

HORLEY TOWN COUNCIL

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Regulation 19 Local Plan Consultation
Strategic Planning,
Crawley Borough Council,
Town Hall,
The Boulevard,
Crawley RH10 1UZ.

20 June 2023

By email: - strategic.planning@crawley.gov.uk

Dear Sirs,

Horley Town Council response to Regulation 19 Consultation of the Crawley Borough Council Local Plan

Horley Town Council (HTC) welcomes the opportunity to comment on the Draft Local Plan and has considered the proposed plan at their planning meetings.

Our response focuses on Strategic Policy EC4: Strategic Employment Location which proposes land in the north east of Crawley, at **Gatwick Green**, to be allocated for delivery of a minimum of 13.73ha of new industrial land, predominantly for B8 storage and distribution uses.

It is noted that this area is located right on the Crawley Borough Boundary, directly opposite the proposed Horley Business Park (within Reigate and Banstead Borough Council), separated by the Gatwick M23 spur road.

As advised previously, the Horley Business Park is planned to have direct access to the M23 spur, however, we note that the Gatwick Green proposals (despite sitting adjacent to the spur road) would be accessed directly off of the Balcombe Road. As the site allocation is to comprise mainly warehousing it can be expected that the vehicle movements in and out of the site will be substantial.

Horley Town Council wishes to continue to put on record its very real concerns on the potential impacts to the road network in Horley.

HTC notes that the draft Policy EC4 (C) requires a Transport Assessment to demonstrate appropriate access of both employee and operational vehicular movements such that the proposals will not create a **“severe” residual impact** on the local and strategic road network. HTC queries the low benchmark Crawley Borough Council is setting for a development to not have “severe” residual impacts given that even a “moderate” residual impact on the local road network would result in an unacceptable increase in traffic within Horley and the local environs. HTC consider that a stricter benchmark should be applied not only to alleviate the potential for increased traffic on an already overstretched road network but also to encourage more sustainable modes of transport to be used.



As you may be aware the A23 is already under great pressure with increases in traffic from two major residential developments in Horley and HGV and operational vehicle movements associated with the North Gatwick Gateway warehouse site, as well as the consented warehouse development at the former Titan Travel site. In addition, there is the possibility that some site traffic will be allowed access to/from the Horley Business Park via the Balcombe Road and, most significantly the pressure on the local road network around Horley from both construction and operational vehicles associated with the proposed Gatwick Airport Northern Runway proposals.

Local Road traffic flows is of such concern to us that Horley Town Council, and the neighbouring Salfords and Sidlow Parish Council, requested Surrey County Council to undertake highway surveys of the A23 from Three Arch Road to the Chequers Roundabout in 2022. The results from the survey work undertaken indicate that the A23 as it meets Horley has traffic flows that once they have built in the morning peak, remain busy throughout the day until they drop in volumes in the evening after the evening peak period. This is in contrast to many roads in Surrey which experience distinct peaks in the morning and evening, with lower flows during the interpeak period, signifying the importance of the A23 and the stretched capacity under which it is already operating.

HTC note that Policy EC4 (D) seeks to prevent HGV traffic from accessing the Gatwick Green site from the north via the Balcombe Road and will not allow HGV movements to egress the site via a right-hand turn onto the Balcombe Road. This is considered positively by HTC, however, we remain unconvinced that HGV movements can be so strictly enforced to prevent vehicles alighting at, for example, M25 junction 8 and travelling through Reigate/ Redhill and Horley along the A23 and Balcombe Road to the Gatwick Green site.

Furthermore, the policy only seeks to cover HGV movements and not employee or smaller servicing/ operational vehicles accessing the site. HTC request that, in the least, the policy is amended to restrict **all vehicles** (with the exception of emergency vehicles) from accessing or egressing the site to or from Horley along the Balcombe Road.

It is disappointing given the sites proximity to the adjacent M23 Spur road that further investigations to provide a direct access cannot be assessed and incorporated in to the policy requirements within the Local Plan.

HTC would question the current demand for warehouse and distribution units given the number of empty distribution units within the Horley area at the Gatwick Gateway site and the yet to be delivered consented proposals at the former Titan Travel site, both of which offer new commercial floorspace to the market. Albeit we do acknowledge that the intention is that Gatwick Green site will meet economic need towards the end of the plan period.

As an aside, HTC also note that the draft Policy EC4 requires an Agricultural Land Classification Statement to be provided. However, we would question why a site is being allocated for Strategic Employment use if the Council haven't considered the agricultural land quality of the site. The NPPF requires at paragraph 174 that *"Planning Policies and decisions should contribute to and enhance the natural and local environment by:.....(b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of **the best and most versatile agricultural land**, and of trees and woodland"*. Given the Government's Food Security strategy HTC would expect that the quality of agricultural land be considered before it is allocated for alternative uses.

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To conclude, HTC strongly supports the draft policy requirement for an outline planning masterplan approach to the site which includes both phasing and the programming of infrastructure as part of an application. HTC consider this essential to the sites allocation to ensure that mitigation will be delivered in a timely and commensurate way.

We trust our concerns will be taken into consideration.

Yours Faithfully,

A handwritten signature in blue ink that reads 'Joan Walsh' is enclosed in a thin blue rectangular border.

Town Clerk

