

# Crawley 2040

Draft Crawley Borough Local Plan 2023 – 2040  
May 2023

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## Written Statement on Matter 10

Gatwick Green Limited



**GatwickGreen**

WHERE THE FUTURE WORKS

## **Matter 10 – Transport and Infrastructure**

Issues 1 & 3

Questions 10.1, 10.2, 10.3, 10.4, 10.15, 10.16, 10.18,  
10.21-24, 10.27, 10.28, SQ10.36, SQ10.37

Reference: 055

Savills, Steer and empiric partners on behalf of Gatwick  
Green Limited

### **Written Statement**



## 1.0 Introduction

- 1.1 Gatwick Green Limited (GGL) owns about 47 ha (116 acres) of land, 44 ha of which is allocated as a Strategic Employment Location (SEL) known as Gatwick Green strategically situated to the south of the M23 spur road east of Gatwick Airport. A plan showing the extent of GGL's landholding and the allocated SEL is at **Appendix 1**.

## 2.0 Issue 2: Whether the approach to transport infrastructure to support the plan's proposals is soundly based

### Question 10.1

- 2.1 The transport strategy and policies of the SCBLP are sound because they were prepared on evidence grounded in recent government policy to plan for future transport on a 'vision and validate / decide and provide' approach under Circular 01/2022. There is no need for the Plan to be amended. Consistent with this, the proposed development at Gatwick Green is underpinned by a vision encapsulated in a sustainable transport strategy, in line with Crawley's transport strategy (New Directions for Crawley, Transport and access for the 21st century, CBC March 2020).
- 2.2 The transport strategy for Gatwick Green is set out in GGL's Reg 19 reps in Strategic Policies EC4 and ST1<sup>1</sup> and endorsed by Crawley Borough Council (CBC) in the Statement of Common Ground between it and GGL<sup>2</sup>. It is understood that CBC are considering a modification to EC4 to require the preparation of a transport vision for Gatwick Green to be approved by the Council. In the meantime, and in line with Circular 01/2022, the transport vision proposed by GGL is set out below and repeated in **Appendix 2**, which describes schemes which comply with the provisions of the Circular.

GGL shares CBC's transport vision and strategy. The strategy seeks to ensure that walking and cycling routes are safe, direct, attractive and popular and that bus/Fastway services are smart, create zero emissions and have traffic signal priority and Wi-Fi, use new bus shelters with live information and serve the Borough's neighbourhoods. As potential employers, GGL is keen to support Crawley residents in becoming more active, productive and healthy, where their first choice for travel to work at the site is walking, cycling or taking Fastway services. It is recognised that businesses reap the benefit of more contented staff who have less stressful journeys to work, with more choice, less congestion and avoiding costly car parking.

At the core of Gatwick Green's Vision is the creation of a "Sustainable Transport Corridor" (STC), integrated into the design and layout of the development, to offer safe and segregated travel for pedestrians, cyclists, and bus passengers. The STC

<sup>1</sup> REP 055 (2023) Gatwick Green Ltd, Strategic Policy EC4, Appendix 2 (Outline Transport and Access Appraisal), paras 1.4-1.7 | REP 055 (2023) Gatwick Green Ltd, Strategic Policy ST1, Section 5.0

<sup>2</sup> PS/CBC/SoCG/17: Crawley Borough Council and Gatwick Green Ltd Statement of Common Ground, Section 7.0 Transport

will connect neighbourhoods to employment opportunities and provide onward travel to a range of facilities.

- 2.3 **Appendix 2** provides a summary of how Gatwick Green fully complies with the relevant policies within Circular 01/2022 to deliver a policy compliant development.

#### **Question 10.2**

- 2.4 The mitigation plan for the M23 and A23 is set out within the Infrastructure Delivery Schedule (October 2023), which clearly defines the measures necessary, when these are likely to come on stream, the costs associated with the mitigation and how funding will be secured. This is referred in Section 7 (Transport) paragraph 4 of the SoCG between CBC and Gatwick Green.
- 2.5 The Infrastructure Plan identifies contributions towards strategic infrastructure necessary for the delivery of the SCBLP. This can be delivered through CIL contributions, s106 contributions and other opportunities, such as funds currently administered by the Local Enterprise Partnership (LEP) and those allocated via the Department for Transport (DfT). Gatwick Green is excluded from CIL and is not subject to a sustainable transport contribution under the Planning Obligations Annex. Accordingly, Gatwick Green Limited will contribute to improvements to the SRN and sustainable transport interventions in accordance with an apportionment formula to be devised by WSCC.
- 2.6 As Gatwick Green is identified as a strategic employment site within the SCBLP, it is accepted that the developer will be required to enter into a Section 106 agreement and contribute proportionally to strategic infrastructure, such as future improvements to junctions on the M23.
- 2.7 Consequently, the Infrastructure Plan and the Infrastructure Delivery Schedule (IDS, October 2023) form a sound and robust basis to ensure the delivery of transport infrastructure and the transport vision for Crawley, and ensure adverse effects on the transport networks are avoided. Improvements to the SRN will be funded from various sources as outlined in the IP, with the precise apportionment to be determined by WSCC.
- 2.8 **Appendix 3** contains plans which demonstrate that GG is easily accessible via Junction 10 of the M23, Crawley Avenue and Balcombe Road. Similarly, should GAL deliver its Southern Runway proposal, Gatwick Green will remain accessible via Junction 10, Crawley Avenue and the re-aligned section of Balcombe Road. It could, with the agreement of National Highways/Gatwick Airport Ltd, also be accessed from the diverted A23. Plan 3a demonstrates the access from Junction 10, via the proposed changes to

the Crawley Avenue/Balcombe Road junction. Plan 3b shows the same access should the Southern Runway proposal be delivered.

**Question 10.3**

- 2.9 GGL supports the Council's transport study and sensitivity testing as the basis for a sound transport strategy and the delivery of specific improvements across all modes, as defined in the Infrastructure Plan. This is reinforced in the Statement of Common Ground between CBC and GGL (Section 7., paras 4 and 5).

**Question 10.4**

- 2.10 As a strategic development, it is acknowledged that Gatwick Green will be required to develop a bespoke infrastructure package to supplement CIL contributions. This will be secured through conditions and a s106 legal agreement which will include a package of obligations, contributions and s38 and s278 works.

**3.0 Issue 3: Whether there is sufficient infrastructure capacity or scope for planned improvements to support the plan's proposals and secure sustainable growth.**

**Question 10.15**

- 3.1 GGL supports the Council's transport study and sensitivity testing as the basis for a sound transport strategy and the delivery of specific improvements across all modes, as defined in the Infrastructure Plan. This is reinforced in the Statement of Common Ground between CBC and GGL (Section 7., paras 4 and 5).

**Question 10.16**

- 3.2 See response to question 10.22 in relation to Transport Infrastructure.

**Question 10.18**

- 3.3 Thames Water has confirmed in writing that its sewerage and Crawley WWTW can accommodate the minimal waste water flows from Gatwick Green allocation over the Plan period<sup>3</sup>.

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<sup>3</sup> REP 055 (2023) Gatwick Green Ltd, Strategic Policy EC4, Appendix 4 of Appendix 3 (Fulfilling the development management provisions)

**Question 10.21**

- 3.4 This question is largely addressed in our comments to question 10.22. However, in response to the specific question about the lead delivery authority and sources of funding, the Infrastructure Delivery Schedule (October 2023) sets out the potential cost of schemes and the sources of funding. The precise details on funding sources and how costs will be apportioned will be addressed through supplementary guidance from West Sussex County Council. The lead agency on each scheme will be determined by National Highways and the Local Authorities and is not the responsibility of individual developers. GGL will, however, respect and work with the nominated lead agency to progress those schemes for which a contribution is sought.

**Question 10.22**

- 3.5 The Council's Infrastructure Delivery Schedule (IDS, October 2023) sets out how infrastructure will be aligned with the likely delivery of development within the Plan. The infrastructure improvements are based on forecast demand, allowing for sustainable transport interventions. Following discussion with CBC, it is understood that some amendments will be made to the published IDS in respect of mitigation at Junction 10 of the M23 to more accurately reflect the planned timescale for the works.
- 3.6 A feature of the SCBLP is that transport improvements will be subject to a 'monitor and manage' approach. This provides an active process to ensure that transport schemes for the highway network and sustainable modes will be delivered in advance of, or in parallel with, growth planned in the SCBLP. This approach applies equally to Gatwick Green, so ensuring that transport schemes will be delivered when they are needed. GGL will work with WSCC or National Highways to ensure timely delivery.
- 3.7 The Schedule set out in **Appendix 4** shows GGL's indicative programme for Gatwick Green and the alignment of the timing of those infrastructure schemes noted in the IDS as relevant to the development.

**Question 10.23**

- 3.8 Our responses to questions 10.21 and 10.22 address this question.

**Question 10.24**

- 3.9 GGL is committed to delivering the Sustainable Transport Corridor (STC) in the early phase of the development to ensure safe, segregated travel for those accessing or

passing through the site on foot or by bicycle. The STC will be connected to the LCWIP routes to provide safe travel to the wider network, thereby linking the residential and commercial areas of Crawley and Horley. Crucially, these routes and the proposed transport hubs within the site will allow nearby residents the ability to interchange with buses and trains at the connected rail stations.

- 3.10 Gatwick Green would support the establishment and implementation of a mechanism to allow for pooling of contributions to enable schemes to come forward earlier, especially if those schemes have a larger impact on modal shift.
- 3.11 For example, Cycle Route A - Gatwick Airport to town centre via Manor Royal (and Northgate) - identifies significant opportunity to connect Gatwick Airport, employment and Rail with Crawley, and is identified as a priority route. Proportional contributions from Gatwick Green could be used to deliver part of this route.
- 3.12 **Appendix 5** contains a plan which shows the onsite infrastructure to be delivered by GGL and the schemes which it may support. This includes potential connections to the LCWIP routes, bus / Fastway services and mobility hubs, which can come forward with the development of Gatwick Green.

**Question 10.27**

- 3.13 Our response to this question is addressed in our Statement on question 10.28.

**Question 10.28**

- 3.14 GGL submitted Reg 19 representations to the Planning Obligations Annex (the Annex) which should be read alongside its representation on Policy EC5 (Employment and Skills Development). In its representation on the Annex, GGL proposed some additional text to enable a more flexible approach to the delivery of facilities/services related to major sites such as Gatwick Green, to enhance employment and skills development. A similar change to the text of the SCBLP was proposed in relation to Policy EC5 (see GGL's Statement on Matter 4, Policy EC5).
- 3.15 The basis for seeking this flexibility is the advice in Planning Practice Guidance (PPG) that developers may be asked to provide contributions for infrastructure in several ways, including via planning obligations or CIL (para 003 Reference ID: 23b-003-20190901). It goes on to state that authorities may choose to set different policy requirements for different sites or types of development in their plans, so reinforcing the need for a flexible approach (para 004 Reference ID: 23b-004-20190901).

- 3.16 PPG also states that ‘planning obligations will be appropriate for funding a project that is directly related to that specific development’ – this applies particularly to major developments where the critical mass provides an opportunity for a bespoke form of mitigation to help deliver the Council’s objectives. Taken collectively, this advice supports a more flexible approach to the provision of facilities/services to deliver employment and skills development associated with the economic growth opportunities arising from Gatwick Green.
- 3.17 The provision of some form of on-site training and skills development facility, tailored to the needs of the future occupiers at Gatwick Green, and Crawley’s workforce, is a long-standing intention of GGL (see GGL Reg 19 reps dated 2020, 2021 and 2023). This offers significant benefits in providing specific skills training in the increasingly professional and technical workforce profiles of new generation logistics operations. GGL’s representations, therefore, seek a minor change to the Annex and Policy EC5 to allow a flexible approach to enable an employment and skills development facility to be delivered on-site via a planning obligation under s106. The precise changes being sought to the text of the Annex and the SCBLP are contained in GGL’s Reg 19 reps<sup>4</sup>; these may also justify a change to Policy EC5.
- 3.18 The Council has addressed one aspect of the changes to the text sought by GGL; this being the need for the Council to work with developers in securing the delivery of infrastructure. This is contained in the suggested schedule of modifications in relation to para 8.9 of the Plan. GGL fully supports this change, which will greatly enhance the deliverability of the Plan and the infrastructure associated with its allocations.

## 4.0 Supplementary Questions

### SQ10.36

- 4.1 Whilst it is accepted that GGL might be called upon to make a proportionate contribution to mitigation at Junctions 10 and 11, defining the mechanism and procedure for administering and directing the work lies with the relevant local highway authority and National Highways.

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<sup>4</sup> REP 055 (2023) Gatwick Green Ltd, Planning Obligations Annex, paras 3.1 & 3.2 | REP 055 (2023) Gatwick Green Ltd, Policy EC5, para 3.2



**SQ10.37**

- 4.2 During the last five years, the transport and access strategy for Gatwick Green has been assembled with the aim of encouraging those employed on the site to travel by public transport and/or the active modes. The team has worked closely with Metrobus to identify existing services that could be enhanced to provide connections to a wide area of residential and commercial locations around north-west Sussex and the southern parts of Surrey. Services will also need to access nearby rail stations, including Three Bridges, Horley and Gatwick.
- 4.3 It is anticipated that Gatwick Green will assist in supporting new or extended bus services and that the on-site “bus hubs” will provide high quality, contemporary waiting facilities. Contributions towards off-site priority measures may also come forward, depending on the phasing of the development and the measures agreed as part of the Transport Assessment.
- 4.4 Services would benefit from bus only access through Buckingham Gate, subject to approval by Gatwick Airport. This measure would significantly improve the direct links between Forge Wood and buses/Fastway travelling from the south and east of Gatwick Green. The bus strategy is set out in detail in GGL’s reps on Strategic Policy EC4<sup>5</sup>. An email sent by the Commercial Director of Metrobus on the 31<sup>st</sup> of October 2023 supports the approach and is copied below:

*Thank you for sending the Access and Public Transport Strategy for Gatwick Green. I'm pleased to see that the strategy for Gatwick Green incorporates measures to support sustainable travel to the site, particularly the sustainable transport access points and superhubs. These Fastway-style interventions help us to provide a better service and encourage the uptake of bus use as we've employed so successfully elsewhere in Crawley.*

*I'm keen that we maintain dialogue as this project develops and will work closely with you on proposals to ensure that Gatwick Green is well served by sustainable transport.*

*Kind regards*

Nick Hill | Commercial Director  
[Brighton & Hove Buses](#) and [Metrobus](#)

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<sup>5</sup> REP 055 (2023) Gatwick Green Ltd, Strategic Policy EC4, Appendix 2 (Outline Transport and Access Appraisal)

# Matter 10

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## List of Appendices:

Appendix 1 - Land Ownership and Allocation Plan

Appendix 2 - Circ. 01/2022 – Gatwick Green Compliance

Appendix 3 - Gatwick Green access scenarios

Appendix 4 - Combined Development and Infrastructure Trajectory

Appendix 5 - Gatwick Green: Active Modes and Bus Connections



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WHERE THE FUTURE WORKS

# Appendix 1

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Site Plan  
Land Ownership and Allocation



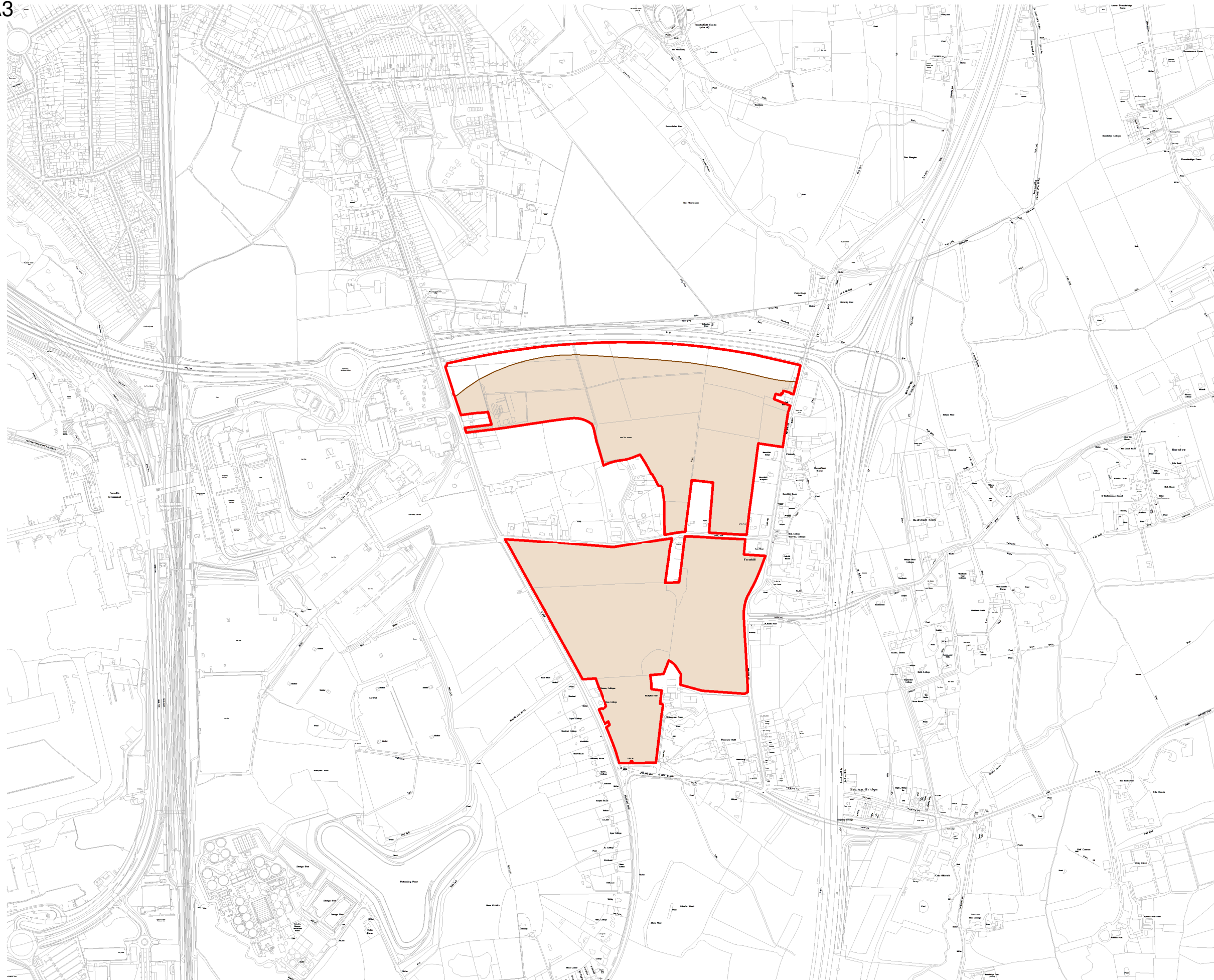
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WHERE THE FUTURE WORKS

Client  
Wilky Group

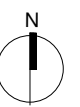
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Index	Revision	Date	Int	Chkd



**LEGEND**

- GATWICK GREEN LIMITED OWNED LAND
- PROPOSED STRATEGIC EMPLOYMENT LOCATION UNDER POLICIES EC1 AND EC4



APPROXIMATE NORTH

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Nero Brewery, Cricket Green, Hartley Wintney, Hants RG27 8QA  
tel: 01252 844144 www.lsharchitects.co.uk

Job No / Drg No	Rev	Scale	Status
11/091 / SK-165	-	As indicated	PRELIMINARY
Date	Director	Author	Check
16/06/2023	JA	AH	--

Job  
GATWICK GREEN

Drawing  
Reg 19 (2023) - Appendix 1 - Site Plan

NOTE: All figures are approximate and have been measured and expressed in a manner as defined by the current edition of the RICS Code of Measuring Practice, unless otherwise stated. Figures relate to the current stage of the project and any development decisions to be made on the basis of this information should include due allowance for the increases and decreases inherent in the design and building processes. Reproduced from Ordnance Survey mapping under Licence Numbers 10002432 & 100018493

This drawing may be scaled or cross referenced to the scale bar for Planning Application purposes only. Do not scale for any other purpose, use figured dimensions only. Subject to site survey and all necessary consents. All dimensions to be checked by user and any discrepancies, errors or omissions to be reported to the Architect before work commences. This drawing is to be read in conjunction with all other relevant materials.

# Appendix 2

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Circ. 01/2022 – Gatwick Green Compliance



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## Gatwick Green Compliance with Circular 01/2022

Reference (para. in Circular)	Plan-making requirements	Relevant Local Plan Text/Evidence
11	<p>The company will act in a manner which conforms to the principles of sustainable development. In this context, the company's licence agreement defines sustainable development as encouraging economic growth while protecting the environment and improving safety and quality of life for current and future generations</p>	<p>Gatwick Green (As defined in Policy EC4) brings forward the opportunity to deliver a strategic employment site in line with the 'three dimensions' definition in the NPPF, including economic, social, and environmental objectives.</p>
12	<p>New development should be facilitating a reduction in the need to travel by private car and focused on locations that are or can be made sustainable.</p> <p>Developments in the right places and served by the right sustainable infrastructure delivered alongside or ahead of occupancy must be a key consideration when planning for growth in all local authority areas</p>	<p>Policy EC4: 'Strategic Employment Location' includes requirement to demonstrate <i>'through a comprehensive Mobility Strategy how the development will include measures and improvements to maximise sustainable access to the site, focusing on how the development will optimise the usage of sustainable modes of transport as opposed to the private vehicle'</i>.</p> <p>As set out in Appendix 2 of the Gatwick Green Regulation 19 Consultation Representation (Policy EC4) on behalf of Gatwick Green Limited (June 2023) a comprehensive Mobility Strategy has been developed for the Site.</p> <p>The proposal will contribute towards a defined strategy to link existing and developing residential areas, employment opportunities and day-to-day facilities within Crawley town centre, Horley, Forge Wood, Manor Royal, Three Bridges and Gatwick Airport in line with the principle of the 'Sustainable Neighbourhood'. This will enable the development of 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) and the Government's ambition for a step change in the number of walking and cycling trips undertaken daily.</p>

Reference (para. in Circular)	Plan-making requirements	Relevant Local Plan Text/Evidence
		<p>In summary, the transport strategy includes:</p> <ul style="list-style-type: none"> <li>• Delivery of an access strategy and internal layout with a Sustainable Traffic Corridor (STC) which prioritises on-site public transport (Fastway) provision, with high quality walking and cycling routes in line with latest emerging guidance;</li> <li>• An access strategy which will deter HGV users from inappropriate roads, including those in Horley and Copthorne.</li> <li>• Contributions towards strengthening existing Fastway and bus routes and delivery of targeted Fastway/bus infrastructure, including bus priority and transit routes alongside enhancing existing pedestrian and cycle routes.</li> <li>• Plugging the ‘missing gaps’ and connecting to both the Crawley and Reigate and Banstead Borough Councils Local Cycling and Walking Infrastructure Plan.</li> <li>• A ‘Decide and Provide’ approach to highway capacity rather than the ‘Predict and Provide’ approach which has led to capacity improvement schemes designed to accommodate car based journeys at the expense of public transport, walking, and cycling The emerging masterplan and proposed access strategy do not prejudice the delivery of either the Gatwick DCO or the Second Runway surface access strategy.</li> </ul> <p>The Local Plan spatial strategy is supported by evidence provided in the Crawley Transport Study and the Compact Residential Development Study</p>

Reference (para. in Circular)	Plan-making requirements	Relevant Local Plan Text/Evidence
13	<p>As set out in the Transport Decarbonisation Plan, Gear Change, Bus Back Better and the second Cycling and Walking Investment Strategy, walking, wheeling, cycling and public transport must be the natural first choice for all who can take it. However, where developments are located, how they are designed and how well delivery and public transport services are integrated has a huge impact on people's mode of travel for short journeys. The company will therefore expect strategic policy-making authorities and community groups responsible for preparing local and neighbourhood plans to only promote development at locations that are or can be made sustainable and where opportunities to maximise walking, wheeling, cycling, public transport and shared travel have been identified.</p>	<p>As set out in response to Policy 12, the allocation proposal will bring forward a package of measures aimed at delivering non-car access as a priority, i.e. walking, wheeling, cycling and public transport as the natural first choice for all who can, whilst ensuring that the local highway network can accommodate predicted vehicular and HGV traffic. While some car-borne traffic is inevitable, measures will be put in place to ensure trips are completed as sustainably as possible.</p>
14	<p>This approach seeks to make the most efficient use of capacity within the overall transport network, improve health and wellbeing, and support government policies, strategies and guidance that aim to reduce the negative environmental impacts of development,.....</p>	<p>Given its sustainable location within Crawley's boundary and close to existing employment areas and neighbourhoods, there is an opportunity to link the Site into established bus and Fastway routes and the emerging Fastway development programme. Targeted improvements to pedestrian and cycle routes will also benefit both existing residents and future travellers to Gatwick Green.</p> <p>As set out in Section 3.0 of Appendix 2 of the Gatwick Green Regulation 19 Consultation Representation (Policy EC1) on behalf of Gatwick Green Limited (June 2023), the strategy is wholly compliant with local regional and national policy.</p>



Reference (para. in Circular)	Plan-making requirements	Relevant Local Plan Text/Evidence
	<p>The Transport Decarbonisation Plan and the Future of Freight Plan also recognise that local planning and highway authorities need help when planning for sustainable transport and developing innovative policies to reduce car dependency. This includes moving away from transport planning based on predicting future demand to provide capacity ('predict and provide') to planning that sets an outcome communities want to achieve and provides the transport solutions to deliver those outcomes (vision-led approaches including 'vision and validate,' 'decide and provide' or 'monitor and manage'). The company will support local authorities in achieving this aim through its engagement with their plan-making and decision- taking stages, while recognising the varying challenges that will be presented by certain sites based on their land use, scale and/or location</p>	<p>A vision for Gatwick Green has been development, as set out below:</p> <p><i>GGL shares CBC's transport vision and strategy. The strategy seeks to ensure that walking and cycling routes are safe, direct, attractive and popular and that bus/Fastway services are smart, create zero emissions and have traffic signal priority and Wi-Fi, use new bus shelters with live information and serve the Borough's neighbourhoods. As potential employers, GGL is keen to support Crawley residents in becoming more active, more productive and healthy, where their first choice for travel to work at the site is walking, cycling or taking Fastway services. It is recognised that businesses reap the benefit of more contented staff who have less stressful journeys to work, with more choice, less congestion and avoiding costly car parking.</i></p> <p><i>At the core of Gatwick Green Vision is the creation of a "Sustainable Transport Corridor" (STC), integrated into the design and layout of the development, to offer safe and segregated travel for pedestrians, cyclists, and bus passengers. The STC will connect neighbourhoods to employment opportunities and provide onward travel to a range of facilities.</i></p> <p>The approach to development at Gatwick Green is wholly in keeping with the 'Decide and Provide' approach advocated within the Crawley Local Plan, Crawley Transport Strategy and Infrastructure Plan whereby any highway capacity shortcomings can be addressed through consideration of sustainable travel mitigation connected with the Crawley Transport Strategy. This approach, which (as far as possible) reduces the need for highway capacity mitigation is in line with the borough's aspiration for a mitigation strategy that will encourage sustainable travel rather than promote highway capacity mitigation that will encourage car use and undermine the uptake of sustainable modes of travel.</p>

Reference (para. in Circular)	Plan-making requirements	Relevant Local Plan Text/Evidence
16	<p>In the context of achieving sustainable development, the creation of high-quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. The NPPF is clear that design quality should be considered throughout the evolution and assessment of development proposals. Plan-making and decision-taking should ensure that developments optimise the potential of sites to support local facilities and sustainable transport networks.</p>	<p>Gatwick Green will bring forward high quality development, through an agreed masterplan, which will be designed to fit in with the neighbouring environment in line with the NPPF.</p> <p>Through the Sustainable Transport Corridor, the development will ensure permeability and the urban structure will result in a coherent network of paths and corridors that take advantage of direct routes through the site and connect the development to where people want to go once outside of the Site, where they will connect to the network of pedestrian, cycle and public transport linkages.</p>
17	<p>Successful development depends upon a movement network that makes connections to destinations, places and communities, both within the site and beyond its boundaries. The company will support development promoters and local authorities in applying the principles of Manual for Streets, the National Design Guide on Movement, inclusive mobility and local transport note 1/20 to ensure priority is given to pedestrian and cycle movements, and that well-considered parking, servicing and utilities infrastructure for all users is incorporated into development proposals.</p>	<p>In addition to aspects highlighted in response to paragraphs 12 and paragraphs 16 above, the site will bring forward:</p> <ul style="list-style-type: none"> <li>• An access strategy and internal layout with a Sustainable Transport Corridor (STC) which prioritises on-site public transport (Fastway) provision, with high quality walking and cycling routes in line with latest emerging guidance;</li> <li>• Contributions towards the Borough Councils Local Cycling and Walking Infrastructure Plan, thus plugging the 'missing gaps' to both the Crawley and Reigate and Banstead.</li> <li>• The principles of current best practise, i.e. Manual for Streets, the National Design Guide on Movement, inclusive mobility, local transport note 1/20 and Active Travel England, will be considered at all stages of design.</li> </ul>

Reference (para. in Circular)	Plan-making requirements	Relevant Local Plan Text/Evidence
23	Capacity enhancements such as modifications to existing junctions or road widening to facilitate development should be determined on a case-by-case basis. The general principle should be accepted where proposals would include measures to improve community connectivity and public transport accessibility, and this will be weighed against any negative safety, traffic flow, environmental and deliverability considerations, impacts on the permeability and attractiveness of local walking, wheeling and cycling routes, and alternative options to manage down the traffic impact of planned development or improve the local road network as a first preference.	The Crawley Transport Strategy and Crawley Transport Study have identified a range of interventions to deal with the residual impact arising from the Local Plan, both in terms of impacts on the local network and the SRN. At the time of any Planning Application, an agreed package of measure will be secured through a Section 106 agreement aimed at providing improvements which not only address development impacts, but also improve connectivity for all users and promote mode shift towards, walking, cycling and public transport, as identified in previous responses.
24	Where new connections and capacity enhancements to the SRN would be accepted, the relevant authorities and development promoters should fully consider this outlay with respect to the viability of development	As agreed with CBC, Gatwick Green is not dependent on the delivery of any significant capacity improvements to address impacts between the site and the SRN. Contributions towards the identified impacts of Gatwick Green, both independently and cumulatively, in line with the CBC modelling have been considered and are factored into the viability assessment of the site.
26	The NPPF prescribes that transport issues should be considered from the earliest stages of plan-making and in development proposals so that sustainable transport can be promoted. In relation to the preparation of local plans and spatial development strategies, the government expects that the relevant authorities will engage with the company from the outset of this process, to understand the interaction between land use designations and the impacts on road safety and future performance of the SRN. The involvement	The Gatwick Green promoters have actively engaged with Crawley Borough Council, West Sussex County Council, Surrey County Council and National Highways as part of ongoing discussions in respect to the drafting of the Local Plan and the development of the supporting evidence base, including the Crawley Transport Study.

Reference (para. in Circular)	Plan-making requirements	Relevant Local Plan Text/Evidence
	<p>of the company will ensure that the strategic transport evidence base will provide a robust assessment of any positive and negative impacts on the SRN and inform a transport strategy and the Strategic Environmental Assessment (SEA) for the study area that aligns with the safe operation and long-term integrity of the SRN.</p>	
28	<p>The policies and allocations that result from plan-making must not compromise the SRN's prime function to enable the long-distance movement of people and goods. When the company assists local authorities in the development of their plans and strategies, the local authority should ensure that the SRN is not being relied upon for the transport accessibility of site allocations except where this relates to roadside facilities or SRN-dependent sectors (such as logistics and manufacturing). The company will also work with local authorities to explore opportunities to promote walking, wheeling, cycling, public transport and shared travel in plan-making, in line with the expectations set out in the NPPF and the Transport Decarbonisation Plan.</p>	<p>The Strategic Employment site (EC4) will deliver industrial land, which will mainly consist of B8 storage and distribution floorspace., which falls within the terms of 'SRN-dependent sectors'. As set out above, the Site will bring forward a comprehensive mobility strategy aimed at maximising the potential for sustainable travel to and from the site commensurate with the uses proposed. Traffic modelling in support of the Local Plan has identified how the scheme can be mitigated without there being a severe residual impact on the SRN. The masterplan will be developed to promote walking, wheeling, cycling, public transport and shared travel internally and connect to the wider existing and proposed network, in line with local, regional and national policy.</p>

Reference (para. in Circular)	Plan-making requirements	Relevant Local Plan Text/Evidence
29	<p>New connections and capacity enhancements to the SRN which are necessary to deliver strategic growth should be identified as part of the plan-making process, as this provides the best opportunity to consider the cumulative impacts of development (including planned growth in adjoining authorities) and to identify appropriate mechanisms for the delivery of strategic highway infrastructure.</p> <p>However, there cannot be any presumption that such infrastructure will be funded through a future RIS. The company will therefore work with local authorities in their strategic policy-making functions in identifying realistic alternative funding mechanisms, to include other public funding programmes and developer contribution strategies to be secured by a policy in a local plan or spatial development strategy.</p>	<p>The Crawley Transport Study identifies mitigations in the form of junction at M23 junctions 10 and 11. The study gives indicative costings for these, and they are further identified in the Local Plan Infrastructure Plan.</p> <p>Notwithstanding this, Gatwick Green is not required to make contributions to these schemes, which are either already committed or are required to make other schemes acceptable.</p> <p>Gatwick Green will be able to make a substantial contribution to the funding of the necessary mitigation identified in the Infrastructure Plan, in the form of developer contributions.</p>
30	<p>The NPPF is clear that planning policies should recognise the specific locational requirements of different economic sectors, including for storage and distribution operations at a variety of scales and in suitably accessible locations. To operate efficiently, the freight and logistics sector requires land for distribution and consolidation centres at multiple stages within supply chains including the need for welfare facilities for the drivers of commercial vehicles. For instance, some hubs serve regions and tend to be located out-of-town near the SRN, while others are 'last-mile' facilities that will support more sustainable freight alternatives in urban areas. The Future of Freight Plan sets out that a joined-up approach between the planning system, local authorities and industry</p>	<p>The strategy in respect of the identification and accommodation of employment needs is based on the Economic Growth Assessment and Employment Land Availability Assessment and is further justified in the Employment Needs and Land Supply Topic Paper.</p> <p>Gatwick Green is well located to provide storage and distribution operations at a variety of scales and in suitably accessible location, which can serve both a strategic purpose with good access to the SRN as well as the opportunity for last-mile facilities serving the local urban area, including Gatwick.</p>

Reference (para. in Circular)	Plan-making requirements	Relevant Local Plan Text/Evidence
	<p>can safeguard and prioritise the land needed for these uses, such that all parties should work together to identify the specific requirements in their area.</p>	
31	<p>The NPPF expects local plans and spatial development strategies to be underpinned by a clear and transparent evidence base which informs the authority's preferred approach to land use and strategic transport options, and the formulation of policies and allocations that will be subject to public consultation. The company will expect this process to explore all options to reduce a reliance on the SRN for local journeys including a reduction in the need to travel and integrating land use considerations with the need to maximise opportunities for walking, wheeling, cycling, public transport and shared travel.</p>	<p>The local Plan is underpinned by a suite of documents which sets out the spatial strategy for development, as well as how the need to travel will be minimised and how low carbon, non-private car trips will be promoted, through the designation of the right development in the right place and a decide and provide approach to mitigating traffic impacts. Development at Gatwick Green complies with, and complements, that approach.</p>

Reference (para. in Circular)	Plan-making requirements	Relevant Local Plan Text/Evidence
32	<p>The Transport Decarbonisation Plan indicates that carbon emissions from car and van use is the largest component of the United Kingdom’s total transport emissions. While action is being taken to decarbonise transport such that all new cars and vans will be fully zero emission at the tailpipe from 2035, the proposed location of growth in current plan periods and whether new developments would be genuinely sustainable remain important factors in demonstrating that a local authority area is on a pathway to net zero by 2050 and therefore compliant with the requirements of the Climate Change Act 2008.</p>	<p>As set out in responses on paras. 12, 15, 16, 23 and 28 above, Gatwick Green will promote alternative, low carbon modes of travel. The Logistics and Supply industry is already making great strides in reducing the carbon footprint of operations and future operators will be encouraged to demonstrate plans to reduce vehicle emissions associated with the operation of the site.</p>
33	<p>Alongside this, the local authority should identify the key issues within their study area regarding transport provision and accessibility, setting out how the plan or strategy can address these key issues in consultation with the company. It is the responsibility of the local authority undertaking its strategic policy-making function to present a robust transport evidence base in support of its plan or strategy. The company can review measures that would help to avoid or significantly reduce the need for additional infrastructure on the SRN where development can be delivered through identified improvements to the local transport network, to include infrastructure that promotes walking, wheeling, cycling, public transport and shared travel. A robust evidence base will be required, including demand forecasting models, which inform analysis of alternatives by accounting for the effects of possible mitigation scenarios that shift demand into less carbon-intensive forms of travel.</p>	<p>As set out in responses on paras. 12, 15, 16, 23 and 28 above the Local Plan evidence base identifies measures that would help to avoid or significantly reduce the need for additional infrastructure on the SRN. The CBC modelling has identified where development can be delivered through improvements to the local transport network, including walking, wheeling, cycling, public transport and shared travel, all of which are promoted by Gatwick Green.</p>

Reference (para. in Circular)	Plan-making requirements	Relevant Local Plan Text/Evidence
34	The company's engagement with plan-making will help inform the preparation of the local authority infrastructure delivery evidence base. From a transport perspective, this evidence should provide a means of demonstrating to the examining inspector, development industry and local communities that planned growth is deliverable, and that the funding, partners and relevant processes are in place to enable the delivery of infrastructure; or that there is a realistic prospect that longer term investment can be secured within the timescales envisaged.	The Local Plan evidence base has shown that that planned growth is deliverable, and that the funding, partners and relevant processes are in place to enable the delivery of infrastructure.
35	Local plans and spatial development strategies should seek to better integrate the SRN with the wider road network and other transport modes to enhance connectivity, maximise opportunities to facilitate economic growth and support transport decarbonisation across the country.	The Local Plan evidence base has shown this. Strategic employment at Gatwick Green is an integral part of the coordinated strategy to development the Crawley area while maximising opportunities to facilitate economic growth and support transport decarbonisation across the country.
36	In line with the aims of promoting sustainable development and the commitment in the Transport Decarbonisation Plan to deliver a world class cycling and walking network in England by 2040, planned improvements to the SRN must include the consideration or development of safe and integrated networks for pedestrians, wheelers, cyclists and horse-riders.	Planned improvements to the SRN are not directly related to Gatwick Green, however as set out above, Gatwick Green will contribute towards the delivery of walking and cycling interventions locally, which will advocate mode shift and reduce demand on the whole network.



Reference (para. in Circular)	Plan-making requirements	Relevant Local Plan Text/Evidence
42	<p>Local planning authorities and development promoters are encouraged to identify any potential impacts on the SRN that may result from development proposals and discuss them with the company at the earliest opportunity. In the first instance, new developments should give priority to walking, wheeling and cycle movements and facilitate access to high-quality public transport where possible. The needs of people with disabilities and reduced mobility should be appropriately addressed in relation to all modes of transport. This can be achieved through good design and proper consideration of the needs of our communities in accordance with local design codes and Manual for Streets.</p>	<p>As set out above in response to Policies 12, 16, 17, 23, 26 and 29 the mobility strategy aims to prioritise walking, wheeling and cycle movements and facilitate access to high-quality public transport where possible. The applicant has submitted evidence in respect to the impacts arising from the development on the SRN and has been working with CBC to ensure that the Local Plan evidence modelling is suitably robust and considers the impacts of Gatwick Green on the SRN.</p>
43	<p>The company expects development promoters to enable a reduction in the need to travel by private car and prioritise sustainable transport opportunities ahead of capacity enhancements and new connections on the SRN. For residential-led developments, due consideration should be given to home and street layouts, broadband infrastructure, safe and secure cycle parking, and access to local amenities and open space in support of these aims, while mobility or micromobility hubs should be provided in larger schemes. In addition, high-powered and open- access EV chargepoints should be installed where developments include on-street or communal parking to support the government’s objective to end the sale of new conventional petrol and diesel cars/vans by 2030 and HGVs by 2040, and its commitment to decarbonise transport by 2050.</p>	<p>In addition to responses on paras. 12, 15, 16, 17 it is of note that:</p> <p>The Sustainable Transport Corridor will include mobility hubs, aimed at encouraging modal interchange within the site, and reduce the need to travel by car.</p> <ul style="list-style-type: none"> <li>• Parking will be provided in line the Authorities standards (Policy ST2 ‘Car and Cycle Parking Standards), but will be reduced as far is reasonably possible, with walking cycling and public transport promoted ahead of the private car;</li> <li>• The use of car clubs and car sharing will be promoted through the Travel Plan</li> <li>• Electric vehicle charging points for cars and cycles will be provided for staff and visitors and where possible for commercial vehicles associated with the on-site operations</li> </ul>

Reference (para. in Circular)	Plan-making requirements	Relevant Local Plan Text/Evidence
44	<p>Travel plans are an effective means of incentivising the use of sustainable modes of transport. Where these are required, development promoters must put forward clear targets and commitments to manage down the traffic impact of development and maximise the accessibility of and within sites by walking, wheeling, cycling, public transport and shared travel. Targets for achieving a modal shift to sustainable transport will need to be subject to sustained monitoring and management by an appointed travel plan coordinator. Advice on preparing and monitoring travel plans is contained in the planning practice guidance.</p>	<p>To assist with the delivery of the Mobility Strategy a Travel Plan will be developed which will include measures and improvements to maximise sustainable access to the site, focusing on how the development will optimise the usage of sustainable modes of transport as opposed to the private vehicle, and detailing infrastructure improvements that will be required to adequately mitigate the development impacts on the highways network, detailing how these improvements will be delivered and operated.</p>
46	<p>With specific regard to HGV parking, government policy is clear in the Future of Freight Plan, 'Planning reforms for lorry parking' Written Ministerial Statement (8 November 2021) and the NPPF that development proposals for new or expanded goods distribution centres should make sufficient provision for HGV drivers, which should include overnight parking and an adequate level of welfare facilities. The need to increase provision for HGV drivers at roadside facilities is set out in paragraphs 79-82 of this circular.</p>	<p>Policy EC4: 'Strategic Employment Location' makes provision (where justified) for the inclusion of 'small-scale convenience retail and small-scale leisure facilities that would support the principal industrial-led storage and distribution function.' It further requires the provision of 'high quality public realm', which along with the mobility hubs can be designed to accommodate the needs of HGV drivers.</p>

# Appendix 3

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Gatwick Green access scenarios



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WHERE THE FUTURE WORKS

# Plan 3A – HGV Access route to Gatwick Green

## Legend

- Gatwick Green
- Motorway
- Main Road
- Minor Road
- HGV Route
- Sustainable Transport Corridor
- Railway
- Railway Station
- Mobility Hub [Indicative]
- Site Entrance [Indicative]



# Plan 3B – Potential future access route to Gatwick Green and GAL car parks [Southern Runway]



## Legend

- GAL Southern Runway Surface
- Access Strategy
- Safeguarded Area / GAL Future Parking Area
- Access to GAL Safeguarded Land
- Gatwick Green Proposed Access
- Balcombe Road Diversion [Proposed by GAL]
- Gatwick Green Access Route
- - - Sustainable Transport Corridor
- - - HGV Route
- ⬡ Mobility Hub

# Appendix 4

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## Combined Development and Infrastructure Trajectory



**GatwickGreen**

WHERE THE FUTURE WORKS



# Appendix 5

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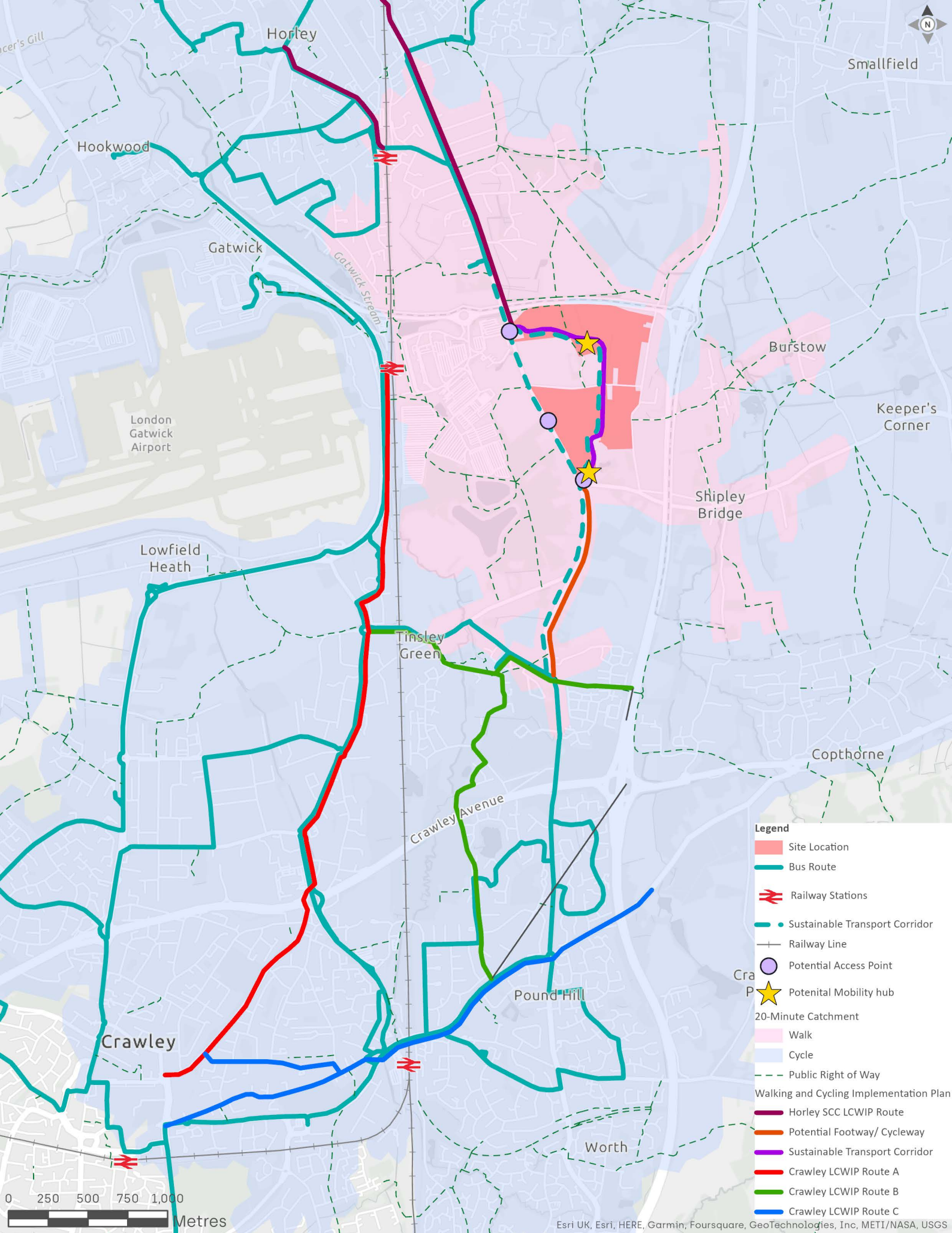
## Gatwick Green: Active Modes and Bus Connections



**GatwickGreen**

WHERE THE FUTURE WORKS





# Gatwick Green

Appendix 5 - Gatwick Green Overarching Sustainable Access Strategy: Active Modes and Public Transport Connections



Scale: 1:28,500  
 Date: 12/12/2023  
 Creator: CRead