

ARORA GROUP

MATTER 5.1; IS THE AIRPORT BOUNDARY, AS A PLANNING POLICY DESIGNATION FOR THE PURPOSES OF IMPLEMENTING POLICIES EC1, EC2 AND EC7 AND POLICIES GAT1-4, SOUNDLY BASED?

SUMMARY

The Airport Boundary, as proposed, is not soundly based. It appears to have become a GAL ownership boundary, as opposed to a planning policy designation reflecting the needs, demands and projected requirements of the Borough.

This is explained in more detail below. These representations supplement those already lodged by the Arora Group.

NEED FOR SUSTAINABLY LOCATED GROWTH

Draft Policies EC1 and EC2 encourage making the most efficient use of land or buildings within the Main Employment Areas which is supported.

The need for sustainability to be at the forefront of the decision-making process has never been more crucial.

To this end, it is profound that an office building, Schlumberger House, which is currently within the Local Plan 2015 Airport Boundary (which is the boundary within which Employment policies are applicable) designation is proposed to be removed. Moreover, the de-designation of this office building is proposed in favour of development on greenfield land (Policy EC1 (v) Gatwick Green) and extensions to Manor Royal (Policy EC1 (iv)).

It is unsound to remove Schlumberger House from the airport boundary as proposed as it leads to unsustainable growth, directly at odds with the purpose of draft Policies EC1 and EC2.

GRADE A OFFICE ACCOMODATION

Supporting text for Policy EC1; para 9.23 clearly identifies a significant need for Grade A offices as there is a qualitative shortfall within the Borough, which we agree with and support in principle:

9.23 Taking account of the available employment land supply pipeline, as explained in paragraph 9.15 above, Crawley is meeting its identified quantitative office land requirement, notwithstanding a wider qualitative demand in the sub-region for higher specification Grade A offices. The outstanding business land requirement is for industrial land, substantially for B8 storage & distribution uses, where there is need for a minimum 41,315sqm (13.73ha). This is summarised below.

To have removed an existing office building from both the Submission draft Airport Boundary AND the Main Employment Area designations is therefore unsustainable and unsound.

The draft Gatwick Airport Masterplan has identified a need for new (additional) office space on land in/close to the terminals, Schlumberger House is located less than 400 metres from the South Terminal building.

Schlumberger House which is currently located within the adopted Airport Boundary of the Local Plan 2015, offers circa 11,700sqm of office accommodation which could deliver Grade A facilities to meet the future needs of the Borough.

Were the site excluded from the airport boundary, as proposed in the current Submission Local Plan, there is no prospect of providing Grade A office accommodation due to the restrictions placed upon the site by the safeguarding designation.

It is not sound to exclude an existing office building, which has primary vehicular access from the south airport terminal road system, from the revised airport boundary when there is a clear need to provide Grade A office accommodation.

The site is a sustainably located brownfield site which appears to have been excluded from the draft airport boundary due to its ownership as opposed to sound planning reasons.

SCHLUMBERGER HOUSE

The site, Schlumberger House, was purchased by the Arora Group from BAA, with a sitting tenant which BAA had themselves put into the building. That sitting tenant was Schlumberger.

It is noted that Schlumberger has been referenced within the draft Gatwick Airport Masterplan 2019; section 2.3.3 where the document looks to identify the differences between the 2015 Local Plan designation and the Masterplans proposed 'airport boundary' and is states:

“On the north-east boundary, Schlumberger House has been excluded as this is not GAL controlled land.”

It is of concern that the land ownership boundary identified in the Masterplan of 2019 has been taken forward to the Submission Local Plan. It is deemed to be unsound and fails to reflect the needs of Boroughs sustainable growth agenda.

The 'Crawley Borough Council Officer Responses to Crawley Borough Local Plan Review Representations Summaries' dated Sep 2023 provides a brief comment of response to the initial representations lodged by the Arora Group about Schlumberger House and states:

“Schlumberger House is not included within the airport boundary identified by Gatwick Airport, nor is it currently in airport-related use. There is no justification for its inclusion within the airport boundary.”

It is therefore evident that the LPA has unquestionably proposed an airport boundary identified by Gatwick Airport and not adequately based upon the Plan-making framework of the NPPF; which states that '[t]he development plan must include strategic policies to address each local planning authorities priorities for the development and use of land in its area.' Para 17.

CONCLUSION

The Airport Boundary has not been soundly based. It is not positively prepared, it is not justified and based upon evidence, in some areas it is in fact contradictory, the policy is not effective or consistent with national policy and should be amended.

The draft Airport Boundary fails to deliver sustainable policies and sustainable growth.