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Our Ref: 15849a

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CRAWLEY LOCAL PLAN 2024-2040 EXAMINATION

CONSULTATION ON MAIN MODIFICATIONS

REPRESENTATION SUBMITTED ON BEHALF OF AIRPORT INDUSTRIAL PROPERTY UNIT TRUST ('AIPUT')

Please accept this as a formal representation by AIPUT to the consultation on the Main Modifications of the Crawley Borough Local Plan 2023 to 2040, open from Monday 12 February to Monday 25 March 2024.

AIPUT is a long-term active investor-stakeholder at and in near proximity to major UK gateway airports, with real assets under management representing almost £700m as at Q1 2023. AIPUT's portfolio across four London international airports extends to 2.5 million sq ft. The portfolio at/in the vicinity of Gatwick Airport ('the Airport') comprises:

- Viking House – Located within the Airport boundary fronting onto the Perimeter Road South. Viking House is located outside the Crawley Local Plan safeguarding area.
- Gatwick Gate Estate – Located to the south of the Airport adjacent to its southern boundary. Gatwick Gate Estate is outside the airport boundary and within the airport safeguarding area.
- The Fleming Business Centre – Located to the south of the Airport within the Manor Royal Industrial Estate.
- Tesla Crawley Base – Located to the south of the airport.

The remainder of this representation outlines AIPUT's comments on the Main Modifications to Policy GAT2 ('MM20') and Paragraph 10.19 ('MM21').

Previous Engagement

AIPUT submitted a formal response by AIPUT to the Consultation on the Crawley Submission draft Local Plan, which began on 9 May 2023. AIPUT raised their concerns with the restrictive nature of

Policy GAT2 on development opportunities and the unclear definitions of ‘small scale development’ provided in paragraph 10.19.

Main Modification 20

The proposed modifications to Policy GAT2 set out in MM20 of the Crawley Borough Council Schedule of Main Modifications to the Submission Local Plan (February 2024) provides a more detailed explanation of small scale developments:

“Small scale development such as changes of use, minor building works and residential extensions within this area will normally be acceptable. Improvements to existing employment buildings including small scale extensions and refurbishment will normally be acceptable provided it will not lead to a significant intensification or significant increase in the scale of development. Where appropriate, planning permission may be granted on a temporary basis. The airport operator will be consulted on all planning applications within the safeguarded area”.

Main Modification 21

The proposed modifications to accompanying paragraph 10.19 (MM21) provide a more detailed guide for the interpretation of Policy GAT2:

“For the purpose of policy interpretation small-scale development also includes development such as residential extensions, some changes of use, or other minor building works such as changes to the external appearance. Small scale improvements to employment buildings and refurbishment will normally be acceptable within a similar footprint, provided that there is not a significant intensification of development on the site, either individually or cumulatively with other extensions. Appropriate temporary uses may include those that are short term, with a defined end date and which don’t involve significant construction. Incompatible development within safeguarded land is regarded as development which would add constraints or increase the costs or complexity of the development or operation of an additional runway. The airport operator will be consulted on all applications within the safeguarded area for a second runway”.

Summary

AIPUT is supportive of these modifications and the added definition of ‘small scale development’ in Policy GAT2 and paragraph 10.19 which would allow for the updating or refurbishing of buildings. We consider these against the soundness tests in policy.

Firstly, as made out in previous submissions, there is a reasonable need to invest in enhancements or redevelopment of individual existing buildings when they come to the end of their functional and/or economic life to provide new facilities that modern incoming occupiers require, and in line with sustainability and energy efficiency objectives and policies of the National Planning Policy Framework. MM20 and MM21 are therefore positively prepared and consistent with national policy as required by Paragraphs 35 and 36 of the NPPF.

Secondly, MM20 and MM21 will reduce the risk of properties and land within safeguarded areas surrounding the airport from becoming blighted. Moreover, MM20 and MM21 provides an appropriate level of flexibility for the updating and refurbishing existing facilities and infrastructure which is required for the safe and efficient operation of the current or the expanded airport. Consequently, MM20 and MM21 are justified and effective, as required by Paragraphs 35 and 36 of the NPPF.

We consider that MM20 and MM21 are required for soundness and will ensure that Policy GAT2 meets the needs of the areas surrounding the airport and provides an effective policy for allowing necessary development within the airport safeguarded area balanced with the continued efficient and safe operation of the existing airport and the long terms strategic aims of the Borough in accordance with national policy.

AIPUT would wish to be reconsulted in the event of changes to further modifications to GAT2. Any consultations should be sent to Colin Turnbull (colin.turnbull@dwd-ltd.co.uk) and Callum Cook (callum.cook@dwd-ltd.co.uk).

Yours sincerely,

A handwritten signature in black ink that reads "DWD". The letters are stylized and connected.

DWD

For and on behalf of AIPUT