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



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.

CBC/008 Matter 4: Economy, Employment and Retail; Issue 2: Employment Land Supply Contents:

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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

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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 typeETBT1 0 0 1 108.02 14(e)8(n)-

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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

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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 o3(c)3(e)8(Cd)5(8()6(p)-3(433.63 Tm[)]

- 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

- 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(in)5()-3(Se)-2(p)5(95.41 635.98 Tm 0.00372 Tc(3)).

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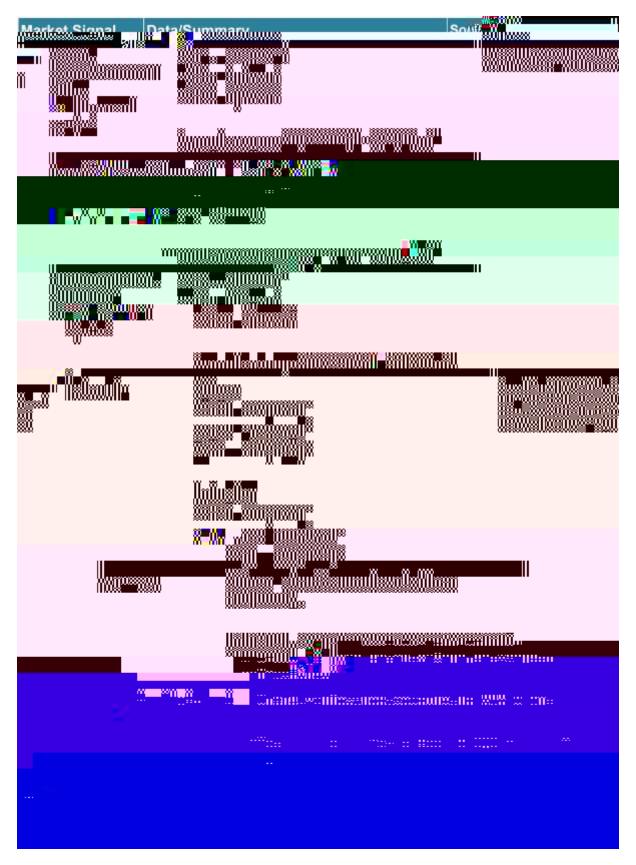
4.7 Should policy EC1 refer to a possible long term requirement to identify

- 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



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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

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	

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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.