

Crawley Borough Council  
Strategic Planning,  
Town Hall,  
The Boulevard,  
Crawley,  
RH10 1UZ

Our ref: EY/0202116  
Date: 20<sup>th</sup> October 2023

Dear Sir/Madam,

**Re: Representations to the Crawley Borough Council draft Submission Local Plan on behalf of the Caravan and Motorhome Club.**

We act on behalf of the Caravan & Motorhome Club ('the Club') and are instructed to submit representations to the draft Submission Crawley Borough Local Plan (2023).

The Club has a single site within the local authority area located at Gatwick Club Campsite, Charlwood Road, Lowfield Heath, Crawley, West Sussex, RH11 0QA. The Club would like to have the option to extend the Site, in order to deliver improvements to the Site to ensure its long-term viability and continue to support the rural economy.

**Site and Surrounding Area**

Gatwick Club Campsite ('the Site') is located just south of London Gatwick Airport. The location of the Site is shown in **Figure 1** below. The Site facilities includes 24 pitches for touring vehicles as well as six camping pitches, and storage.

The Site itself is bordered by trees, screening it from wider views. The Site is immediately surrounded by fields, and to the north of the site (and adjacent to the site entrance on Charlwood Road) is Mayfield Farm (residential use) and Maple Manor Hotel. The River Mole is located 200 metres east of the Site. There are a wide range of uses in the wider surrounding area, including London Gatwick Airport and associated long-term car parking, and also residential, industrial, and commercial uses.

The Site is located outside of the defined built-up area (in the Upper Mole Farmlands Rural Fringe, Policy CL8). The Site is also within the Gatwick Ai rport Safeguarded Land (Policies EC1, EC2, GAT1-GAT4) and the Gatwick Aerodrome Safeguarding area (Policy DD5).

Part of the edge of the eastern boundary of the Site is within/ adjacent to a Biodiversity Opportunity Area (Policies GI2 & GI3).

Figure 1: Site Location



### Draft Submission Crawley Borough Local Plan (2023)

Overall planning policy needs to be correctly worded as to allow for the Club, an important rural economy business, to develop and improve their Site to ensure its long-term viability and to ensure the Site can be adapted and upgraded to meet the needs and standards of its users.

The requirements and expectations of tourists seeking to make use of such sites around the country has changed with the times, and relevant policy within the Plan should be amended to accommodate this. Policy should encourage the expansion of existing rural businesses in a sustainable way, to ensure that they can continue to adapt to changing demand and requirements. Emphasis should also be placed on promoting and facilitating the development of appropriate sites in rural areas, particularly for the development of existing leisure sites to accommodate their expansion and adaption of their leisure provision in response to changing demand and trends.

Provision should be made within policy for development on existing leisure sites to provide pods and lodges and other temporary accommodation to ensure they can continue to adapt to changing demand and requirements.

Furthermore, in light of established trends in the trajectory of housing demand within the borough, London and nationally, the Borough should ensure planning policy is sufficiently flexible to accommodate the redevelopment of brownfield sites for residential uses to meet this demand.

Whilst it is the intention of Gatwick Club Campsite to remain in leisure use at present, the Club would like sufficient flexibility to allow residential development on site either in tandem with the current use, or solely development residential dependant on their needs, and subject to an alternative site within the borough being found to accommodate the Club.

We set out below comments specifically in relation to draft policies.

#### Policy CL8: Development Outside the Built-Up Area

Regarding point xii of Policy CL8 *“Avoid introducing a use which by virtue of its operation is not compatible with the countryside.”*, the Club considers that this is too broadly worded and is not clear. The policy and the supporting text does not define what uses would be considered incompatible with the countryside.

Therefore, it is not an effective policy and should be re-worded to provide clarity on compatible uses in the countryside.

The Club considers that any development that supports the leisure and tourism industries and the rural economy should be encouraged in the countryside, in line with paragraph 84 of the NPPF. Moreover, the policy should specifically allow for the extension to existing businesses that support the rural economy. This will enable the Club to ensure that they can continue to adapt to changing demand and requirements and in turn continue to support the rural economy.

This is also supported at paragraph 4.18 of the Plan which states "*Crawley's countryside is an extremely valuable leisure, amenity and environmental asset for the community, which should be conserved and enhanced in a positive way. This must be integrated with the need to achieve the Plan's wider vision and objectives to support sustainable development within the countryside*". The Club supports this statement and encourages the Plans policies to specifically encourage enhancement of leisure sites in the countryside.

The Site is located within the Upper Mole Farmlands Rural Fringe. Under this subsection of Policy CL8, the wording recognises that this sub area has an important role in maintaining the valuable recreational links from the northern neighbourhoods of Crawley into the countryside. However, the Club is concerned that the policy is not clear, and the policy should recognise the role that tourism and leisure sites have in supporting and maintaining recreational links and the rural area as a whole.

Whilst this policy subsection does specifically support extensions to Manor Royal, which the supporting text clarifies is in response to the demand for business (para 4.70), the policy should also recognise that other areas within the Upper Mole Farmlands Rural Fringe are also capable of supporting the rural economy, particularly sites that will support other uses in addition to business to support the diverse nature of the rural economy.

The policy should therefore be worded to encourage diversification and expansion of sites that are already serving a role in supporting the rural economy and have the demand and capacity to expand and support the diverse nature of the rural economy, including sites that support the leisure and tourism industries. This will enable the Club to ensure that they can continue to adapt to changing demand and requirements and in turn continue to support the rural economy.

#### Policy EC13: Rural Economy

The Club supports the principle of Policy EC13 which supports the sustainable growth of the rural economy in Crawley's countryside.

Emphasis should also be placed on promoting and facilitating the development of appropriate sites in rural areas, particularly for the development of existing leisure sites to accommodate their expansion and adaption of their leisure provision in response to changing demand and trends, which in turn supports the rural economy.

#### Strategic Policy H1: Housing Provision

The Club supports the wording of Policy H1, particularly in reference to supporting housing opportunities on brownfield sites and on the edge of Crawley.

#### Policy GAT2: Safeguarded Land

The Plan has identified a large area of land around London Gatwick Airport to safeguard from development that would be incompatible with expansion of the airport (Policy GAT2).

The Club considers that this policy is too broadly worded and should clarify development that would be considered incompatible. The Plan should allow for the Club, an important rural economy business, to develop and improve their Site to ensure its long-term viability and to ensure the Site can be adapted and upgraded to meet the needs and standards of its users.

**Summary**

In summary, it is requested that sufficient emphasis is placed on ensuring flexibility within local policy for the development of existing leisure sites to accommodate the expansion and adaption of their leisure provision in response to changing demand and trends. Additionally, emphasis should be placed on promoting and facilitating the development of appropriate sites for residential use, including brownfield sites.

The Club reserves the right to comment on additional documents, and issues, in future consultations.

Yours faithfully,

