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Your Ref: REP 127 (2021) Arora Group Policy GAT2

Further to the published Main Modifications to the Crawley Local Plan, it is noted that whilst the Inspectors have recommended changes to GAT2 to provide clarity/remove ambiguity, no changes have been proposed in the main modifications that are being consulted upon.

Objection is therefore raised that insufficient modifications have been made to GAT2. The current drafting of GAT2 does not accord with the Inspectors recommendations.

Set out below is a summary of the objections to the currently draft of Policy GAT2.

Policy GAT2

- It remains our opinion that the changes do not take account of the Inspectors comments and fail to provide sufficient clarity;
- Safeguarding around Gatwick has been in place since 2007 and the land within this zone has been effectively sterilised for some 16 years. It is for this reason that even CBC have looked to release 'Gatwick Green' to meet the Boroughs employment needs. To this end, the rigidity of safeguarding policies are unduly constraining the ability of the Borough to meet its strategic goals. Greater flexibility to allow the optimisation of the existing commercial sites in the safeguarding area should now be incorporated into Policy GAT2. The uncertainty around aviation at a national level should not be allowed to constern, would allow some forms of redevelopment for existing employment sites without adding constraints or increasing the costs or complexity of delivering a second runway.
- The wording put forward in the Main Modifications mirrors that of the Dec 23 consultation and has failed to take on board the comments set out in the Inspectors report. The current policy wording could be open to misinterpretation, especially if the text alternatively approach such as Floor Area Ratio (FAR). Similarly, 'significant intensification or significant increase in the scale of development' in the final part of para 2 of Policy GAT2 can be exploited, a large extension to a warehouse may not lead to significant intensification, whereas a small extension to a dense employment user, such as an office could have a greater intensity of use and only a result in a minor increase in the scale of development.
- Turning to paragraph 10.19, the term 'similar footprint' should be deleted from the supporting text. The air safeguarding restrictions in the safeguarding area will offer

limited (if any) opportunity for upward extension therefore permissible extensions will always alter the footprint of any given building.

- We are raising these matters today not to frustrate the process but to ask for clarity and to avoid lengthy case law debates following adoption of the Local Plan.

Please can you advise when the amended wording of Policy GAT2 will be consulted upon?