

CRAWLEY BOROUGH LOCAL PLAN EXAMINATION

Crawley Borough Council Response to Inspector's
Matters, Issues and Questions

Matter 4: Economy, Employment and Retail
Issue 2: Employment Land Supply

February 2015



CBC/008 Matter 4 Economy, Employment and Retail; Issue 2 February 2015

Issue 2: Whether the amount of employment development proposed represents the maximum available and deliverable within the borough at the present time, having regard to airport safeguarding and other constraints on land supply.

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4.4 Are the employment sites identified as deliverable in years 1-5 and 6-10 (not subject to safeguarding) in the Employment Land Trajectory suitable for employment development? Has their availability and viability been robustly assessed? Are these sites capable of delivering the stated amounts of employment land? Does the land supply match the type and quality sought by the market?

- 4.4.1 Land supply in Crawley is recognised as being highly constrained, particularly as a consequence of a tight administrative boundary, existing environmental constraints and designations, and the safeguarding of land north of Manor Royal for a possible second runway at Gatwick Airport. This presents challenges to accommodating objectively assessed employment and housing needs over the Plan period, and necessitates the supply-led approach applied by the CBLP. However this needs to be balanced with the fact that the borough is experiencing a period of buoyancy in terms of development delivery and positive markets signals regarding demand for space in the town.
- 4.4.2 In identifying land most suitable for employment development (rather than housing) the CBLP takes a clear position in seeking to maximise the use of Crawley's existing employment land, directing economic growth to the Main Employment Areas (MEA) designated in Policy EC2. These sites, as identified by the Employment Land Trajectory (dated November 2014¹, & the latest position in February 2015 (ELT)² are situated in existing MEAs, and are subject either to planning applications/ permission, or are vacant or are likely to become available based on market information. Having regard to their current planning status, developer liaison through the September 2014 call for sites, and their location within the designated MEAs, these sites are identified to come forward in Years 1-5 of the Plan. These sites are therefore considered to be suitable, available and viable for development in the early part of the Plan period.
- 4.4.3 Sites identified in Years 6-10, have been promoted to the council through the call for sites, or as a result of pre-application discussions. These sites are largely situated outside of the built up area boundary, but within close proximity to Manor Royal, and are broadly unaffected by safeguarding. It is feasible that these sites could come forward as extensions to Manor Royal subject to addressing other constraints. Two sites identified within Years 6-10 are currently subject to safeguarding. These are linked closely to the non-safeguarded Year 6-10 sites, and could theoretically come forward if safeguarding were to be lifted. As these could form part of a larger site, given adjacent safeguarding constraints, it is anticipated that phased developments may occur, or that a larger scheme would be submitted following a government decision on the second runway and safeguarding.

¹ LP064: Crawley Employment Land Trajectory (November 2015) CBC

² LP064b: Crawley Employment Land Trajectory (February 2015) CBC

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- 4.4.4 Land in the north of the borough is considered to represent the most appropriate locations for economic growth in Years 6-10 of the Plan. These locations are well connected to existing MEAs at Manor Royal and Gatwick Airport, and benefit from good existing transport links and infrastructure. The sites have been actively promoted for economic growth through the call for sites, and are recognised by the council as being unsuitable for residential development as a result of existing, and potential future, noise constraints associated with Gatwick Airport.
- 4.4.5 The EGA³ and its subsequent update⁴ demonstrate that the local commercial market in Crawley is buoyant and has responded to the end of the recession strongly and quickly. Market signals⁵ (see Appendix A) demonstrate this, whilst the updated ELT⁶ shows that, following a significant period of site delivery and planning applications, there is 23.2ha of land identified as suitable, available and achievable within the Plan period⁷, (reduced from 44.13 in the 2014 ELT) as shown in Appendix B. Therefore, the sites have been adequately assessed in regard to their viability, availability and suitability in line with the council's Guidance Note that supports the ELT (LP064).
- 4.4.6 As set out by the proposed modification to Policy EC1⁸, the identification of 23.2ha of land allows for provision of employment development within the early years of the Plan period. It continues to utilise the criteria of Policies EC2 and EC3 of the CBLP⁹ in that there is a presumption in favour of B use class provision and this complements the market signals and dialogue with land owners with regard to development proposals for these areas.
- 4.4.7 The 2015 ELT¹⁰ undertakes a further assessment of employment land in the borough and cites development potential in hectares. Where available it also cites floorspace figures (sqm) based on forecast density assumptions from the EGA¹¹ and more defined floorspace proposals from planning applications where available. Whilst there may be an actual increase in intensification of floorspace on site and potential for increases in building heights, the use of hectares as a monitoring mechanism is appropriate given evidence from the EGA and uncertainty over periods 6-10 and 11-15. Given the dialogue between land owners and agents on many of the larger scale

³ LP062: Northern West Sussex Economic Growth Assessment Para 3.56 Bullet 6; Para 7.57-58 (April 2014), NLP (2014) NLP

⁴ LP062b: Economic Growth Assessment Crawley Update (2015) NLP

⁵ as detailed in CBC/008: CBC Written Response to Inspector's Matter 4: Economy, Employment and Retail, Issue 2: Land Supply, Appendix A (2015) CBC

⁶ LP064b: Crawley Employment Land Trajectory (Feb 2015) CBC

⁷ LP001d: Schedule of Further Proposed Modifications to the Submission Local Plan (September 2014), MM071-MM077 (February 2015) CBC

⁸ CBC/007 Council's Response to Matter 4: Economy, Employment and Retail, Issue 1: Objectively Assessed Employment Needs, Appendix B (2015) CBC; and LP001d: Schedule of Further Proposed Modifications to the Submission Local Plan (September 2014), MM071-MM077 (February 2015) CBC

⁹ LP001: Crawley Borough Local Plan (September 2014) CBC

¹⁰ LP064b: Crawley Employment Land Trajectory (2015) CBC

¹¹ LP062: Northern West Sussex Economic Growth Assessment Crawley, Appendix 8 Employment Space Requirements Methodology (2014) NLP

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sites proposed in the ELT, it is considered that all opportunities have been considered, including any new sites coming forward as a result of the call for sites.

- 4.4.8 Significant market liaison has been undertaken to understand the type and quality of land supply that is required, including discussion with sub-regional and local business representatives through the 2014 EGA and the August 2014 call for employment sites. The market view, endorsed by the 2014 EGA¹², is that there is strong quantitative and qualitative need for a Strategic Employment Location(s) in Crawley that is capable of complementing the existing role and function of Manor Royal. The preferred location for SEL is in the Area of Search¹³ at the north of the borough. However, until there is certainty as to the future status of the safeguarded land, a SEL cannot come forward in Crawley.
- 4.4.9 The CBLP is clear that employment generating provision should be within Main Employment Areas. The Policy approach acknowledges that this should not be solely restricted to B uses and that flexibility and a positive approach to future employment provision within MEAs is paramount. This is supported by the Manor Royal Business Group statement (Appendix C) and representations received during previous Local Plan consultations¹⁴ which highlight that the council should look to be flexible whilst maintaining support for strong economic growth.

¹² LP062 Northern West Sussex Economic Growth Assessment (2014) paras 3.46-3.49; 8.16-8.17; 9.16; Appendix 1, NLP

¹³ LP001a Submission Modification Draft Local Plan (November 2014) p12

¹⁴ LP004 Crawley Borough Local Plan Consultation Statement, p115-137 (2014) CBC

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4.5 Are there potential employment sites in Crawley (outside the safeguarding zone) not included within the Employment Land Trajectory that are suitable for development, available and achievable over the plan period?

- 4.5.1 The amount of employment development potential across the borough has been considered as part of the Sustainability Appraisal (SA) process¹⁵ and the Urban Capacity Study¹⁶ (UCS). These assessments considered all land within the borough, and particularly whether sites would be more appropriate and deliverable for housing or employment. The SA also noted that moderate flexibility should allow for further local employment generation at a neighbourhood level and Policy CH1 supports the value of appropriate employment development at neighbourhood centres.
- 4.5.2 Policy E2 recognises that a flexible approach to the wider definition of employment growth, for Crawley as part of the heart of Gatwick Diamond, is essential to ensuring a balanced and healthy economy. Policies EC3, EC5 and GAT2 acknowledge that for the specific main employment areas of Manor Royal, Town Centre and Gatwick Airport, additional policy considerations are required, as they all have varying location-specific characteristics. Given the approach of EC2 to a more flexible use of employment space, it is not considered necessary to allocate or identify specific sites within these MEAs as defined on the Local Plan Map¹⁷. The ELT identifies the known sites but others may come forward through intensification/ churn. Therefore, it represents a minimum supply figure.
- 4.5.3 Outside of the MEAs, work undertaken through the UCS looked at any additional areas that may be suitable for economic development. This work was not able to identify any further employment areas, beyond those MEAs designated by Policy EC2. This illustrates the importance of providing a healthy supply of employment land and builds on the EGA study requirement for a higher level of land supply for B-class development over the previous Employment and Review undertaken in 2009/2010.
- 4.5.4 The UCS also provided an assessment of the role and capacity for development of the town's neighbourhoods and their parades. The Preferred Strategy Local Plan¹⁸ identified the parades as additional MEAs. This recognised the role and function of the neighbourhoods in providing retail and commercial functions. However, following representations at preferred strategy and queries regarding the redevelopment of the parades, the policy principles were clarified in the CBLP, which recognised the role of the parades as providing a more retail-led, localised employment function that is distinct to the MEAs formally designated by Policy EC2.

¹⁵ LP003: Crawley Borough Local Plan Sustainability Appraisal, p298-325 (2014) CBC

¹⁶ LP090: Urban Capacity Study, para 1.8 (2013) CBC

¹⁷ LP002a: Local Plan Map (November 2014) CBC

¹⁸ LP028: Crawley Borough Local Plan 2014 – 2029 preferred strategy consultation draft (2012) CBC

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The neighbourhood parades are therefore considered in their own right in Policy EC8.

- 4.5.5 As part of the SHLAA¹⁹ assessment process and the SA²⁰, sites that had been considered as having potential for housing and employment, or those that had been proposed by land owners were also assessed to see if they were appropriate to be identified as additional sites requiring further work. These include three sites at Stephenson Way and land adjacent to Three Bridges Station. The submitted SA²¹ further assessed these sites, and the Stephenson Way sites were rejected for housing based on their site characteristics and evidence in the EGA which recognised the important function of the site as a key industrial location for smaller businesses²². Further liaison with Network Rail, as a landowner for one of the sites, further outlined that the sites are considered appropriate and necessary for employment. These sites were identified in Policy EC2 as forming the wider Three Bridges Corridor MEA.
- 4.5.6 The inclusion of the three Stephenson Way sites into the Three Bridges Corridor MEA ensures maximum opportunity and flexibility for employment development and that this wider definition is more appropriate than restricting them to B use classes as per those identified in the ELT. The SA²³ also considers the wider employment potential of sites that are located within the locational-specific Policies of EC3, EC5 and GAT2. The SA process identified that, given the specific role and function of Manor Royal and Gatwick Airport, and representations received in relation to them, it would not be appropriate to allow employment uses that were inconsistent with the CBLP objectives for these areas. The town centre is however recognised as an appropriate location for a more flexible range of main town centre uses, and the approach of Policies EC5 and EC6 contributes positively to the provision of non B-class economic growth.
- 4.5.7 The employment potential of the two sites to the south of the borough: “East of Brighton Road”²⁴ and the adjacent site “Tilgate Country Park”²⁵ was considered and rejected. For east of Brighton Road, the assessment demonstrates that, whilst there is a limited potential for additional employment floorspace within the existing MEA adjacent, the site characteristics and negative assessment with regards to location, and the natural environment, mean it would not be a sustainable location for economic development. It is concluded that the MEA at Tilgate Business Park should not be enlarged and, as the site is not considered suitable, it has not been included

¹⁹ LP079: Crawley Strategic Housing Land Availability Assessment (2014) CBC

²⁰ LP029: Sustainability Appraisal of the Local Plan Preferred Strategy Additional Sites Consultation Document, p40-49 (2013) CBC

²¹ LP003: Crawley Local Plan Sustainability Appraisal, p298-325 (2014) CBC

²² LP062: Northern West Sussex Economic Growth Assessment, Para 3.45 (2014), NLP

²³ LP003: Crawley Local Plan Sustainability Appraisal, p299-323 (2014) CBC

²⁴ LP003: Crawley Local Plan Sustainability Appraisal, p323 (2014) CBC

²⁵ LP003: Crawley Local Plan Sustainability Appraisal, p325 (2014) CBC

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in the ELT. It also concluded that Tilgate Park is not considered suitable for employment development beyond that relating to its recreational function.

- 4.5.8 In line with national PPG and the NPPF²⁶ on building a strong and competitive economy, the council considers that it has identified all the known suitable, appropriate and deliverable sites for employment development within the borough.

²⁶ National Planning Policy Framework, para 18(2012) DCLG

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4.6 Is it appropriate to delay identifying a longer-term employment land supply until the decision is made on a second runway at Gatwick airport? Should policy EC1 identify a specific site or sites within the preferred location for strategic employment rather than an Area of Search?

- 4.6.1 Paragraph 1.38 of the CBLP clearly identifies that the Plan has been prepared on the basis of growth at Gatwick Airport to 45 million passengers per annum, within its current configuration of a single-runway, two-terminal airport. However, the Plan is required to safeguard land for a second runway and refers to the on-going work of the Airports Commission regarding runway capacity. Paragraph 1.38 – 1.43 set out how the CBLP will need to be reviewed in light of the Airports Commission recommendations and response of the government.
- 4.6.2 All three possible scenarios regarding Gatwick that could arise from the government’s response to the Airports Commission recommendation, either the provision of a runway at Gatwick; no runway now but the retention of safeguarding; or the removal of safeguarding, will have different implications for the Plan, including that of employment land provision as the different scenarios would generate different levels of both demand and opportunities for employment land. Therefore, it is not possible to be able to identify longer term supply with any certainty now. Further details are found in paragraphs 1.38 – 1.43 and 9.5 – 9.6²⁷ of the CBLP, the Local Development Scheme²⁸ (LDS) and explained further in Topic Paper 1²⁹.
- 4.6.3 The council response to Matter 2³⁰ also addresses this issue and highlights that the Airports Commission reinforces this approach: “spatial development plans and strategies make no allowance for the impacts and expansion of Heathrow or Gatwick and should not be expected to. Local plans must necessarily respond to anticipated local needs at the time they are drawn up. Airport expansion at Heathrow or Gatwick would have a significant impact on the nature of future local and regional needs and create new opportunities, changing the conditions for which decision-makers must plan. It should not be inferred that any current local plans are deficient if they do not take account of the impacts of airport expansion nor that in requiring change, airport expansion plans are necessarily misaligned with existing plans and strategies.”³¹
- 4.6.4 This was reinforced by the Inspector’s Initial Findings into the Horsham District Planning Framework: “any decision to expand Gatwick Airport by building a second

²⁷ LP001: Crawley Borough Local Plan Submission Consultation Draft (September 2014) Crawley Borough Council

²⁸ LP040: Crawley Borough Council’s Local Plan Local Development Scheme 2013 – 2016 (2014) Crawley Borough Council

²⁹ LP010: Topic Paper 1: Future of Gatwick Airport & Local Plan Review (November 2014) Crawley Borough Council

³⁰ CBC/002: Council’s Response to Inspector’s Matter 2: Overall Spatial Strategy Question 2.3 (2015) CBC

³¹ Strategic Fit: Fit with Wider Spatial and Socio-Economic Development Strategies, paragraph 1.5, p9 (November 2014) Airports Commission

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runway would have major implications for the planning of the whole sub-region and would almost certainly necessitate an urgent review of the HDPF (and quite probably the plans of all authorities in the Gatwick Diamond area). ...³².

- 4.6.5 The Local Enterprise Partnership's (LEP) Strategic Economic Plan (SEP)³³ and Northern West Sussex EGA³⁴ recognise that Crawley should remain the focus for economic growth, at the heart of the Gatwick Diamond. This is also recognised by adjacent authorities in the LSS³⁵. Given the need to identify how and where this growth might be accommodated the council has undertaken a range of assessments. The Sustainability Appraisal³⁶ identifies the Land to the North of Manor Royal to be the most sustainable location for additional employment growth, and the SA rejects other sites to the south of the borough. This is underpinned by the amount of land proposed by land owners as part of the council's various consultation stages of the Local Plan and its specific call for sites in Sept 2014.
- 4.6.6 As the Key Diagram³⁷ illustrates, there are 523ha of land within the Area of Search. A limited proportion of this has been identified as an Area of Search for housing, in addition to employment development (particularly to the North of Forge Wood and north of Langley Green). However, the potential use of the wider area of safeguarded land for housing is limited due to noise contour constraints associated with the existing single runway. While this area is double the area of Manor Royal Business District adjacent (240 hectares) which is one of the main employment hubs in the sub-region and home to over 500 businesses and employing 30,000 people. The council's Employment Land Trajectory³⁸ (Appendix B, Table 4.2) identifies that there is 164.94ha of employment land available and actively being promoted by land owners and developers; of which 139.17ha is currently affected by safeguarding. Whilst Policy EC1 relates to the Area of Search, it is considered that the ELT and its related Map³⁹ demonstrate that there are a number of options available to ensure that the quality and quantity of economic floorspace required by the LEPSEP and the EGA can be provided, in the most sustainable location and to meet the demands of the market, locally and in the wider sub-region.
- 4.6.7 The ELT illustrates that there a number of large sites within this safeguarded area that could provide the quantum of development required as specified in the higher growth and alternative growth scenarios of the EGA. The council is clear that, given the constraints of safeguarding, it can only identify land at this time for the baseline scenario. However, it believes that should safeguarding be lifted then the additional

³² Horsham District Planning Framework (HDPF) examination Inspector's Initial Findings, paragraph 25 (19 December 2014) Inspector Geoff Salter

³³ LP046: Coast to Capital Local Enterprise Partnership Strategic Economic Plan (2014) C2C

³⁴ LP062: Northern West Sussex Economic Growth Assessment (2014), NLP

³⁵ LP048; Gatwick Diamond Local Strategic Statement (2012)

³⁶ LP003: Crawley Borough Local Plan Sustainability Appraisal, p232 (2014) CBC

³⁷ LP001a: Crawley Borough Local Plan Modifications Draft, p12 (November 2014) CBC

³⁸ LP064: Crawley Employment Land Trajectory (February 2015) CBC

³⁹ LP064: Crawley Employment Land Trajectory (February 2015) CBC

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land is in principle available and appropriate for economic development. Whilst the sites have been assessed in line with the criteria recommended in the PPG, with regard to the Crawley-specific market demands, it is considered inappropriate at this stage to identify any preferred sites for consideration. There may well be additional areas of land within the Area of Search which could come forward if safeguarding is lifted, and detailed assessment of the most appropriate locations within this area will take place if safeguarding is lifted.

- 4.6.8 Whilst there is more information available regarding the proposition by Gatwick Green, following the Core Strategy in 2008 and more recent discussions with planning agents, there are other alternative proposals for sites within the Area of Search that are being proposed by other land owners.
- 4.6.9 Following the decision on the second runway, which may act as the trigger for a Local Plan review, if safeguarding is removed, additional work can be undertaken in dialogue with the variety of landowners as to the specific considerations for each site and any other proposals which may come forward. This would allow a full consideration of road infrastructure requirements, landscape constraints, flooding and other design considerations as well as other factors including viability which would normally underpin a more detailed allocation. Given the fact that there are a number of active proposals at this early stage, it is considered that the identification of any specific sites would undermine this process and be premature. Also, even if a new runway is located at Heathrow, the government requirement to safeguard land at Gatwick may be continued so this detailed work could be abortive if undertaken now.

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4.7 Should policy EC1 refer to a possible long term requirement to identify land outside the borough to meet in full Crawley's employment needs?

- 4.7.1 As explained in Matter 2⁴⁰, throughout the CBLP⁴¹ the document recognises the importance of CBC's role in engaging with neighbouring authorities to ensure the delivery of Crawley's unmet needs for housing and employment, and it recognises the limitations on the provision of growth based on its land supply position. This is illustrated most clearly in its Topic Paper 5 (Unmet Needs)⁴². Paragraph 5.22 of the CBLP refers to the possible future need for land outside the borough to be identified to meet Crawley's employment growth needs. However, it is also recognised that it is beyond the remit of the Plan to allocate land outside Crawley's boundaries. Therefore, this reference is not made in Policy EC1.
- 4.7.2 As the 2014 EGA highlights, there is a significant sub-regional demand for employment land located in, or very close to, Crawley. This approach is also endorsed by the LEPSEP. The EGA⁴³ acknowledges that this level of demand would not necessarily be replicated elsewhere in the sub-region if the land cannot be provided at Crawley because of the locational draw of Gatwick Airport, the clustering of large companies at Manor Royal and Crawley's key transport links. With the current issue of safeguarding acting as a significant restraint for Crawley, in providing the required amount of land as identified in the EGA, for even the baseline, the council believes it should allow all possible opportunities for provision to be considered in the future.
- 4.7.3 Policy EC1 proposes a hierarchical approach, pending a decision on the second runway. It states that the preferred location for employment land is within the boundaries of the borough, as identified in the Area of Search, then on the periphery of Crawley, then in association and discussion with adjacent local authorities. This approach is consistent with the significant cross boundary working that has been undertaken historically, with Horsham in regard to housing delivery and with the extensive duty to co-operate undertaken with the EGA providing a joint evidence base in regard to employment across the Northern West Sussex (NWS) area.
- 4.7.4 The borough council continues to work with adjacent authorities with regard to strategic employment locations especially in regards to Mid Sussex District Council with their studies into a SEL at Burgess Hill; Horsham District Council in relation to north of Horsham; and dialogue with Reigate & Banstead Borough Council regarding their employment requirements and opportunities. The council will continue to work alongside land owners and developers within the Area of Search to maximise evolving development opportunities. The NWS Position Statement confirms the

⁴⁰ CBC/002: Council's Response to Inspector's Matter 2: Overall Spatial Strategy Question 2.3 (2015) CBC

⁴¹ LP001: Crawley Borough Submission Local Plan 2015 – 2030, paragraphs 1.33; 2.25-2.26; 5.22; and 6.40-6.41 (September 2014) Crawley Borough Council

⁴² LP014: Topic Paper 5: Unmet Needs (2014) CBC

⁴³ LP062: Economic Growth Assessment for the northern West Sussex Area (2014) NLP

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three authorities will seek to collectively promote sustainable economic growth across the wider economic areas of Gatwick Diamond and the LEP⁴⁴.

- 4.7.5 Given that the council's ELT can identify adequate land within the Area of Search to provide in excess of the maximum growth scenario from the EGA, it is considered that the identification of a short term of land supply of 23 hectares for years 0-5 warrants the council maintaining its current position until a decision on safeguarding is made, with recognition of a potential future need to work with other local authorities in order to meet the town's employment needs in full.

⁴⁴ LP129: Northern West Sussex Position Statement, para. 5.2 (2014) CBC, HDC, MSDC

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APPENDIX A: EGA UPDATE (2015) NLP: MARKET SIGNALS EXTRACT

Market Signal	Data/Summary	Source
Gross completions of B Class employment space	2014 – 15,550m ² 2013 – 8,170m ² 2012 – 8,770m ² Annual average 2002-2014 – 39,480m ²	West Sussex County Council Monitoring Data (2002 to 2014)
Losses of B Class employment space	2014 – 19,590m ² 2013 – 1,340m ² 2012 – 5,200m ² Annual average 2002-2014 – 17,790m ²	
Net completions of B Class employment space	2014 - -4,030m ² 2013 – 6,830m ² 2012 – 3,570m ² Annual average 2002-2014 – 21,690m ²	
Take-Up	<u>Offices</u> 2013 – 237,000ft ² 2012 – 173,379ft ² 2011 – 117,185ft ² <u>Industrial</u> 2013 – 200,000ft ² 2012 – 400,000ft ² 2011 – 390,000ft ²	
Vacancy	Offices - 10.5% of total stock (circa 488,000ft ²). Industrial – 3% of total stock (approximately 315,000ft ²). This is as low as it has ever been in Crawley.	Stiles Harold Williams, Crawley / Gatwick & Mid-Sussex Office Focus Q3 2014 & Industrial & Logistics Focus Q3 2014
Quality of stock	Grade A office stock accounts for 20% of the total (circa 97,000ft ²)	
Average asking rents	Offices - £17.50 (Grade B stock) to £23.50 (Grade A stock) Industrial - £7 (secondary accommodation) to £8.50 (prime accommodation). Some rents are now hitting £11-12ft ² for prominent units.	

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APPENDIX B: ECONOMIC GROWTH FORECASTS AND LAND SUPPLY POSITION

Table 4.1: Crawley Employment Land Trajectory November 2014 Extract⁴⁵

	Non Safeguarded	Safeguarded	Total
Land Supply Years 0-5	44.13	0	44.13
Land Supply Years 6-10	5.41	14.39	19.8
Land Supply Years 11-15	0	121.95	122
LAND SUPPLY 2015-2030	49.54	136.34	185.9

Table 4.2: Crawley Borough Council Employment Land Trajectory (February 2015)⁴⁶ Extract

	Non Safeguarded		Safeguarded		Total		
	Office	Industrial	Office	Industrial	Office	Industrial	
Land Supply Years 0-5	15.31	5.05	2.83	0	18.14	5.05	23.2
Land Supply Years 6-10	2.71	2.71	7.20	7.20	9.90	9.90	19.8
Land Supply Years 11-15	0	0	60.98	60.98	60.98	60.98	122.0
LAND SUPPLY 2015-2030	18.02	7.75	71.00	68.17	89.02	75.92	
	25.77		139.17		164.94		

Table 4.3: Employment Forecasts by Scenario

Time Period	Forecast Source	Employment Growth	
		Job Growth (All Sectors)	B Class
2006-2026 ⁴⁷	Experian (Feb 2009)	5,900 (295 p.a)	n/a
2011-2031 ⁴⁸	Experian (May 2013)	16,440 (822 p.a)	5,880 (294 p.a)
2015-2030 ⁴⁹	Experian (Dec 2014)	15,160 (1,011 p.a)	3,720 (248 p.a)
1997-2015	Past Employment Trends (Experian Dec 2014)	17,856 (992 p.a) ⁵⁰	3,996 (222 p.a) ⁵¹

⁴⁵ LP064: Crawley Employment Land Trajectory (2014) CBC

⁴⁶ LP064b: Crawley Borough Council Employment Land Trajectory (February 2015) CBC

⁴⁷ LP062: Northern West Sussex Economic Growth Assessment, Table 7.17 p131 (2014) NLP

⁴⁸ LP062: Northern West Sussex Economic Growth Assessment, Table 7.17 p131 (2014) NLP

⁴⁹ LP062b: Crawley Economic Growth Assessment Update, Table 2.12, p17 (2015) NLP.

⁵⁰ LP062b: Crawley Economic Growth Assessment Update, Para 2.41, Fig 2.3, p15 (2015) NLP.

⁵¹ LP062b: Crawley Economic Growth Assessment Update, Para 2.15, p7 (2015) NLP.

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APPENDIX C: MANOR ROYAL BUSINESS GROUP STATEMENT

Statement of Common Ground: Manor Royal Business Group and Crawley Borough Council

The Manor Royal Business Group continues to support the Council in its preparation of the Crawley Borough Local Plan. The group reiterates its representations to the Local Plan, in regard to the fact that it is important for businesses and developers to have certainty and to know what to expect when dealing with the local planning authority.

In regard to the Economy policies, MRBG acknowledges that there is an issue with the supply of B Use Classes, particularly Industrial (B2 and B8). This is a problem now and all indications are that this is going to get worse with demand out-stripping supply in the not too distant future, if it's not already. The approach to tackle this through Policy EC3 is supported. Whilst there have been some recent returns to the market in these classes (City Link, Lloyds Banking) they have been snapped up by new occupiers almost straight-away demonstrating demand.

The market has seen some decent B1 (office) developments proposed (Leonardo and Nova) which is very encouraging, alongside improvements to other stock, such as Churchill Court is being brought up to Grade A standard, but they have long been vacant. The group is also encouraged with the Site E2 coming forward as there has been a lack of decent office stock built on spec for a while.

The MRBG also notes that a number of buildings have been permitted to change to housing which reduces the overall availability. For Manor Royal, the loss of employment space to "alternative" uses is something that we would like to resist, as it tends to undermine the overall reputation and "brand" of Manor Royal as a business destination as well as reduce available floorspace. The approach of policy E3 to protect business floorspace is therefore supported.

The group also welcomes the amendments to policy EC4 that ensure that the commercial operation of the business district is considered when development proposals come forward, outside those implemented under the current permitted development rights.

The policy also recognises that there is a need on Manor Royal for certain facilities to serve a local market (employees and businesses). The challenge always is how this can be managed to avoid "creep" and the Local Plan policies recognise this both for facilities on Manor Royal and with regard to the impact of retail warehouse development.

Issue 2: Whether the amount of employment development proposed represents the maximum available and deliverable within the borough at the present time, having regard to airport safeguarding and other constraints on land supply.

The provision of small scale retail (food, café, coffee shop) would be welcome in Manor Royal. The group agree with an approach in EC3 that protects Manor Royal for employment /business uses but recognises the need for something to serve a local market and successful commerce. The issues of land supply as set out in policy EC1 shows that there is no available land for any further significant development that is not in some way impacted by Gatwick Second Runway.

Whilst this does make life difficult to plan for given where we are at with the Airports Commission and runway debate generally, the approach of the Local Plan is sensible. The MRBG is seeking further clarity on the timing of a review of the CBLP if and when a government decision is made. However, it understands that the Borough Council, in its Local Development Scheme (LDS), states in para 1.7 that, following a government decision on runway capacity, that an immediate review of the LDS will be triggered. It will be for the review of the LDS to set out the programme and scope for the review of the Local Plan itself, the approach to which will depend on the extent of the review required.

The MRBG supports the endorsement of Manor Royal as the Gatwick Diamond's focus. And supports planning policies that ensure that Manor Royal can retain its position and even be enhanced.

The MRBG welcomes the opportunity to work alongside the Council in continuing to shape the future of the town and how the Borough Council deals with the issue of the second runway.

Signed Steve Sawyer 23rd February 2015



Signed Diana Maughan 23rd February 2015

