance on the conservation and enhancement of biodiversity and the provision of net gain on sites in the Borough, consistent with national planning policy and guidance. Policy GI3 has been designed to ensure that these matters are appropriately addressed in the planning process – in relation to Gatwick Green, this will include the preparation of the masterplan, and an outline planning application supported by ecological assessments in accordance with the requirements in Strategic Policy EC4.

## **3.0 Implications for Gatwick Green**

- 3.1 Development proposals for Gatwick Green will need to incorporate features to encourage biodiversity, achieving a net gain of 10%. Biodiversity net gain should be provided in the first instance on-site, or otherwise off-site through work to provide a biodiversity uplift or by securing Biodiversity Credits. The provision of net gain will take into account the proposed large-format industrial and logistics uses for the site; the site's existing, and scope for, additional / replacement green infrastructure; connectivity with off-site green infrastructure / biodiversity; opportunities for habitat creation within the Gatwick Woods Biodiversity Opportunity Area (BOA) within which the site is located, and if necessary, the use of Biodiversity Credits.
- 3.2 The overall masterplanning of the Site under Strategic Policy EC4 will need to have regard to the BOA and any other biodiversity and ecology considerations that arise from more detailed work. There will be a range of biodiversity considerations taken into account in the design and operation of the proposals for the Site. These will include:

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<sup>1</sup> <https://www.gov.uk/guidance/natural-environment>

- The integration of trees, hedgerows and biodiversity into the layout and design and enhance blue/green infrastructure in the context of the Gatwick Woods Biodiversity Opportunity Area.
- The integration of 'important' hedgerows and retaining a green buffer along Balcombe Road.

3.3 The Appendices to GGL's representation on Policy EC1 of the DCBLP (2020) (2020 Appendices) form part of the Council's evidence base (Consultation appendix 4b: Wilky Group appendices combined). The environmental considerations relating to biodiversity are addressed in the 2020 Appendices and subject to the updated Preliminary Ecological Appraisal (PEA) contained at Appendices A – E of Appendix 3 to GGL's representation on Strategic Policy EC4. These Addenda confirm that the original recommendations remain valid in the context of the proposed allocation of Gatwick Green under Strategic Policies EC1 and EC4 and any other changes in circumstances.

3.4 The updated PEA confirms that the Site can be developed whilst respecting the biodiversity in and around it, and includes recommendations on appropriate avoidance and mitigation measures. These will be designed in accordance with the sequential approach to addressing harm contained in Policy GI2. The proposals will also address the need to deliver a 10% net gain in biodiversity under Policy GI3. These matters will be addressed at the planning application stage and set out in a report on biodiversity and ecology and a Design and Access Statement.

## 4.0 Conclusions

4.1 GGL acknowledges the need for the Gatwick Green proposals to address the biodiversity considerations relating to the Site referenced in Policy GI3, including a 10% net gain in biodiversity. The masterplan proposals for the Site required under Strategic Policy EC4 will comply with these provisions so as to achieve a sustainable and well-designed scheme for the Site.

4.2 It is considered that Policy GI3 provides appropriate and proportionate requirements for addressing biodiversity and net gain, consistent with national policy. Development at Gatwick Green as allocated in Strategic Policy EC4 will be designed to incorporate biodiversity which interlinks with that on adjoining land, where appropriate. A 10% net gain in biodiversity will also be delivered in line with national policy and Policy GI3.

# Crawley 2040

Draft Crawley Borough Local Plan 2023 – 2040

June 2023

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Regulation 19 Consultation  
Representation on behalf of  
Gatwick Green Limited



**GatwickGreen**

WHERE THE FUTURE WORKS

Development and Requirements for Sustainable Transport

June 2023

**Policy ST1**



# 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

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Surname:	Fish	Fife
Organisation:	Gatwick Green limited	Savills
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Address line 2:	Lower Road	Priors Walk
Town/city:	Leatherhead	Wimborne
Postcode:	KT22 9HD	BH21 1PB
Telephone:	01483 230320	01202 856912
Email:	<a href="mailto:Sally.fish@wilky.co.uk">Sally.fish@wilky.co.uk</a>	<a href="mailto:sfife@savills.com">sfife@savills.com</a>

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Policy:

Other:

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

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

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Please see attached response

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**Signature**



**Date**

19/06/2023



**Draft Crawley Borough Local Plan 2024 - 2040  
May 2024**

**Regulation 19 Consultation**

**Representation on behalf of Gatwick Green Limited**

**Strategic Policy ST1: Development and Requirements for  
Sustainable Transport**

**June 2023**



**steer**

## 1.0 Introduction

### Background

- 1.1 This representation is submitted on behalf of Gatwick Green Limited (GGL). For clarification, Gatwick Green Limited is a wholly owned subsidiary of The Wilky Group (TWG), which has a long-standing interest in the promotion of strategic employment land within the Crawley Borough Council (CBC) area. Previous representations were submitted by TWG, but the land is now vested in Gatwick Green Limited. This representation relates to Strategic Policy ST1 Development and Requirements for Sustainable Transport in the Draft Crawley Borough Local Plan, 2023 (DCBLP).
- 1.2 GGL owns about 48 ha (119 acres) of land east of Gatwick Airport. The land has been promoted by GGL as a strategic employment opportunity known as Gatwick Green (the Site), most of which forms a proposed allocation as a Strategic Employment Location (SEL) of 44 ha (108.7 acres) under Strategic Policy EC4 in the DCBLP. The proposed allocation is for a comprehensive industrial-led development of predominantly storage and distribution uses under use class B8.

### Scope of representation

- 1.3 This representation sets out the evidence in support of the Crawley Transport Strategy<sup>1</sup> and Strategic Policy ST1 with reference to:
- National and regional planning and transport policy.
  - Local transport strategies - Highway and Planning Authorities.
  - How Strategic Policy ST1 supports sustainable development within Crawley.
  - How Gatwick Green is aligned with the principles behind the Council's strategy and policies on transport, including Strategic Policy ST1.

## 2.0 Direction of National / Regional Transport Policy

- 2.1 The National Planning Policy Framework, (NPPF, 2021) confirms the purpose of the planning system is to contribute to the achievement of sustainable development.

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<sup>1</sup> New Directions for Crawley, Transport and access for the 21<sup>st</sup> century, Crawley Borough Council, March 2020 and paras 2.54-2.56 of DCBLP

2.2 Paragraph 104 of Section 9 of the NPPF sets out that transport issues should be considered from the earliest stages of plan-making and development proposals, so that:

1. The potential impacts of development on transport networks can be addressed.
2. Opportunities from existing or proposed transport infrastructure, and changing transport technology and usage, are realised – for example in relation to the scale, location or density of development that can be accommodated.
3. Opportunities to promote walking, cycling and public transport use are identified and pursued.
4. The environmental impacts of traffic and transport infrastructure can be identified, assessed and taken into account – including appropriate opportunities for avoiding and mitigating any adverse effects, and for net environmental gains.
5. Patterns of movement, streets, parking and other transport considerations are integral to the design of schemes and contribute to making high quality places.

2.3 Paragraph 105 confirms this approach, stating that:

*“The planning system should actively manage patterns of growth in support of these objectives. Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions and improve air quality and public health. However, opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and this should be taken into account in both plan-making and decision-making.”*

2.4 The report titled *Gear Change – A bold vision for walking and cycling (DfT – July 2020)*, sets out the Government’s ambition for a future where half of all journeys in towns and cities are cycled or walked. With 58% of car journeys in 2018 being under 5 miles, and in urban areas, more than 40% of journeys being under 2 miles in 2017–18, many people would be able to walk or cycle to their destination.

2.5 The report provides nine key pledges to increase the level of walking and cycling, including:

- The delivery of thousands of miles of safe, continuous, direct routes for cycling in towns and cities, physically separated from pedestrians and volume motor traffic, serving the places that people want to go.
- Creating cycle, bus and walking corridors, closing a limited number of main roads to through traffic except for buses and access.
- Reducing rat-runs and delivering “school streets” which protect children.
- Improve the National Cycle Network, with higher design standards and creating more “Mini-Hollands”.

- 2.6 Transport for South East, (TfSE) comment in the introduction to their Transport Strategy published in 2020 that such strategies were typically devised on a “predict and provide” basis, with planners making forecasts about future transport demand based on past trends, with investment focused on expanding capacity on road and rail networks.
- 2.7 The TfSE approach (Transport Strategy, June 2020) going forward is to decide on the future people want for the region and plan a transport system that helps make it happen, putting people and places first, rather than vehicles. The vision stated in the TfSE strategy is that:
- *By 2050, the South East of England will be a leading global region for net-zero carbon, sustainable economic growth where integrated transport, digital and energy networks have delivered a step change in connectivity and environmental quality; and*
  - *A high-quality, reliable, safe and accessible transport network will offer seamless door-to-door journeys enabling our businesses to compete and trade more effectively in the global marketplace and giving our residents and visitors the highest quality of life.*

### 3.0 Crawley’s Transport Strategy

- 3.1 The Vision that Crawley Borough Council is proposing for transport and travel was clearly stated in the publication of a policy document in March 2020 entitled ‘New Directions for Crawley, Transport and access for the 21<sup>st</sup> century’. The introductory section states that “*Crawley Borough Council aims to join those in the forefront of new thinking on transport and access to find sustainable solutions for Crawley*”.
- 3.2 The means by which CBC will deliver its vision is set out on page 11 of New Directions, (March 2020), as follows:

*“In the light of the climate emergency, health needs, developing technology and new policies and approaches for Crawley and the south-east, as well as studies and experience across Europe, Crawley Borough Council aims to work in partnership with WSCC, transport, business and community bodies, to meet the following aims:*

1. ***Improved sustainable travel infrastructure*** – prioritise walking and cycling network improvements and facilities, improving public transport access and services.
2. ***Smarter highway network management*** – managing demand, directions, speeds and inefficient road space allocation to address congestion and improve access and health of neighbourhoods and business districts.
3. ***Integrated transport and land use planning*** – ensure housing and business development centres on public transport links and walking

*and cycling networks as ‘Transit Oriented Development’ for improved access.*

4. **Effective travel planning** – *working with business and other organisations to improve commuter, visitor, shopping and leisure choices and reduce single-occupancy car use.*
5. **Shared mobility** – *develop facilities such as car clubs and shared bikes, with electric vehicle charging to broaden choices beyond conventional private car use”.*

3.3 It is recognised that the strategy and policies enshrined in the Draft Crawley Borough Local Plan (DCBLP) attempt to balance the aspirations for growth and new development with the need to minimise carbon emissions and the impact of travel on climate change and air quality. The Plan states at paragraph 2.54:

*“The Crawley Transport Strategy ‘New Directions’ identifies opportunities for Crawley for developing a more attractive and practical transport infrastructure that works for everyone, whether or not they drive and whether or not they are able-bodied. It sets out a vision for decarbonising transport whilst developing access to work, education, shopping and leisure that is easier, more affordable and healthier”*

3.4 Crawley has a record of delivering genuine improvements in public transport through Fastway, which has helped achieve a shift from car to bus travel. It is also clear that recent sustainable transport measures proposed and under development as part of the Coast to Capital Growth Fund are an extension of a local commitment to innovation in transport. This includes significant investment in hydrogen powered buses with zero emissions. The DCBLP (para 2.39 to 2.41) sets out that:

- Crawley has excellent communications, lying adjacent to the M23, close to the M25 and is on the mainline railway linking London to Brighton and the south coast. Gatwick Airport is located within the borough.
- The town itself is served by a rapid guided bus service: Fastway, which provides attractive and effective public transport services, which are essential to facilitate and encourage a shift to sustainable modes of transport.
- There is a network of green corridors, providing attractive pedestrian and cycle routes through the neighbourhoods and into the town centre and out into the countryside.
- The identification and delivery of improved public transport needs to be focused on optimal routes and connecting the higher density neighbourhoods to Crawley’s three primary economic centres and its two regional transport nodes: Three Bridges station and Gatwick Airport and its station. This will help to provide a viable, dependable and sustainable transport alternative.
- Together with promoting active travel, cycling and walking, modal shift will lead to reduced carbon emissions, improved air quality, and a reduction in traffic volumes and the borough’s over-dependence and reliance on private vehicles for getting around.

- All new developments should be planned to maximise links in the transport network and opportunities for all forms of sustainable transport. A key priority area for the Plan period will be to build upon and improve the dependability, frequency, capacity and speed of the Fastway service in key areas of the borough, to encourage a viable and attractive alternative to car use, both for commuters, residents and visitors.

3.5 Paragraph 2.56 of the DCBLP refers to the Government's Cycle and Walking Investment Strategy, published in 2017, contains challenging targets for travel by active modes by 2025. This forms a basis for the adopted Crawley Local Cycle and Walking Infrastructure Plan (LCWIP), which informs an approach to the sustainable transport in Strategic Policy ST1.

#### **4.0 Crawley's policy response: Strategic Policy ST1**

4.1 Strategic Policy ST1 sets out the requirements for development in relation to sustainable transport. The key aims of the policy are:

- That development should be located and designed to prioritise and encourage travel via the walking and cycling network and public transport routes, while reducing dependency on travel by private motor vehicle.
- That development should be phased so that walking and cycling infrastructure which forms part of the development is delivered at the earliest opportunity.
- Development should contribute to improved sustainable transport infrastructure off-site, including, where appropriate, bus priority measures, enhanced passenger information, and routes identified in the Council's adopted Local Cycling and Walking Infrastructure Plan.
- Development should provide an appropriate amount and type of parking in accordance with Policy.
- Developments should not cause an unacceptable impact in terms of increased traffic congestion or highway safety.
- Development will be considered acceptable in highways terms unless there would be an unacceptable impact on highway safety, or the cumulative impact on the transport network is severe and cannot be satisfactorily mitigated.

4.2 GGL considers that Strategic Policy ST1 is entirely consistent with and advances the aims and principles embodied in current and emerging national, and regional transport strategies and plans. The Crawley Transport Strategy (defined in Para 2.54 of the DCBLP) is also framed within the context of the West Sussex Transport Plan (2022) which states its objectives as:

- Sustain economic prosperity.
- Accommodate demographic change and planned development.
- Avoid and minimise impacts on public health.

- Enable healthy lifestyles and ensure access to services.
- Achieve net zero by 2050.
- Avoid and minimise impacts on the environment and enhance biodiversity.
- Adapt to climate change.
- Reduce the need to travel by car; improve road efficiency, rail services, bus networks; extend and improve active travel facilities,

4.3 GGL therefore support the Council’s strategy and policy response under Strategic Policy ST1 and understands that the implementation of schemes to deliver the policy are underway in many parts of the borough. The need to afford priority to cyclists, pedestrians and public transport users is enshrined in Strategic Policy ST1 and is in line with central and regional policy to improve connectivity for those travelling within and to destinations outside the Borough. GGL support this approach and briefly describe in the following section the way in which the proposed development at Gatwick Green will meet the aspirations for Sustainable Transport defined in Strategic Policy ST1.

4.4 A more detailed description of the transport measures is contained in Appendix 2 of GGL’s representations on Strategic Policy EC4 submitted in response to consultation on the DCBLP.

## **5.0 Approach for Gatwick Green**

5.1 GGL has adopted the West Sussex Transport Plan (WSTP, adopted 2022) objectives along with the policy commitments contained within Strategic Policy ST1 of the DCBLP, forming principles to guide its approach to sustainable transport as follows:

- Provide employment opportunities that widen and deepen the skill base of residents in Crawley and its immediate neighbours. This will reduce levels of “out-commuting” and therefore the length of trips. Shorter journeys are made more easily by active modes, walking and cycling and potentially, personal electric transport.
- Link new and existing residential development with employment opportunities at Gatwick Green through supporting infrastructure and transport services that cater for carbon neutral modes of travel, potentially reducing reliance on the private car and in line with the concept of Mobility as a Service, (MAAS).
- Ensure a consistent approach to the delivery of new transport services and infrastructure across borough/county boundaries and to work in partnership with relevant agencies such as the Coast to Capital LEP and Transport for the South-East (TfSE).
- Achieve a high level of integration between carbon-neutral modes by providing strategically located and high quality interchange facilities (the concept of super-hubs is already established in Crawley).

- Establish a multi-modal, comprehensive and flexible Sustainable Transport Strategy which is phased in line with the development.
- Following completion of the Crawley Transport Model, consideration will be given to modest improvements to road junctions in line with the CBC policy of attracting a greater mode share for cyclists, pedestrians and bus users.

5.2 The overarching transport strategy for Gatwick Green is therefore to ensure people can reach the new facilities by appropriate transport modes, promoting sustainable travel as part of a lifestyle choice allowing employees and visitors to access the site by foot, cycle and public transport. The aim is to reduce the use of private cars for shorter journeys from the neighbouring residential areas and those further afield. At the heart of the development philosophy will be a transport strategy which recognises the need to address climate change and the pledge by Crawley Borough Council to reduce carbon emissions generated by CBC activities by at least 45% by 2030<sup>2</sup>, in line with the Inter-Governmental Panel on Climate Change.

5.3 The following sets out how development at Gatwick Green is consistent with and meets the requirements of Strategic Policy ST1:

### **Public Transport**

- The ability to introduce several accesses onto Balcombe Road provides an opportunity to divert existing fastway/bus services to penetrate the site. This will incidentally benefit existing residents and businesses and other new development along the Balcombe Road Corridor.
- Public transport provision for the site will, in collaboration with CBC and Metrobus, be integrated into the Fastway Development Programme.
- Mobility transport hubs will be introduced within the site. These are already proposed for Manor Royal and will allow for seamless interchange between ride sharing, public transport and non-motorised modes of travel in line with existing initiatives identified within the Crawley Growth Programme and Crawley New Directions.

### **Walking and cycling**

- Alongside the public transport provision, the access strategy and internal layout will prioritise high quality, safe walking and cycling routes in line with latest guidance.
- In conjunction with CBC, improvements will be made to existing pedestrian and cycle routes, plugging gaps and connecting to the enhanced network specified in the adopted Crawley Local Cycling and Walking Infrastructure Plan (LCWIP).

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<sup>2</sup> Crawley Borough Council Climate and Ecological Emergency Action Plan – September 2021 Core Principles for Action Introduction -The Global Climate Change and Ecological Emergency, Crawley Borough Council, November 2021



## Parking

- The development will deliver an appropriate amount of parking for both cars, light vehicles and heavy goods vehicles in line with parking standards and typical demand, to ensure that there is no adverse impact on the local highway network or neighbouring areas.
- Parking infrastructure will meet the standards and requirement at the time of any application(s) and would include meeting anticipated demand for Electric Vehicle (EV) Charging Infrastructure. The scale and type of parking will meet Local Plan Policy and West Sussex County Council's 2019 Guidance on Parking in New Developments, along with emerging EV Strategy and any appropriate guidance in respect to the development of Hydrogen recharging network.

## 6.0 Conclusions

6.1 The Strategic Policy ST1 is consistent with the NPPF and associated policy and guidance and as such is sound against the tests set out in paragraph 35 of the NPPF. It also represents a positive response to the Council's transport strategy ('New Directions') to develop more attractive transport infrastructure that serves everyone alongside decarbonising transport across the town.

6.2 The Gatwick Green development would satisfy Strategic Policy ST1 through explicitly meeting the following requirements:

- i. The development is designed to prioritise the needs of pedestrians, cyclists and public transport users over ease of access by the motorist.
- ii. Appropriate amount and type of parking is provided in accordance with Strategic Policy ST1 and Policy ST2.
- iii. The development will be phased to ensure infrastructure for pedestrians and cyclists is available from first occupation.
- iv. Contributions will be made to bus priority and LCWIP schemes, where appropriate.

6.3 A Transport Assessment will be produced for Gatwick Green which includes a Mobility Strategy or Travel Plan to meet the requirements of Strategic Policy ST1. Crawley Borough Council is at the forefront of the emerging national policy of Decide and Validate, recently adopted by Transport for South-East (TfSE). This will assist in meeting its aspiration to reduce carbon emissions and is consistent with West Sussex County Council objectives, defined in the adopted WSTP.

# Crawley 2040

Draft Crawley Borough Local Plan 2023 – 2040

June 2023

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Regulation 19 Consultation  
Representation on behalf of  
Gatwick Green Limited



**GatwickGreen**

WHERE THE FUTURE WORKS

**Planning Obligations Annex**

June 2023



# 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:	Ms	Mr
First name:	Sally	Simon
Surname:	Fish	Fife
Organisation:	Gatwick Green Limited	Savills
Address line 1:	Fetcham Park	Wessex House

Address line 2:	Lower Road	Priors Walk
Town/city:	Leatherhead	Wimborne
Postcode:	KT22 9HD	BH21 1PB
Telephone:	01483 230320	01202 856912
Email:	<a href="mailto:Sally.fish@wilky.co.uk">Sally.fish@wilky.co.uk</a>	<a href="mailto:sfife@savills.com">sfife@savills.com</a>

## 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:

Planning  
Obligations  
Annex

### 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.

Please see attached response

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

### 7. Please set out what modification(s) you consider necessary to resolve the issues you have identified above. You need to state why this modification will make the Local Plan legally compliant or sound. It would be helpful if you are able to suggest how the wording of any policy or text should be revised. Please be as clear as possible. Any non-compliance with the duty to co-operate is incapable of modification at examination.

Please see attached response

*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:**

GGL has made significant representations on the Planning Obligations Annex, including seeking some changes to the Annex in the context of its site at Gatwick Green, which is a proposed strategic employment allocation under Strategic Policy EC4. The changes relate to providing some flexibility in the means by which infrastructure is to be delivered and specifically with regard to contributions towards provision for skills and employment facilities in the Borough. It is considered that the representation raises important and significant planning matters relating to the comprehensive planning and delivery of the proposed allocation, which justify the attendance of GGL at the Hearings.

*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**



**Date**

19/06/2023

**Draft Crawley Borough Local Plan 2024 - 2040  
May 2023**

**Regulation 19 Consultation**

**Representation on behalf of Gatwick Green Limited**

**Planning Obligations Annex**

**June 2023**



## 1.0 Introduction

### Background

- 1.1 This representation is submitted on behalf of Gatwick Green Limited (GGL). For clarification, Gatwick Green Limited is a wholly owned subsidiary of The Wilky Group (TWG), which has a long-standing interest in the promotion of strategic employment land within the Crawley Borough Council (CBC) area. Previous representations were submitted by TWG, but the land is now vested in Gatwick Green Limited. This representation relates to the Planning Obligations Annex in the Daft Crawley Borough Local Plan, 2023 (DCBLP).
- 1.2 GGL owns about 48 ha (119 acres) of land east of Gatwick Airport. The land has been promoted by GGL as a strategic employment opportunity known as Gatwick Green, most of which forms a proposed allocation as a Strategic Employment Location (SEL) of 44 ha (108.7 acres) under Strategic Policy EC4 in the DCBLP. The proposed allocation is for a comprehensive industrial-led development of predominantly storage and distribution uses under use class B8.

### Scope of representation

- 1.3 This representation sets out the evidence in support of the Planning Obligations Annex (the Annex) with reference to:
- The National Planning Policy Framework (NPPF, 2021).
  - The Planning Practice Guidance (PPG).

## 2.0 Planning Obligations Annex

### Intention of the Annex

- 2.1 The purpose of the Planning Obligations Annex is to provide the basis for developer contributions, the in-principle need for which is established in various planning policies in the DCBLP. The DCBLP is supported by a Whole Plan Policies & Community Infrastructure Levy Viability Assessment and related update<sup>1</sup>, which through an iterative

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<sup>1</sup> For: Crawley Borough Council Crawley Borough Local Plan Review: Whole Plan Policies & Community Infrastructure Levy Viability Assessment, Dixon Searle Partnership for Crawley BC, Final Report Issued March 2021 | Viability Assessment - Update and Viability Assessment – Update Appendix I: Results summary tables & sample appraisal summaries, Dixon Searle Partnership for Crawley BC, December 2022



process demonstrated that the optimum approach was taken to ensure the Plan secured the necessary requirements in order to make development acceptable in planning terms, whilst being viable and deliverable. The overarching policy that requires planning obligations related to development is Strategic Policy IN1.

- 2.2 The Annex is therefore important to ensure development within Crawley is served by, and helps provide, infrastructure of a suitable scale, quality and location so as to avoid harmful impacts. The Annex sets out the basis for planning obligations under various policies in the form of works or derived from contribution amounts based on formulas or generic approaches. This includes a formula for a sustainable transport contribution, which applies to all residential and commercial developments outside of the Gatwick Airport Boundary.

### **National planning policy and guidance**

- 2.3 The Annex is considered to be in accordance with the policy and guidance contained in the National Planning Policy Framework (NPPF) and Planning Practice Guidance (PPG). The need to plan for and protect infrastructure features throughout the NPPF. In relation to strategic infrastructure related to strategic land use policies such as Strategic Policy EC1 and Strategic Policy EC4, the NPPF requires those policies to make sufficient provision for, *inter alia*, infrastructure to serve strategic development; such infrastructure includes transport, telecommunications, security, waste management, water supply, wastewater, flood risk and coastal change management, the provision of minerals and energy (including heat), and community facilities (such as health, education and cultural infrastructure) (para 20). The NPPF requires joint working between strategic policy-making authorities and relevant bodies to determine where additional infrastructure is necessary (para 26).
- 2.4 Local Plans should set out the contributions expected from development, including for infrastructure such as that needed for education, health, transport, flood and water management, green and digital infrastructure. Such policies should not undermine the deliverability of the Plan (para 34). Paragraphs 55 – 58 deal with planning obligations to bring about the delivery of infrastructure related to new development. The policy guidance states that planning authorities should use conditions on a planning permission where possible, or otherwise where a condition is not appropriate, use planning obligations. Where planning obligations must be secured, they must only be sought where they meet the tests set out in Regulation 122(2) of the Community Infrastructure Levy (CIL) Regulations 2010, i.e. they are necessary to make the development acceptable in planning terms, directly related to the development and fairly and reasonably related in scale and kind to the development.

- 2.5 NPPF paragraph 58 goes on to confirm the importance of up-to-date policies that identify contributions expected from development – planning applications in accordance with such policies will be treated as being viable in line with the viability assessment of the Local Plan. The weight to be given to scheme-specific viability assessments at the application stage will depend on how up-to-date the Plan and related viability assessment are and any changes in the circumstances of the site since the Plan was adopted.
- 2.6 The importance of providing infrastructure features throughout the NPPF in relation to achieving sustainable development (para 8a); building a strong and competitive economy (para 81); promoting healthy and safe communities (para 92c); promoting sustainable transport (Section 9); supporting high quality communications (Section 10), and meeting the challenges of climate change (Section 14).
- 2.7 The NPPF policy is supplemented by more detailed guidance in Planning Practice Guidance (PPG) on planning obligations<sup>2</sup>. PPG sets out guidance on the scope, nature and use of planning obligations under CIL or developer contributions. PPG states that policies for planning obligations should be set out in plans and examined in public, and informed by evidence of infrastructure needs and a proportionate assessment of viability (Paragraph: 004 Reference ID: 23b-004-20190901).
- 2.8 It is considered that the Annex provides an appropriate basis for securing reasonable and proportionate planning obligations from new development. It is therefore consistent with national policy and guidance on infrastructure and planning obligations, and so represents sound guidance in the context of the tests at paragraph 35 of the NPPF.

### **The need to retain flexibility in application**

- 2.9 PPG states that the evidence of need for infrastructure can be standardised or formulaic, and plan-makers should consider how needs and viability may differ between site typologies and may choose to set differential requirements. Policy requirements should be clear so that they can be accurately accounted for in the price paid for land. PPG also states that developers may be asked to provide contributions for infrastructure in several ways (Paragraph: 003 Reference ID: 23b-003-20190901), implying that there should be flexibility in how that is achieved, such as through planning obligations or contributions under CIL.

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<sup>2</sup> <https://www.gov.uk/guidance/planning-obligations>

- 2.10 PPG goes on to state that “...if a formulaic approach to developer contributions is adopted, the levy can be used to address the cumulative impact of infrastructure in an area, while planning obligations will be appropriate for funding a project that is directly related to that specific development”. Whilst this guidance implies a binary approach to the funding and delivery of infrastructure, in reality the picture will be somewhat less clear. Some infrastructure ‘projects’ may be clearly required, whilst others may in part/full be triggered by past/future underlying growth or other development; in such cases, this may require a more nuanced approach. This therefore implies that the DCBLP should include some text that reflects the need for a flexible approach to the application of the Annex.
- 2.11 However, this flexibility is not reflected in the Annex. Pages 270-271 of the DCBLP set out the approach to planning obligations and CIL, but it is considered that the Plan would benefit from some text to summarise the core of the Council’s approach and its role in working with developments to bring infrastructure forward. Aligned with the need for some flexibility, TWG has made representations to Strategic Policy EC4, which include the removal of the clause that precludes the application of a s106 sustainable transport contribution to Gatwick Green – this would also align the policy with the Annex.
- 2.12 More specifically, there is a need for flexibility in relation to meeting the obligation in relation to employment and skills development under Policy EC5. The policy and the Annex require development to contribute by (1) committing to a site-specific employment and skills plan, and (2) making a proportionate financial contribution towards employment and skills initiatives in Crawley.
- 2.13 TWG supports the objectives behind these obligations, but considers that there is a need for more flexibility in the case where a development provides on-site employment and skills training capacity, that ought to be assessed as providing for skills training, in lieu of a contribution under Policy EC5 and the Annex (DCBLP page 278, item (ii)). For large scale developments, such as Gatwick Green, providing on-site skills and apprenticeship training facilities in the area of strategic logistics and advanced manufacturing would provide a suitable alternative way of delivering significant social and economic value to Crawley. Therefore, there should be flexibility in the application of Policy EC5, in combination with the Annex, to recognise that such value can equally be provided as works in lieu of a financial contribution.

### **3.0 Proposed changes to the Planning Obligations Annex**

- 3.1 In order to reflect the need to ensure a flexible approach to the identification of the most appropriate form of planning obligations and the Council's role in that, it is proposed that the following text be added to the end of the first paragraph on page 271 of the DCBLP:

*“In summary, infrastructure will be funded via CIL or development contributions under s106, or otherwise provided as works undertaken by developers so as to make development acceptable in planning terms. Crawley Borough Council will work with developers to secure the delivery of infrastructure.”*

- 3.2 In order to acknowledge that the contribution towards employment and skills training in Crawley could be in the form of on-site skills training and education facilities, the following text should be added to the paragraph on page 282 of the Plan under the heading 'Policy EC5: Employment and Skills Development':

*“It is recognised however, that for some major developments, it may be more appropriate for provision to meet part ii.) of the policy to be in the form of on-site education and skills training facilities to be funded by the development and its occupiers.”*

# Crawley 2040

Draft Crawley Borough Local Plan 2023 – 2040

June 2023

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Regulation 19 Consultation  
Representation on behalf of  
Gatwick Green Limited



**GatwickGreen**  
WHERE THE FUTURE WORKS

Draft Sustainability Appraisal / Strategic Environmental Assessment

**SA/SEA**  
June 2023



# 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

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### PART B – Your representation

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## PART A – Personal details

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

	1. Personal details	2. Agent’s details
Title:	Ms	Mr
First name:	Sally	Simon
Surname:	Fish	Fife
Organisation:	Gatwick Green Limited	Savills
Address line 1:	Fetcham Park	Wessex House

Address line 2:	Lower Road	Priors Walk
Town/city:	Leatherhead	Wimborne
Postcode:	KT22 9HD	BH21 1PB
Telephone:	01483 230320	01202 856912
Email:	<a href="mailto:Sally.fish@wilky.co.uk">Sally.fish@wilky.co.uk</a>	<a href="mailto:sfife@savills.com">sfife@savills.com</a>

## 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 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.

Please see attached response

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



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

Yes, I wish to participate in the examination hearings

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

The Planning Inspectorate's procedure guide for Local Plan Examinations (Feb 2023) states at para 3.14 that where a representor supports a policy, the LPA has the discretion to include that representor as part of its team at the Hearings. On this basis, GGL could attend the Hearings, if requested by Crawley Borough Council.

*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**

19/06/2023

**Draft Crawley Borough Local Plan 2024 - 2040  
May 2023**

**Regulation 19 Consultation**

**Representation on behalf of Gatwick Green Limited**

**Draft Sustainability Appraisal / Strategic Environmental  
Assessment**

**June 2023**



## 1.0 Introduction

- 1.1 This representation is submitted on behalf of Gatwick Green Limited (GGL). For clarification, Gatwick Green Limited is a wholly owned subsidiary of The Wilky Group (TWG), which has a long-standing interest in the promotion of strategic employment land within the Crawley Borough Council (CBC) area. Previous representations were submitted by TWG, but the land is now vested in Gatwick Green Limited. This representation relates to the draft Sustainability Appraisal / Strategic Environmental Assessment<sup>1</sup> (SA/SEA), a legal requirement that supports the Draft Crawley Borough Local Plan, 2023 (DCBLP).
- 1.2 GGL owns about 48 ha (119 acres) of land east of Gatwick Airport. The land has been promoted by GGL as a strategic employment opportunity known as Gatwick Green, most of which forms a proposed allocation as a Strategic Employment Location (SEL) of 44 ha (108.7 acres) under Strategic Policy EC4 in the DCBLP. The proposed allocation is for a comprehensive industrial-led development of predominantly storage and distribution uses under use class B8.
- 1.3 This representation notes that the SA/SEA has been prepared in accordance with the advice in the Planning Practice Guidance (PPG), and that the outcomes of the evaluation of options in relation to Strategic Policies EC1 and EC4 and Policy GAT2 and other policies are the right outcomes and supported.

## 2.0 Strategic Policy EC1

- 2.1 The Council has assessed the alternative options for Strategic Policy EC1 in relation to addressing the unmet economic and employment land needs of the Borough in its Sustainability Appraisal (SA/SEA - pages 230-233). This evaluated three options: (1) rely on the NPPF to direct economic growth to the most appropriate and sustainable locations, (2) plan only for the level of need that can be accommodated within the main employment areas and work with neighbouring authorities to accommodate any unmet growth, and (3) adopt a spatial approach that recognises the role of Crawley as a sub-regional location and plan positively to meet economic growth needs by maximising the use of land in the existing employment areas, small extensions to Manor Royal and the allocation of Gatwick Green to meet Crawley's significant industrial and warehouse land requirements.
- 2.2 Option 3 was selected as the most sustainable spatial option as it recognises Crawley as a key sub-regional centre and plans positively to meet its economic growth needs

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<sup>1</sup> Crawley Borough Council Local Plan Review | Sustainability Appraisal / Strategic Environmental Assessment, Draft Report, For the Submission Local Plan, May2023

within the borough. The SA/SEA summarises the merits of Options 3 as follows (page 233):

*“...the approach will enable Crawley to respond to market signals, planning for the specific sectors where growth is identified, and support continued economic recovery from the current economic recover from the Covid-19 pandemic. In identifying new business land, the approach will help to retain and attract business and investment, both to Crawley and the wider functional economic market area. In doing so, the approach responds to NPPF requirements to plan positively for economic growth, and reinforcing and strengthening Crawley’s economic role, and that of the wider area.”*

- 2.3 This analysis is reflected in Topic Paper 5<sup>2</sup> (Employment Needs and Land Supply, May 2023). The findings of the SA/SEA in relation to Strategic Policy EC1 are fully supported. The conclusions remain valid in the light of GGL’s objections to Strategic Policy EC1 and the suggested change to identify a higher employment land need figure.

### **3.0 Strategic Policy EC4**

- 3.1 The Council assessed the high-level alternative options in relation to Strategic Policy EC4 for providing for an Strategic Employment Location (SEL) (pages 238-239). This evaluated three options: (1) allocate a SEL only though Strategic Policy EC1, (2) allocate a SEL though a dedicated local plan policy that sets out the site-specific requirements for the site, and (3) explore the scope to allocate an industrial-led SEL through an Area Action Plan.
- 3.2 Option 2 was selected as it allowed for detailed matters relating to the amount and type of business floorspace, transport and access, design and amenity and environmental considerations to be addressed in policy and provide a framework to achieve a sustainable development through a masterplan and planning application. The Council’s approach is supported in that it has allowed for the Gatwick Green SEL to be identified as part of the overall economic strategy for the Borough articulated in Strategic Policy EC1, with the detailed matters relating to site / development requirements to be addressed separately in a site-specific policy (Strategic Policy EC4).
- 3.3 The findings of the SA/SEA in relation to Strategic Policy EC4 are fully supported. The conclusions remain valid in the light of GGL’s objections to Strategic Policy EC4.

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<sup>2</sup> Topic Paper 5: Employment Needs and Land Supply, Crawley Borough Council, May 2023

## 4.0 Policy GAT2

- 4.1 The Council has assessed the alternative options in relation to Safeguarded Land in its Sustainability Appraisal (SA/SEA) (pages 250-252). This evaluated three options: (1) safeguarding land as shown in the Gatwick Airport Master Plan<sup>3</sup> (GAMP), (2) do not safeguard any land, and (3) safeguard land with an amended boundary to allow for strategic employment provision. Option 3 was selected as the most sustainable option as it responded to national policy to retain safeguarding, but with an amended boundary to accommodate Crawley's unmet employment land needs in the form of a SEL at Gatwick Green. This approach enabled land south of the airport required to accommodate the physical land take of a possible wide-spaced runway and its operations to be retained. The approach was based on the following analysis (page 252):

*“The council does not consider parking to represent an efficient use of the site, particularly given the significant employment needs of Crawley borough, and is of the view that the airport could accommodate parking more efficiently through decked and robotic parking and other efficiency measures, should it be demonstrated that additional on-airport parking is required having regard to the airport’s surface access obligations stated in the S106 legal agreement. This approach, which retains safeguarding with an amended boundary to allow strategic employment provision, is considered to represent the most sustainable option”*

- 4.2 This analysis is reflected in Topic Paper 2 on Gatwick Airport<sup>4</sup>. The findings of the SA/SEA in relation to Strategic Policy GAT2 are fully supported.

## 5.0 Other policies

- 5.1 The SA/SEA also contains comparative evaluations of the options with regard to sustainable transport and infrastructure provision (Strategic Policies ST1 and IN1). In relation to these evaluations, the SA/SEA concluded in favour of locally-specific policies on sustainable transport and infrastructure over relying on the NPPF (the ‘do nothing’ option). Both evaluations demonstrated significantly more benefits for a detailed locally-specific policy over the ‘do nothing’ option. On this basis, it is considered that there is an overwhelming and sound case in support of these policies.

## 6.0 Conclusions

- 6.1 Overall, the SA/SEA is legally compliant and GGL supports the Council's findings with regard to Strategic Policies EC1, EC4, ST1 and IN1 and Policy GAT2.

<sup>3</sup> Gatwick Airport Master Plan 2019, Gatwick Airport Limited, xx 2019

<sup>4</sup> Topic Paper 2, Gatwick Airport, Crawley Borough Council, May 2023