

# Crawley Borough Local Plan Review 2024 - 2040

## Manor Royal BID Regulation 19 Response

16 June 2023

**Author:** Steve Sawyer (Executive Director) as approved by the Manor Royal BID Board.

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**This is the formal response of the Manor Royal Business Improvement District (BID) Company to Crawley Borough Council as part of the review of the Crawley Borough Local Plan that provides the planning and land use policies to help meet Crawley’s employment land and floorspace needs for the period 2024 to 2040.**

The Manor Royal BID Company (MRBD Limited) was formed in June 2013 following the successful outcome of the BID ballot conducted in accordance with the Business Improvement Districts (BID) Regulations (2004), plus two subsequent “renewal” ballots. The Manor Royal BID represents and promotes the interests of Manor Royal based companies and staff, with sole responsibility for managing and delivering the BID Business Plan for which businesses in Manor Royal have voted.

This response predominantly focusses on “Economic” policies as they impact on Manor Royal. It is recognised that housing supply and supporting infrastructure are also important. On these issues the Manor Royal BID has produced and previously supplied a “Strategic Statement” and detailed comment on Gatwick Airport, extracts from which are provided as an Appendix.

### Commentary and Manor Royal BID response

#### Economic Growth

The policies and approach to promoting the Manor Royal Business District (Policies EC1, EC2 and EC3) are largely in line with previous policies and are designed to protect the prime function of Manor Royal. The Manor Royal BID supports this approach.

The policies continue to protect and promote Manor Royal for B Use Class development (Offices, Industrial units and warehouses, para 9.9). Setting out a policy to encourage the promotion of a dedicated “business hub” (para 9.10) to help meet the long-known need for improved facilities to enhance the Manor Royal offer is also a positive step, whether that comes forward as part of a single development or as a series of smaller developments, provided that it does not undermine the area’s core function. Recognising the role the new Innovation Centre might play in fulfilling some of those “business hub” functions would be helpful, of which the Manor Royal BID is supportive.

Explicit reference has been made to the Manor Royal Economic Impact Study (Lichfields, 2017), studies undertaken in respect of ReEnergise Manor Royal and the work of the Manor Royal BID itself. The Local Plan sets out how s106 contributions from developers will be sought to improve public realm and these will be allocated to projects identified jointly by the Council and the Manor Royal BID. This is a positive development and makes best use of local knowledge and the strategic work of the Manor Royal BID, specifically the Manor Royal Projects Pack. It is also encouraging to see the Council recognise the Manor Royal BID as a key partner in the development of Manor Royal Business District. On these points, the Manor Royal BID acknowledges and thanks the Council.

In light of Manor Royal's strategic importance and the intention of the Council to support development outside of the town (e.g. Horley Business Park) and promote a new Strategic Employment Location within the borough boundary (Gatwick Green, EC4), it is important that the Local Plan reflects the need to upgrade the Manor Royal offer, improve public realm, broadband capabilities, available onsite facilities, address transport issues and encourage supporting and complementary uses to help create a quality of place that encourages investment and retains businesses. It is positive to see the Local Plan reflect these issues, which needs to be followed by swift action and tangible investment on the ground that the Manor Royal BID has proven it can help with.

**Strategic Employment Location (Policy EC4)** The Manor Royal BID recognises the identified need to provide more employment floorspace that cannot be accommodated within existing locations. We acknowledge the "Gatwick Green" strategic employment allocation (Policy EC4) with a focus on larger scale B8 uses. The need to ensure this is brought forward in a way that is complementary and does not undermine Manor Royal's strategic function as one of Crawley's and the Gatwick Diamond's key employment locations is mentioned in the plan. This is critical to ensure Gatwick Green meets a demand currently unmet, and not able to be met, by Manor Royal and to avoid displacement effects. Therefore;

*In providing an allocation to Gatwick Green as a strategic employment location, the Council should explicitly state that their preferred policy position is to support development, growth, intensification and appropriate extensions of existing employment areas like Manor Royal and that any other such developments will be subject to the requirement for an impact assessment justifying significant development outside the existing main employment areas with an assessment of how new development impacts existing areas, including but not limited to the impact Gatwick Green may have. This would be equivalent to a "town centre first" policy for places like Manor Royal. The Manor Royal BID feels this is the responsible and sustainable approach to guiding development that properly balances growth with protection of limited resources and the environment.*

**Article 4 Directions for Manor Royal removing Permitted Development Rights (para 9.33):** The Manor Royal BID is wholly supportive of this approach in order to safeguard the core function of Manor Royal as a business location that might otherwise be undermined by inappropriate and non-compatible (residential) uses. Therefore; *The Manor Royal BID seeks reassurances from the Council about the protections for Manor Royal to prevent unplanned residential development in the business district and the impact of Class E that could undermine the prime function of Manor Royal.*

**Business Hub and facilities (para 9.47, policy EC3):** The Manor Royal BID is encouraged to see specific reference for the need to provide better support facilities that might be accommodated in the form of a "Business Hub" and its importance for attracting and retaining businesses. Therefore; *Beyond a general supportive statement to this effect, the Manor Royal BID encourages the Council to take positive action to encourage development of these facilities, to work with the BID to bring them forward over the plan period, to be specific about the ideal location for such facilities and to actively pursue opportunities to deliver the Business Hub, for example when considering the development of the Innovation Centre.*

**Supporting the Creative industries (Policy EC9):** This policy makes reference to the need for better provision in support of creative industries, including the need to enhance the supply and range of employment floorspace for start-ups, incubation and grow-on space throughout the Borough. Further, the Economic Growth Assessment (EGA) finds that Crawley performs poorly in terms of new business start-ups (para 101). Reference is also made to the role of the Innovation in terms of providing "grow-on" space for hi-tech small businesses (SMEs). The Manor Royal

BID would argue that this is, at least in part, due to the lack of provision of smaller business space generally (sub 3,000 sqft) particularly smaller industrial and workshop space, similar to that provided by the Council at The Enterprise Court. This lack of affordable small business space limits the ability for small businesses to start and grow in Crawley where recent development trends of private developers favours larger scale industrial, warehouse and logistics facilities. An issue identified repeatedly by the Manor Royal BID, including in its Economic Impact Study (2017). The Innovation Centre will, to a degree, help a certain type of business, however, it is not by itself a solution. This is likely to continue to be a gap impacting companies of all types beyond creative or hi-tech industries. *The Manor Royal BID acknowledges the need for smaller business space. However, it encourages the Council to be more specific about the gap in terms of size and type of provision, to recognise that gap exists in Manor Royal and that it impacts on businesses beyond the Creative and Hi-Tech Industries. While the BID supports the promotion, attraction and growth of these specialist companies throughout Crawley the Local Plan should acknowledge the need that exists beyond these niche sectors in support of local entrepreneurs and start-ups and be more specific about how it might encourage these uses to come forward.*

**Gatwick Airport (Chapter 10, Strategic Policy GAT1), including Safeguarded Land (GAT2)** Manor Royal BID is supportive of a successful Gatwick Airport. It also recognises the need for the Local Plan to provide sufficient space – economically and spatially – for the local economy to diversify, broaden and become more resilient to avoid over-dependence on a single economic driver or industry. The BID is also realistic in recognising the impact and consequences (positive and otherwise) of being located near to a busy international airport and vital piece of the national infrastructure.

Para 10.6 refers to the draft Aviation Strategy (Dec 2018) concluding that demand for future runway capacity up to 2030 could be met by a combination of expanding Heathrow with other airports making the best use of existing runways. Due to the uncertainty created by COVID19, predicting future demand is difficult and so the National Infrastructure Commission (NIC) will not consider capacity beyond 2030. Therefore, it has been deemed prudent to continue to safeguard land for a possible future wide-spaced second runway at Gatwick that could, potentially, increase capacity to 95 million passengers per annum (mppa). For comparison purposes in 2017 Heathrow Airport handled circa 78 mppa.

Para 10.14 refers to the intention, as part of its Masterplan (2019), for Gatwick Airport Limited to pursue a Development Consent Order (DCO) to bring into routine use the standby runway for smaller aircraft movements, referred to as the Northern Runway Project. This would have the effect of increasing capacity to 75.6 mppa by 2038 and to 80.2 mppa by 2047.

In any and each event guidance is clear that airport growth, where it is justified, must meet strict environmental conditions. The BID takes this to apply to both the Northern Runway Project and any future wide-spaced second runway.

While airport policy remains unchanged any development in the safeguarded area would be prohibited with the exception of small residential extensions or the refurbishment of existing buildings,

Increased land take for the Gatwick Safeguarded area at the northern boundary of Manor Royal, compared to the extent of land required to be safeguarded in previous iterations of the Local Plan, effectively blights more land from being developed and curtails minor extensions to the business district that the Local Plan states it supports.

Therefore: *The Manor Royal BID regrets the Council has not been able to release land to allow sustainable growth of Manor Royal to the north, as was the previous intention when it proposed introducing an Area Action Plan. The Manor Royal BID does not support the extension of the Gatwick Airport Safeguarded Area that prevents even minor extensions. The extent of the safeguarded area should at least be returned to the previous boundary line and, if possible, tested further to allow more land to be released for the development and extensions of Manor Royal to*

come forward. Acceptance of the extended safeguarded area is contrary to supporting Manor Royal's growth and the diversification of Crawley's economic base and forces the Council to allocate other land for development outside the main employment areas. This is not a sustainable approach for any town much less one where land is scarce and has the effect of increasing the cost of development by limiting land supply.

The continued need to safeguard land for a second runway (Policy GAT2) and the extent of land identified in the Local Plan blights development for a seemingly indefinite period with little challenge or indication when that might be reviewed, therefore; The Manor Royal BID regrets the Council has not been able to release land to allow sustainable growth of Manor Royal to the north as was the intention of the previous iteration of the Local Plan and encourages the Council to challenge GAL on the extent of land to be safeguarded, makes clear its intention to review the approach to continued and indefinite safeguarding of land for a second runway and signals its clear intent to review this as soon as practicable involving an immediate review of the Local Plan when changes to national aviation policy allow.

The Local Plan policies support development of the airport with a single runway (Policy GAT1) and recognises the intention to bring into routine use the standby runway, which would increase capacity from circa 48 mppa to 75.6 mppa by 2038, and eventually to 80.2 mppa. Therefore; As per our previous responses, while the Manor Royal BID is generally supportive of growth at Gatwick Airport with a single runway including plans to bring into more active use the standby runway to further meet the increasing demand for air travel, while not increasing the actual footprint of the airport. This support is on condition that safety is not compromised, and due consideration is given to the impact this may have on the surrounding area, particularly in terms of congestion, increased demand this would create for employment land and housing in an already highly constrained area and secondary issues related to possible wage inflation and commuters and passengers parking in surrounding areas. On these points we are not entirely convinced that sufficient measures have yet been taken to mitigate these impacts and believe there is a case for GAL to work more closely with the local authorities to invest in the local infrastructure including support for measures to control parking issues created by airport users in areas like Manor Royal. The burden of managing and controlling these issues should not fall entirely on the local authorities.

**Sustainable Design and Construction (Policy SDC1)** Living sustainably within our means has been shown to be increasingly important to businesses and developers. The Manor Royal BID has responded by introducing a new Objective (Sustain & Renew) as part of its new BID Business Plan (2023-28). This is informed by work undertaken by the BID with consultants BioRegional to develop a Sustainability Action Plan for Manor Royal using the "One Planet Living" framework. Not only does this consider the role of the BID in supporting local businesses, it also encompasses how the BID maintains the area and designs and delivers improvement projects e.g. the Microparks and public realm projects. It is also positive to see the ReEnergise Manor Royal (Local Energy Community) Project mentioned in the Local Plan (para 15.31), that is specifically focussed on how companies work collaboratively through a not-for-cooperative model to facilitate easier, quicker and cheaper deployment of solar panels. In the future this may well also include aspects of storage and sharing. Therefore; The Manor Royal BID asks that the Council consider how it might make applicants aware of ReEnergise Manor Royal when advising on planning applications in order to benefit the development and the advancement of renewable energy through the deployment of solar panels in Manor Royal. It also asks that the Council liaise with Gatwick Airport and consider introducing a policy to provide certainty to installers, including ReEnergise Manor Royal, concerning the Aerodrome Safeguarding.

**Sustainable Transport (Policy ST1):** When advising developers on Travel Plans to minimise single occupancy car journeys into Manor Royal, there is often little regard for how developers might engage with the Manor Royal BID to make use of free to access initiatives provided to Manor Royal companies via the BID to encourage, support and promote modal shift. There is also little regard for how aspirations to promote Electric Vehicle (EV) charging (para 17.14) might also be extended to encompass investment in the public highway where, inevitably, Manor Royal workers park. Therefore; The Manor Royal BID asks for consideration to be given by planning officers to advise developers on the role of the BID in supporting modal shift and to liaise with the BID to help inform their travel plans

in support of their tenants. Further, the Council are asked to consider – in liaison with West Sussex County Council Highways – how better use of the public highway in Manor Royal might be used to support EV charging.

**Area of Search for a Crawley Western Multi-Modal Transport Link (Policy ST4):** The Manor Royal BID recognises the need to provide relief to parts of the Crawley road network caused by new development to the west of Crawley. It is understood that there are a number of variables that make it difficult to be specific about the exact location of the proposed transport link and, therefore, it's potential impact on County Oak and Manor Royal properties. Para 17.28 refers to the initial scoping work considering the extent of the Gatwick safeguarded area. Para 17.30 refers to a possible interim measure to minimise the impact on commercial buildings in County Oak/Manor Royal ahead of any decision on progressing a second runway. There is concern regarding the possible impact on the existing commercial buildings of County Oak / Manor Royal and to any possible extensions to the Manor Royal area that might be impacted by the area of search for this transport link. It is also unclear why the area of search now stops at London Road (A23) when previously it extended further to the east to meet Gatwick Road. Therefore; The Manor Royal BID asks that the Council considers this proposal for how it impacts existing buildings in County Oak / Manor Royal, development sites e.g. Jersey Farm, how any such road would facilitate development in or future extension of Manor Royal and how it might resolve long-standing issues of congestion e.g. by relieving pressure in the County Oak area. In respect of transport modelling, given the demand for space and the encouragement of more efficient and intensive use of land, the Manor Royal BID requests that transport modelling should look at junctions and capacity both with and without the Transport Link to provide more certainty concerning the extent of development and intensification that can be accommodated. Further, the BID asks that the Council clarifies why the Transport Link stops at the London Road (A23) when previously it extended to Gatwick Road in the east.

**Development Outside the Built-Up Area (Policy CL8)** A need to review the countryside policies as they relate to Manor Royal (para 4.70), particularly at the northern boundary (Upper Mole Farmlands Rural Fringe). Given the acceptance of a Western Multi-Modal Transport Link and of the extended safeguarded area, which the Manor Royal BID does not support, the retention of this policy is non-sensical and over-burdensome on developers. Therefore; The Manor BID recommends these countryside policies as they impact Manor Royal be reviewed in favour of a refreshed Manor Royal Design Guide. Given that by accepting the Western Relief Road and the extended safeguarded area the Council has accepted the urbanisation of the northern boundary of Manor Royal, to continue to apply existing countryside policies in the meantime is non-sensical.

**Employment Development and Amenity Sensitive Uses (Policy EC11):** This policy concerns the Buffer Zones at Manor Royal and Forge Wood where employment uses will be permitted, provided they do not adversely impact upon the amenity, function and setting of nearby residential uses. The Manor Royal BID understands why this policy exists but feels the definition is vague in terms of what the Council deems to be "adverse" thereby making it difficult for businesses and residents to understand what uses might be deemed acceptable. This policy would benefit from more definition and clarity.

**Biodiversity and Net Gain (Policy GI3):** The Manor Royal BID supports the objective of this policy to improve the Biodiversity of the town. Often this can only be achieved by long-range planning and site management. Sometimes offsite measures are required. Where this is necessary it should conform to a strategic level plan to avoid poorly informed piecemeal investment in planting schemes out of keeping with vision and aspiration for the area. The Manor Royal BID has responded by introducing a new Objective (Sustain & Renew) as part of its new BID Business Plan (2023-28). This is informed by work undertaken by the BID with consultants BioRegional to develop a Sustainability Action Plan for Manor Royal using the "One Planet Living" framework. Not only does this consider the role of the BID in supporting local businesses, it also encompasses how the BID maintains the area and designs and

delivers improvement projects e.g. the Microparks and public realm projects. The BID is in the progress of developing a Biodiversity Net Gain Plan to inform the sensitive planting and management of the public areas to achieve improved biodiversity across the Business District. Therefore; *The Manor Royal BID asks the Council to advise developers who are required to deliver or fund offsite measures in Manor Royal to achieve biodiversity net gain that their plans should be informed by the Manor Royal Biodiversity Net Gain Plan agreed in liaison with the Manor Royal BID.*

**Water Neutrality (Policy SDC4)** Water Neutrality is taken to mean that *for every new development, total water use in the region after the development must be equal to or less than the total water-use in the region before the new development.* In practical terms this means first reducing demand for water from the new development as far as practicable, and then offsetting the remaining demand elsewhere within the same region. The vast majority of the water for the Manor Royal Business District is supplied from the Sussex North Water Resource Zone (WRZ) requiring development, including change of use, to demonstrate water neutrality through water efficient design and offsetting of any net additional water use.

The introduction of a Local Planning Authority (LPA)-led water offsetting scheme is welcomed where this can unlock frustrated development in Manor Royal, and provided water credits generated in Crawley are not lost to the town, particularly those generated in Manor Royal. It is noted that it will not be a requirement for developers to use the LPA-led scheme leaving the option open for developers to propose other offsetting that might be deployed within the impacted WRZ. Clear guidance will need to be provided by the LPA on acceptable offsetting arrangements and advice needs to be practical and prompt.

Para 15.44 states that non-residential buildings are required to achieve 3 credits within the BREEAM water issue category. This may include incorporating a range of measures, such as greywater recycling and rainwater harvesting into the design of new development, and fitting water saving fixtures such as flow regulators, low flush toilets, low volume bath, aerated taps and water efficient appliances (in particular, washing machines and dishwashers).

Para 15.45 states that any additional demand arising from development will need to be offset against existing supplies. It is envisaged that this will be achieved through demand management savings identified in Southern Water's Water Resource Management Plan, together with measures to be identified in a joint Local Planning Authority-led Offsetting Implementation Scheme (OIS) being prepared. Developers wishing to access the LPA-Led Offsetting Implementation Scheme (OIS) will have to "buy in" to the scheme in accordance with a series of stated obligations. However, to comply and receive planning consent, sufficient water capacity must be provided prior to permission being granted that might mean delays at various points in the plan period while the necessary offsetting is delivered prior to approval (para 15.49).

This is a severe constraint that has frustrated the development of Manor Royal with the potential to deter investment. Some developers, even of the very smallest kind, have found negotiations with the Local Planning Authority (LPA) on this matter slow and difficult. The Manor Royal BID acknowledges this is a new area for an already busy, and possibly under-resourced, LPA. The Manor Royal BID is also aware of numerous developments involving the replacement of higher water usage developments (e.g. offices) with more efficient and less water intensive developments (e.g. warehouses) and yet there is no mechanism to retain or share this surplus across the Business District to facilitate new development. The benefit of making water savings is, therefore, lost to Manor Royal and the town. Therefore; *The Manor Royal BID asks that the LPA provide clear and prompt guidance to developers to avoid unhelpful delays, that water surplus (credits) generated in Manor Royal are retained to support future development in Manor Royal including change of use, that guidance is provided to developers about appropriate off-setting measures they may be able to implement outside the LPA-Led offsetting scheme, consideration is given to the introduction of non-household water saving advice visits as mentioned in the Sussex North Water Neutrality Study: Part C – Mitigation Strategy Final Report (November 2022) and consider how this*

might be provided to Manor Royal companies and how the water savings this generates can be used to benefit new development. The Manor Royal BID welcomes the opportunity to work with the Council on this.

## Other matters

**Release of land to the north of Manor Royal:** A previous iteration of the Local Plan proposed an Area Action Plan to explore options to release land in the retained safeguarded area for development and to allow extensions to Manor Royal at its northern boundary, something the Manor Royal BID continues to be supportive of. On advice the Council has removed this intention and retained the safeguarded status until which point Government policy triggers a review. The Manor Royal BID supports a review of the safeguarded land at the earliest opportunity subject to Government policy. If this land were to be released, the Manor Royal BID is unclear whether there is sufficient demand to accommodate both the Horley Business Park and the development of another strategic employment location. If not, the Council should consider which of these sites it prefers and be clear on its position to avoid simultaneously promoting both sites and undermining existing locations, including Manor Royal. Therefore, the Local Plan should be clear whether its support of Horley Business Park and other sites outside the main employment areas is contingent on development to the north of Manor Royal.

**Manor Royal Supplementary Design Guides (SPGs):** These supplementary design guides covering design and public realm in Manor Royal were produced as part of the Masterplanning process of 2010. Since then many changes have taken place, including; the production of three Manor Royal Project Packs, the Manor Royal Sustainability Action Plan and plans for a Manor Royal Biodiversity Net Gain Plan. More generally there is increased awareness now of new environmental standards, including energy, biodiversity and water efficiency. Therefore; The Manor Royal BID asks that consideration is given to reviewing and refreshing the Manor Royal Supplementary Design Guides to ensure they are still relevant.

**Broadband capability:** The Council has produced its own vision statement for Manor Royal to be “the south east’s leading digitally enabled and mixed use innovative business park, attracting sustained business investment that will deliver high value employment and higher levels of productivity and economic growth”. While this is not a vision the BID recognises it does not object to it. However, to achieve it sufficient high-speed broadband capability to all buildings and for all businesses must be available. This was identified as part of the Manor Royal BID’s previous Business Plan (2018-23) and again in the current Business Plan (2023-28). Limited progress has been made in satisfying this need and future proofing Manor Royal in this way, which undermines the Council’s vision. Therefore: The Manor Royal BID has experience of working on projects to improve broadband speeds throughout the Business District and urges the Council to commit to making the necessary improvements during the very earliest phases of the plan period to avoid the attractiveness of Manor Royal to the high-tech companies the Council wishes to attract being undermined.

## **APPENDIX A: Extracts from the Manor Royal BID Strategic Statement as they relate to housing and infrastructure.**

### **Transport and parking**

The ease of moving people, goods and services is a major consideration of any area and particularly for an area as significant as Manor Royal with so many businesses and people attracted to and using it. Congestion, particularly at peak times, is something that needs to be managed. MRBD supports initiatives that assist businesses in encouraging their staff to make use of alternatives to making single occupancy car journeys while recognising that travelling by car is popular and for some necessary.

MRBD supports strategic partners who are active in encouraging and promoting better connections and increased capacity particularly by rail and road, including bus infrastructure and improving key stations and the way users can easily use these stations to move from one mode of transport to another i.e. rail to bus.

The availability of sufficient parking for car users is an issue for some where parking problems can impact on the attractiveness of the area as a place to work and can be problematic for visitors and customers, particularly those businesses that are customer facing or retail in nature.

Manor Royal used to benefit from areas dedicated to car parking. These have now been developed. For some parking remains problematic. Consideration of how new development impacts on trip generation and congestion is important and MRBD would welcome consideration of options to ease parking pressures. This could include some form of park and ride or the creation of a communal on-site parking facility / transport interchange or hub with ease of access to and from it.

The proper enforcement of traffic orders and restrictions is important for the continued free flowing, safe use and attractiveness of Manor Royal. Extensive work by the BID, including feedback and engagement with businesses, highlights the inadequate enforcement arrangements currently in place and Traffic Regulation Orders (TROs) in much need of review and revision. It is important this is acted on and the solution is sensitive to the needs of the area and the people expected to use it.

The condition of roads, pavements and cycleways is important for their safe use, the perception of the area and for encouraging people to cycle and walk. However, the condition of these around the Business District is variable and in need of improving and upgrading. This includes upgrading of surfaces, safe separation of different users, and in some places the clarity of road markings signage and lighting. Improvements to the public realm should also be prioritised and supported for the benefits this can have in encouraging active travel as well as the much needed upgrade of the overall appearance, look and feel of the Business District.

### **Housing and labour, including skills**

Tight labour market conditions and access to people with higher level skills are sometimes cited as problems for local firms generally. Action therefore is needed in this area for which MRBD is an advocate. It will participate where it can to influence delivery and policy and recognises that housing delivery (in terms of quantity and quality / mix) to ensure housing growth meets economic growth and is matched to the aspirations of the Business District.

Housing supply, good transport infrastructure, labour supply and the economic growth of the area are inter-related and must go hand in hand. Where this does not happen this could lead to increased difficulty with recruitment, increased labour costs and/or business frustration – aspects of “over heating”. MRBD would be concerned where proper consideration is not given to these factors and development of any kind is promoted that leads to a worsening of this situation either in or around Manor Royal.



## **APPENDIX B: Text from Manor Royal BID response to the Gatwick Masterplan consultation (December 2018)**

MRBD recognises the benefits of an expanded Gatwick Airport. MRBD remains supportive of proposals that support growth. Plans to improve the efficient use of the existing runway (Option 1) are sensible and supported.

Plans to bring into more active use the emergency runway to further meet the increasing demand for air travel (Option 2), while not increasing the actual footprint of the airport, are also sensible provided safety is not compromised and due consideration is given to the impact this may have on the surrounding area, particularly in terms of congestion and secondary issues related to commuters and passengers parking in surrounding areas. On this point we are not entirely convinced that sufficient measures have been taken to mitigate these impacts and believe there is a case for GAL to work more closely with the local authorities to invest in the local infrastructure.

Our primary concern for Gatwick Airport to grow to circa 70mppa is whether the local infrastructure can cope with that level of use and that our area does not invite similar pressures, problems and criticisms experienced at Heathrow Airport.

It is also noted that growth of this order would bring new opportunities, which we would be enthusiastic about promoting to Manor Royal based businesses. It would also bring new challenges. The availability of land to accommodate new commercial space and housing development is already highly constrained. Even without the introduction of a second runway we would encourage the Airport to work positively with the local planning authorities to find ways this might be remedied so that the Airport's growth can be accommodated successfully and not at the expense of other businesses and the area generally.

A bigger Gatwick is also predicted to generate an uplift in demand for workers. Again, while this is an opportunity it is also a challenge in an area with practically zero unemployment where companies already struggle to recruit. This must be taken account of to avoid significantly increasing this pressure and causing companies to suffer from the impact of further wage inflation and other problems caused by not being able to fill positions and having to widen their area of search, which itself has the twin impact of creating an upward pressure on wages and to encourage further in-commuting.

On this point we would encourage GAL to look at ways they can help promote and support opportunities for people to work in the area generally and not just to focus on those opportunities available at the airport itself. This would require the airport to take a broader "place based" approach to promoting the economic area of which it is a part.

### **A call for closer partnership working**

Since the change in ownership of the airport there have been notable improvements in the airport itself and the supporting infrastructure. This has benefitted the airport and the surrounding area and is reflected in above target increases in passenger numbers. As the airport grows it is important it maintains good relations with the surrounding businesses and residents.

We would welcome the input of Gatwick Airport into the plans of the Manor Royal BID, as voted by the Manor Royal businesses in the BID Renewal Ballot, so that we can ensure an active and harmonious relationship between the two areas. It is the efficient function of both these areas and their healthy co-existence that is key to the continued success of the local economy. This could also lead to more positive relationships being built between the two areas that could lead to a better understanding, more reciprocal trade and the possibility of shared projects with the potential for much better outcomes.

## **Pressure on infrastructure and the ability to innovate**

The consequences of growth in terms of the pressure on the local infrastructure is something that is felt and shared by all. It is important that Gatwick Airport is an active partner working with the local residents, businesses and their representative groups alongside the local authorities to manage these consequences.

This should include proactive ways to engage with and invest in solutions to encourage modal shift (e.g. by working with Metrobus to help them to continually improve their service both in terms of innovation and frequency), to help to manage areas in the immediately vicinity to control parking (e.g. by working with local authorities and possibly investing in local off-airport parking service teams) and looking at ways that Gatwick Airport can work with groups like the Manor Royal BID to understand its pressures and help to deliver, in partnership with the local authorities, improvements to the road, walking and cycling infrastructure.

Gatwick Airport could also be a significant partner in sharing its expertise with Manor Royal BID and local partners to help us to jointly innovate and embrace new ideas for improving sustainable travel behaviour (e.g. by sharing their experience of introducing electric vehicle car sharing schemes and being a champion for their introduction in nearby areas). Gatwick Airport could also share its technology experience on how data could be used to better inform travel decisions by people accessing the airport and travelling around the area generally.

### **Option 3: Safeguarding land for a future second runway**

The points made above apply even more to proposals to expand the airport by developing a second runway. The continued safeguarding of land for development of a second runway and the prohibition of any other development serves to indefinitely constrain growth of the area. MRBD acknowledges the airport's desire to retain the option to introduce a second runway and to retain land for that purpose. In so doing MRBD highlights the continued uncertainty and frustration this on-going hiatus brings.

Recognising the role Government has in deciding the future of national infrastructure assets like Gatwick Airport, MRBD encourages all parties to work towards a resolution to the status of the safeguarded land to bring an end to the unhelpful uncertainty and blight this effectively brings to Manor Royal and the wider area.

While generally supportive of growth at Gatwick Airport, MRBD cannot provide unreserved support for a second runway until further information is provided on key issues concerning; replacing lost commercial space, assisting displaced businesses, housing provision, infrastructure improvements (including but not limited to transport infrastructure) and the intention to involve local companies in any future development and operation of the airport.

As well as the associated social and environmental considerations, which go hand in hand with any major infrastructure project of this scale and importance, MRBD needs further clarity about what measures will be put in place to manage the impact of this development on the Business District. Estimates suggest that approximately 1,000,000 square feet of commercial floorspace on Manor Royal will be lost, which equates to between 11% and 12.5% of the total current floorspace offer.

In the event that a second runway is pursued, which we recognise is not the specific intent of the Draft Masterplan, we encourage Gatwick Airport to consider in more detail and to make more specific commitments as to how they can contribute to improving the surrounding infrastructure, other than the proposed financial contribution to the local authorities that seems a somewhat passive approach to a notable problem. The contribution proposed (£10m

over 5 years) also seems inadequate to make any meaningful difference even to the current situation let alone a scenario where the capacity of the Airport is almost doubled.

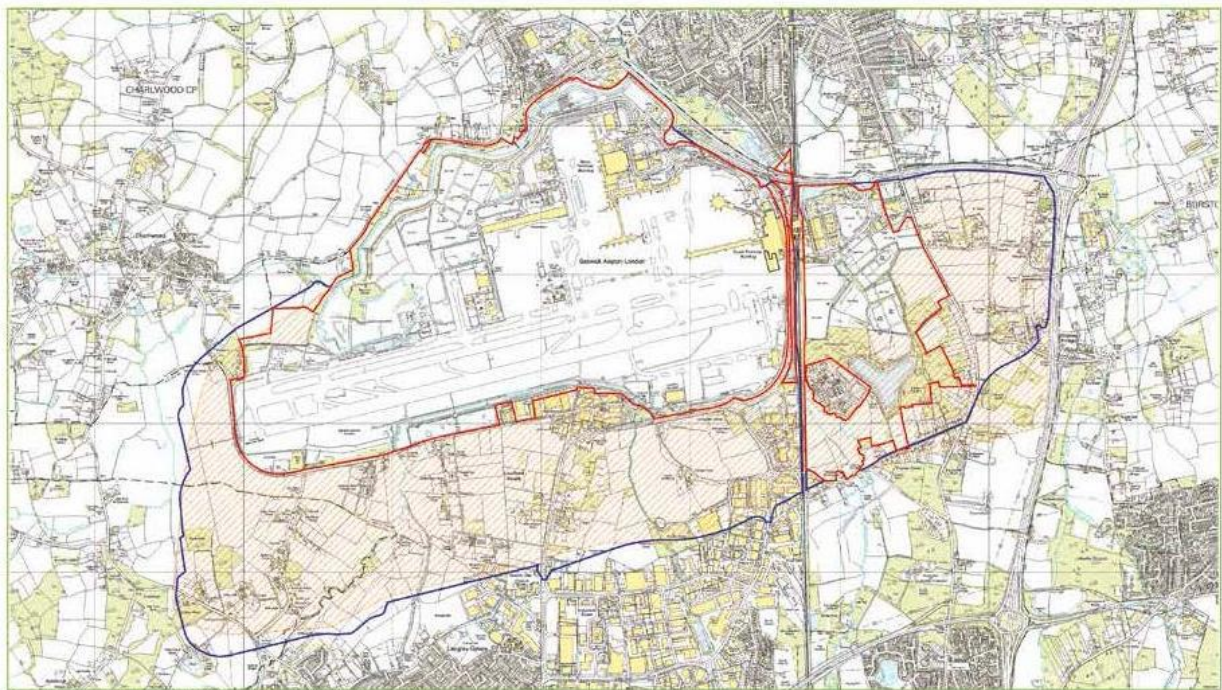
One of Manor Royal and Crawley’s selling points is good transport connections. There are challenges faced by so many people already making the daily commute to the area. It is important these challenges can be met and the current situation not made worse. MRBD would also want to have a much better understanding of the potential impact on major access routes, particularly London Road but also Gatwick Road.

In providing this response MRBD acknowledges that its view is one of many. It also acknowledges that most local businesses and business organisations tend to support the expansion of Gatwick Airport, albeit some of that support is tempered. It is important that every effort is made to engage with the business community and that their views are properly represented and taken account of.

MRBD looks forward to an on-going dialogue with GAL throughout this process and in helping GAL understand the views of local businesses, particularly those located on Manor Royal Business District.

### Gatwick Airport Masterplan boundary map

Map of changed airport boundary showing increased land take for the safeguarded area to accommodate space for a possible second runway extending further into Manor Royal than previously proposed, potentially affecting more properties and businesses.



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PLAN 21 - Safeguarded land Additional Runway

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