

# **CRAWLEY BOROUGH LOCAL PLAN EXAMINATION**

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

Matter 4: Economy, Employment and Retail  
Issue 3: Main Employment Areas and Gatwick Airport

February 2015



*Issue 3: Whether the policies for Main Employment Areas and Gatwick Airport (EC2-4, GAT1-4) are positively prepared and effective.*

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## **CBC/009 Matter 4: Economy, Employment and Retail; Issue 3: Main Employment Areas and Gatwick Airport**

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*Issue 3: Whether the policies for Main Employment Areas and Gatwick Airport (EC2-4, GAT1-4) are positively prepared and effective.*

**4.8 Is the clause of policy EC2 relating to loss of employment floorspace justified and consistent with NPPF? It is not clear whether the clause applies to all Main Employment Areas, including Manor Royal, Gatwick Airport and the town centre. If it does not apply, what is the justification for a different (lesser?) protection being applied to the principal business location, Manor Royal, under policy EC3?**

- 4.8.1 Crawley is established as the leading sub-regional employment destination at the Heart of the Gatwick Diamond<sup>1</sup>. To maintain this position, the CBLP positively promotes sustainable economic growth, and identifies the geographical clusters of historic economic growth as the town's Main Employment Areas (MEAs).
- 4.8.2 Significant economic growth is projected in Crawley over the Local Plan period, with the 2014 EGA identifying growth of 822 workforce jobs per annum<sup>2</sup>, and the 2015 EGA update outlining higher growth of 1,011 workforce jobs per annum<sup>3</sup>. As recognised in the 2014 EGA, the employment land supply pipeline for Crawley is heavily constrained by the requirement to safeguard land for a possible second runway at Gatwick Airport<sup>4</sup>. Strain is also placed on employment land supply by the loss of commercial premises to other uses, particularly at present through the Prior Approval process for B1 to C3, a factor highlighted by Manor Royal Business Group<sup>5</sup> as a key market concern.
- 4.8.3 The constrained land supply position and ongoing loss of employment sites place considerable pressure on the town in terms of accommodating its objectively assessed economic growth needs. This places significant weight on the need to retain Crawley's existing employment areas.
- 4.8.4 The clear intention of Policy EC2 is, therefore, to promote all MEA's as destinations for economic growth, and to protect their integrity as employment locations. However, it is recognised that flexibility is necessary<sup>6</sup> within the Policy to ensure that the Plan is able to respond to changes in economic circumstance but the council considers that this must be set against the overall Policy objectives in promoting and protecting the MEAs.
- 4.8.5 The Policy EC2 clauses i- iii regarding the loss of employment floorspace provide flexibility for alternative uses where there are no reasonable prospects of a site being used for employment use. This is most explicitly reflected in criteria i. and iii which require applicants to demonstrate that any net loss of employment floorspace use is justified in economic terms, and that proposals will not undermine the economic role and function of the MEA. Given the importance of employment

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<sup>1</sup> LP046: Coast to Capital Local Enterprise Partnership Strategic Economic Plan, Page 46 (March 2014) Coast to Capital LEP

<sup>2</sup> LP062: Northern West Sussex Economic Growth Assessment, Table 7.17 p131 (2014) NLP

<sup>3</sup> LP062b: Crawley Economic Growth Assessment Update, Table 2.12, p17 (2015) NLP

<sup>4</sup> LP062: Northern West Sussex Economic Growth Assessment, Paras 3.36; 9.13 (Bullet Point 1) (2014) NLP

<sup>5</sup> REP/046: MRBD Limited Response to Technical Consultation on Planning (September 2014) Manor Royal Business Group

<sup>6</sup> National Planning Policy Framework, Para 22 (2012) DCLG

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floorspace in Crawley, part ii. of the clause requires applicants to demonstrate that the loss of floorspace is outweighed by wider social, environmental or economic benefits resulting from proposals. This reflects the principle of sustainable development underpinning the NPPF<sup>7</sup> and Local Plan<sup>8</sup>.

- 4.8.6 Policy EC2 reflects the NPPF requirement that plans are capable of responding rapidly to changes in economic circumstance, including the expanding or contracting of business sectors<sup>9</sup>. It responds to the NPPF objective to avoid the long-term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose, and provides flexibility for alternative use of land or buildings where this is the case, having regard to the individual merits of applications and market signals<sup>10</sup>. The Policy EC2 clause relating to loss of employment floorspace is justified and fully consistent with the NPPF.
- 4.8.7 The clause is intended to apply to all Main Employment Areas designated by Policy EC2, including Manor Royal, Gatwick Airport, and the Town Centre. These three MEAs are recognised for their specific economic role and individual characteristics, and are therefore guided by more spatially specific policy approaches. However, the individual policies for each location are intended to be considered against the strategic economic approach of Policies EC1 and EC2.
- 4.8.8 It is acknowledged that Policy EC2 would benefit from a minor text amendment to more explicitly clarify that the loss of employment clause applies to all MEAs, including Manor Royal, Crawley Town Centre, and Gatwick Airport. Therefore, the council propose additional wording as a modification to the final paragraph of Policy EC2<sup>11</sup>, as set out in Appendix A of this statement.

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<sup>7</sup> National Planning Policy Framework, Para 17 (2012) DCLG

<sup>8</sup> LP001: Crawley Submission Local Plan, Policy SD1 Presumption in Favour of Sustainable Development, p22 (September 2014) CBC

<sup>9</sup> National Planning Policy Framework, Para 21, Bullet Point 4 (2012) DCLG

<sup>10</sup> National Planning Policy Framework, Para 22 (2012) DCLG

<sup>11</sup> LP001d: Schedule of Further Proposed Modifications to the Submission Local Plan (September 2014), MM078 (February 2015) CBC

#### **4.9 Is the requirement for non B-class development to enhance the role of Manor Royal (policy EC3) justified and consistent with NPPF? Should the CBLP provide clarity about how the test for non B-class uses would be applied?**

- 4.9.1 The approach of Policy EC3, promoting Manor Royal for business-led economic growth, is considered to be justified by evidence and consistent with the approach of the NPPF. The policy approach has been developed having full regard to the market objectives of the business community. This includes the Coast to Capital LEP, Gatwick Diamond Initiative, Crawley Local Economy Action Group (LEAG), and Manor Royal Business Group (MRBG), all of which are seeking greater a focus on the protection of B-class uses in Manor Royal to provide certainty and encourage investment.
- 4.9.2 Manor Royal is Crawley's premier employment location. In its capacity as the leading business destination in sub-region it is regarded by Coast to Capital<sup>12</sup> LEP and Gatwick Diamond Initiative<sup>13</sup> as the key asset to drive economic growth within the functional economic area.
- 4.9.3 Over time, there has been a significant incursion of non-business activity at Manor Royal. Market feedback obtained through the 2014 EGA identifies strong concern that this trend is eroding the role and function of Manor Royal as a business location, potentially deterring future investors and, in practical terms, undermining delivery of new B-class development as higher value non-business uses are proposed and landowners hold onto land for these uses<sup>14</sup>. The market view is that diversification of activities in Manor Royal has left companies unclear of the future direction of the business district, creating uncertainty as to the type of occupier that may take up adjoining sites, and concern as to the impact this could have on existing operations. Businesses are subsequently considered less likely to invest in their current premises, impacting upon the overall environment and perception of Manor Royal<sup>15</sup>. Market feedback emphasises the need to protect Manor Royal as a location for business, building upon its established role and function, with both Crawley LEAG<sup>16</sup> and Manor Royal Business Group<sup>17</sup> considering Policy EC3 to be sound. Therefore, in line with the objective of the NPPF to support economic growth and businesses, any non B-Class development proposals in Manor Royal should only be permitted if they enhance the role of the business district.

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<sup>12</sup> LP046: Coast to Capital Local Enterprise Partnership Strategic Economic Plan, p46 (March 2014)

<sup>13</sup> LP048: Gatwick Diamond Local Strategic Statement, Para 4.5 (2011) Surrey County Council, West Sussex County Council, Crawley Borough Council, Horsham District Council, Mid Sussex District Council, Mole Valley District Council, Reigate and Banstead District Council

<sup>14</sup> LP062: Northern West Sussex Economic Growth Assessment, Para 9.16 (April 2014) NLP

<sup>15</sup> LP075: Manor Royal Master Plan, Paras 2.12-2.15, p6 (2010) GVA Grimley

<sup>16</sup> REP/014: Crawley Local Economy Action Group (2014)

<sup>17</sup> REP/046: Manor Royal Business Group (2014)

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- 4.9.4 As discussed by Matter 4 Issue 1<sup>18</sup>, there is significant need for land to accommodate business (B1/B2/B8) growth over the Plan period. With the 2015 EGA<sup>19</sup> and February 2015 ELT<sup>20</sup> identifying a limited business land supply of 23ha, there is unmet need equating to 35ha business land<sup>21</sup>. Loss of office space through the prior approval process is eroding an already limited land supply, with two Manor Royal offices lost to date, totalling a deficit of 6,257 sqm, and introducing non-conforming residential uses inconsistent with the principal economic function of the Main Employment Area. This acts as a further constraint to growth and barrier to investment.
- 4.9.5 The Policy EC3 approach, to protect and enhance the functioning of Manor Royal as a location for business, is justified by evidence and is NPPF compliant. However, it is recognised that the NPPF definition of employment is wider than solely B-class uses<sup>22</sup>. Therefore, Policy EC3 provides flexibility for non-business uses where these are of a scale and function that enhance the established business function of Manor Royal.
- 4.9.6 This approach is justified through a number of key evidence base studies, including work progressed in liaison with the business community. The Manor Royal: Final Report (Regeneris)<sup>23</sup> and Manor Royal Master Plan<sup>24</sup> identify the business district as being in a vulnerable position because it lacks the competitive advantage of other South East business parks. Market feedback identifies a lack of key amenities and facilities in place at Manor Royal to support the day-to-day needs of employees. Many larger businesses have seen this as a barrier to recruitment and have had to provide facilities in-house to meet their employee's needs at additional cost burden, whilst this is not an option for smaller businesses. With other leading business parks in the South East able to offer these facilities; this presents a barrier to the ongoing commitment of businesses to Manor Royal<sup>25</sup>.
- 4.9.7 These factors are recognised by evidence and market feedback as presenting key obstacles to economic growth at Manor Royal. Reflecting the views of business, particularly Crawley LEAG<sup>26</sup> and MRBG<sup>27</sup>, Policy EC3 is clear that non-business uses may be able to contribute to the established role and function of Manor Royal as a business location.
- 4.9.8 As required by the NPPF<sup>28</sup>, the policy intention is not to be overly restrictive or act as a barrier to investment. Rather, Policy EC3 pro-actively supports business, seeking to

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<sup>18</sup> CBC/007: Council's Response to Inspector's Matter 4: Economy, Employment and Retail, Issue 1: Objectively Assessed Economic Growth Needs (2015) CBC

<sup>19</sup> LP062b Economic Growth Assessment 2015 Update, Table 3.3 p23 (February 2015) NLP

<sup>20</sup> LP064b: Crawley Borough Council Employment Land Trajectory (February 2015) CBC

<sup>21</sup> LP062b Economic Growth Assessment 2015 Update, Para 3.17 p24 (February 2015) NLP

<sup>22</sup> National Planning Policy Framework, p51, Glossary: Economic Development (2012) DCLG

<sup>23</sup> LP076: Manor Royal: Final Report, p7, Para 2; p45, Para 7 (2008) Regeneris

<sup>24</sup> LP075: Manor Royal Master Plan, Para 2.2, p6 (2010) GVA Grimley

<sup>25</sup> LP075: Manor Royal Master Plan, p15, Paras 4.25-4.29 (2010) GVA Grimley; and LP076: Manor Royal: Final Report, p24 Paras 4-6 (2008) Regeneris

<sup>26</sup> REP/014: Crawley Local Economy Action Group, 2014.

<sup>27</sup> REP/046: Manor Royal Business Group, 2014

<sup>28</sup> National Planning Policy Framework, Para 21 (2012) DCLG



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address known vulnerabilities of Manor Royal in order to reinforce and strengthen its position as the leading business location in the Gatwick Diamond.

- 4.9.9 Whilst the robust evidence base, including the Masterplan, provides further guidance as to how the policy objectives should be achieved, in addressing the policy, applicants must demonstrate how their proposals will help address an identified gap in the Manor Royal offer, and are of an appropriate scale and function, to meet the needs of businesses and the day-to-day needs of the people that work there.
- 4.9.10 As paragraph 5.40 of the CBLP explain, there is market demand for a range of uses beyond B class uses on Manor Royal. The range is such and other needs may arise in the future, so a defined test to outline which uses are appropriate would be an overly restrictive approach. In addition to this, the council encourages extensive pre-application discussion with land agents and developers, and utilises its strong relationships with Manor Royal Business Group and Crawley Local Economy Action Group to facilitate how the needs of Manor Royal businesses are complemented without undermining the overall economic function of the area. This approach has been applied successfully through recent pre-application discussions and subsequent planning permission (subject to legal agreement) at the former GlaxoSmithKline site, Manor Royal<sup>29</sup>.

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<sup>29</sup> LP064b: Crawley Borough Council Employment Land Trajectory, Sites 5 and 6 (February 2015)

#### **4.10 Is the treatment of retail warehouse locations at Manor Royal (paragraph 5.41 and policy EC7) appropriate and consistent with NPPF?**

- 4.10.1 The Retail Capacity & Impact Study 2014 Update identifies capacity for up to 26,650 square metres comparison retail floorspace over the Plan period to 2030<sup>30</sup>. In line with the NPPF Town Centre First approach, recently reiterated by Ministers in the January 2015 Planning Directorate Newsletter<sup>31</sup>, Policy EC7<sup>32</sup> directs the available retail capacity to the Town Centre. The CBLP is clear that Crawley Town Centre, and respectively, well-connected sustainable edge-of-centre locations (subject to sequential and impact testing) are the focus for accommodating retail growth. This is recognised under Local Plan Policy EC6<sup>33</sup>, which identifies Town Centre and edge-of-centre sites for a range of Main Town Centre uses<sup>34</sup> and residential. The NPPF does not place a blanket restriction on retail and leisure development in non-central locations, and development in these locations is allowed provided the sequential and impact tests are satisfied. Where proposals are put forward in edge-of-centre or out-of-centre locations, these will only be permitted where it is demonstrated that the NPPF sequential and impact assessments are satisfied.
- 4.10.2 Policy EC3 protects Manor Royal for business and business-supporting uses. Whilst this approach allows flexibility for retail which is of a scale and function that would support the business function of Manor Royal, proposals for retail warehousing are not seen as compatible with the policy approach.
- 4.10.3 However, County Oak, situated at the western extent of Manor Royal, falling outside of the area identified by MRBG as representing the formal Manor Royal Business District, but within the Manor Royal Main Employment Area defined by the Local Plan, has a more established retail function. It is characterised by large retail warehousing, other mixed uses and surface car parking, which is recognised as distinct to the principal business function of Manor Royal.
- 4.10.4 The Local Plan applies the Town Centre First Approach and, therefore, County Oak is not designated as a retail centre, and is not viewed as sequentially preferable or equivalent to Town Centre or edge-of-centre sites, in impact terms. However, where proposals are able to demonstrate that requirements of sequential and impact testing are met, in order to protect the principal business function of Manor Royal and other MEA's, County Oak should continue to represent the focus for out-of-centre retail.

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<sup>30</sup> LP067: Crawley Retail Capacity and Impact Study Update, Figure 2, p16 (2013) DTZ

<sup>31</sup> Planning Update Newsletter January 2015, Annex A (2015) DCLG; and provided in CBC/010: Council's Response to Inspector's Matter 4: Economy, Employment and Retail, Issue 4: Retail, Appendix C (2015) CBC

<sup>32</sup> LP001a: Submission Modification Draft Local Plan, p65 (November 2014) CBC

<sup>33</sup> LP001a: Submission Modification Draft Local Plan, p63-65 (November 2014) CBC

<sup>34</sup> LP023: National Planning Policy Framework, p53, Glossary: Main Town Centre Uses (2012) DCLG

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**4.11 Land south of Haslett Avenue is shown on the Policies Map as a Main Employment Area but not identified as such in policy EC2. Do the proposed modifications to paragraph 5.31 address this satisfactorily? Are there other Main Employment Areas not listed in EC2?**

- 4.11.1 Land to the south of Haslett Avenue forms part of the former Three Bridges Corridor site allocation that was identified in the 2008 Core Strategy<sup>35</sup>. The allocation included a housing site at Haslett Avenue (the former leisure centre)<sup>36</sup> which separated Denvale Trade Park and Spindle Way from the larger Stephenson Way part of the allocation to the east.
- 4.11.2 The updated Three Bridges Corridor Main Employment Area as allocated in the Local Plan continues to include Denvale Trade Park, Spindle Way, and Stephenson Way, and also includes land at Hazelwick Avenue. With the housing site at Haslett Avenue having now been built out, Denvale Trade Park and Spindle Way appear separate to Stephenson Way and Hazelwick Avenue on the Policies Map, but continue to form part of the wider Three Bridges Corridor Main Employment Area.
- 4.11.3 However, if it is considered that further clarity would assist, additional wording is suggested to be added to Policy EC2. The council's proposed amended policy text<sup>37</sup> is set out in Appendix A.

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<sup>35</sup> LP034 Crawley Borough Council Core Strategy (2008) Policies TBC1 and TBC2, Pages 62-63.

<sup>36</sup> LP034 Crawley Borough Council Core Strategy (2008) Policy H2, Page 24.

<sup>37</sup> LP001d: Schedule of Further Proposed Modifications to the Submission Local Plan (September 2014), MM078 (February 2015) CBC

**4.12 Is it appropriate that part of Lowfield Heath Main Employment Area is within Gatwick Airport boundary, where different policies and provisions apply? Is the final paragraph of policy EC2 appropriate to a site (TSB, Russell Way) identified for housing in policy H2?**

4.12.1 The airport boundary as defined on the Local Plan Map<sup>38</sup> was amended at the Submission Local Plan stage following earlier representations<sup>39</sup>. Buildings within the airport boundary do have restrictions as set out in Policy GAT2 and require operations to relate directly to the airport.

4.12.2 The council agree that to provide clarity to the owners of property within the Airport Boundary at Viking House, an amendment to the Local Plan Map could be made as a further modification to the CBLP<sup>40</sup>. This would re-align the boundary of the Main Employment Area to exclude the property from the Main Employment Area of Lowfield Heath. It would remain within the Main Employment Area of Gatwick Airport and, therefore, subject to the site specific criteria Policy GAT4 as well as the more general MEA approach outlined in Policy E2. The extract of the Local Plan Map as amended, and corresponding amendments to the Key Diagram and Main Employment Areas Plan<sup>41</sup>, are as shown in Appendix B.

4.12.3 For Policy E2 and its exemptions clauses relating to loss of employment proposals, whilst the Policy covers all losses of employment, the criteria for Policy E2 allows flexibility to be demonstrated. The sites in Policy H2 are housing sites with a minimum yield cited. The TSB, Russell Way site is identified in the SHLAA<sup>42</sup> as a Local Plan Key Housing Allocation, Deliverable Site and it is acknowledged that it could come forward as part of a mixed use site. The TSB site is allocated in the Local Plan for a minimum of 40 dwellings<sup>43</sup> which would satisfy the Policy E2 exceptions clause. It is not considered necessary to amend Policy E2 in relation to a single site. As the site sits adjacent to two other sites that could have development potential, and are identified with the Three Bridges Corridor main employment area, the potential loss of the employment across the wider site beyond the allocated area should meet the full Policy E2 tests. The council believes that it is clear that the site in Policy H2 is already allocated for housing.

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<sup>38</sup> LP002a: Crawley Submission Local Plan Map Proposed Main Modifications (November 2014) CBC

<sup>39</sup> LP004: Crawley Local Plan Consultation Statement, Appendix 2 Early Consultation (Issues & Options) p119 (2014) CBC

<sup>40</sup> LP001d: Schedule of Further Proposed Modifications to the Submission Local Plan (September 2014), MM066; MM079; and MM099 (February 2015) CBC

<sup>41</sup> LP001a: Crawley Submission Modification Draft Local Plan, P58 (November 2014) CBC

<sup>42</sup> LP079: Crawley Strategic Housing Land Availability Assessment, p75-76, Category C, Site 258 (2014) CBC

<sup>43</sup> LP001: Crawley Submission Local Plan, Page 74 (September 2014) CBC

**4.13 Does the proposed modification to policy EC4 reflect an appropriate balance between the protection of residential amenity and the importance of maintaining the economic function of Main Employment Areas? Does this, and the proposed modification to paragraph 6.48, appropriately address the specific case of Crawley Goods Yard?**

4.13.1 The proposed modification to Policy EC4<sup>44</sup> is suggested to ensure an appropriate balance between the protection of residential amenity and the important of maintaining the economic function of Main Employment Areas.

4.13.2 The amended text responds to representations received in relation to submission Local Plan Policy EC4, which considered that existing business should not be constrained by the inappropriate introduction of residential development in Main Employment Areas. NPPF<sup>45</sup> outlines that an existing business should not have unreasonable restrictions placed upon it because of changes in land use since it was established. For this reason, it is considered the additional wording, as set out in Policy EC4 and paragraph 6.48, assists in more explicitly safeguarding the operations of existing business as well as the amenity of existing residents.

4.13.3 Equally, in response to representations relating to Crawley Goods Yard, amended text has been added to Policy ENV11 (Development and Noise)<sup>46</sup> to ensure through careful planning, design, and layout, the noise impact for future users of residential development affected by noise will be made acceptable. It is considered that the proposed modifications reflect the requirements of NPPF<sup>47</sup>, and respond to the specific issues raised in representations relating to Crawley Goods Yard.

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<sup>44</sup> LP001a: Submission Modification Draft Local Plan, Policy EC4, p50 (November 2014)

<sup>45</sup> LP023: National Planning Policy Framework, Para 123, Bullet Point 3 (2012) DCLG

<sup>46</sup> LP001a: Submission Modification Draft Local Plan, Policy ENV11, p110 (November 2014)

<sup>47</sup> LP023: National Planning Policy Framework, Para 123 (2012) DCLG

#### **4.14 Does policy GAT2 give sufficient clarity about the nature of minor development that is acceptable within the airport safeguarding area?**

- 4.14.1 Policy GAT2 safeguards land from development which would be incompatible with the expansion of the airport to accommodate a second runway. The requirement to safeguard land and protect it from “incompatible development” was first introduced in the 2003 Aviation White Paper<sup>48</sup> and re-stated in the 2013 Aviation Policy Framework<sup>49</sup>. There is no further explanation in either document of what is meant by “incompatible development”.
- 4.14.2 The 2008 Crawley Core Strategy Policy G2 was the first local development framework policy which safeguarded land for a second runway at Gatwick and provided guidance on the type of development that would be permitted in the safeguarded area. This approach was endorsed in the Inspector’s Report on the Core Strategy Examination.
- 4.12.3 Paragraph 110 of the Inspectors Report into the Core Strategy states:  
“In my view the clear implication of a policy protecting land from ‘incompatible development’ is that planning permission will be refused for most forms of development, other than minor changes of use and small scale building works. Otherwise there is a clear risk that substantial development could be built on land which (perhaps only a few years later) has to be compulsorily purchased in order to implement national policy. I cannot see that this would be in the public interest.”
- 4.12.4 Policy GAT2 is a continuation of the Core Strategy Policy G2<sup>50</sup>. The Policy gives reference to examples such as small scale building works and residential extensions in order to provide clarity on the scale of development that is considered to be minor and therefore acceptable.

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<sup>48</sup> LP121: Aviation White Paper: The Future of Air Transport, Para 12.3 (2003) DfT

<sup>49</sup> LP122: Aviation Policy Framework, Para 5.9 (2013) DfT

<sup>50</sup> LP034: Crawley Borough Council Core Strategy, p51 (2008) CBC

#### **4.15 Is a separate aerodrome safeguarding policy necessary to reflect the impact of development in the wider area on the operational integrity and safety of the airport?**

- 4.15.1 Gatwick Airport and its technical sites (e.g. radar stations) along with other civil aerodromes are officially safeguarded to ensure that their operation and development are not inhibited by buildings, structures or works which would impair the safe operation of the airport e.g. by impairing navigational aids or communication systems, obscuring runway lights, distracting pilots or increasing the risk of bird strike. Circular 1/2003<sup>51</sup> provides guidance on this issue and the process to be followed by local planning authorities, and refers to the site specific safeguarding map which is produced for each aerodrome which indicates to the local planning authority where consultation with the airport operator or air traffic control operator is required.
- 4.15.2 It is noted that the 2003 Circular<sup>52</sup> does state that plans should include a policy stating that aerodrome safeguarding areas have been established and will be the subject of consultation with the operator of the airport or technical site. However, the general approach to the preparation of planning policies since this time has sought to reduce the number of policies which summarise guidance in other documents. The council has successfully enforced the approach to aerodrome safeguarding to date without a specific planning policy as it follows the process set out in the Circular and the requirements for consultation contained on the aerodrome safeguarding map.

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<sup>51</sup> DfT/OPDM Circular 1/2003 Safeguarding Aerodromes, technical sites and military explosives storage areas <https://www.gov.uk/government/publications/safeguarding-aerodromes-technical-sites-and-military-explosives-storage-areas>

<sup>52</sup> As above.

## APPENDIX A: PROPOSED POLICY EC2 MAIN MODIFICATION

### LOCAL PLAN MARKED-UP MODIFICATIONS EXTRACT:

#### Policy EC2: Economic Growth in Main Employment Areas

As a key economic driver in the sub-region, Crawley's main employment areas make a significant contribution to the economy of the town and the wider area. Therefore, Main Employment Areas are identified as a focus for sustainable economic growth, each of which has a different character and function.

Whilst identified as Main Employment Areas, Manor Royal, Gatwick Airport and the Town Centre perform a specific employment role which is recognised in individual location-specific Policies EC3, EC5 – 7, and GAT 1 – 4.

The other Main Employment Areas are:

- Three Bridges Corridor (including [Denvale Trade Park, Spindle Way, Stephenson Way and Hazelwick Avenue](#))
- Maidenbower Business Park
- Tilgate Forest Business Centre
- Broadfield Business Park
- Lowfield Heath
- Broadfield Stadium and K2 Crawley
- The Hawth

Proposals for employment generating development at the ~~six~~ seven locations above will be supported where they contribute to the specific characteristics of the main employment area, and overall economic function of the town, through providing a mix of employment generating uses.

Proposals that would involve a net loss of employment floorspace [in any Main Employment Area, including Manor Royal, Gatwick Airport and Crawley Town Centre](#), will only be permitted where they are able to demonstrate that:

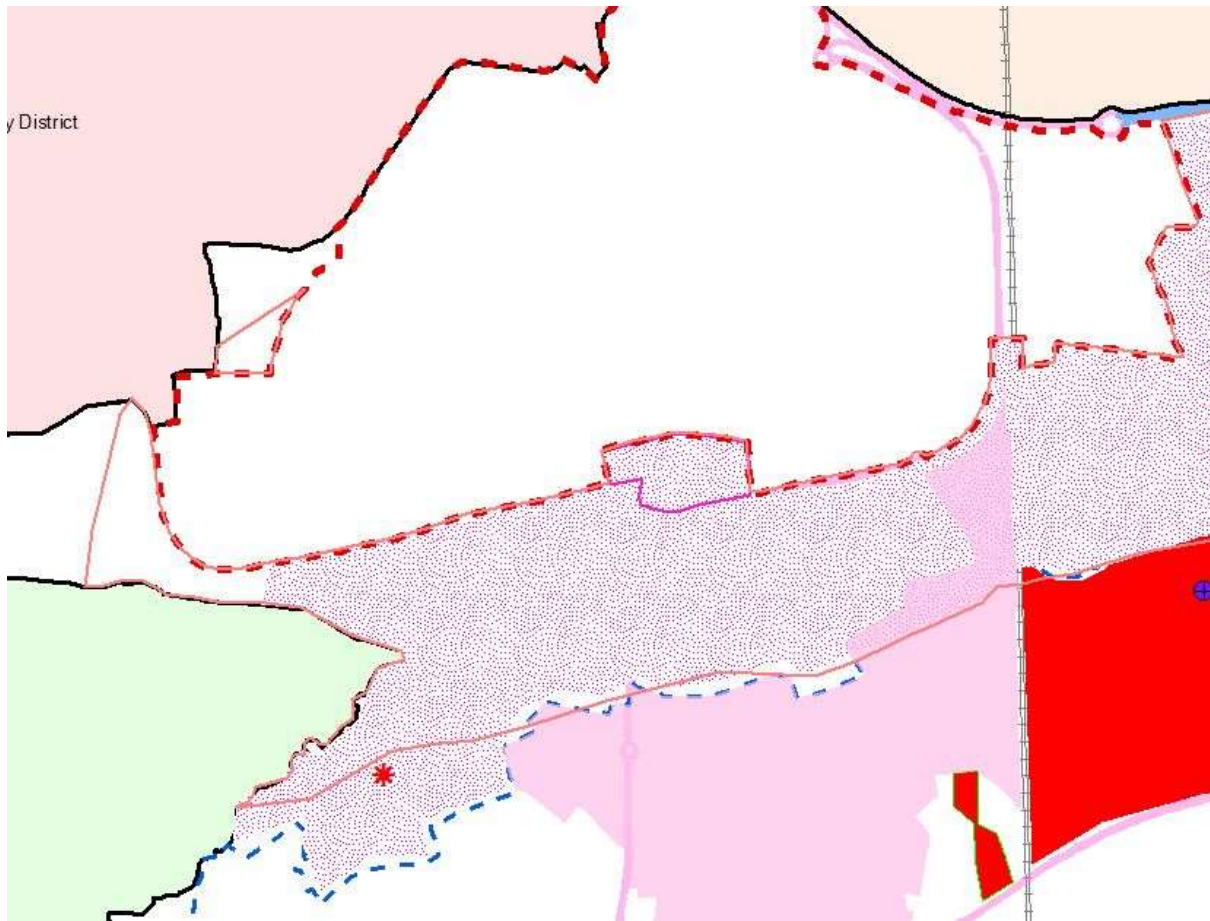
- i. the site is no longer suitable, viable or appropriate for employment purposes; and
- ii. the loss of any floorspace will result in a wider social, environmental or economic benefits to the town; and
- iii. there is no adverse impact on the economic role or function of the Main Employment Area, and wider economic function of Crawley.



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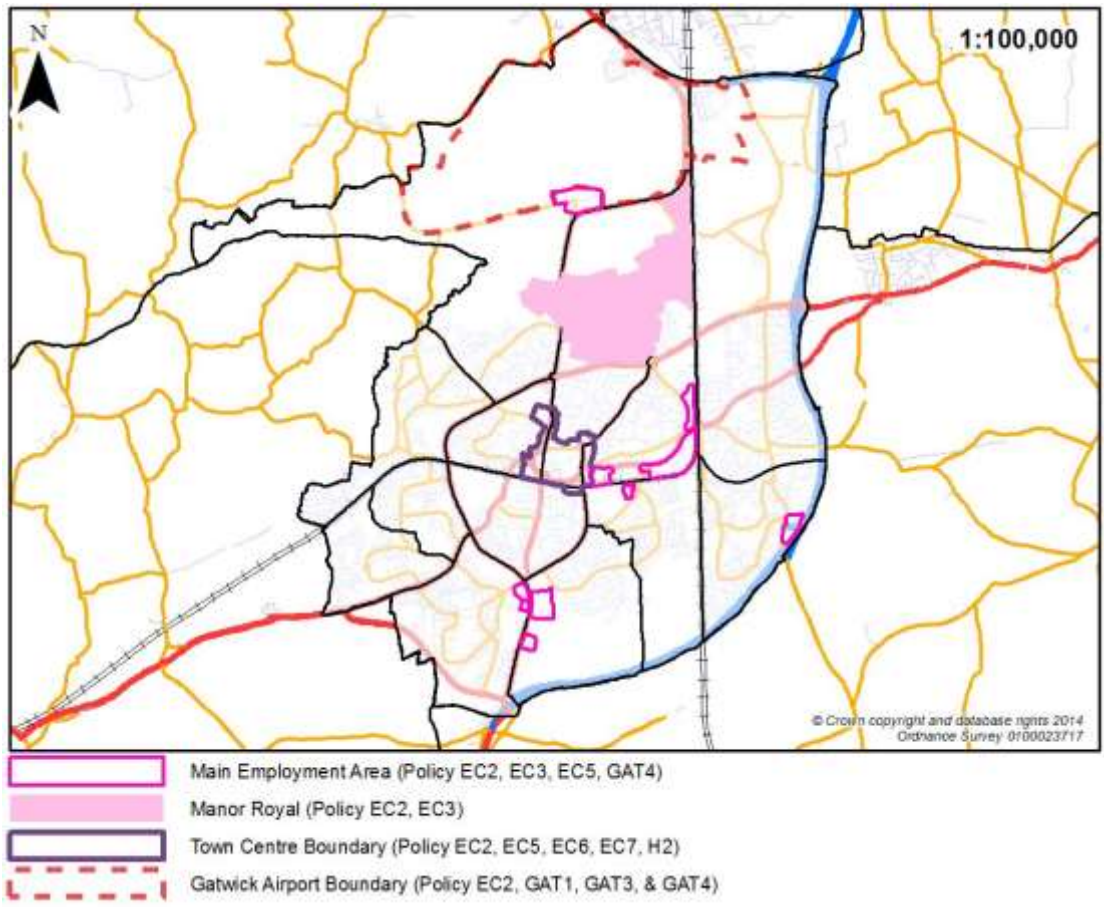
**APPENDIX B: PROPOSED LOCAL PLAN MAP MAIN MODIFICATIONS**

**KEY DIAGRAM MODIFICATIONS EXTRACT p12:**



Issue 3: Whether the policies for Main Employment Areas and Gatwick Airport (EC2-4, GAT1-4) are positively prepared and effective.

**MAIN EMPLOYMENT AREAS MAP MODIFICATIONS EXTRACT p58:**



*Issue 3: Whether the policies for Main Employment Areas and Gatwick Airport (EC2-4, GAT1-4) are positively prepared and effective.*

**LOCAL PLAN MAP MODIFICATIONS EXTRACT:**

