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Dear Elizabeth and the Policy team

Jersey Farm response to Main Modifications consultation for Crawley Borough Local Plan 2023-2040.

Following our participation at the Crawley Borough Local Plan Examination in November- January 2024 we are now writing to you in response to your Main Modifications Consultation open until the 25th of March 2024.

On behalf of our clients Windsor Developments Ltd, in relation to their site at Jersey Farm we would like to submit the following comments to make in regard to your proposed main and minor modifications.

We would also like to state our disappointment that despite our attendance and participation in the examination process and continued engagement with the Council, that no changes either by way of main modifications have been to the Plan. This is despite our ongoing dialogue with the Borough Council to support their Employment Land Trajectory (ELT) and our clients aligning with the wider objective of the plan, in providing additional employment land, across the plan period to 2040.

We are disappointed that despite being fully engaged in the process since the call for sites, and at both Regulation 18 and Regulation 19 stages, our attendance and participation at the examination and detailed representations to the Inspectors regarding employment land supply, market conditions and availability of appropriate size and scale buildings to sustain economic growth, no main modifications have been made in regard to our comments.

In regard to **Policy CL8 and Development Outside the Built Up Area Boundary** we do not consider that the Council or the Inspector have adequately considered the potential for building A at Jersey Farm, (as illustrated on the submitted masterplan) being included within the Built Up Area Boundary. In addition, the boundary has not been changed to allow Building B or a rationalisation of the countryside boundary to align with the road that has in part, already been implemented. The supporting Main Modifications to the Proposals Map fail to address this.

We also note that there have been no changes to para 9.25 which states that *“In response to demand for additional business land, carefully planned minor extensions abutting the Manor Royal boundary may be appropriate. Should proposals come forward for these areas, regard must be had to the countryside setting of the site, its surrounds and context, given its location within the Upper Mole Rural Fringe (Policy CL8). Crucially, development in these areas should not prejudice the potential future delivery of a southern runway to the*

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south of Gatwick Airport within the safeguarded land. Should any extensions be considered appropriate, development will need to demonstrate how it delivers additional business floorspace in line with Policy EC3.

We will therefore consider any next steps in regard to a planning application as part of the Development Management process and further engagement with Crawley Borough Council.

With regard to **Policy GAT2: Safeguarded Land**, we still believe that there is an inconsistency with principle and extent of safeguarding and this is not rectified adequately in the main modifications. The policy remains inconsistent with Policy ST4.

We do welcome the clarification under GAT2 on small scale extensions and minor works and that the policy has changed to clarify a southern Runway given the current DCO for a “second” runway to the North.

In relation to **ST4: on Area of Search for a Crawley Western Multi Modal Transport Link (CWMMTL)** we note the inclusion of criteria c that requires development to have regard to “*Land safeguarded at Gatwick Airport for potential future southern expansion.*” This does not appear to be consistent with safeguarding under GAT2 and having participated at the session with GAL Ltd we do not believe this amendment goes far enough to provide clarity about the policy application for Development Management purposes.

In regard to the Local Plan map modifications February 2024, we also note that there 2 elements to the key for Policy ST4 with a pink dotted “Area of search for CWMMTL” and grey dotted “interim Area of Search for CWMMTL. However this is not clear in the reasoned justification to support the text and we do not believe that the Inspectors Post hearing letters makes any distinction between these 2 areas, other than accepting the safeguarding area includes the interim area of search. Again, we believe this conflicts and is inconsistent with GAT2.

We thank you for the opportunity to be consulted on the Main Modifications but do not believe the changes adequately address our comments throughout the process, or reflect the Inspectors’ Post hearing comments.

We request that we are continued to be informed of the next stages of the plan and it proceeds to Full Council.

Yours sincerely



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