

Crawley Borough Local Plan Review 2021 - 2037

Manor Royal BID Regulation 19 Response

01 March 2021

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This is the formal response of the Manor Royal Business Improvement District (BID) Company to Crawley Borough Council as part of the review of the Crawley Borough Local Plan that provides the planning and land use policies to help meet Crawley's employment land and floorspace needs for the period 2021 to 2037.

The Manor Royal BID Company (MRBD Limited) was formed in June 2013 following the successful outcome of the BID ballot conducted in accordance with the Business Improvement Districts (BID) Regulations (2004). The Manor Royal BID represents and promotes the interests of Manor Royal based companies and staff, with sole responsibility for managing and delivering the BID Business Plan for which businesses in Manor Royal have voted.

This response predominantly focusses on "Economic" policies as they impact on Manor Royal. It is recognised that housing supply and supporting infrastructure are also important. In response to these issues extracts from the Manor Royal BID's "Strategic Statement" were previously provided with a detailed comment on Gatwick Airport policies, which have not been repeated here.

Commentary and Manor Royal BID response

Economic Growth

The policies and approach to promoting the Manor Royal Business District (Policies EC1, EC2 and EC3) are largely in line with previous policies and are designed to protect the prime function of Manor Royal. The Manor Royal BID supports this approach.

This latest iteration of the Local Plan is much improved on the previous version. The Council has made a number of improvements that will support the work of the Manor Royal BID and, most importantly, support the development of Manor Royal as one of the town's prime employment areas.

The policies continue to protect and favour Manor Royal for B Use Class development (Offices, Industrial units and warehouses). There is now specific mention of the need for improved facilities, a "business hub" and more explicit policies in support of decentralised energy all of which are supported by the Manor Royal BID.

More explicit reference has been made to the Manor Royal Economic Impact Study (Lichfields, 2018), studies undertaken in respect of ReEnergise Manor Royal and the work of the Manor Royal BID itself. The Local Plan sets out how s106 contributions from developers will be sought to improve public realm and these will be allocated to projects identified jointly by the Council and the Manor Royal BID. This is a positive development and makes better use of local knowledge and the strategic work of the Manor Royal BID, specifically the Manor Royal Projects Pack. It is also encouraging to see the Council recognise the Manor Royal BID as a key partner in the Local Plan and the development of Manor Royal Business District. On these points, the Manor Royal BID acknowledges and thanks the Council.

In light of Manor Royal's strategic importance and the intention of the Council to support development outside of the town (e.g. Horley Business Park) and promote a new Strategic Employment Location within the borough boundary (Gatwick Green), it is important that the Local Plan reflects the need to upgrade the offer, improve public realm and facilities available onsite, address transport issues and encourage supporting and complementary uses to help create a quality of place that encourages investment and retains businesses. The Local Plan is stronger in this respect than the previous version. This needs to be followed by swift action and tangible investment on the ground, which the Manor Royal BID has proven it can help with.

In offering broad support for the Local Plan the Manor Royal BID makes the following comments:

- Acceptance within the Local Plan of Horley Business Park as the destination for new office occupiers.
The Manor Royal BID is concerned about this but accepts it is not entirely in the gift of the Council to influence.
- How the new "Gatwick Green" strategic employment allocation (Policy EC4) with a focus on B8 uses can be brought forward in a way that is complementary and does not undermine Manor Royal as the strategic and more sustainable main employment site.
The Manor Royal BID recognises the land supply issues that necessitate this current allocation but feels; the Council ought to prioritise more sustainable extensions, intensification and re-development at Manor Royal and other main employment sites first. The Manor Royal BID draws attention to the fact that land supply issues and the ability for Manor Royal to grow incrementally is significantly constrained by accepting the extended Gatwick Airport safeguarded area; it is unclear whether the Council has factored in the volume of sites now available for development on Manor Royal (circa 30 acres not obviously included in the Economic Growth Assessment); and how this new Strategic Employment Land allocation can be brought forward in such a way that is complementary to and does not undermine Manor Royal. The Council should explicitly state that their preferred policy position is to support development, growth, intensification and appropriate extensions of existing employment areas like Manor Royal and that any other such developments will be subject to the requirement for an impact assessment justifying significant development outside the existing main employment areas with an assessment of how new development impacts existing areas, including but not limited to impact Gatwick Green may have. This would be equivalent to a "town centre first" policy for places like Manor Royal. The Manor Royal BID feels this is the responsible and sustainable approach to guiding development that properly balances growth with protection of limited resources and the environment.
- Increased land take for Gatwick Safeguarded area at the northern boundary of Manor Royal effectively blights more land from being developed and curtails minor extensions to the business district that the Local Plan states it supports.
The Manor Royal BID regrets the Council has not been able to release land to allow sustainable growth of Manor Royal to the north, as was the previous intention when it proposed introducing an Area Action Plan. The Manor Royal BID does not support the extension of the Gatwick Airport Safeguarded Area that prevents even minor extensions. The extent of the safeguarded area should at least be returned to the previous boundary line and, if possible, tested further to allow more land to be released for the development and extensions of Manor Royal to come forward. Acceptance of the extended safeguarded area is contrary to supporting Manor Royal's growth and the diversification of Crawley's economic base and forces the Council to allocate other land for development outside the main employment areas. This is not a sustainable approach for any town much less one where land is scarce and has the effect of increasing the cost of development by limiting land supply.
- The continued need to safeguard land for a second runway (Policy GAT2) and the extent of land identified in the Local Plan blights development for a seemingly indefinite period with little challenge or indication

when that might be reviewed,

The Manor Royal BID regrets the Council has not been able to release land to allow sustainable growth of Manor Royal to the north as was the intention of the previous iteration of the Local Plan and encourages the Council to challenge GAL on the extent of land to be safeguarded, makes clear its intention to review the approach to continued and indefinite safeguarding of land for a second runway and signals its clear intent to review this as soon as practicable involving an immediate review of the Local Plan when changes to national aviation policy allow.

- The Local Plan policies support development of the airport with a single runway (Policy GAT1) and recognises the intention to bring into routine use the standby runway, which would increase capacity from circa 48 mppa to 70 mppa.

As per our previous response, the Manor Royal BID is generally supportive of growth at Gatwick Airport with a single runway including plans to bring into more active use the standby runway to further meet the increasing demand for air travel, while not increasing the actual footprint of the airport. This support is on condition that safety is not compromised, and due consideration is given to the impact this may have on the surrounding area, particularly in terms of congestion, increased demand this would create for employment land and housing in an already highly constrained area and secondary issues related to possible wage inflation and commuters and passengers parking in surrounding areas. On these points we are not entirely convinced that sufficient measures have yet been taken to mitigate these impacts and believe there is a case for GAL to work more closely with the local authorities to invest in the local infrastructure including support for measures to control parking issues created by airport users in areas like Manor Royal. The burden of managing and controlling these issues should not fall entirely on the local authorities.

- Lack of clarity concerning the area of search for the proposed Western Relief Road (Policy ST4) including; why it now stops at London Road (A23) when previously it extended further to the east to meet Gatwick Road.

The Manor Royal BID requests the Council considers this proposal for how it impacts development sites e.g. Jersey Farm, how any such road would facilitate development in or future extension of Manor Royal and how it might resolve long-standing issues of congestion e.g. by relieving pressure in the County Oak area. In respect of transport modelling, given the demand for space and the encouragement of more efficient and intensive use of land, the Manor Royal BID requests that transport modelling should look at junctions and capacity both with and without the Western Relief Road to provide more certainty concerning the extent of development and intensification that can be accommodated.

- A need to review the countryside policies as they relate to Manor Royal (para 4.64), particularly at the northern boundary. Given the acceptance of a Western Relief Road and of the extended safeguarded area, which the Manor Royal BID does not support.

The Manor BID recommends these countryside policies as they impact Manor Royal be reviewed in favour of a refreshed Manor Royal Design Guide. Given that by accepting the Western Relief Road and the extended safeguarded area the Council has accepted the urbanisation of the northern boundary of Manor Royal, to continue to apply existing countryside policies in the meantime is non-sensical.

- Policy EC11 (Employment Development and Residential Amenity) concerns the Buffer Zones at Manor Royal and Forge Wood where employment uses will be permitted, provided they do not adversely impact upon the amenity, function and setting of nearby residential uses.

The Manor Royal BID understands why this policy exists but feels the definition is vague in terms of what the Council deems to be "adverse" thereby making it difficult for businesses and residents to understand what uses might be deemed acceptable. This policy would benefit from more definition and clarity.

Other matters

Business Hub and facilities (para 9.38, policy EC3): The Manor Royal BID is encouraged to see specific reference for the need to provide better support facilities that might be accommodated in the form of a “Business Hub” and its importance for attracting and retaining businesses. Beyond a general supportive statement to this effect, the Manor Royal BID encourages the Council to take positive action to encourage development of these facilities, to work with the BID to bring them forward over the plan period, to be specific about the ideal location for such facilities and to actively pursue opportunities to deliver the Business Hub, for example when considering the development of the Innovation (Fusion) Centre.

Economic Development Strategy: The Manor Royal BID acknowledges the intention of the Council to devise a new Economic Development Strategy for the borough to help with recovery and encourage a more diversified economy. The Manor Royal BID would want to be involved in that process to ensure alignment with the BID Business Plan priorities and to help shape the strategy.

Class E & Permitted Development (para 9.24): The Manor Royal BID is concerned about the introduction by Government of the new Class E and extending Permitted Development Rights, about which it has written to the Government as part of the formal consultation exercise. This has been shared with the Council. The Manor Royal BID seeks reassurances from the Council about the protections for Manor Royal to prevent unplanned residential development in the business district and the impact of Class E that could undermine the prime function of Manor Royal.

Release of land to the north of Manor Royal (para 1.33 and 10.17): The previous iteration of the Local Plan proposed an Area Action Plan to explore options to release land in the retained safeguarded area for development and to allow extensions to Manor Royal at its northern boundary, something the Manor Royal BID continues to be supportive of. On advice the Council has removed this intention and retained the safeguarded status until which point Government policy triggers a review. The Manor Royal BID supports a review of the safeguarded land at the earliest opportunity subject to Government policy. If this land were to be released, the Manor Royal BID is unclear whether there is sufficient demand to accommodate both the Horley Business Park and the development of another strategic employment location. If not, the Council should consider which of these sites it prefers and be clear on its position to avoid simultaneously promoting both sites and undermining existing locations, including Manor Royal. Therefore, the Local Plan should be clear whether its support of Horley Business Park and other sites outside the main employment areas is contingent on development to the north of Manor Royal.

Reliability of economic forecasts and the need for flexibility: The wide variance in different economic forecasts provided as part of the Northern West Sussex Economic Growth Assessment (January 2020) from which land supply predictions are made (both in volume and type) are noteworthy. While some basis for making predictions is necessary, these wide variances demonstrate how difficult it is to accurately predict future demand with any accuracy. Indeed, if the Council had chosen another forecast the Local Plan would have made different assumptions about future land supply requirements. The Manor Royal BID asks for the Council to be mindful of this and to remain flexible throughout the plan period, to periodically test the basis upon which it makes predictions, listen to the market and be prepared to make adjustments where necessary to ensure these forecasts constitute a robust basis for promoting and guiding development.

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