

**Crawley Borough Council 2024-2040 Local Plan
Examination MIQs Matter 4 –
Issue 1: 4.1, 4.2, 4.3, 4.4, 4.6, 4.10, 4.11
Issue 3: 4.26, 4.31**

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Matter 4: Economic Growth

Issue 1: Whether the employment land requirement (Policy EC1) will support sustainable economic growth

- 4.1. **Is the employment land requirement identified in the Plan soundly based? Is it consistent with national policy at NPPF paragraphs 81-83 in terms of positively and proactively encouraging sustainable economic growth in the Borough? Does the proposed approach to employment land in the Plan provide the appropriate conditions for businesses to invest, expand and adapt?**

Is the employment land requirement soundly based? Is it consistent with para 81-83 positively and proactively encouraging sustainable growth?

1. We agree with the Northern West Sussex Economic Growth Assessment (EGA) Update January 2023 (EGSM/EG/O5) and Topic Paper 5 (DS/TP/O5) para 4.13 which confirms that Crawley remains the dominant commercial centre in Northern West Sussex Economic Area, driving demand for employment space, attracting the most activity and commanding the highest rents, but we do not consider that the Local Plan is consistent with national policy in terms of positively and proactively encouraging sustainable growth.
2. It is relevant to consider market context and we would refer the Inspectors to the Vail Williams' letter "Response on Behalf of Jersey Farm for Crawley Borough Council Local Plan Review 2024 - 2040 Regulation 19 Local Representations" dated 20th June 2023, and in particular the section titled "Vail Williams Market Context on EC1 to EC4", pages 19 to 23 inclusive. See Appendix 2 attached to Matter 1.
3. The market context set out in this letter remains substantially unchanged, although the 'heat' has come out of the logistics development market due to an increase in build costs, interest rates and a shift in investment yields in the last year to 18 months. Occupier demand remains good and some of the speculative developments listed on page 21 of the letter have since let, so the main implication of these recent market changes is a reduction in land values.
4. Topic Paper 5 para 4.14 summarises the EGA and says that the pent-up demand originally identified in the 2015 Local Plan still exists, albeit recent logistics developments has absorbed some demand. The EGA acknowledges market concerns of new stock shortages in particular sizes, and we as local agents remain concerned about the limited nature of the supply of new sub 10,000 sq ft (930 sq m) stock, and units for Eg(iii) and B2 uses, which are needed to support the sub-region's next phase of growth. We also agree with point 4.5 of the Topic paper 5 that identified a particular gap in supply of smaller industrial starter units and 'move on' space in 2018. We still consider this to be the case and whilst there is some second-hand older space, there is very little new development targeting these size ranges as developers chase more profitable big logistics occupiers. This means that today there remains an acute shortage of smaller new units targeting both industrial and warehouse occupiers within CBC.
5. It is also relevant to note that where developers have been unable to obtain sites on Manor Royal, land has instead been acquired as near as possible to the Manor Royal business estate, but within adjoining Planning Authorities, typically within Mid Sussex District at Copthorne (J10 M23) and Pease Pottage (J11 M23), and Reigate and Redhill District at Salfords (A23). This was noted also in para 4.14 of the Topic Paper.

6. The EGA 2020 had regard to past development rates but we would suggest that this has already been constrained given previous land supply issues recognised in the Core Strategy and 2015 Local Plan. The more recent update to the EGA further looks at impacts of COVID and market “bounce-back conditions”, and there is therefore an increase in past development rates, resulting in land requirements of a minimum of 26.2ha, with an identified deficit of 13ha. CBC propose that Gatwick Green can address that deficit and provide a buffer but the general maintenance of safeguarding elsewhere and the unbalanced approach regarding safeguarding being lifted at Gatwick Green is inconsistent with Para 81-83 of the NPPF.
7. Further, Policy EC1 is inconsistent with NPPF paragraphs 81-83 as it does not adequately provide for sites that are sustainably located, contiguous with Manor Royal, that could be developed for smaller unit ranges, and Eg(iii) uses, and as a result does not positively and proactively encourage sustainable economic growth in the Borough. We provide further context on this below.
8. The Plan has regard to the Crawley Employment Land Trajectory (Base Date 31st March 2023 (EGSM/EG/02)). The Jersey Farm site is considered both as a whole and as individual ownership parcels and is categorised by CBC as not Suitable, and uncertain under Achievable. We consider it relevant to update the Inspectors on ownership and the extent of the red line within the current Jersey Farm Masterplan. We append this Masterplan ref 0390-RDJWL-ZZ-XX-DR-A-0058 Rev3 in ppendix 1, and we provide further comments below to avoid any ambiguity on Ardmores Limited’s ability to deliver the development within the red line.
9. The site has been promoted by Ardmores and, during the September 2019 call for sites, Ardmores’s subsidiary company Windsor Developments Limited. More recently, the total site size has reduced slightly from 19ha to 17.2ha as Option terms have not been progressed with two landowners, namely, site Ref 5(i) (The Grove/Maxwell) and site Ref 5(ii) (Rixon and Crook). Plot/Unit A comprising 0.6ha, has planning consent under CR/2019/0696/FUL and has been bought by an owner occupier (Philip Dennis Food Services). A breakdown of ownership/control within the Masterplan Rev3 is below:

| | | |
|------------------|-------|---|
| Title WSX73064 | 11 Ha | Freehold Ardmores Ltd |
| Title WSX 246004 | 4 Ha | Freehold Ardmores Ltd |
| Title WSX 92331 | 2 Ha | Freehold Ohm/Hill with an Option agreed with Ardmores Ltd |
10. Given the higher growth scenarios demonstrated in the Lichfields EGA, there is a need for a more flexible and resilient approach to sustainable economic growth. This would require a more varied land supply over the minimum of 23 hectares, to improve the qualitative and quantitative offer of the Borough. In addition, extensions to Manor Royal (including Jersey Farm) can allow a mix of small to mid-range sized units responding to market demand and lack of current supply.
11. As experienced local agents, we know that the market requires more flexibility in quantitative and qualitative terms, and if safeguarding is an absolute constraint, and applied consistently, both in principle and in its current extent, then the Gatwick Green SEL under policy EC4 cannot be accommodated.

Does the proposed approach to employment land in the Plan provide the appropriate conditions for businesses to invest, expand and adapt?

12. In our opinion, the Plan does not provide the appropriate conditions for businesses to invest, expand and adapt, as there is a commercial incentive for the larger distribution/industrial sites such as Gatwick Green to be developed for ‘big box’ and ‘mid-box’ logistics use (i.e. Amazon etc), as this use generates the best return on investment. If Gatwick Green is built out predominately for logistics use as expected, the development would serve the wider region beyond CBC as there is limited logistic development along the southern M25 to serve the London Boroughs. This market push for big logistics development can be demonstrated by the amount of

accommodation speculatively built by developers, as set out on page 21 of the Vail Williams letter dated 30th June 2023, which mainly comprise 'mid box' B8 units.

13. The type of accommodation which needs to be provided for businesses to invest, expand and adapt, needs to be on sustainable sites that are also suitable for a range of smaller units, and those that can accommodate Eg(iii) or B2 planning uses. These are less financially attractive to develop speculatively as Eg(iii) units and B2 uses require a higher land take to satisfy LPA parking ratios, yet do not attract more rent than B8 use. Also, smaller units cost more to build and tend to attract poorer covenant which in turn impacts on the capital value of the investment. The provision of Eg(iii) and B2 uses along with a range of smaller B8 units is important to allow local businesses, as opposed to the national logistic companies, to expand or move to efficient accommodation. NPPF 81 says significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development.
14. Jersey Farm, located adjacent to Manor Royal, has potential to accommodate such smaller B8 use local companies, and Eg(iii) and B2 occupiers, as demonstrated by the Jersey Farm Masterplan ref 0390-RDJWL-ZZ-XX-DR-A-0058 Rev3

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Issue 1: Whether the employment land requirement (Policy EC1) will support sustainable economic growth

- 4.2 **Including by reference to PPG paragraphs 2a-026-20190220 and 2a-027-20190220 does the analysis and assessment of employment land required over the plan period take sufficient account of local economic strategies, market demand, the current condition and employment land stock (including losses of employment space to other uses) and local market signals?**
1. We acknowledge the Local Plan review process has regard to and assesses the impacts of various high-level CBC led, LEP led and Gatwick and wider Northern West Sussex evidence bases.
 2. However, as agents active in the local market, we see inherent market demand for more available smaller B8 units, Eg(iii) space, and freehold tenure, which is currently deficient and in demand.
 3. We also see a demand for new energy efficient buildings and a ‘flight to quality’ by occupiers. There are also additional legislative challenges for older buildings to complying with enhanced EPC grades, which will force refurbishment or replacement (“churn”) of old stock.
 4. There has been limited loss of employment space to other uses because of high demand for B8 developments, which we predict will continue. This has also been helped in part by the CBC Article 4 Direction 4 removing permitted development rights to convert to residential uses. However, some office buildings have been lost and replaced by new B8 logistic development, and some sites have been acquired by car showroom or for drive- thru use.
 5. We do not consider that the Plan currently has full regard to market conditions, due mainly to the absolute constraint of safeguarding, which is limiting the available land supply and ability for the LPA to positively allocate sustainable sites adjacent to Manor Royal.
 6. We conclude that Policy EC1 and EC4, allocating Gatwick Green for most of the new employment provision, carries a significant risk that this will only increase the provision of stock of mid-box and big-box logistics, with limited future provision of new allocations for smaller B8 units and Industrial units. In addition, if there were any issues with deliverability, CBC would have limited alternative employment provision.
 7. We therefore believe CBC’s approach is contrary to local economic strategies which aim to support Crawley as a prime industrial location in North West Sussex, capable of responding to market demand, the current condition and employment land stock and local market signals.

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- 4.3 **Is the submitted Plan consistent with the economic priorities for the Local Enterprise Partnership(s) and Gatwick Diamond and will it appropriately support Crawley as the prime industrial location in Northern West Sussex?**
1. Vail Williams are familiar with both the Gatwick 360o Strategic Economic Plan (DS/LEP/01) and the Gatwick Diamond Local Strategic Statement (DS/GD/01). These are high level vision documents with limited detail provided on their Local Industrial Strategy for Crawley, as a prime industrial location in Northern West Sussex.
 2. The Vail Williams agency team have attended various LEP, Gatwick Diamond and Manor Royal specific networking events, so have opportunities to understand local business needs. This is enhanced through our activity as letting/selling agents on local employment accommodation.
 3. We consider the 'prime industrial location' to be Manor Royal and its immediate fringes. For the reasons stated in our other responses on Matter 4, the Plan does not allow Manor Royal to grow due to safeguarding. Both the LEP and Gatwick Diamond have a high-level vision for sustainable development. We consider that growth would be best located on sites that are contiguous with the principal business area, Manor Royal, close to facilities etc.
 4. However, the lack of a variety of sites identified in the Plan for future allocation is a concern, as it is likely to result in inadequate provision for smaller B8 users and industrial occupiers. As such the effect of Plan is likely to be contrary to the LEP and Gatwick Diamonds economic priorities.

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- 4.4 **Does the plan provide sufficient flexibility to accommodate needs not anticipated in the Plan and to enable a rapid response to changes in economic circumstances in accordance with NPPF paragraph 82(d)?**
1. In our opinion the Plan does not adequately address para 82(d) of the NPPF for the following reasons.
 2. Gatwick Green is the only site outside the main employment areas considered by CBC to be Suitable, Available and Achievable in the Employment Land Trajectory document, and if approved it is likely to be developed for predominantly large-scale mid-box and big-box distributions units, in line with CBC's Commentary – "...predominantly B8 storage and distribution." In the absence of other smaller sites being allocated, in a sustainable location close to both existing employment and residential areas, we believe the Plan will not be flexible enough or enable a rapid response to changes in economic circumstances.
 3. The EGA has regard to past trends in business floorspace completions and forecasts of future labour supply based on population growth linked to housing need, determined through standard planning methodology. These produce a broad set of business land requirements which range from 21.4ha to 69ha. If the economic growth is at the higher range envisaged by CBC/Lichfields in the EGA, i.e. as much as 69ha of employment land is needed over the Plan period, then insufficient land will have been allocated. The Plan does therefore not provide flexibility for the highest (or higher) growth scenario in the EGA. Furthermore, The Crawley Employment Land Trajectory (Base Date 31st March 20230 (EGSM/EG/01) identifies sites A to J as Sites Deliverable, but one site, site E (The Base-4.2ha) is completed already with some occupier interest, so this site does not offer future land for development. Therefore, the Land Trajectory's available land assumption as at today's date is 4.2ha too high.
 4. It is also relevant to consider Homes England's Proposals for Strategic Growth West of Crawley as set out in the "Horsham and Crawley Statement of Common" (SOCG/06). The provision of small units and incubation units on Jersey Farm's western boundary, close to this possible major allocation of 3,000 up to 10,000 new homes, would offer additional flexibility contiguous with the Manor Royal business district.
 5. Further, para 7.4 in SOCG/06 acknowledges that, whilst yet to finalised, it will be necessary to protect a highways link corridor capable of accommodating the Crawley Western Multi Modal Transport Link (CWMMTL). The necessary flexibility to accommodate the route is illustrated in the Jersey Farm Masterplan ref 0390-RDJWL-ZZ-XX-DR-A-0058- submitted with the Vail Williams' letter "Response on Behalf of Jersey Farm for Crawley Borough Council Local Plan Review 2024 - 2040 Regulation 19 Local Representations" dated 20th June 2023. (This letter and the latest Masterplan are appended to MIQ. 4.1.)
 6. To assist with a more flexible allocation of suitable, deliverable and available land, in close proximity to the CWMMTL and West of Ifield, Jersey Farm can provide 17.2 hectares in a sustainable location adjacent to the existing Manor Royal business district, that could accommodate between 28,000-40,300m² of flexible employment space to meet local employment needs, in a range of unit sizes and uses, for occupier flexibility, consistent with NPPF paragraph 82(d).

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- 4.6 **Does the latest Economic Growth Assessment (EGA) Supplementary Update for Crawley 2023 potentially underplay the likely demand for additional employment land over the plan period by: (i) extrapolating growth from 2011-21 which would include an element of suppression during the Covid-19 pandemic; and (ii) factoring-in past constraints in land supply in the Borough?**
1. We refer the Inspectors to the Vail Williams' letter "Response on Behalf of Jersey Farm for Crawley Borough Council Local Plan Review 2024 - 2040 Regulation 19 Local Representations" dated 20th June 2023, and in particular the section titled "Vail Williams Market Context on EC1 to EC4", pages 19 to 23 attached as Appendix 1 to Matter 1.
 2. We stated in the above letter that, in the absence of a supply of new stock, take-up rates will be suppressed - in the same way the EGA (EGSM/EG/06) refers to past development rates, which in the absence of available allocated sites will also be suppressed. This aligns with our statement that Crawley has suffered from a lack of new developments over several years due to a lack of suitable land, potentially further suppressing take-up. We therefore consider the EGA projected demand could be underplayed as a result.
 3. As referred to in 4.4, the reasoned justification to EC1 in the Local Plan confirms that Employment land requirements could range from 21.4ha to 69ha, acknowledging that the proposed allocation is a "minimum" and therefore it is likely that the demand for additional employment land over the plan period has been underplayed. This would also mean the Plan is insufficiently flexible, particularly if growth is higher than anticipated.
 4. We believe extrapolating growth from 2011-21 in the EGA would include an element of economic suppression during the Covid-19 pandemic, but this would vary depending on the sector.
 5. Factoring-in past constraints in land supply in the Borough, as local letting agents, we have seen the consequence of this historic lack of supply, resulting in occupiers looking for space outside of the Borough in part due to a lack of new stock, and due to a significant increase of rents/land values, driven by an imbalance of poor land supply and strong demand. This will also impact on local smaller businesses who are either 'priced out' of the area or will be unable to bear the occupancy costs to grow locally.
 6. We therefore consider that the long-term land supply constraints since 2011 have distorted the market and reduced opportunities for local new improved stock. The EGA updates therefore are considering an already frustrated land supply position, and we believe that this Local Plan Review should address opportunities to release land for enhanced and flexible economic growth, aligning with the CWMML under ST4, and implications for continued safeguarding (in principle and extent), because of the reality that no airport use has in fact been required on the safeguarded land over many years and GAL's promotion of the DCO for the Northern Runway.

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4.10 What reasonable alternative employment land scenarios have been considered through the Sustainability Appraisal process?

1. Our client has also submitted comments on this matter under Matter 1: Issue 5: 1.16 and Matter 4.31 as both MIQs require discussion of reasonable alternative employment land scenarios in relation to the Sustainability Appraisal.
2. The SA in document KD/SA/01 page 400 -439 looks at other alternative employment sites, that have been rejected by CBC against the SA criteria. These include our client's sites at Jersey Farm, and confirms that there are a number of rejected employment sites in the SA.
3. Whilst each of the sites forming part of the Jersey Farm Masterplan have been assessed individually, the SA also considers the site as a collective on page 405-406. The Jersey Farm sites are listed under the assessment of Rejected Employment Sites:
4. Jersey Farm Business Park Jersey Farm Business Park (incorporating Land at Jersey Farm (Sites B and C), Land at Little Dell Farm (Sites A, B & C), Land at Poles Lane (Sites A & B)).
5. Collectively, these sites form 17.2 hectares and are promoted by Vail Williams on behalf of Ardmore Ltd.
6. Our client also owns a separate site, Land at Spikemead Farm, and this land is available but as it is not contiguous, this does not form part of the Jersey Farm Business Park Masterplan area and is assessed in the SA separately. (Our client confirms that this is also suitable and available and deliverable. holdings).
7. The SA confirms that Jersey Farm Site B is situated outside of the Gatwick Airport safeguarded land, west of the permitted scheme at Jersey Farm Site A, and extends west into the countryside. However, the Built up area boundary has not been amended on the Proposals Map to consider the suitability of the Site B, nor the extant permission at Site A.
8. We agree that the other promoted land parcels are located within land that is safeguarded for development of a potential future southern runway at Gatwick Airport, and agree that the site is situated within the Area of Search for a Western Multi-Modal Transport Link. The SA also confirms that there are no specific environmental designations within the collective promoted site.
9. The wider Jersey Farm collective site, is negatively scored on Objective 8 on providing sufficient infrastructure, but as a result of safeguarding. The SA sees safeguarding as a constraint, despite the ability of the site to provide the CWMMTL from the boundary to London. This scoring is flawed when considering Jersey Farm as a reasonable alternative, and inconsistently applies safeguarding to Jersey Farm and other rejected sites, whilst promoting Gatwick Green which is also within the safeguarding area (see our Response on MIQ 1.16).

10. The SA on page 406 states for the wider Jersey Farm site *“It is possible that opportunities may exist to access the site longer-term via a western Crawley multi-modal link road, potentially avoiding development exacerbating existing traffic congestion at County Oak. However, the site cannot be allocated due to the requirement to retain safeguarding, as it is predominantly located on land that is needed for the physical land take of a southern runway, road diversions and other operational uses should this be required. Therefore, there is risk that the potential delivery of nationally significant infrastructure, in the form of a southern runway, would be prejudiced were this site to come forward. Significant Negative Impact (--)”*
11. The SA does not go on to assess other sites as a reasonable alternative, as a strategic employment location.
12. The SA does not consider other options in regard to allocating alternative Strategic Employment Land locations. We therefore do not believe that the SA has adequately and reasonably looked at all of the likely effects of the EC policies against the SA objectives. This should have considered sites at Jersey Farm, or the other Manor Royal extensions in combination.
13. Nor do we believe that the SA as it stands sufficiently tests any reasonable alternatives for a Strategic Employment Location (“SEL”), other than Gatwick Green, including Jersey Farm master planned area or other extensions to Manor Royal promoted by others, combined with Jersey Farm.
14. Jersey is a suitable and sustainably-sized at 17.2 hectares, (compared to the minimum 13.73 hectares allocated at Gatwick Green in Policy EC4). Jersey Farm is adjacent to Manor Royal and was positively promoted in the last Local Plan 2015, and repeatedly positively assessed throughout the SHELAA and employment land assessments process, other than in regard to safeguarding. The SA also confirms that Jersey Farm site B is also outside of safeguarding.
15. The SA assessment should have been undertaken a proper consideration of all relevant sites, as a reasonable alternative, despite safeguarding, to be consistent with the CBC proposed approach to EC4. (See Appendix 1 attached at Matter 1 for revised and updated Masterplan October 2023).
16. The SA does however consider as a reasonable alternative, the approach of not identifying any new employment land, and the implications of this for both Crawley and the wider Gatwick Diamond, is viewed as having a significant negative impact. Page 440 concludes that *“The key implication of not allocating a strategic employment location is that Crawley’s outstanding storage & distribution needs would not be met..., potentially leaving a supply gap that would not otherwise be catered for. This is particularly the case given the strong market demand for B8 premises in Crawley. In the absence of a strategic employment location, it is likely that B8 demand will continue to be directed to Manor Royal, and though warehousing represents an important aspect of the Manor Royal function, it is possible that the overall mixed-use nature of the business district will be eroded if office, industrial and other employment land continues to be redeveloped for warehousing. Identification of new employment land for storage & distribution would provide market choice and economic resilience for Crawley and the wider Gatwick Diamond, supporting economic growth in line with national policy. As such, it is considered that there would be negative economic impacts were the Local Plan not to identify new employment land.”*
17. Therefore, whilst we agree that provision of employment land is required within the Borough, we do not agree that the SEL has to be provided at Gatwick Green as the only SEL alternative, and as safeguarding being removed elsewhere has not been tested for all relevant alternatives, the SA is flawed. Therefore, the SA and policy EC4 (and GAT 2 and ST4) are not positively prepared, are unjustified, ineffective, and inconsistent with national policy and therefore unsound.

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Issue 1: Whether the employment land requirement (Policy EC1) will support sustainable economic growth

- 4.11 **Is it necessary for soundness to increase the employment land requirement in Crawley to ensure there is a strong, competitive economy over the plan period? If so, what would be a reasonable, alternative figure and could that be accommodated within the Borough under the current safeguarding regime for Gatwick?**
1. The SA 9KD/SA/01 concludes that additional employment land is required for a strong competitive economy. The alternative of no SEL allocation, is assessed as harmful and the SA concludes on page 441 that *“it is considered that there would be negative economic impacts were the Local Plan not to identify new employment land.”*. We agree that additional new land is required.
 2. In the CBC evidence base, EGSM/EG/01 May 2023, the Employment Land Trajectory shows Jersey Farm Site A as deliverable with only 5.32 hectares of office and 9.17 hectares of industrial and warehouse land, and confirms Gatwick Green has a minimum of 13.73 hectares industrial and warehouse land (compared to 17.2 hectares at Jersey Farm, adjacent to Manor Royal or 12 hectares below the CWMMTL).
 3. EGSM/EG/02 Employment Land Availability Assessment (ELAA) May 2023 considers Jersey Farm (both as a whole at 17.2 hectares and as individual sites -Jersey Farm Business Park (incorporating Land at Jersey Farm (Sites B and C), Land at Little Dell Farm (Sites A, B & C), Land at Poles Lane (Sites A & B) also see Response to 4.10 for further detail.
 4. The ELAA consider positively as ‘available’, uncertain as to ‘achievable’ and as not suitable. The entire Jersey Farm site is in fact positively suitable, available, and achievable, and can provide c53,000sqm (27,421 sqm) of economic floorspace.
 5. Should the CWMMTL be aligned to preferred route ES3/ES3a under ST4, it can provide 27,241 sqm across 12 hectares to the south of the CWMMTL. Therefore, the Jersey Farmland could be included in its entirety, if safeguarded is amended, as 17.2 hectares as a reasonable alternative site, or as 12 hectares to the south, of the CWMMTL given the proposed alignment of ST4. Please refer to Appendix 1 attached at Matter 1 for the amended October 2023 masterplan.
 6. We agree with para 3.13 of the Topic Paper 2 that confirms that HOR9 allocated in the Reigate and Banstead Local Plan will not support the under supply of industrial land in Crawley, given that the allocation in their development management plan is for predominately B1 (Egiii) floorspace.

7. Contrary to the suitable and sustainable location of the land adjacent to Manor Royal, CBC promotes policies EC1 and EC4, allocating Gatwick Green for employment use – likely for larger/mid box logistics and storage development (although no detailed masterplan is available – further underlining the lack of soundness of the proposed allocation). However, Gatwick Green is also safeguarded land (and as made clear in other Responses, CBC has applied an inconsistent and unsound approach to safeguarding, in terms both of principle and extent). Further, Gatwick Green is in a disparate and disconnected location from the Main Employment Area at Manor Royal) and we do not consider that this aligns with the objective of Topic Paper 2 para 4.5 which identifies there is *“a particular gap in the supply of smaller industrial ‘starter units’ ranging in size from 400-500sq.ft and ‘move on’ space. At the larger scale end of the market, industrial units over 20,000 sq.ft are found to be in short supply despite attracting good levels of occupier interest. The limited availability of land for new development has been identified as a key constraint, echoing the position across the wider M23 corridor market area.”*
8. We therefore believe that an alternative approach to the location of employment provision adjacent to Manor Royal, and a more appropriate provision of the qualitative mix of uses, requires a reconsideration of the Plan to ensure soundness, to increase the soundness of the employment land requirement in Crawley and provide for a strong, competitive economy over the plan period.
9. It is therefore necessary for soundness to increase the employment land requirement in Crawley, particularly as an extension to Manor Royal to ensure there is a strong, competitive economy over the plan period.
10. Given the growth scenarios demonstrate assessment in the Lichfields EGA, and the need for a flexible and resilient approach to sustainable economic growth, more land supply is required, to improve the quantitative offer of the Borough. In addition, qualitatively smaller extensions to Manor Royal can allow a mix of small to mid range sized units responding to market demand and lack of current supply.
11. As experienced local agents, we know that the market requires need more flexibility in quantitative and qualitative terms, and if safeguarding is an absolute constraint in principle and in its current extent, then this cannot be accommodated within existing safeguarding.

Matter 4: Economic Growth

Issue 3: Whether the approach to Strategic Employment Location at Gatwick Green (Policy EC4) is sound

- 4.26 **Is the Gatwick Green allocation underpinned by an evidence base, proportionate to plan-making, that the site can come forward (for predominantly warehouse/logistic uses) without causing unacceptable impact on highway safety, or that residual cumulative impacts on the road network would not be severe? Does the transport modelling for the Plan demonstrate that the allocation is deliverable?**
1. The Gatwick Green allocation is underpinned by the Crawley Transport Study (ES/ST/01a) which tests scenarios without and with the allocation. The modelling demonstrates that the allocation is deliverable in terms of traffic impact and highway safety, based on the growth assumptions for the local area.
 2. However, the growth assumptions in the modelling are that Gatwick Airport will remain in its current configuration as a single-runway, two terminal airport (ES/ST/01a paragraph 3.4.7).
 3. The traffic modelling has not tested the Gatwick Green allocation's impact in a scenario with the proposed relocation of Gatwick Airport's northern runway to create a second operational runway and how this interrelates, should the DCO be approved. It is therefore not clear how the residual cumulative impact of Gatwick Green and the additional airport runway will affect the local and strategic road networks.
 4. With the DCO process for the Northern Runway underway, and with the real potential for significant airport growth and the associated traffic growth, the second runway scenario must be included in the Crawley Transport Study for it to be sound.
 5. Therefore, the Gatwick Green allocation does not appear to be underpinned by an adequate evidence base, that can demonstrate adequate highway safety, or that residual cumulative impacts on the road network would not be severe, or that the allocation is deliverable, and further assessment should be undertaken. These comments align with our DCO representation that can be made available on request.

Matter 4: Economic Growth

Issue 3: Whether the approach to Strategic Employment Location at Gatwick Green (Policy EC4) is sound

4.31 Were any alternative reasonable options to Gatwick Green assessed as part of the SA?

1. We do not believe that the approach to EC4 at Gatwick Green is sound. Our Regulation 19 representations clarify that we consider the approach to safeguarding under GAT2 is applied inconsistently, allowing the allocation to create a “polo” or hole in the blanket safeguarding which is not adequately explained or evidenced in Topic Paper 5 nor the Reasoned Justification of GAT2 or EC4 (see also our Responses on MIQ 1.16 and 4.10).
2. We also consider that there is a lack of a full “non safeguarding scenario” and “reduced safeguarding” scenario testing in the SA (KD/SA/01), so the SA is flawed, because if a SEL is justified then other alternatives that are within safeguarding could also have been acceptable and should have been properly assessed. Therefore, the SA and policy EC4 (and GAT 2 and ST4) are not positively prepared, are unjustified, ineffective, and inconsistent with national policy and therefore unsound.
3. The allocation of EC4 as a minimum 13.73hectare site does not look at all alternatives in a “policy off” scenario, enabling a full assessment of reasonable alternatives, (i.e. an effective, neutral assessment, without pre-judging the outcome at Gatwick Green that CBC seeks to achieve). In addition, the SA and policies under EC4 and ST4 for the western relief road also show that CBC unjustifiably treats safeguarding as a matter to be inconsistently applied. The application by CBC of a flexible approach to safeguarding for Gatwick Green, but its use as an absolute constraint for other reasonable alternatives, is fundamentally unsound.
4. The SA does not consider other options in regard to allocating alternative Strategic Employment Land locations. We therefore do not believe that the SA has adequately and reasonably looked at all of the likely effects of the EC policies against the SA objectives. This should have considered sites at Jersey Farm, or the other Manor Royal extensions in combination.
5. Nor do we believe that the SA as it stands sufficiently tests any reasonable alternatives for a Strategic Employment Location (“SEL”), other than Gatwick Green, including Jersey Farm master planned area or other extensions to Manor Royal promoted by others, combined with Jersey Farm.
6. Our comments and MIQ responses to the SA and alternative assessments are also dealt with under our Matter 1.16 and Matter 4.10 statements.
7. The principle of safeguarding (GAT 2) should be applied consistently, and the extent of safeguarding should be properly evidenced and justified. Policy EC4 and SA and other supporting evidence should have looked at the reasonable alternative sites capable of providing additional employment land, including land at Jersey Farm.