

Crawley Borough Local Plan 2023-2024 Strategic Policy EC4: Strategic Employment Location Extract

CBC proposed further Modifications following Gatwick Airport Limited's Main Modifications Representation: shown in **Green Highlight** below. These proposed amendments follow the same format and are added to the existing Main Modifications, shown as marked-up text (**bold, blue underline** = new text; ~~red/grey strike-through~~ = deleted text) below.

Please note: grey strike-through text for criteria c and d indicates these have been rearranged to swap order of listing.

Strategic Employment Location

- 9.52 Land east of Balcombe Road and south of the M23 spur, known as Gatwick Green, is allocated for the development of a Strategic Employment Location that will contribute significantly to meeting Crawley's substantial need for new industrial and warehouse land and floorspace. The site is strategically located in proximity to Gatwick Airport, Manor Royal Business District, and the allocated Horley Strategic Business Park site in Reigate & Banstead Borough. Gatwick Green offers significant opportunity to deliver the type and quantum of industrial-led business floorspace that is needed to maintain and enhance Crawley's leading role as an economic driver of at the heart of the Coast to Capital LEP and Gatwick Diamond areas. It can be delivered without prejudicing the delivery of a new southern runway at Gatwick Airport, should that be supported by the Government.
- 9.53 As identified by Strategic Policy EC1, over the period to 2040 there is outstanding need for provision of at least ~~13.73~~**17.93**ha new storage & distribution-led industrial land in Crawley. The Gatwick Green Strategic Employment Location will be substantially led by the provision of industrial and storage & distribution floorspace, supported by ancillary uses that are of an appropriate scale and function. Through expanding the range and quantum of business floorspace within Crawley, Gatwick Green will support the growth of existing Crawley businesses and attract new investment to the borough, enabling market demand for industrial and warehouse space in Crawley, which has been frustrated by a constrained land supply position, to be accommodated within the borough. This offer will be complementary to the mixed business function of Manor Royal, and the office-led Horley Strategic Business Park.

Strategic Policy EC4: Strategic Employment Location

Land east of Balcombe Road and south of the M23 spur, referred to as Gatwick Green, is allocated for the comprehensive development of an industrial-led Strategic Employment Location.

Requirements

Proposals for development of the Strategic Employment Location will be required to:

Employment Uses

- a. Provide as a minimum ~~13.73~~**17.93**ha new industrial land, predominantly for B8 storage and distribution use, ~~demonstrating through appropriate evidence the justification for any further industrial floorspace beyond this amount.~~
- b. Justify any limited complementary ancillary uses such as office floorspace, small-scale convenience retail and small-scale leisure facilities that would support the principal industrial-led storage and distribution function.

Movement and Accessibility

- c. Demonstrate through a Transport Assessment that appropriate access can be provided to the site having regard to both employee and operational movements. This must demonstrate that there will be no severe residual impact on the local and strategic road network, taking into account the operation of Gatwick Airport as nationally significant infrastructure, the allocated Horley Strategic Business Park, and the impact of committed developments in the borough and surrounding areas. Demonstrate through a comprehensive Mobility Strategy, **accompanying the Master Plan for the Gatwick Green site**, how the development will **achieve the master plan-level vision for the development as regards movement, including through** ~~include~~ measures and improvements ~~to~~ that maximise sustainable access to the site, **focusing on how the development will** ~~and~~ optimise the usage of sustainable modes of transport as opposed to the private vehicle. **The Mobility Strategy will** ~~and detailing~~ **detail** infrastructure improvements that will be required to adequately mitigate the development impacts on the highways network, **detailed and set out** how these improvements will be delivered and operated. HGV traffic will not be allowed to enter Gatwick Green from the north on Balcombe Road, and will not be allowed to egress the site via a right turn onto Balcombe Road. **The Mobility Strategy will demonstrate how the required measures and infrastructure improvements will work alongside the highways improvements required for the expansion of the airport as shown in the Gatwick Airport 2019 Masterplan. It will be prepared in consultation with West Sussex County Council, National Highways, Gatwick Airport, relevant public transport operators and active travel groups. The Mobility Strategy will accompany the Master Plan to be agreed by the council prior to submission of an outline planning application.**
- d. Demonstrate through a comprehensive Mobility Strategy how the development will **achieve the master plan-level vision for the development as regards movement, including through** ~~include~~ measures and improvements to that maximise sustainable access to the site, focusing on how the development will ~~and~~ optimise the usage of sustainable modes of transport as opposed to the private vehicle. **The Mobility Strategy will** ~~and detailing~~ **detail** infrastructure improvements that will be required to adequately mitigate the development impacts on the highways network, **detailed and set out** how these improvements will be delivered and operated. HGV traffic will not be allowed to enter Gatwick Green from the north on Balcombe Road, and will not be allowed to egress the site via a right turn onto Balcombe Road. **Demonstrate through a Transport Assessment** **to be submitted as part of the outline planning application** that appropriate access can be provided to the site having regard to both employee and operational movements. This must demonstrate that there will be no severe residual impact on the local and strategic road network, taking into account the operation of Gatwick Airport as nationally significant infrastructure, the allocated Horley Strategic Business Park, and the impact of committed developments in the borough and surrounding areas.
- e. Highways infrastructure and improvements that are required as a result of impacts arising from the development must be delivered as part of the development. On the basis that the development will be required to address its own highways impact, a S106 sustainable transport contribution will not be sought.
- f. **Submit a Construction Management and Phasing Plan, to include measures that mitigate any adverse impacts on local and strategic road networks during the construction phase.**

- g. ~~f~~: Provide improvements to public transport facilities, including existing bus infrastructure, and measures to maximise the accessibility of routes/services to future occupiers in and around the site.
- h. ~~g~~: Upgrade and extend pedestrian/cycle routes to the site from residential areas in Crawley and Horley and from Gatwick Airport station.
- i. ~~h~~: Provide appropriate levels of on-site parking solely for the uses on the site and ensure measures are in place to ensure no airport-related parking occurs.
- j. ~~i~~: Submit air quality modelling alongside the Transport Assessment, to include consideration of cumulative impacts.

Sustainable Design and Construction

- k. ~~j~~: Achieve an exemplar development in sustainability terms, achieving BREEAM Excellent rating, and demonstrating how the development will achieve Net Zero emissions and carbon neutrality by 2050.
- l. ~~k~~: Implement an energy strategy developed in accordance with the hierarchy set out in Policy SDC2.
- m. ~~l~~: Demonstrate, through a Flood Risk Assessment and Surface Water Drainage Strategy, how drainage and flood risk (including cumulative flood risk) will be taken into account in the design and layout of development, and appropriately mitigated to ensure that the development is safe in flood risk terms and does not increase flood risk elsewhere.
- n. ~~m~~: Submit an Agricultural Land Classification Statement evidencing that a robust assessment of agricultural land quality has been undertaken for the allocation site and demonstrating how the requirements of Policy EC13 are satisfied.

Digital Technology

- o. ~~n~~: Support the needs of 21st century business through the delivery of high quality communications infrastructure including gigabit capable full fibre broadband.

Character and Design

- p. ~~o~~: Be designed and laid out to achieve an appropriate transition to, and relationship with, neighbouring residential and countryside areas, including through appropriate height, massing and siting of buildings and suitable consideration of shared boundaries to include measures to reinforce existing tree and hedgerow screening. Particular regard should be had to the location of the site in the North East Crawley Rural Fringe landscape character area.
- q. ~~p~~: Ensure the height and design of buildings, lighting and other design aspects are consistent with the operational standards of Gatwick Airport ~~with and to~~ respect to aerodrome safeguarding requirements ([Policy DD5 refers](#)).
- r. ~~q~~: Include an appropriate landscape buffer, and public open space, to reinforce the distinctive identity of Gatwick Green Strategic Employment Location, and its separation from Gatwick Airport, Horley, and the wider countryside setting of the site.
- s. ~~r~~: Provide buildings of an exemplar standard of design to reflect the Strategic Employment Location concept including sufficient flexibility to provide adaptability to cater for a range of, expanding and established businesses and major occupiers and to be complemented by high quality public realm.
- t. ~~s~~: Protect and enhance woodland, existing trees and hedgerows where possible and enhance the green/blue infrastructure on site, including the Gatwick Wood Biodiversity Opportunity Area.
- u. ~~t~~: Ensure the design of buildings provides appropriate interior environment for users, having regard to the impacts of noise from existing and future sources, particularly air traffic and the M23. Mitigate noise intrusion from activities on the site to adjacent residential and open areas.

- v. ~~tt~~ Provide measures to minimise the impact of lighting upon neighbouring residential and adjoining countryside areas.
- w. ~~vv~~ Ensure development proposals conserve the setting of nearby Listed Buildings and Locally Listed Buildings. The retention of important hedgerows will be encouraged as will retention of a buffer to the green corridor along Balcombe Road to retain the historic landscape character.

Impact Assessment

It must be demonstrated how the Strategic Employment Location will address Crawley's identified need for industrial focused business floorspace, and how its offer will be complementary to the mixed-use business function of Manor Royal, the vitality and viability of Crawley Town Centre, delivery of the allocated office-led Horley Strategic Business Park in Reigate and Banstead borough, and other planned strategic employment development in the functional economic market area.

Delivery

Planning conditions and obligations to control delivery of the development, the use of the site and appropriate off-site considerations will be required, including for infrastructure, open space and social commitments. These will include:

- x. Requirement for ongoing economic impacts testing.
- y. Contribute to delivering objectives of the Crawley Employment and Skills Programme, demonstrating through an Employment and Skills Plan (to be agreed by the council) how the development, through its construction and end user phases, will contribute to addressing the local skills gap. This may include, use of local labour, local supply chain procurement and similar skills/capacity support (in conjunction with local education and training providers).

The development of the **Gatwick Green** site will be in accordance with an agreed master plan, **incorporating a vision-led approach as required by Department for Transport Circular 1/2022**. **It will set out the key development, mobility, design and delivery principles including landscape and visual impact produced by the site promoter in consultation with the council** to ensure comprehensive development in line with the above requirements. **The master plan shall be produced by the site promoter in consultation with the council and other parties including statutory consultees, stakeholders, other interested parties and the community.** The master plan **shall be agreed by the council prior to its submission will be submitted** at the outline planning application stage to assist the consideration of subsequent planning application(s) and must include phasing, programming of infrastructure and details on quantum of development and appropriate uses. **The agreed master plan will be taken into account as a material consideration in the determination of any planning applications.**

Reasoned Justification

- 9.54 *Local Plan Policy EC1 identifies overall need for a minimum 26.2ha business land over the Plan period, of which the majority (22.9ha) is for industrial land, predominantly B8 storage & distribution warehousing. With an existing industrial land supply pipeline of ~~9.17~~ **4.97**ha, there is outstanding need for at least ~~13.73~~ **17.93**ha new industrial land in the borough over the period to 2040.*
- 9.55 *The 'call for sites' undertaken for the Local Plan resulted in land totalling just under 160ha being promoted to the council for business-led employment use. These sites, set out within the Employment Land Availability Assessment, are significantly located on land identified in the Gatwick Airport Master Plan for safeguarding.*

- 9.56 As explained in paragraph 10.17 and set out in Policy GAT2, land at Gatwick Airport is required to be safeguarded for a potential future southern runway. Most of the sites promoted to the council for employment are located south of the airport, on safeguarded land that would potentially be required to accommodate the physical land-take needed for a southern runway and road diversions. Employment development at these sites would prejudice the future delivery of a southern runway, were this to be required by the government, and cannot therefore be explored further for allocation, as to do so would be contrary to national policy.
- 9.57 Land to the east of Balcombe Road and south of the M23 spur, referred to as Gatwick Green, has also been promoted to the council for employment use through the ‘call for sites’. The 44ha site is located east of Gatwick Airport, also on land identified by the Gatwick Airport Master Plan for safeguarding. However, unlike the situation for the other employment sites that have been promoted, land at Gatwick Green does not form part of the land take that would be required to accommodate a southern runway and the diversion of the A23, and is shown in the Gatwick Airport Master Plan as being utilised for a large area of surface car parking. The council does not consider parking to represent an efficient use of the site, particularly given the significant employment needs of Crawley borough, and is of the view that the airport could accommodate parking more efficiently through decked parking and other efficiency measures, should it be demonstrated that additional on-airport parking is required having regard to the airport’s surface access obligations stated in the S106 legal agreement. Therefore, the Local Plan retains safeguarding but amends its boundary to exclude land to the east of Balcombe Road and south of the M23 spur, which represents the only site within Crawley that can be allocated for strategic employment growth without prejudicing the possible delivery of a southern runway at Gatwick Airport.
- 9.58 Land at east of Balcombe Road and south of the M23 spur, known as Gatwick Green, is allocated for an industrial-led Strategic Employment Location that will provide a minimum of ~~13.73~~ 17.93ha industrial land, predominantly within the B8 use class. The site identified on the Local Plan Map is larger because, based on past trends and market demands, a greater quantum of industrial floorspace may be required. This could be supported by complementary uses where justified by evidence, including ancillary uses such as a limited provision of offices and supporting amenity uses that will cater for the needs of employees. Also, there is a need for the strategic development to provide comprehensive supporting infrastructure, and an appropriate landscaping buffer to protect the amenity of neighbouring properties. Anticipated to be built out ~~over a seven to ten year period, completed by 2040~~ by 2035, the Gatwick Green allocation will meet Crawley’s economic needs ~~in the latter part of~~ during the Plan period. A Masterplan will be required for the whole of the allocated land, to show how the areas to be built upon in the current, and potentially future, Plan periods, will be landscaped and will fit within the setting of the wider site. **This will include a vision-led approach to development, prepared in accordance with Department for Transport Circular 01/2022: ‘Strategic road network and the delivery of sustainable development.’**
- 9.59 Crawley’s Economic Recovery Plan (2021) sets out that economic diversification is important for the economy’s resilience. Identification of new employment land to address the identified provision gap in the industrial sector, particularly in storage and distribution, will support the shift towards a more diverse and multi-sectoral economy in Crawley, adding to the type and range of employment sites within the borough. This will help to meet the growth and locational requirements of businesses that have outgrown existing sites, and attract new investment that has not previously been able to locate in the borough due to the scale of their operations and lack of appropriate sites. The

allocation of Gatwick Green for industrial-led employment will help to reinvigorate Crawley's economy, supporting existing businesses, attracting new and diverse growth, and reinforcing the key economic role of Crawley within the Gatwick Diamond.

- 9.60 *In doing so, it will be vital to ensure that employment growth at Gatwick Green is delivered in a manner that is complementary to the mixed-business offer of Manor Royal, the vitality and viability of Crawley Town Centre, the office-led Horley Strategic Business Park allocation in Reigate and Banstead borough, and other planned strategic employment development within the functional economic market area. The applicant will be required to demonstrate in detail how the required complementarity will be achieved to ensure that Gatwick Green supports economic growth in a manner that does not undermine existing or planned development.*
- 9.61 *Gatwick Green is sustainably located close to Gatwick Airport, though it does represent a countryside location, and it is vital that development is carefully master planned and designed to ensure that the character of its rural setting within the North East Crawley Rural Fringe is not undermined. Issues that will merit particular consideration will include the relationship with the designated Gatwick Wood Biodiversity Opportunity Area. The amenity of existing properties that border the site will need to be protected, and an appropriate and carefully considered landscape buffer will be required to retain a sense of separation between the site and adjoining countryside and settlements. Regard should be had to presence of woodland, trees and hedgerows, which should be protected and where possible enhanced.*
- 9.62 *The allocated Strategic Employment Location is situated within the Burstow Stream catchment, which is identified as being at a high risk of cumulative flood impacts, whereby multiple development sites, unless carefully planned could result in increased flood risk to third parties. To minimise cross-boundary issues, a detailed local area Flood Risk Assessment and Drainage Study will be required to consider further how the cumulative effects of potential peak rates and volumes of water from development would impact on peak flows, duration of flooding and timing of flood peaks on receiving watercourses. This should detail how SuDS will be incorporated into the development, providing details of adoption, ongoing maintenance and management. This should also outline how the development will seek to provide wider betterment by demonstrating what measures can be put in place to contribute to a reduction in flood risk downstream.*
- 9.63 *The Strategic Employment Location is surrounded by strategic transport links, but it has no immediate access to the strategic road network or Gatwick Airport railway station. A Strategic Employment Location of the scale proposed at Gatwick Green will generate surface access demands that will impact upon the existing highways network. The focus will be to maximise opportunities to access the site by sustainable transport modes, particularly for employees. However, given the scale and industrial nature of the proposed development, development must cater for its operational requirements, particularly HGV movements, demonstrating through the Transport Assessment and Mobility Strategy how this will be achieved without an adverse impact upon the highways network and residential amenity. It is vital that surface access demands arising from the development are appropriately catered for through the delivery of new infrastructure and/or improvements to existing infrastructure as part of the development. An HGV ban for traffic headed into Gatwick Green from the north on Balcombe Road is proposed at the access junctions into the site to prevent this traffic travelling through the built-up area in Horley. A right turn ban is also proposed for HGV traffic egressing the site, to prevent this traffic using the northern sections of Balcombe*

Road thus mitigating any potential adverse impacts from this HGV traffic such as noise and air pollution. Given the requirement to provide the physical infrastructure to support the Strategic Employment Location as part of the development itself, a S106 sustainable transport contribution will not be sought.

- 9.64 It should be noted that the requirements set out under Policy EC4 do not represent an exhaustive list, and development at Gatwick Green will be required to have regard to the Local Plan as a whole.

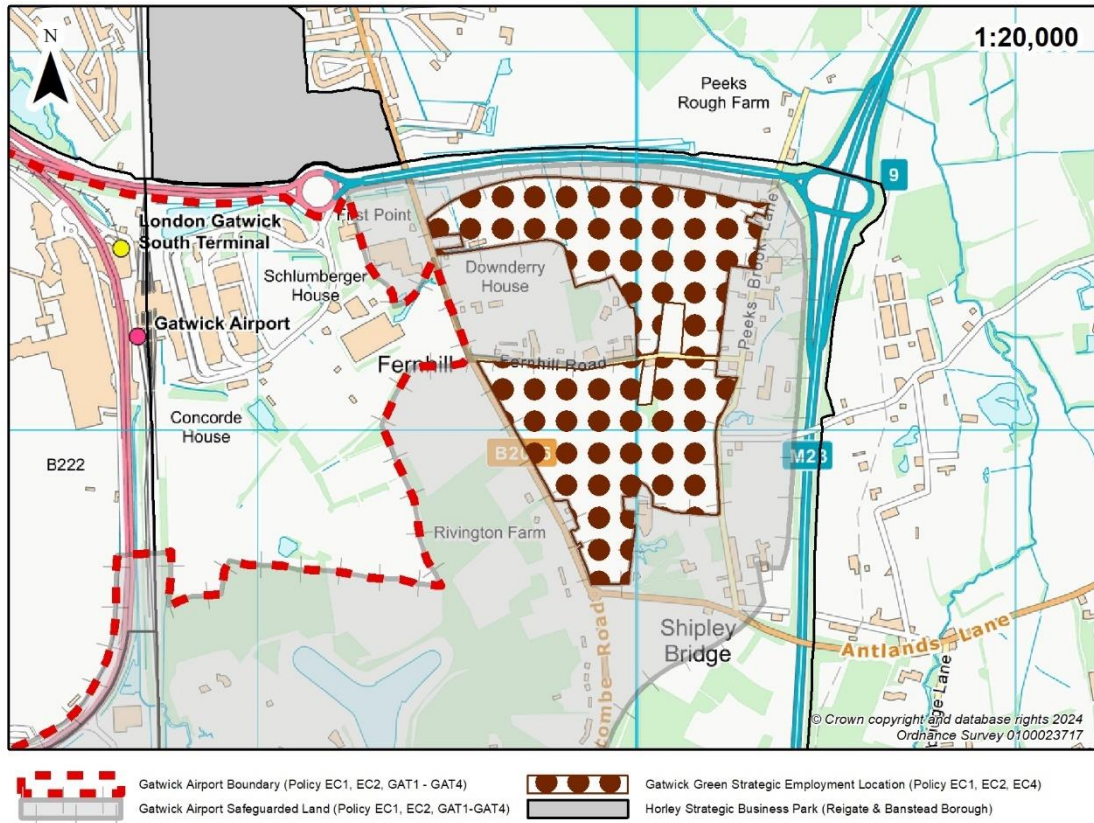


Figure 1: Strategic Employment Location