

Crawley Borough Council 2024-2040 Local Plan Examination MIQs Matter 2 - Issue 1: 2.4

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Where great relationships yield the best property outcomes

Matter 2: Spatial Strategy

Issue 1: Whether the Spatial Strategy is sound

- 2.4: **Gatwick Airport and operational activities in support of the airport is clearly a key part of any spatial strategy for the Borough. In general terms, safeguarded land for the airport (under Policy GAT2) applies to the remaining tracts of undeveloped land within the Borough. If the extent of safeguarded land was not necessary or was not found to be sound as part of this examination, would that necessarily result in a different spatial strategy, especially in terms of options to meeting housing needs? Would it be premature to conclude on that now or are there known principles (such as noise levels) which mean safeguarding has limited bearing on a spatial strategy to meet housing needs in the Borough?**
1. We believe that the extent of safeguarding demonstrated on the Crawley Local Plan Map CBLP/M/01 and protected under GAT2 is not justified and unnecessarily constrains land supply for the Borough. If safeguarding was not required in principle or to the extent as shown on the Proposals Map then a different spatial strategy would be required for the Local Plan for employment purposes.
 2. On behalf of our clients Ardmore Ltd /Windsor Developments, we have stated in our previous representations to the Local Plan Review that the Gatwick Airport Masterplan 2019 (EGSM/GA/06) is not and should not be an absolute constraint. Crawley Borough Council themselves accept that this is the case, and their Area Action Plan for Regulation 18 demonstrated that a different strategy for the Borough would be forthcoming if safeguarding was amended or lifted.
 3. There is also inconsistency in regard to GAT2 and safeguarding within the submission policy position, which maintains safeguarding in principle and to new larger geographical extent, yet also suggests that the extent of safeguarding can be altered where necessary, notably for Crawley Western Multi Modal Transport Link ST4 (under evidence base ES/ST/02a-m) and also Gatwick Green (Policy EC4).
 4. If an alternative spatial strategy builds on that identified in EC1, and EC3 then new Employment development should build on the existing Manor Royal, as the Town's Main Employment Area.
 5. Our site at Jersey Farm, as a whole (defined by our Masterplan 0390-RDJWL-ZZ-XX-DR-A-0058 P3 as Appendix 1 (attached at Matter 1) to MIQ Response 4.1), is suitable, available and deliverable, both with and without a CWMMTL Road, should safeguarding be reduced or removed.
 6. Our client has continued to lobby against safeguarding as part of the Aviation 2050 EGSM/GA/03 and the GAL masterplan EGSM/GA/06. They also continue to challenge the approach to blanket safeguarding as part of the recent government consultations and also as part of the current Development Consent Order (DCO) process to the Northern Runway.
 7. GAL is actively promoting the use of the Northern Runway through the DCO process. Our DCO representation can be made available should that assist the Inspectors.

8. We note that in Topic Paper 2: Gatwick Airport (DS/TP/02) CBC confirms that in 2015, the previous Local Plan Inspector concluded that *“it is difficult to identify on a contingent basis the precise area of land required for such a complex major project and it is not unreasonable to include some flexibility even if not all the land is ultimately used”* (para. 2.1.2). However, 8 years later the position still remains ambiguous and this is the third iteration of local development framework (following the 2008 Core strategy and 2015 Local Plan) where the matter has remained undefined, effectively sterilising suitable sustainable development.
9. We consider a different spatial strategy is required to make the Plan sound, with removed or reduced safeguarding, enabling a coherent allocation of employment land to sustainably meet the needs of the borough. GAL and Topic Paper 2 confirm that GAL are not actively seeking a southern runway and the lack of any realistic prospect of a southern expansion, after so many years of in action, and now the promotion of the DCO means that a different spatial strategy is required.
10. Para 2.3.4 of Topic Paper 2 confirms that the Council acknowledge the constraint: *“The requirement to safeguard land for a possible southern runway has historically impacted on Crawley’s ability to accommodate its employment needs within the borough, constraining economic growth. Given the outstanding need for industrial land, the Local Plan process has needed to consider carefully the justification and extent of safeguarding.”*
11. Para 3.4.6 of the Topic Paper 2 confirms that CBC were advised by a PINS Inspector that the previous AAP was not appropriate. It was suggested that a trigger for changes to national aviation policy could allow for the removal of the safeguarding of all the land for Gatwick Airport expansion, through a review of the Local Plan, rather than as piecemeal development. However, CBC continues to seek to *“kick the can down the road”* even though the Aviation Strategy supports extra runway capacity at Heathrow, and the DCO seeks additional capacity at Gatwick (on the Northern runway).
12. Alterations to safeguarding would enable a different, sound, spatial strategy that pays greater regard to a more sustainable strategic employment location, and is both operationally and geographically complementary to Manor Royal, as well as the proposed Crawley Western Multi Modal Transport Link (CWMMTL) alignment, and any future housing-led development at West of Crawley.
13. In regard to land supply and the Local Plan spatial strategy, it is evident that the safeguarding is constraining economic growth and the EGA and ELT reflect this position. Indeed all of the Jersey Farm Masterplan illustrated in Appendix 1 (attached at Matter 1) except Site B, is effected by current safeguarding.
14. The unconstrained supply is stated in the EGA as 69 hectares (the higher growth scenario) and therefore this would require a significant allocation of additional employment floor space above the spatial strategy currently proposed.
15. Given that this Local Plan review is the third planning framework for the Borough that retains safeguarding, and the GAL DCO, it is not premature to conclude on safeguarding and it is necessary and timely that safeguarding is reviewed, reduced and removed.