



Report to Crawley Borough Council

by Roy Foster MA MRTPI

An Inspector appointed by the Secretary of State
for Communities and Local Government

Room 3/25
The Planning Inspectorate
Temple Quay House
2 The Square
Temple Quay
Bristol BS1 6PN
☎ 0117 372 8255

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Section 20

REPORT ON THE EXAMINATION INTO THE CRAWLEY CORE STRATEGY DEVELOPMENT PLAN DOCUMENT

Document submitted for examination on 25 May 2006

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1, 13, 15 & 27-30 March
and 19 June 2007

Introduction

1. The purpose of an independent examination of a Development Plan Document (DPD) under section 20(5) of the Planning and Compulsory Purchase Act 2004 is to determine whether the DPD (a) satisfies the requirements of S19 & S24(1) of the Act and any regulations made under S17(7) & S36 relating to the preparation of DPDs, and (b) is sound.
2. This report contains my assessment of the Crawley Core Strategy DPD (CS) against the above matters, together with my recommendations and the reasons for them, as required by section 20(7) of the Act.

Statutory requirements

3. My report mainly relates to soundness issues. However, a point arises in relation to Regulation 13(5) of the Town and Country Planning (Local Development) (England) Regulations 2004. This requires that *'where a DPD contains a policy that is intended to supersede another policy, it must state that fact and identify the superceded (sic) policy.'*
4. When attempting to familiarise myself with the nature and scope of the material to be examined I found it difficult and time-consuming to discern the extent to which the CS (and its Proposals Map) replaced, modified, or retained unchanged the many policies and proposals of the Local Plan and its Proposals Map. In the same way, at pre-adoption stages of the process, users of the CS Proposals Map would have been helped by more clarity about these distinctions.
5. At my request the Council produced a 'Regulation 13(5) table' set out at part 1 of Appendix 2 to this report, fulfilling the requirement of the Act. Part 2 of the appendix indicates changes to the legend to the Proposals Map, clarifying whether or not the features in the legend represent altered or unaltered elements of the Local Plan Proposals Map or entirely new features introduced in the CS. I have slightly amended the content of parts 1 and 2 to take account of my other recommendations in this report and consider that this information should be included in the CS.
6. **I conclude that the content of the CS fails to meet Regulation 13(5) but that this defect can be rectified by including the content of parts 1 and 2 of Appendix 2 to this report as Appendix 2 of the CS. I recommend accordingly.**

Soundness – introduction

7. In the report I assess the Core Strategy (CS) against the nine tests of soundness set out in Planning Policy Statement (PPS) 12: 'Local Development Frameworks'. I make that assessment in the context of the list of matters which I identified as the basis of the examination. I have found aspects of unsoundness against tests iv, vi, vii and viii. Most crucial is a lack of secure provision for housing over the time-scale specified in the CS to 2018. I have considered whether this failure, coupled with others identified in the report, require me to recommend withdrawal of the CS as unsound. However, I conclude that Crawley's current circumstances require that (a) the current backlog of housing provision is rectified by at least the short-term security which the CS can ensure and (b) that a firm basis is provided for proceeding with the next stages of

detailed planning of Town Centre North. I therefore recommend a considerable number of changes which will make the CS sound for the short-term, pending an early review to provide longer-term certainty of housing provision against the requirements of the merging South East Plan. These changes are as set out at relevant points within the report.

8. During the course of the examination the Council offered two lists of potential changes. The 'List 1' changes correct a small number of minor factual errors and out-of-date references. These are all appropriate for inclusion in the adopted version of the CS but since they do not bear upon issues of soundness I make no further reference to them and do not include them in my recommendations unless (as in a few cases) they happen to be embedded within parts of the CS that I have recommended for change on soundness grounds. In such cases I include them in the interest of avoiding possible confusion.

9. The Council's 'List 2' changes were put forward as possible remedies for other elements of accepted unsoundness. I consider those potential changes alongside all the other material raised at the examination.

General overview on the site specificity of the CS

10. Before addressing the tests of soundness, I consider it necessary to make some general observations about the degree of site specificity in the CS. As the Council recognises, the strategy is considerably more site-specific than would normally be expected from the guidance provided in PPS12 (paras 2.9–14) and the more recent 'Core Strategy Guidance' prepared by the Planning Advisory Service (PAS). Instead of expressing its spatial policy primarily through the non site-specific key diagram, the Proposals Map accompanying the CS makes a significant number of changes from that attached to the Crawley Local Plan.

11. The Council put forward two main reasons for this degree of site specificity. The first stems from the Secretary of State's decision in March 1999 to impose an Article 14 direction under the Town and Country Planning (General Development Procedure) Order 1995. This prevented planning permission being granted for development of the planned new neighbourhood at Crawley North-East pending resolution of whether or not (in the light of national policy for airports) land should continue to be safeguarded for the option of a second runway at Gatwick. Due partly to the Council's inability to rely on this new urban extension, Crawley has experienced a substantial shortfall in housing delivery in recent years. Because of this, the authority has been one of a number required by the Government Office for the South East (GOSE) to prepare an action plan to tackle the backlog in provision. Faced with the need to identify sufficient housing land, the Council decided to identify 'housing development opportunities' (effectively site specific allocations of major sites for a minimum of 100 dwellings) in policy H2 and on the Proposals Map.

12. GOSE acknowledges the Council's difficulties in relation to housing and gave some support to the above approach. While reiterating the general requirement that the strategic focus of a CS should not be undermined by excessive detail, it even opened the door (in Crawley's 'unique set of circumstances') to a still more fine-grained approach to allocations within the CS. However, I have no evidence to support making allocations on any consistent basis below the Council's selected threshold.

13. I discuss more detailed aspects of the strategy's housing provision in considering part 2/2 of the CS. I there conclude, amongst other things, that the identification of particular sites now, through the CS, is the only way of providing certainty of delivery of enough housing, even in the short term. I therefore support site specificity in this respect.

14. The second main reason for site specificity in the CS is the Council's ambition to make progress with a substantial expansion of Crawley's role as a retail centre. Having worked up the Town Centre North (TCN) proposal over the past 6 years or so (initially with English Partnerships and more recently also with the assistance of its intended development partner) the Council has now reached a critical point where it considers that commitment to the proposed boundaries of TCN within the CS would give impetus to the next stages of implementation. It would normally be the case that a CS would only give commitment in principle to this form of expansion, with the working-out of site specific detail left to a subsequent Town Centre AAP. However, major expansion of Crawley Town Centre already receives considerable authority from the structure plan and the draft RSS and things have now reached the point where further concerted progress on this bold, complex, and regionally important scheme requires that site boundaries be defined soon. GOSE supports that approach. In these unusual present circumstances I consider it sound in principle to adopt a site-specific approach to TCN. I consider more detailed aspects of the soundness of this scheme in my examination of part 2/15 of the CS at the end of this report.

15. Beyond the issues of housing and TCN, the CS further departs from the principle of non site specificity by making additional changes to boundaries identified on the Local Plan Proposals Map as follows:-

- (a) defining boundaries of land to be safeguarded against possible expansion of Gatwick;
- (b) defining land to be included in the study area for the urban extension known as West and North West of Crawley;
- (c) introducing a number of detailed changes to the boundary of the built-up area;
- (d) making alterations to the boundaries of the strategic gaps;
- (e) identifying land for two new 'employment opportunity areas';
- (f) identifying land within the 'Three Bridges Corridor' policy;
- (g) amending the town centre boundary by extending it outwards in 3 areas, additional to that covered by TCN.

16. With regard to (a) above (Gatwick safeguarding), I consider that national policy in the Air Transport White Paper: The future of Air Transport (ATWP) provides exceptional justification for the Proposals Map to define the limits of the land to be safeguarded for a possible future runway. I am reinforced in that view by the strong views expressed about how much land should be so safeguarded. This element of national policy clearly causes a significant and unfortunate amount of uncertainty in the area south of the airport and it is at least preferable that a definite early limit is drawn to the area subject to that uncertainty. I discuss the details of this matter further in my consideration of part 2/8, but find it sound in principle to define the safeguarded area in the CS.

17. Turning to (b) above (West and North West of Crawley), the Horsham CS Inspectors found it sound for the limits of the study area for the forthcoming cross-border Joint AAP to be defined on the Horsham Proposals Map. It is clearly logical and appropriate for the same approach

to be adopted here as far as the boundary principle is concerned, although I consider the disputed issue of where the boundary of the study area should lie under part 2/10.

18. As for (c) and (d) above, for the reasons set out in my discussion of part 2/14 of the CS, I consider it generally inappropriate for the CS to alter the boundaries of the 'strategic gaps' and the 'built-up area' from those defined in the Local Plan. In the case of the strategic gaps, national advice in PPS7 and emerging draft RSS policy provide a different contextual background from that underlying the Structure and Local Plans. As I explain in the context of part 2/14 I have concerns about some of the boundaries of the strategic gaps in the CS (and the concepts behind them) but the regional approach to gaps in the draft RSS is a matter of dispute and this needs to be clarified before the principles and site-specific details of the gaps are formally reviewed. The present boundaries should therefore be retained until they can be reviewed in the forthcoming Development Control DPD (DCDPD).

19. In the case of the built-up area, as I explain in looking at part 2/14, the CS and its evidence base provide no explanation for the most substantial of the changes to the boundary, which takes it out into open countryside. If there are supportable reasons to alter the boundary, based on a credible evidence base, this is also a matter best left to resolution through the DCDPD.

20. Dealing with (e) above, in my examination of part 2/7 of the CS I conclude that there is sufficient evidence to point the way to a reasonably reliable strategic direction for policy on employment land, and consider it appropriate for the two named 'employment opportunity areas' to be identified in the CS. As for (f), the Three Bridges Corridor is a generally sound policy, already partly implemented. Although it is a little anomalous for the Proposals Map to define the extent of the corridor precisely I recommend no change to part 2/13 of the CS or the Map.

21. Finally, turning to (g), the additional town centre extensions are not specifically explained or clearly justified in the CS, as submitted, or in the evidence base. However, having discussed the matter at the hearing sessions I do not find them unsound, for the reasons explained under part 2/15. Rather, I include changes to better explain their objectives.

22. Overall, therefore, I find it appropriate in Crawley's present circumstances for the CS to include a reduced number of site specific changes to the Proposals Map. However, the circumstances and reasons applying at this particular time do not mean that it will generally be appropriate for future reviews of the CS to adopt that approach. Nor would it be appropriate to interpret this decision as a precedent for core strategies elsewhere to include substantial site specificity unless it can be demonstrated that the sites in question are strategic ones fundamental to the delivery of the strategy.

Overview of my findings on the soundness tests

The 'procedural' tests (i-iii)

23. Despite a minor delay to the start of the examination hearings caused by the Council's omission of one site from the list of alternative sites advertised under Regulation 32, the CS was prepared in accordance

with the scope and general milestones in the Local Development Scheme. The first test of soundness is therefore met. Similarly, I have found nothing to suggest that the Council's extensive consultations at the various preparatory stages of the CS did not comply with the requirements of the 2004 Regulations or the then emerging Statement of Community Involvement. Consequently the second test is also met.

24. Every stage of the CS was subjected to a process of sustainability appraisal (SA) and strategic environmental assessment (SEA) so the third test is also satisfied. Having said this, the 'housing development opportunities' identified under policy H2 were not assessed individually, only as a complete package. Nor were comparative assessments made of options introduced into the CS preparation process by stakeholders and consultees. Although these factors did not fatally flaw the SA/SEA processes it reduced their usefulness in shedding light on the relative credentials of the selected sites, compared with one another, and with other options put forward at the various stages.

The 'conformity' tests (iv–v)

25. The fourth test of soundness has two parts. First, the CS should be *'a spatial plan which is consistent with national planning policy and in general conformity with the regional spatial strategy' (RSS)*. In my more detailed consideration of Part 2/2 of the CS I conclude that the housing provision at policies H1 and H2 does not meet the requirement of PPS3 (para 53) that LDDs should set out the strategy for delivering the housing provision required to enable continuous development of housing at the required rate for at least 15 years from the date of adoption. This has serious implications for the soundness of the CS. However, in Crawley's particular circumstances the adequacy of the long-term housing provision is not the only consideration – it is also important that a firm statutory foundation is provided for quickly recovering the current backlog, if only on the temporary basis that the CS achieves. Additionally, as I explain elsewhere in the report, it is important that certain factors are resolved urgently through the CS, ie the geographical limits of Town Centre North (to allow progress to be made on this regionally important scheme) and the extent of the area to be safeguarded against possible expansion of Gatwick. In all these particular local circumstances (as explained more fully at paragraphs 64-66) I find the CS sound in terms of its housing provision, but only in a heavily qualified way – that is, by making changes to indicate that the CS will have a limited short-term currency and will be subject to an early review providing longer-term certainty against the emerging requirements of the South East Plan.

26. In the more detailed parts of this report I also find aspects of unsoundness against other elements of national policy. Policies EN1 (part 2/4) and G1 (part 2/9) are inconsistent with PPS9 and PPG13 respectively, as are some aspects of the transport policies (part 2/6) against PPG13 and the Crawley Area Transport Plan. However, all of these failings can be remedied by appropriate changes. The same applies to some minor aspects of policy H3 (part 2/2), against PPS3, and the explanatory text to ICS5 (part 2/3), against PPS17.

27. I also find the proposals for changes to the strategic gaps (policy C2, part 2/14) insufficiently founded in national and emerging regional policy. In my view the proposed amendments to the gaps are premature and lacking clear justification at this stage. It is therefore appropriate to change the CS to make it clear that the Local Plan boundaries will

continue to operate until the background policy framework towards gaps is clarified.

28. In addition, the overall structure of the strategy does not fulfil the requirement of PPS12 (para 2.9) that it should contain, among other things, a 'spatial vision'. However, this deficit is capable of being met through inclusion of a slightly revised version of a text prepared by the Council during the examination. This draws out existing themes of the CS and brings them together in a more coherent form without introducing new themes not previously explored through the process to submission.

29. Turning to consistency with the RSS, I agree with SEERA's view that the CS is in general conformity both with the adopted strategy (RPG9) and the emerging RSS (the draft South East Plan (SEP)).

30. The second part of test (iv) is that the CS should have '*properly had regard to any other relevant plans, policies and strategies relating to the area or to adjoining areas*'. The only unsoundness that I have found in this respect is the different way in which the Crawley CS and the Horsham CS deal with the possibility of a relief road to the west of Crawley. This matter is capable of being overcome by an appropriate change.

31. Dealing with the fifth test – 'regard to the authority's community strategy', the Community Strategy *A vision for Crawley 2003-2020* focuses on six priority issues. These are felt to be the matters of most concern to local people and upon which the Council considers the greatest impact can be made, namely affordable housing, community safety, the local economy, health and social care, education and life long learning, and local environment. Insofar as appropriate, the CS seeks to provide a spatial dimension for these issues and is sound.

The 'coherence, consistency and effectiveness' tests (vi-ix)

32. My detailed findings under these tests are set out later in this report in my consideration of part 2 of the CS. In summary, I find some aspects of the CS unsound, but capable of appropriate change. The housing sections of the document are not based on a fully reliable evidence base and do not give confidence in implementation. They therefore fall short against tests vii and viii as well as test iv, as discussed above. I have already indicated the nature of the change necessary to deal with this.

33. Some policies of the CS (sustainability policies S1 and S2 and countryside policy C1) do not amplify national policy by adding sufficient local distinctiveness. They therefore fail soundness test vii and need replacement by briefer explanatory material. The references to a university campus and a new hospital in part 2/3 of the CS require deletion as they are now inconsistent with the current reliable evidence base and it is unclear how they would be implemented. Some aspects of the policies relating to transport (part 2/6), employment (part 2/7), Gatwick (part 2/8), and Manor Royal/County Oak (part 2/9) also require changes to correct failings against tests vii and viii.

34. As for Part 2/10 (West and North West of Crawley) this requires some relatively minor changes, firstly to bring greater coincidence with the policies of the adopted Horsham CS (test vi), and secondly to ensure that the geographical extent of the study area for the Joint Area Action

Plan is sufficiently great to ensure proper consideration of all the land between the existing urban edge and the new urban extension (tests vi-ix). Part 2/11 (North East Sector) also requires some change of emphasis under test vii to make clearer the timescale and circumstances for its release for development.

35. Turning to part 2/14 (the countryside) there is no reliable evidence base for the most major of the changes to the built-up area, making this proposal unsound under test vii, while 2 of the other 3 changes are of inappropriate scale for inclusion in a core strategy. In my view these issues are best left to be resolved at a more appropriate tier of the LDF, as explained later in this report.

36. As for part 2/15, I find this generally sound, although it is necessary under tests vii and viii to make some minor changes to policies TC1 and TC2 and their accompanying paragraphs.

Detailed consideration of soundness issues

Part 1 – Core strategy drivers and key issues

37. In my view the submitted Core Strategy does not provide a clearly identifiable 'spatial vision', which is a key component referred to in paragraph 2.9 of PPS12. Without this it is unsound through lack of compliance with test iv. Although the Council feels that such a vision can be identified if the CS is taken as a whole, it accepts that it is not set out overtly and is largely implicit. Before the close of the examination hearings the Council brought together and presented a short statement of the spatial vision of the CS, cross-referenced to its various sources within existing parts of the strategy and without introducing new themes. The statement can still perhaps be criticised as being somewhat short on spelling out the spatial connectivity between the various elements of the long-term place-making vision. However, I consider that insertion of this text at the end of Part 1 will overcome the present omission and make the CS sound, although I have made a limited amount of change to the Council's text to make it compatible with my other recommendations.

38. I conclude that the CS is unsound through its lack of a clear spatial vision and recommend that it be changed by insertion (at the end of Part 1 of the CS) of the text at Appendix 3 of this report.

Part 2 - Planning and development themes

2/1 - Sustainability

39. The critical soundness issue relating to this part of the CS is whether or not it provides any element of distinctively Crawley-specific guidance or merely summarises national and emerging regional policy on sustainable development. In my view section 1 does not provide a meaningful local perspective. Instead, it includes (sometimes with a slightly different gloss) a selection of some of the principal contents of various well-known sources such as the UK Sustainable Development Strategy, PPS1 Delivering Sustainable Development (and the draft supplement on Planning and Climate Change), PPS3 Housing, PPS6

Planning for Town Centres, PPS7 Sustainable Development in Rural Areas, PPS9 Biodiversity and Geological Conservation, PPS10 Planning for Sustainable Waste Management, PPG13 Transport, PPG15 Planning and the Historic Environment, PPS22 Renewable Energy, PPS23 Planning and Pollution Control, and PPS25 Development and Flood Risk.

40. In any case, it is a moot point how far local interpretation of national policies is necessary in all instances because some of the national policies address critical UK-wide and/or international issues. Some of these require response at the level of national/international policies, standards, targets and implementation mechanisms rather than reworking and refinement at the level of Development Plan Documents against a background of as-yet rather uncertain local powers and responsibilities.

41. The possible exception to the absence of a local element is the second bullet point of policy S2, and that part of the first bullet point relating to energy generation. Support for the inclusion of a specific requirement of this type can be found in PPS22 (paras 8 and 18) but there appears to be no particular evidence base that underpins or justifies the actual content of these parts of S2.

42. In my view policies S1 and S2 do not meet tests vii and viii and their inclusion is not necessary to provide 'advice to developers' or 'a hook for a proactive approach by the Council'. The national policies already do so. This part of the CS needs to be changed, deleting S1 and S2 and leaving section 1 in the form of a general commentary on sources of national advice on sustainability. If there are genuinely locally-specific aspects of sustainability that need to be worked out in distinctive detail the preferred options for doing so can be examined, brought forward and justified in a future review of the CS or (if appropriate) in other documents included in the Council's LDS such as the Planning and Climate Change SPD.

43. I conclude that part 2/1 of the CS is unsound and recommend that it is changed by deleting policies S1 and S2 and replacing paragraphs 1.5 to 1.12 as follows:

Achieving Sustainable Development and Building Sustainable Communities

1.5 Achieving sustainable development and building sustainable communities are major aims of national planning policy. These aims underpin the development plan for Crawley, comprising the emerging Regional Spatial Strategy (the South East Plan) and the various documents produced by the Borough Council through its Local Development Scheme, including this Core Strategy.

The following publications set out some of the principal elements of national policy on sustainable development and building sustainable communities that are relevant to Crawley:

UK Sustainable Development Strategy:

PPS1 Delivering Sustainable Development (and the draft supplement on Planning and Climate Change):

PPS3 Housing:

PPS6 Planning for Town Centres:

PPS7 Sustainable Development in Rural Areas:

PPS9 Biodiversity and Geological Conservation:

PPS10 Planning for Sustainable Waste Management:

PPG13 Transport:

PPG15 Planning and the Historic Environment;

PPS22 Renewable Energy;

PPS23 Planning and Pollution Control;

PPS25 Development and Flood Risk.

1.6 The policies of these and other relevant Government publications are not repeated in this strategy but are embedded and reflected in its Borough-specific policies and proposals and will underlie the Council's decision making in all areas affected by the strategy, including those on individual planning applications.

2/2 - Housing

44. The main issues to consider here are the soundness of the CS in terms of (1) the extent of its housing provision, (2) the method it adopts for ensuring certainty of provision and (3) its likely effectiveness in identifying sufficient land. Dealing first with the extent of the provision, the CS seeks to ensure a 10-year housing land supply from the date of its adoption by extending the annualised WSSP housing requirement for Crawley (300pa) by a further two years to 2018, arriving at a total of 5100 for the period 2001-18. Although the draft RSS proposes an increased annual rate of provision of 350pa for the period 2006-26, and Crawley has not objected to that, I am not convinced that the CS provision to 2018 should be formally increased before the RSS has reached adoption. Nonetheless, the direction of travel is for an early increase in the rate of provision. This would justify a relaxed view being taken if land supply looked to be heading for a surplus in provision to 2018 at WSSP rates.

45. However, the recent position of Crawley has been the opposite of that situation as it has severely under-shot the WSSP annual requirement. Completions in the first 5 years to 2006 totalled only 556 (111pa), a main reason for this being the delay of the long-planned North East Sector because of the Article 14 direction imposed by the SoS. Because of this a backlog of 944 had accumulated by 2006, to the extent that the residual requirement for 2006-18 is now 4544, the equivalent of 413pa during that period. I support the view that the aim should be to recover the current backlog as soon as possible rather than over the whole period of the CS, especially as annual rates will anyway need to increase in future if the higher provision in the draft RSS is adopted. I therefore consider that the housing trajectory should make up the backlog in WSSP provision during the 5-year period 2007/08 - 2011/12.

46. This brings me to issue 2. Because of the recent housing shortfall the Government Office for the South East (GOSE) required Crawley to prepare an action plan to improve supply. Faced with a need to identify replacement housing land in order to demonstrate the soundness of the CS, the Council took the unusual decision to identify site-specific 'housing development opportunities' (effectively allocations of major sites for a minimum of 100 dwellings) in policy H2 and on the Proposals Map.

47. GOSE acknowledges the Council's difficulties in relation to housing and has given some support to the above approach. Moreover, while reiterating the general requirement that the strategic focus of a CS should not be undermined by excessive detail, it has even opened the door (in

Crawley's 'unique set of circumstances') to a still more fine-grained approach to allocations within the CS.

48. In my view 100 dwellings is a low threshold to justify status as a 'strategic site' but in Crawley's special circumstances I support the concept of identifying such sites in the CS as a response to the need to achieve some certainty about tackling the backlog of provision. However, I have no evidence to support the making of allocations on any consistent basis below the Council's selected threshold of 100 and do not recommend pursuing that option in the CS context.

49. I now turn to issue 3 – the likely effectiveness of the CS in achieving an adequate supply of housing land. Of the strategic sites identified in policy H2, the Haslett Avenue and Stone Court sites are now under construction and helping to create a significant increase in the annual build-rate. However, to assess whether the improved rate is likely to be sustained it is necessary to reach a view on how many dwellings on the other H2 sites are likely to be (in PPS3 terms) 'deliverable' in 5 years (say by the end of 2011/12), 'developable' in 10 years (say by 2016/17) or, beyond that, only able to make a contribution to Crawley's needs after that year. My judgements on these sites are made against the evidence available about the particular individual circumstances of the various sites and do not differ greatly from those arrived at by the Inspector in the recent call-in case concerning the North East Sector. Overall, I conclude that the Council's delivery assumptions in the revised and updated versions of the CS housing trajectory tend towards the optimistic, in some cases excessively so.

50. Town Centre North (TCN): Although past estimates of the scheme's residential content have varied considerably, the Crawley/Grosvenor expectation now seems to have settled at around 800. In my view it is sound to rely upon completion of that number of dwellings here within the CS period to 2018 but it could be over-optimistic to regard any as 'deliverable' within 5 years in PPS3 terms. I am also somewhat doubtful about the assumption of the Council's revised trajectory that regular completions of 100pa will take place over an 8 year period, as it seems to me that the residential components of a complex mixed-use scheme may not be delivered so smoothly and constantly. Nonetheless, as the Council places the bulk of TCN in the 5-10 year 'developable' category the assumption of a regular annual delivery rate has the virtue of evening out some of the uncertainty about when completions will occur. From what I heard about TCN I would regard it as more reliable to plan on the basis of a 6-year delivery period commencing in 2012/13.

51. Telford Place/Haslett Avenue: A recent application proposes mixed use development including 312 flats. Land ownership is about to be unified in the intended developer's hands and although there are road diversion/closure issues yet to be pursued, a smaller scheme could go ahead without highway alteration. Even accepting this site as 'deliverable' in PPS3 terms I consider it unlikely that completions would begin to come though before 2008/09 at the earliest, a year later than assumed by the Council.

52. Dorsten Square and surroundings: The Council assumes 160 completions in the 3 years 2008/09–2010/11. As indicated in the Central Bewbush draft SPD this scheme is for mixed residential and health/community development on underused sites at the Neighbourhood Centre (which is clearly in need of regeneration) as well as further residential

development south of Breezehurst Drive on land occupied by the existing leisure/youth centre, a car park, a children's playground, an enclosed ball games area and a small part of a playing field. A recent resolution gives skeleton confirmation of the Council's intention to proceed with the scheme but this complex inter-agency venture clearly requires the timely replacement of various facilities and there is no clear evidence as to its financing or programming. I agree with the Inspector in the North East Sector call-in case that this site is 'developable', rather than 'deliverable' in PPS3 terms. Development should therefore be assumed to commence in 2012/13.

53. Ifield Community College: This surplus educational land is assumed by the Council to yield 170 dwellings (plus some health/social provision) during the 2 year period 2008/09–2009/10. The scheme has been delayed by studies and discussions about the extent of transport infrastructure improvements necessary to support it, but in my view it is unlikely that this important publicly-owned urban brownfield site will remain sterilised for long without a satisfactory and viable solution being negotiated. Although I prefer to allow for a further year's delay in the first delivery of units, a scheme of this type and scale could still be completed by the end of 2010/11.

54. The 'Thomas Bennett' site: Much of this site is brownfield in nature as it was formerly occupied by school buildings, but some lies in one corner of former playing fields. From my inspection I find no reason to suppose that development of this site would be prevented by PPG17 considerations or that any highways and access issues are not resolvable. The County Council wishes to progress development once the CS is adopted and the Council's trajectory expects 200 completions here in the 3 year period 2008/09-2010/11. It seems to me prudent to assume that development may not commence before 2009/10 but otherwise I accept that the site is likely to be 'deliverable'.

55. East of Tinsley Lane: Of these three sports grounds, owned by English Partnerships (EP), one was a housing allocation in the local plan but is still actively used by a thriving local football club running many teams. The other two are leased to local companies but one appears to be disused and the other only lightly used, also by the football club. EP's remit now places greater priority on developing sites of this kind. However, I am not convinced by the Council's assumption that 100 houses will be built here in 2008/09. I understand that the club may be willing to relocate to a larger, better quality ground more able to meet its requirements and ambitions, but from the evidence available it may not be straightforward to identify and agree a suitable alternative site and implement a move. It will also be necessary to demonstrate that loss of these sports grounds can be justified in PPG17 terms and that possible access/ownership issues can be overcome. In my view tests vii and viii are not met as these sites are not demonstrably 'deliverable' or 'developable' housing sites at present, so it is premature to regard them as sound and reliable candidates for inclusion under policy H2.

56. Other sources of supply relied on by the CS: From the evidence I find no difficulty in regarding as 'deliverable' the generally agreed stock of identified planning permissions (some of which relate to sites where construction has commenced) and the minimal generally-agreed short-term allowance for very small unidentified sites. However, the evidential base for the Council's allowance upon windfalls is weak. It appears that windfalls have been assumed to make up whatever residual requirement

remained after deduction of more certain sources of supply. At submission stage windfalls were assumed to contribute 140 dwellings pa throughout the period 2005-18. Although the revised trajectory produced for the examination reduced reliance on windfalls to 88-89pa I can find no basis for either figure in the Urban Housing Potential Study and it is contrary to advice in PPS3 to rely upon windfalls in the absence of genuine local circumstances that prevent specific sites being identified.

57. On the other hand, the Council have produced evidence of some 250 or so dwellings on windfall sites within permissions granted in April-November 2006. There is no reason to suppose that these will not be implemented and I therefore support inclusion of an allowance of 50 pa, derived from that source, for the 5 years 2007/08 to 2011/12. This is not much above the average annual number achieved in 1991-2003 [44pa]. It is possible that Crawley will experience more windfalls in future than in the past because the New Town may now be maturing to the point where a greater amount of natural redevelopment or 'churn' begins to occur. However, the extent of this is unknown and I consider that it would be contrary to the climate of certainty that PPS3 seeks to introduce to assume that any particular number will continue into the future. It would be more appropriate in the post-PPS3 climate to seek to identify some of these future brownfield redevelopment sites (especially those below the CS threshold of 100 dwellings) in a Site Allocations DPD, but the Local Development Scheme does not currently provide for one.

58. Additional strategic housing sites: Claims have been advanced for a number of additional strategic housing sites - at the North East Sector, Lucerne Drive, land east of Brighton Road, and land at Worth.

59. It is accepted that the North East Sector is a suitable site for a new neighbourhood. Gatwick-related considerations aside, housing completions could begin here by 2008/09 and development of the site be completed (or at least substantially so) during the CS period. However, the Secretary of State's recent appeal decision seems to leave the site incapable of development unless and until it is no longer held to be prevented by reasons related to national policy safeguarding land for a second runway at Gatwick.

60. Turning to Lucerne Drive, the owner has promoted the site for housing at all the appropriate stages of the CS preparation process but the Council prefers to retain it as a potential employment site. In considering part 2/7 of the CS I conclude that the site is unlikely to be taken up and does not need to be reserved for that purpose. As the SA/SEA process appraised the credentials of all the H2 sites in combination, the Council's evidence base provides no means of measuring Lucerne Drive against any of them individually. However, the promoters submitted a sustainability appraisal and in my view this confirms that the site's credentials in that respect rank alongside other sites within the neighbourhoods identified in policy H2. The Council accepted that the capacity of the site would just reach the 100-dwelling threshold and that, if I decided the site was not required for employment, it was open to me to identify it as an additional strategic housing site. The land has no infrastructure constraints, could probably be developed quickly to provide say 25 units in 2008/09 and 75 in 2009/10, thus making a modest, but rapid contribution towards meeting the present deficit. Overall, therefore, I consider it sound and appropriate to identify this land in the CS.

61. The land east of Brighton Road, south of Crawley, was suggested to the Council as an opportunity area at both Preferred Options and Submission stages. At the earlier stage it was put forward as an opportunity area, potentially for residential development, and at the later stage (reflecting the Council's then current aspiration for a university campus) as a location suitable for accommodating that, together with student and general housing and employment development. Following the removal of the emphasis on university development here, the promoters now suggest a revised mix of about 1100 dwellings, a neighbourhood centre, school, open space and about 4ha of employment space. The four main landowners express willingness in principle to enter into an agreement that could see delivery of housing commencing in 2010/11 and concluding in 2016/17.

62. In view of its built-up nature Crawley has little greenfield land to consider for further development and this is perhaps the only substantial area not affected at least in part by the airport-related issues holding back the North East Sector. However, Crawley has traditionally grown on the neighbourhood principle and in my view this area is not, as it stands, large enough to continue that concept successfully. Whether or not there is scope in this general area to create a neighbourhood of acceptable size, or the ability to link what is physically a somewhat isolated area adequately into the structure of an existing neighbourhood, are issues which may need to be considered in the context of the work I describe below under my conclusions and recommendations on housing land supply. At this stage, however, I do not consider it sound and appropriate to identify this land as a strategic housing opportunity.

63. At Worth there is undeveloped land in a number of parcels outside the defined built-up area. There are constraints affecting some of these areas including a conservation area and two archaeological designations, but in any case this is not a sufficiently front-loaded proposal to take forward in the CS and even if some development were acceptable here it may not reach the threshold for recognition as a strategic opportunity. In my view if any case can be made for adjusting the built-up area boundary here this is something that should be pursued through the Development Control DPD, as discussed in relation to section 4 of the CS (Countryside).

Conclusion on housing land supply and implications for soundness

64. I conclude from all the above that the evidence base behind the Council's housing trajectory is only partly reliable. Housing land supply in Crawley will now quickly recover the serious backlog at the end of 2005/06 (by 2008/09 against the WSSP and by 2009/10 against the draft South East Plan). Taking 2011/12 as the end of the 5-year period in PPS3 terms, the supply will remain adequate until that year measured against WSSP requirements but is then likely (unless further sites come forward) to slip back into a steadily increasing backlog. Considered against the draft South East Plan this reversal into backlog would occur earlier and then deteriorate faster.

65. As I have already indicated in my overview on soundness, this situation has serious implications for the soundness of the CS as the requirements of PPS3 (para 53) for a clear indication of a 15 year supply of land are not met. If housing were the only consideration to be placed in the balance I would have been driven to the conclusion that the CS should be withdrawn as unsound against tests iv, vii and viii. However, as I have explained in the overview, it is important that certain other very

important matters are resolved urgently through early adoption of the CS. It is also important that a firm foundation is provided for quickly recovering the current housing backlog, if only on a temporary basis.

66. In the circumstances I find the housing provisions of the CS sound, but only in a heavily-qualified way - that is, for a limited short-term period and subject to an early review of the LDF. This review will certainly include the CS, but may also require a Site Allocations DPD. It will be necessary for that review to be completed in time to provide certainty about where and when further housing development will be delivered from 2011/12 onwards for the rest of the period to 2026. I am therefore recommending substantial change to part 2/2. In my view there is no point in the CS seeking to extend its housing provision to 2018 since its content in the two added years would not be sound. The policies, the supporting text, and the housing trajectory at Appendix 1 of the CS all need to reflect and set out the basis of the provision made in the context of PPS3 against the requirements of the WSSP and draft SEP and explain that this will achieve recovery of the present backlog over the next 5 years but not provide an adequately certain long-term housing land supply. Consequently there needs to be a clear policy commitment to an early review. In addition (and as discussed under part 2/11) I consider it necessary for a sound CS to indicate unequivocally that the only bar to development of the North East Sector is that it is prevented for reasons related to the ATWP's safeguarding requirement for Gatwick. If and when the land were not held to be affected by this constraint, construction of the new neighbourhood could commence without further policy restraint without waiting to be endorsed by the review, as the function of the review would be to identify land that will be released in clearly defined phases, triggered through appropriate monitoring processes, during any such periods that the North East Sector still cannot be delivered.

67. Turning briefly to policies H3 and H4, the reference in H3 to the sequential test is too prescriptive and does not comply with PPS3. In my view this needs to be changed to give more emphasis to the sustainability of housing locations. The emphasis of the fourth bullet point is also unsound in appearing not to give more priority to public transport. I make appropriate recommendations to cover these unsound points. Policy H4 may not be entirely consistent with PPS3, but in my view it is not so far out of line as to be unsound.

68. I conclude that the following policies and paragraphs of part 2/2 are unsound and recommend that they be changed as set out below.

- 2.1 **Crawley's housing stock needs to continue to grow. Natural growth in the population combined with a gradual reduction in the average size of households creates an internal pressure for more housing. In the wider context the town is recognised as a sustainable location for meeting some of the wider housing needs of this part of the South East as outlined in the draft South East Plan. However, not all housing needs can, or will, be met. In particular, and as explained below, recent circumstances have made it impossible to identify sufficient land for housing after 2011/12. Also, the need for affordable housing outstrips the amount which could be appropriately secured as part of the balanced and sustainable growth of the town. It is essential the Borough seeks to accommodate the housing requirements identified in the West Sussex Structure Plan and establishes a strategy to consider provision beyond 2016 to ensure the Town's social and economic health is maintained.**
- 2.2 **Since its New Town designation, the Town has developed on the basis of the neighbourhood principle. This approach has been successful in providing an environment where people want to live with good access to local facilities. There are opportunities for**

new housing development within the neighbourhoods and in the Town Centre as more efficient use is made of land previously used for other purposes. There is also potential, ~~in the longer term, for a new neighbourhoods at the North East Sector 2.3. As a consequence of the Government's Airport Policy, the North East Sector Strategic Development Location has not been delivered. It is unlikely to become available for several years and alternative housing provision primarily within the built up area has now been identified. Furthermore, the West Sussex Structure Plan identifies a Strategic Development Location for the and on land to the West and North West of Crawley. a~~ Although the development latter will be planned as a sustainable urban extension to Crawley, most of the development is likely to be predominately within Horsham District. ~~As a consequence of the direct implications for Crawley, t~~ The two authorities are working together to produce a Joint Area Action Plan for the this development.

[2.4 retained unchanged as new 2.3]

Objectives

2.54 The key objectives and principles for delivering an appropriate level and type of housing in appropriate locations are:

- To deliver sufficient housing to ~~meet the requirements of the West Sussex Structure Plan whilst providing for further housing in the longer term, make up the current accumulated backlog and meet the requirements of the West Sussex Structure Plan to 2011/12, pending early fundamental review of the LDF to provide certainty of delivery against the requirements of the South East Plan over the longer term to 2026.~~

[remaining objectives unchanged]

Housing provision

[Paragraphs 2.6 to 2.14 and policies H1 and H2 to be replaced as follows]

2.5 The Core Strategy reflects the adopted West Sussex Structure Plan 2001-2016 which requires Crawley to guarantee a land supply of 4500 units (300pa). However, recognising the town's central role within the Gatwick Area sub-region the draft South East Plan proposes to increase provision in Crawley to 350pa during the period 2006-2026. Government guidance in PPS3 requires Local Planning Authorities to have regard to the levels of housing provision made in such emerging Regional Spatial Strategies and set out, in Local Development Documents, their policies and strategies for delivering the appropriate level of housing provision, including identifying broad locations and specific sites that will enable continuous delivery of housing for at least 15 years from the date of adoption. This provision should identify sufficient specific 'deliverable' sites (ie those which are suitable, available now, and able to afford a reasonable prospect of delivery within the first 5 years), together with a further supply of specific 'developable' sites for years 6-10 and, where possible, for years 11-15. Where it is not possible to identify specific sites for years 11-15, broad locations for future growth should be indicated. Once identified, the supply of land should be managed in a way that ensures that a continuous five year supply of 'deliverable sites' is always maintained.

2.6 In recent years Crawley has fallen behind the annual housing delivery rates required by both the West Sussex Structure Plan and the emerging South East Plan. In 2001-06 only 556 net completions occurred, creating a major backlog of 944 against a Structure Plan requirement of 1500 dwellings for that period. The Core Strategy aims to make up that backlog and move forward against a background of greater certainty in accordance with PPS3. To do this it departs from the usual non site-specificity of core strategies and identifies a number of 'deliverable' and 'developable' site-specific strategic housing opportunity sites, defined as those capable of yielding at least 100 dwellings. These sites, located within and around the town centre and on mainly brownfield land within the neighbourhoods, are capable of providing a gross total of 2313 dwellings (2265 net) by 2015/16. Those completions, taken together with existing planning permissions likely to be implemented soon and a supply of confidently-expected windfall sites lasting until 2011/12, are expected to put housing provision back on track by 2008/09, against both the Structure Plan and the South East Plan rates and with the backlog removed. However, unless the identified land supply is substantially augmented in good time there can be no confidence that this improvement in housing delivery will be sustained. It could quickly fall into deficit again - by 2012/13 against the Structure Plan. Against the draft South East Plan (taking elimination of backlog into account) there is likely to be only one year of small surplus, in

2009/10, before provision declines progressively more seriously into deficit. This situation is illustrated in the Housing Trajectory at Appendix 1.

2.7 In 1993 the West Sussex Structure Plan identified the North East Sector as the most appropriate site for the next new residential neighbourhood at Crawley. However, a recent decision by the Secretary of State (May 2007) effectively precludes commencement of this long-planned development unless and until it is concluded that safeguarding of land at Gatwick does not need to continue or that the land can be developed without detriment to the aims of the ATWP. It is currently uncertain when this issue will be decisively resolved, but it may not be for a considerable time.

2.8 The Borough's continuing inability to rely on residential completions at the North East Sector makes it difficult at this time to produce a sound LDF fully compliant with the Structure Plan building rate to 2016, let alone the more demanding one of the draft South East Plan to 2026. It will therefore be essential to conduct an early review of the LDF, with a revised core strategy assessing broad locational options and, if necessary, a site allocations development plan document in place in time to provide certainty about where and when further development will start delivery from 2011/12 onwards. Unless events have then made it possible to predict a substantial stream of completions at the North East Sector, coupled with the identification of enough certain sites within the urban area, other options for greenfield development inside (and conceivably outside) the Borough boundaries may need to be considered for phased implementation if Crawley is to fulfil its sub-regional role and its contribution to the Gatwick Diamond initiative.

H1 The Core Strategy makes provision for the development of 4040 net ~~5400~~ dwellings in the Borough in the plan period 2001-2016 as follows:~~8, comprised of:~~

- ~~440~~ 556 net completions mid 2001-2005~~6~~;
- ~~Outstanding adopted Local Plan allocations or Major Residential Proposals with Planning Permission for 100 Dwellings or more – mid 2001-2005 – 442 dwellings;~~
- 901 net outstanding full planning permissions to mid 2006, including Stone Court ~~– mid 2001-2005 – 390 dwellings;~~
- 32 small sites allowance to 2010/11
250 – windfalls at 50pa 2007/08 to 2011/12 identified sites – 2040 dwellings;
- 2265 net strategic opportunity sites identified in policy H2 Residual previously developed land unidentified dwelling requirement up to 2018 – 1818 (140 dwellings per annum from 2005 to 2018).

This level of provision is insufficient to meet either the housing requirement of the West Sussex Structure Plan for 2001-2016 or the more substantial requirement of the draft South East Plan for 2006-2026. An early review of the LDF will therefore be undertaken. The review will identify land where development can commence by 2011/12 to meet future needs to 2026. Such land will be earmarked for release in clearly defined phases, triggered through appropriate monitoring processes, if the North East Sector is not available for development at identified milestone dates.

H2 The following sites are identified as strategic housing development opportunities, developable before 2016: capable of providing at least 5100 dwelling plan period (2001-2018) requirement for Borough will be met through the outstanding adopted Local Plan allocations, major residential proposals and identified sites outlined below:

~~(a) Outstanding adopted Local Plan allocations or major residential proposals with Planning Permission for 100 Dwellings or more from mid 2001 to 2005:~~

- ~~• Apple Tree Farm (Ifield);~~
- ~~• Station Hill (Pound Hill);~~
- ~~• Lucerne Drive (Maidenbower).~~

~~(b) Identified Sites:~~

~~[sites reordered with amended descriptions as below]~~

- Haslett Avenue (former leisure centre) – under construction

- Stone Court (Maidenbower) – under construction
- Telford Place/Haslett Avenue (as part of a mixed development)
- Lucerne Drive (former allocated employment land at Maidenbower).
- Ifield Community College (surplus education land, plus community uses)
- Thomas Bennett (surplus education land)
- Dorsten Square and surroundings (as part of the ‘Heart of Bewbush’ project)
- Town Centre North (as part of a mixed development);
- ~~East of Tinsley Lane (allied to satisfactory arrangements for replacement sports facilities);~~

The North East Sector is identified as an appropriate site for the development of a new neighbourhood for Crawley. Development here is currently precluded for reasons related to possible expansion of Gatwick. However, if this barrier to development is lifted there will be no policy bar to immediate commencement of the new neighbourhood, once the necessary permissions have been granted.

[delete paragraph 2.14]

H3 ~~Proposals for~~ Residential development will ~~only be appropriate in~~ be steered to sites ~~locations~~ which:

- are at sustainable locations, maximising the use of ~~accord with the sequential approach (brownfield land; before greenfield unless there are exceptional reasons to the contrary);~~
- are part of, or an extension to, an existing neighbourhood, a new neighbourhood, within the Town Centre or Town Centre/Three Bridges Station transport corridor;
- can be served by existing or new infrastructure;
- have good access ~~by different modes of transport – road,~~ to public transport services and to footpath and cycling networks; ~~walking, cycling and a good public transport service;~~

[remainder of policy unchanged]

Appendix 1 to the CS (Housing Trajectory)

Revise the table, matrix and bar graph in Appendix 1 using the following information:

<u>Plan period requirement 2001-16 at WSSP rates</u>	<u>4500</u>
<u>Completions 2001-2006 (net)</u>	<u>556</u>
<u>Planning permissions (net) (inclu Stone Crt)</u>	<u>901</u>
<u>Small site allowance 2006-2010</u>	<u>32</u>
<u>Windfalls 2007/08-2011/12</u>	<u>250</u>
<u>Strategic opportunity sites (net) to 2015/16</u>	<u>2265</u>
<u>Total</u>	<u>4004</u>

Residual remaining to be identified 496*

* This figure will be increased if the draft South East Plan’s provision of 350pa from 2006 is confirmed.

Part 2/3 - Infrastructure and Community Services

69. Some of the ICS policies are unsound in their submitted form for a number of reasons, as explained below. However, they are capable of changes to meet the soundness tests. Dealing first with policy ICS1, the central issue is the phrase 'preferably on the edge of the town'. The policy appears to give too much preference to accessible locations on the edge of the built-up area if the Borough-wide facility in question cannot be accommodated in the town centre. In my view the Council's List 2 changes are only partly successful in addressing this unsoundness and I recommend further minor change because the appropriate alternative policy preference to the town centre would be other highly accessible sites within the built-up area.

70. In terms of test viii, the Council's List 2 change in relation to Part 3 (Monitoring and Implementation) appropriately makes good the current absence of a monitoring framework for policy ICS1.

71. Turning to policies ICS2 and ICS3, it is possible to criticise these policies for lacking any really significant Crawley-specific vision or content, but these matters may need to be revisited if longer-term sub-regional inter-authority plans for the Gatwick Diamond are taken forward and it becomes necessary to adopt a more proactive 'ringmaster' approach to infrastructure funding. In the meantime, the general thrust of these broadly-based policies is sound.

72. I do not support the addition of two new generally-worded policies on 'water & sewerage infrastructure capacity' and 'utilities development' as they do not offer any Crawley-specific dimension adding value to the infrastructure-related policies of the draft RSS. The Council will have to work closely with Thames Water to ensure timely provision of infrastructure to meet the growing needs of the town through properly-supported bids in accordance with the OFWAT funding cycles, but the evidence available to me does not suggest the existence of any unsound show-stopping impediments to the main elements of the CS.

73. Policy ICS4 and associated parts of the text of the CS reflect the aim of the Community Strategy to raise local skills levels and diversify the economy, placing particular stress on extending local educational opportunities to include the availability of courses at university level. Policy GAT4 of the draft RSS lends support to this concept, as does the Regional Economic Strategy (RES), as well as the Council's own Economic Strategy. However, the CS is premature in supporting the notion that local provision in Crawley will necessarily be made by Sussex University. I was told that the institution has now withdrawn its interest in the proposed campus on the 'East of Brighton Road' site. In any case that land is on the edge of the town beyond the built-up area and is not necessarily the best location for a campus in sustainability, accessibility, linked-use and other community terms. I was informed that Brighton University has expressed some interest in commencing degree-level courses in the town centre in association with Central Sussex College, and I was also shown notes of very early discussions between the promoters of Gatwick Green and Surrey University about the possibility of joint partnership in science-park development. It therefore appears that a fully-focused concept of providing university-level courses/activities in Crawley has yet to be firmly developed, still less the precise land use implications that may stem from this. The content of the CS on this matter therefore fails tests vii, viii and ix. The Council's List 1 & 2

changes address some aspects of this unsoundness, but I consider that the required changes need to go slightly further, as set out below.

74. While the terms of policy ICS5 are sound, the supporting text is less clear, could introduce confusion and conflict with PPS17 (test iv). The Council's List 2 changes mainly overcome this minor unsoundness and I generally support them in my recommendations.

75. Policies ICS6, ICS7 and the associated text (on health care needs) are clearly unsound against tests iv, vii, viii and ix in their references to the construction of a new hospital on land in the AONB for which the sponsoring body has no firm plans. The Council's List 1 and 2 changes generally deal with this defect by omitting such references and I support those alterations with some further minor changes of emphasis.

76. I conclude that the following policies and paragraphs of part 2/3 are unsound and recommend that they be changed as set out below.

- 3.4 The educational needs of the town are an essential element contributing to the quality of life and future prosperity of the community. As the town grows, it will be necessary to ensure that the additional demand arising is catered for by new or improved facilities and services. ~~A potential site has been identified by Sussex University for a new university campus within the town. The sub-region, with particular emphasis on its heart in Crawley, has been identified as a potential locality for a new university campus.~~ If this is progressed, this venture will help to raise skills levels and ~~help to~~ diversify the local economy. ~~away from dependence on Gatwick Airport.~~ Where surplus educational land is identified, it is considered that priority will be given for community uses on the land, if this becomes available, to ensure that the whole community can see a benefit. If no community facilities are required, where appropriate, this land could be used to help provide for housing needs identified in the area.
- 3.5 Providing for the primary healthcare needs of the community is considered ~~as~~ essential. To help ensure that everyone has access to high quality facilities, new or improved development/redevelopment must ensure that adequate healthcare provision is in place to accommodate the increased need. The Council intends to work with the Primary Care Trust to ensure that provision is made in accordance with the community's needs. Higher order healthcare needs are also essential to the vitality of the town. As the health authority is not currently in a position to invest in a new hospital or Accident and Emergency unit in the town, it is essential that everyone has easy access to East Surrey Hospital. If the health authority is in a position to provide additional facilities in the future, this will be fully supported. ~~The Borough Council owns land on the edge of the town and has stated that, in principle and subject to ecological and landscape surveys of the site, it would be prepared to make the land available for an acute regional health care hospital should the Government decide it is required. The Council would support the provision of additional health facilities required to meet the needs of the town and surrounding area and will work with health agencies to identify and establish potential sites.~~
- 3.8 It is considered important that all new community and leisure facilities are placed within highly accessible locations, in order to meet sustainability objectives and maintain quality of life. ~~As the Town Centre is subject to considerable congestion and land is limited, it may be appropriate to locate major community facilities on the edge of the town, where they can be easily accessed.~~
- ICS1 The Council will support the provision of new or improved community, sports, arts and leisure facilities where they add to the range and quality of facilities in the Town, in locations where they are accessible by different modes of transport and to different groups within the local community. Existing community and leisure facilities will be protected where they contribute to the neighbourhood or town overall, unless an equivalent replacement or improvement to services is provided. Major community and leisure facilities which serve the needs of the town as a whole should be located within or close to the Town Centre or, if this is not achievable, at other locations within the town that are highly, preferably on the edge of the town, which are readily accessible by all modes of transport, particularly public transport. Local community and leisure facilities which serve neighbourhood needs should wherever possible be located within or close to

neighbourhood centres or at locations within the built up area that are easily accessible to the local community by foot, cycle and all other modes of transport. Proposals which allow the opportunity for joint provision and sharing of premises will be encouraged.

Providing for a new University Campus

3.17 The Community Strategy stresses the need to diversify the local economy and raise skills levels. ~~The provision of a university campus in the town aims to raise skills levels and diversify the local economy away from reliance on industries related to Gatwick Airport, thus helping to create economic stability. There has been~~ A particular aim is to secure the provision of higher education by establishing a university campus in the town. This concept is supported in both the draft Regional Spatial Strategy and the Regional Economic Strategy and has also gained considerable support ~~for this~~ from the business community and public agencies because of ~~due to~~ the significant potential benefits that would accrue to the town as a whole.

3.18, 3.19 [Delete]

3.20 Work on the project is at an early stage ~~and~~. However, if it becomes necessary the Council will, at the appropriate time, bring forward a site specific DPD to allocate ~~formally~~ a site and establish the planning principles for the development. ~~At that time, the ecological and landscape value of the site will be examined and any possible alternative sites considered. For the time being, the Pease Pottage Hill site will be retained as countryside.~~

ICS4 The Council will work with appropriate partners to support ~~and~~ make provision for a university campus and associated facilities at Crawley. If necessary and at the appropriate time the Council will bring forward a site specific Development Planning Document to allocate a site and establish the planning principles for the development. ~~for a new University Campus, including consideration of the currently preferred site East of Brighton Road.~~

3.21 There is a need for additional community services and facilities within many of Crawley's neighbourhoods for health, education and general community provision. Education land can make a significant contribution to the open character of the Borough and this needs to be taken into account in considering proposals for development. However, where development is considered acceptable ~~It is therefore considered that, when educational land becomes available, community uses should be given first consideration priority.~~ Where these are not appropriate or necessary, consideration will be given to housing due to the strong housing need in the area.

3.22 ~~Education land can make significant contribution to the open character of the Borough and this will need to be taken into account in any development proposals.~~ Further guidance will be prepared through a Green Space Strategy. It is anticipated that when the Green Space Strategy is completed, it will be formalised into a statutory document via the Supplementary Planning Document process, which includes consultation with the public and stakeholders.

3.24 As new development can create additional health needs, ~~including new residents to the local area, existing~~ facilities must be able to cope with increased demand. Therefore, new development may have to contribute towards improving existing facilities or providing additional ones ~~healthcare costs to ensure it can cope with increased demand created,~~ as covered in policy ICS2.

ICS6 Support will be given to the provision of new or improved primary health care and related activities, based on a neighbourhood model. ~~of locally delivered services set out in the Primary Care Trust Service and Estate Capacity Enhancement Programme, is supported.~~ New health facilities, including GP premises, local care centres and healthy living centres should be located in accessible locations close to the community they serve. The location of such facilities will ideally be within or adjacent to neighbourhood centres or the Town Centre.

Providing for Secondary / Higher Order Healthcare Needs

3.25 ~~The Council has previously identified land close to Pease Pottage, to the south of the Town, for a new hospital. Due to its status as AONB, this land would only be released in exceptional circumstances. This area is not that identified for the new university site and the university does not prejudice a new hospital coming forward in that location.~~ The health authority is not currently in the position to provide ~~facilitate~~ a new hospital or Accident and

Emergency unit within Crawley. However, if this position changes, the Council will make every effort to facilitate and support such a provision. In the interim, the Council will work with East Surrey Hospital and other health agencies to ensure all services are made as accessible as possible to all.

ICS7 The improved provision of higher level community and mental health facilities at Crawley Hospital and other locations readily accessible by all modes of transport is supported. In the longer term, if proposals come forward for a new hospital in the town, opportunities for accommodating this will be sought at a highly accessible location on the edge of the town, with access by all modes of transports, particularly public transport. The provision of improved public transport access for residents of Crawley to East Surrey Hospital will be supported.

Part 2/4 – Environment

77. This part of the strategy is mainly sound, if rather detailed. However, policy EN1 is unsound against test iv because it appears to offer precisely the same level of protection to a variety of different nationally and locally recognised nature conservation features, and to the AONB. This defect is overcome by the Council's List 2 changes which contain reference to the relevant national sources of advice in which the approach is more tiered. They also correct the downplaying of the importance of semi-ancient woodland. I support and recommend these changes.

78. A similar point arises in relation to policy ENV5, concerning the built environment but the Council's proffered List 2 changes (most of which I support and recommend) again overcome the unsoundness.

79. **I conclude that the following policies and paragraphs of part 2/4 are unsound and recommend that they be changed as set out below.**

4.3 Environmental features that should be protected and (wherever possible) enhanced include:-

- Areas of Outstanding Natural Beauty (AONB)
- Sites of Special Scientific Interest (SSSI)
- Sites of Nature Conservation Interest (SNCI)
- Sites where protected species are present
- Local Nature Reserves (LNR)
- Ancient and semi-ancient woodland
- Aged and veteran trees
- Networks of natural habitats

~~Semi-ancient woodland also has significant value and should be protected and enhanced wherever possible.~~

[Then remainder of paragraph as submitted]

EN1 Nationally protected areas and areas of local environmental and ecological importance will be protected or enhanced in accordance with European and national legislation and PPS7: Sustainable Development in Rural Areas and PPS9: Biodiversity and Geological Conservation.

[Delete remainder of policy except the final two paragraphs]

EN4 Landscape proposals should be an integral part of all new development schemes. Schemes must demonstrate how existing landscape assets, nature conservation assets, including historic landscape features, and rights of way have been integrated, protected and enhanced and opportunities taken to introduce new landscape, biodiversity and recreational assets. [Then remainder of policy as submitted]

Protecting and Enhancing the Built Environment

4.9 All new developments, whether on sites with designated features or not, should be of high quality and should protect and enhance the distinctive character and important cultural heritage of the town. Existing assets and their settings should be preserved and where

possible enhanced. These assets include Listed Buildings, Conservation Areas, Scheduled Ancient Monuments and other features of archaeological interest, and Registered Parks and Gardens. Guidance on these assets can be found in PPG15: Planning and the Historic Environment and PPG16: Archaeology and Planning.

4.10 In addition to Conservation Areas, local designations assets in the Borough comprise Areas of Special Environmental Quality (ASEQ) and unlisted buildings which are important and interesting features in the street scene or have a place in local history. Guidance on these assets can be found in policies BN10 and BN16 respectively, saved from the Crawley Borough Local Plan 2000, and will be included in the forthcoming Development Control Policies DPD.

EN5 [Retain first paragraph but delete remainder of policy]

Part 2/6 - Transport

80. At core strategic level the CS should aim to provide a clear and coherent Crawley-specific vision of the way in which the development pattern and transport infrastructure of the growing town will be progressively better integrated in order to assist the national objectives set out in PPG13 - promoting more sustainable transport choices, encouraging accessibility to everyday destinations by public transport, walking and cycling, and reducing the need to travel. However, the strategy only partially succeeds in doing this: section 6 provides generally reactive, non-spatial, development-control-type policies instead of setting out a proactive spatial vision. Some of the introductory paragraphs of section 6 begin to develop appropriate themes, but the overall content falls short of indicating the components of a fully-developed and concerted drive towards a more sustainable pattern of development, land use and transport infrastructure. To some extent this is understandable because the Crawley Area Transport Plan (CATP) also lacks focus as a visionary guide and mainly restricts itself to identifying matters still to be studied and investigated. I conclude that the transport element of the CS will need clearer policy development and expression at the next review. This should probably include some form of target for modal shift and indicate the (what at present seem to be rather uncertain) future priorities for expansion of the Fastway network both within and beyond Crawley. In the absence of such work my recommended changes to the headline 'key issue' and policy T1 (as set out below) are the minimum requirements to make the CS sound under tests iv and vii in terms of providing an appropriate strategic focus for transport.

81. Looking at the headline key issue, my changes will signal a move towards a more appropriate approach as far as this is achievable at present, focus on meeting transport 'needs' rather than 'demands' (which may not be capable of being met by the preferred modes of all organisations and individuals) and delete the reference to 'without excessive harm to the environment'. The latter suggests conflict with the UK Development Sustainable Strategy, a guiding principle of which is 'living within environmental limits'. I also recommend the inclusion of the present Fastway routes as a strategic component of the Key Diagram.

82. Turning to the other three transport policies, these pick up on some of the main strands of the principal policy (T1) but all fail the soundness tests in various ways. The issue for T2 on park-and-ride (P&R) is whether or not the policy in its present form has a sufficiently firm foundation to meet soundness tests vii and viii. Much work clearly remains to be done to establish the level of real potential for P&R in

Crawley and whether it would be feasible and viable to introduce it. The CATP gives little prominence to P&R and no positive commitment to developing a system in the next decade, so in my view T2 must be recast to commit the Council to a clearer, stronger leadership position in coordinating the investigation of the potential role of P&R and (if, appropriate) taking it forward thereafter. As currently worded T2 inappropriately appears to delegate much of the task of investigation and implementation to developers, particularly the principal town centre developer, whereas the Council (with its more independent and wider-ranging responsibilities) should be the lead-player. I recommend changes to the policy and paragraphs 6.5 to 6.7 to make clear that the Council will adopt this lead role, as well as avoiding what may be some premature conclusions about the outcome of the feasibility study of the concept.

83. Looking at policy T3 (parking), the CATP refers to the development of a parking strategy covering on and off-street parking. Soundness, measured against tests iv and vii, requires that strategy to be the central focus of T3, with less emphasis given to its current development control aspects. I recommend accordingly below.

84. Dealing finally with T4 (improving rail stations), the policy is mainly broadly consistent with the CATP (soundness test iv) and appropriate in what it has to say about the planned major interchange improvements at Gatwick and Three Bridges railway stations, and the roles and opportunities identified for the two other stations in the Borough. However, I consider it inappropriate for the role of Gatwick Station to be explicitly limited to catering only for air passengers and airport staff. As one of the key elements contributing to the Crawley-Gatwick regional transport hub, the station is a highly strategic point for transport interchange and it is said that Network Rail is considering substantial investment here. In my view it will be important to seize any available opportunities for broadening the function of Gatwick station as an interchange for surface travellers (particularly between rail, coach, Fastway and other buses) provided that airport-related interchange functions (and the achievement of the targets of the Gatwick Airport Transport Strategy) are not hampered by any such developments. I recommend a small change to achieve soundness in this respect.

85. As for the possible station to the west of Crawley, this would almost certainly be outside the Borough. In my view soundness in terms of test vi requires no more than the reference in section 9 of the CS (in the context of the JAAP).

86. I conclude that the following policies and paragraphs of part 2/6 are unsound and recommend that they be changed as set out below.

Headline key issue: Achieving better and more sustainable integration between ~~Securing improvements to the local transport infrastructure of the town and the developing needs of the growing town, its communities and its which meet the demands of an expanding economy, and the needs of the local community without excessive harm to the environment.~~

T1 The Borough Council will work with the County Council and other key authorities, agencies and stakeholders seek to ensure a more comprehensive and sustainable integration between the local transport infrastructure and the changing transport needs of the developing town, its communities and its expanding economy. Particular importance will be placed on: ~~Particular: that new development meets its access needs:~~

- improving and developing public transport options and the cycleway and footpath networks:

- easing congestion at key points on the primary road network;
- concentrating development in locations where sustainable travel patterns can be achieved through use of the existing transport network or timely improvements to it;
- locating more intensive, and higher density developments should, wherever practicable, be located at nodal points along the developing main public transport and cycling/footpath networks;
- New development should contribute to the improvement of sustainable modes through on site provision and through S106 agreements which secure improvements to Fastway, bus service provision, cycling and walking;
- Where necessary, new development will be required to contribute to road network improvements needed to accommodate the scheme;
- employing travel plans wherever possible Major development proposals and other proposals likely to generate significant movement of people and goods should be accompanied by travel plans specifying how that movement will be managed to minimise limit the use of less sustainable forms of transport.

Park and Ride

6.5 ~~The Council considers that Park and Ride may have~~ has the potential to play an important part in the overall transport and parking strategy for the town, particularly for the Town Centre, especially if integrated with the Fastway system. ~~It is likely that the focus for a Park and Ride facility would be to provide parking for long term commuters as long stay parking in the Town Centre will be limited, although it would also be available to shoppers and visitors.~~

6.6 The Council will therefore carry out a study of the role, feasibility, funding and operation of Park and Ride across the Borough in association with the County Council, bus operators, the principal town centre developer and other appropriate partners, would be expected to be examined in relation to major developments within the town, particularly the Town Centre. The feasibility assessment will consider both the operational and locational feasibility of a Park and Ride facility. Consideration may need to be given to whether a successful system would require the identification of ~~finding~~ appropriate sites beyond the Borough boundary.

6.7 [Delete]

T2 The Borough Council will work with the County Council and a wide range of other partners and stakeholders prospective developers, particularly in the Town Centre, to establish the role, need for and feasibility, funding and future operation of a Park and Ride system, including the location of appropriate sites.

[Delete second and third paragraphs]

If the decision is made to introduce a Park and Ride system ~~is C~~ contributions to the provision of ~~park and ride~~ will be sought from developers in appropriate locations in accordance with the level of access demand capable of being to be met by the system. ~~Park and Ride provision. The Council will bring forward advice on this issue following further investigation on the feasibility of Park and Ride.~~

Parking

6.8 The Crawley Area Transport Plan indicates that development of a parking strategy will be a key issue for the town. Central themes of this strategy will be the access needs for the expanded town centre and the way in which parking needs to be managed in association with this, together with issues to do with commuter parking at stations and parking in residential areas. Opposition to a sustainable transport strategy is often focussed on parking restrictions and pricing regimes. However, taking into account the limitations both in terms of transport capacity and the potential impact on the environment, it is believed that a focus on more sustainable forms of transport with accompanying management policies is the right way forward for the future prosperity and development of the town.

T3 The Council will work with the County Council and other key stakeholders to develop a parking strategy for the town. This will include the level of provision to be made for new development which will normally ~~New development will be required to make provision for~~

~~parking. The level and type of parking provision should take into account:-~~ [Retain remainder of policy unchanged]

Improving Rail Stations

6.9 The main rail stations and the areas immediately surrounding them provide opportunities for major development. However, it is important that such development reflects the function and operation of the particular stations concerned. Gatwick station is a highly strategic point for transport interchange and one of the key elements contributing to the Crawley-Gatwick regional transport hub. It will therefore be important to seize any available opportunities for broadening the function of the station as an interchange for surface travellers (particularly by those using rail, coach, Fastway and other buses), always provided that airport-related interchange functions (and the achievement of the targets of the Gatwick Airport Transport Strategy) are preserved or assisted rather than hampered by any such developments. ~~The expansion of Gatwick Airport will put pressure on the scarce land available and it is considered that parking provision should cater solely for staff and passengers using the airport.~~

[then remainder of paragraph 6.9 as submitted]

T4 Any improvements or developments ~~at, or development at~~ or within the vicinity of railway stations will be expected to enhance the specific roles of the individual stations and:

- At Gatwick Station, seize opportunities for broadening the function of the station as an interchange for surface travellers using rail, coach, Fastway and other buses provided that airport-related interchange functions (and achievement of the targets of ~~meet the needs of access requirements for staff and passengers at the airport in accordance with the~~ the Gatwick Airport Transport strategy are preserved or assisted rather than hampered; [...then remainder of T4 as submitted]

[Key Diagram: Include the Fastway routes as a strategic component]

Parts 2/7 & 2/9 – Local Economy and Manor Royal & County Oak

87. I consider these two sections of the CS together as their contents are closely-linked, as are the relevant parts of the evidence base. Soundness on these matters can be considered under the following issues:- (1) Is there a reliable basis for the quantum of employment floorspace indicated in policy E1? (2) Does policy E2 identify appropriate locations? (3) Are parts 2 and 3 of policy E2 appropriate and justified? (4) Is there justification for the protection afforded by policy E3? (5) Does the CS adequately reflect the requirements of the WSSP and the emerging sub-regional policies for strategic sites and sub-regional sites of high quality?

88. Turning first to issue 1, the quantum, policy NE1 of WSSP makes provision for additional employment floorspace of 280,000sq.m in Crawley in the period 2001-16. This quantity is regarded as a yardstick, rather than a prescriptive or inflexible requirement. Implementation is to be monitored and WSSP recognises that it may be necessary to provide a greater or lesser quantity of floorspace during the plan period. The Core Strategy projects the WSSP annual rate of provision by a further two years to 2018 to arrive at a total of 317,333sq.m (which it was generally accepted could be rounded to 320,000sq.m). According to the County Council's monitoring data for the period 2001-2006, a substantial proportion of this figure has already been built and occupied or forms part of an identified supply pipeline. The residual balance is in the region of 29,000sq.m (to 2016) or 67,000sq.m to 2018.

89. A number of other perspectives are offered on the floorspace requirement. The Crawley, Horsham and Mid Sussex Employment Land review (ELR), undertaken by Atkins, identifies a requirement for Crawley

of 350,000sq.m for 2004-2018). The review of the Atkins study by Tym and Partners considers the ELR methodology wanting, suggesting (among other criticisms) that too much weight is placed on trend projections and an unreliable business survey; it estimates need at 126,000sq.m. On the other hand, Halcrow's review of the ELR concludes that while the CS adequately provides for the 'base case' of requirements, provision should be increased to 461,000sq.m to make the most of the recognised strategic importance of Crawley/Gatwick as an economic driver and to better provide for qualitative needs for new land in Crawley.

90. The ODPM guide on ELRs notes the difficulties in building a meaningful picture of employment land and supply using data derived from different sources, accepts the inherent limitations of the available forecasting and projection techniques, and recognises that quantifying the supply is not an exact science, especially where sites can meet several market segments. The draft SEP also recognises that 'there is only a limited relationship between employment change and land use and currently a poor understanding of land supply at a local level.'

91. In the circumstances I am not convinced that there is a strong enough evidence base for policy E1 to adopt a different figure from that provided by the WSSP, especially as the figure is not a prescriptive yardstick and provision at 2006 was already substantially on the way to meeting the requirement to 2016, leaving only a fairly small residual balance. I have concluded above (in relation to section 2 – Housing) that the CS can only be found sound on a short-term basis, and will require an early review to ensure certainty of delivery to 2026 against the SEP requirements. On that basis I have not seen any point in projecting the housing requirement to 2018. The same holds true for employment land. This issue will also need to be comprehensively reconsidered during the review to address some of the matters that I consider below under issue 5. In the meantime it is inappropriate under test vii to extend the provision beyond the end-date of the WSSP (2016).

92. Looking at issue 2, I consider the question of whether the CS identifies appropriate locations within policy E2 to meet the requirement of policy E1. The first area identified is the Borough's very large 'main employment area' mainly comprising Manor Royal and neighbouring County Oaks. This extensive area has undergone, and is still undergoing, major change from its original character as a traditional Mark 1 New Town industrial estate. It has now become an employment area of very mixed character, accommodating some recent B1 developments that would not be out of place on a high-quality business park as well as a wide variety of other modern B1 units, traditional B2 units, distribution depots, and other purpose-built premises and open-storage sites of many kinds. Its critical sub-regional importance is recognised by the Council's decision to fund consultants to undertake an audit and assessment of the estate's performance, strengths, weaknesses, and opportunities for change and improvement.

93. It is too early to anticipate the findings of that study. However, having visited the Manor Royal/County Oaks area on a number of occasions I consider that its potential for higher-density, higher-quality redevelopment is by no means exhausted. In my view the potential contribution of this large area to future growth in employment floorspace is not adequately reflected in the Atkins ELR. That report's assessment of potential sites to meet future needs for employment land seems to me to concentrate too much on a snapshot-in-time approach, some individual

elements of which did not stand up to examination, rather than making more broadly-based estimates of the likely yield of natural or induced churn of existing sites, especially within Manor Royal, over the CS period. In my view some of the broad estimates that I asked participants to make about the way in which the E2 locations could contribute towards meeting the residual of the requirement in policy E1 also underplayed the potential of redevelopment as a source of supply.

94. Turning to Lucerne Drive, this site has for some time been allocated for employment use and planning permissions for office development have existed since the late 1990s. Despite a considerable marketing campaign in 2004-2006 no pre-let or forward-sale occupiers were identified and a number of expressions of interest came to nothing. It may be that the owner's refusal to dispose of the freehold placed some limit on development options but the area is somewhat remote from Crawley's main employment destinations and the adjoining employment site at Jungle Fields has developed only slowly. As the site would accommodate only 10,000sq.m of accommodation it scarcely warrants identification as a strategic opportunity and it would make only a very limited contribution to the overall WSSP requirement. The Council accepted that the CS would not be unsound if Lucerne Drive were omitted and, as already indicated under discussion of part 2/2 (housing), I consider that in Crawley's present circumstances the land would make a greater contribution to local needs if developed for housing at an early date. I therefore recommend its deletion from policy E2. This would cause the residual guideline to rise to a revised figure of about 40,000sq.m.

95. The two 'opportunity areas' identified at North of Manor Royal effectively 'round-off' the northern limits of the existing estate without affecting land which plays a significant role in the strategic gap. Both would also avoid conflict with areas constrained by the Gatwick safeguarded area, except in the case of a small part of one of the areas. The development potential of these two areas (said to be about 34,000sq.m) would go a long way towards satisfying the revised WSSP residual requirement to 2016, while in my view it is not too much to expect that the small balance of the 40,000sq.m will be well within the likely capacity of the other E2 sites to 2016. I therefore find the overall locations identified in policy E2 sound and capable of meeting the broad quantum identified in E1 to 2016 in its recommended changed form. However, as well as Lucerne Drive, I also recommend deletion of Gatwick Airport from policy E2. Its inclusion is inappropriate against test vii as this is not an employment location in the ordinarily understood sense of the term. This is not to say that parts of the site could not play a role if the necessary 'exceptional circumstances' arose. I find no convincing need to extend either the Manor Royal or the County Oaks employment areas into other land to the north (ie, beyond the opportunity sites), and in any case such land is affected by the heavy constraints of the more open parts of the strategic gap and the Gatwick safeguarding area.

96. Considering issue 3, parts 2 & 3 of policy E2 set out criteria which seem to me generally appropriate for circumstances in Crawley. However, I consider it unsound against test vii to select the opportunity areas north of Manor Royal for particular mention in this respect. These areas are not highly visible and may have to be accessed by extending an existing cul-de-sac (in the case of the eastern area) or through other developments (in the case of the western area). While they can contribute to widening the choice of land available for employment-related development they are

not (among the totality of sites in Crawley) uniquely or specially favourably placed to accommodate companies seeking the most prestigious locations. I therefore recommend the deletion of the reference to these areas under part 2 of the policy. For the same reasons I also recommend deletion of policy MC2 and the preceding paragraphs (9.5 to 9.7) as these also give the impression that the opportunity areas have qualities not present elsewhere.

97. Dealing with issue 4, I find policy E3 generally soundly justified and the criteria included within it sufficiently flexible to allow changing circumstances to be properly taken into account in the context of individual sites. However, logic suggests that the final bullet point is a self-contained one applying, for example, to outmoded or outworn premises and is not linked with the preceding four points, which also describe discrete situations in which the marketing criterion would not particularly apply. Thus, soundness against test vii would require the substitution of 'or' for 'and' after the fourth bullet. The criteria within the policy could also set up potential conflict with, for example, TC1 but this can be overcome by the inclusion of an appropriate additional bullet point.

98. I turn finally to issue 5, the possible emerging sub-regional requirement for employment sites of high quality. WSSP considers it important to manage the release of employment land in this part of the county to ensure that a satisfactory balance between new homes and jobs is achieved, with no return to the past tendency for jobs to grow faster than population. It also places a focus on high quality employment uses to meet the needs of this buoyant area. It recognises that redistribution of the WSSP policy NE1 floorspace between Districts may be necessary in order to support growth at Crawley/Gatwick and that some of the Horsham and Mid Sussex allocations could be provided in Crawley, in addition to its own allocation. Reference is also made in NE7 to 'ensuring that sites are allocated in the vicinity of Crawley and Gatwick to meet the strategic requirements of the Crawley/Gatwick economy, including a strategic employment allocation, possibly associated with the strategic location [ie the new urban extension] west of Crawley'.

99. It seems to me that (with the exception of the possibility of an allocation being made in the JAAP for West and North West of Crawley) there has been little systematic consideration of the sub-regional implications of policy NE7. Moreover, the stronger sub-regional focus on Gatwick emerging in the draft SEP (particularly policy GAT4), coupled with regional economic development policies such as the Gatwick Diamond initiative, will place increasing importance on setting up appropriate mechanisms at sub-regional level for efficiently and transparently analysing, addressing and resolving cross-border employment issues of the type foreshadowed in WSSP. These could include longer-term planning to 2026, the 'redistribution' issue referred to above, the extent of any need for strategic employment sites and the best locations for them, and any need to identify high-quality sites aimed at knowledge-economy/research and development functions, higher-education linked sites, and sites attractive to inward investment – especially any more footloose market segments for which a supply-led approach may be appropriate. In my view effective multi-authority and agency mechanisms will need to be set up to consider and determine these emerging long-term sub-regional employment-related issues. In my view the CS is unsound under tests vi-viii in its references to these matters. Policy E1 therefore needs to be strengthened and given more focus to point up the need for this approach.

100. With regard to 'Gatwick Green', in my view the evidence base in support of this concept is not strong enough to demonstrate the need to identify land for such a proposal within policy E2 before the above work has been undertaken. The draft SEP places the emphasis on SMART growth within the Gatwick sub-region and there is as yet no clear framework for concluding that quantitative and/or qualitative needs exist for further employment land on this substantial additional scale. Notwithstanding this, the land is within the extended IMP Gatwick safeguarded area which I support for inclusion in the CS (see discussion at 2/8). Moreover, even if the safeguarded area were more restrictively defined the present respective viewpoints of the Highways Agency and the scheme-promoters do not leave me confident that development could proceed at Gatwick Green without a more convincing common view on the issue of how an expanded airport should be linked to the M23.

101. Referring briefly to the land east of Brighton Road, my conclusions at paragraphs 61-62 of this report also apply to employment use of this area.

102. I conclude that the following policies and paragraphs of parts 2/7 and 2/9 are unsound and recommend that they be changed as set out below.

7.9 It is also acknowledged that flexibility is required in accommodating the overall floorspace requirement for the plan period to reflect the West Sussex Structure Plan requirement being a yardstick. Furthermore, as stated at paragraph 119 of ~~cluded to in~~ the West Sussex Structure Plan and as a potential consequence of the joint working between Crawley Borough Council, Mid Sussex District Council and Horsham District Council, there is potential for redistribution of the District floorspace redistribution requirements of policy NE1 to support growth at Crawley/Gatwick, with some of the Horsham and Mid Sussex District requirement being provided within Crawley in addition to its own allocation. In the Joint Area Action Plan for within between the three authorities of Crawley, Horsham and Mid Sussex to reflect, particularly in relation to planning for the Strategic Development Location West and North West of Crawley consideration is being given to the provision of a strategic allocation to accommodate high quality employment uses to meet the identified needs of the area, in accordance with WSSP.

7.x [Add new paragraph] The draft South East Plan reinforces the sub-regional approach to Crawley/Gatwick and the concept of the Gatwick Diamond as a means of maintaining strong growth of the area's dynamic and generally prosperous economy. Taking this concept forward will require the development of cross-border mechanisms to consider and address the way in which the approach of the WSSP may need to be developed and adapted to identify and meet quantitative and qualitative needs within the sub-region emerging from the South East Plan.

E1 In order to meet the employment growth needs of the town, and to provide it with a strong and diversified economic base as a strategic employment location, ~~347,333~~ 280,000 sq m of net additional employment floorspace will be provided ~~up to 2018 in the period 2001-2016.~~ This figure is regarded as a yardstick, rather than a prescriptive target or ceiling.

To support the town's central role within the Gatwick Sub-Region and the Gatwick Diamond initiative, as a strategic employment location within the wider area, the Borough Council will, in partnership conjunction with West Sussex County Council, and adjoining districts and other stakeholders, will consider and (1) monitor provision of employment floorspace across the sub-region against the Structure Plan yardsticks, (2) consider and the need and/or scope for sub-regional redistribution of WSSP floorspace allocations to achieve the best fit with sub-regional needs and opportunities, and (3) consider and address the implications of additional floorspace requirements arising from any quantitative and qualitative needs that may be identified within the sub-region following adoption of ~~emerge from~~ the South East Plan.

The Council will also monitor and any the impacts arising from the development of Town Centre North may have on the town's employment composition.

E2 [Delete references to Lucerne Drive and Gatwick Airport in E2 (1) and delete the final sentence of E2 (2).]

E3 [Substitute 'or' for 'and' after the fourth bullet:

Insert 'or' after the fifth bullet, and

Include a sixth bullet as follows:- 'the site is within an area identified for an alternative form of development in the Core Strategy'.]

MC2 [Delete]

Part 2/8 - Gatwick Airport

103. I consider policies G1 and G2 separately. The main soundness issue raised by G1 is whether it offers appropriate guidance, consistent with national policy, about the types of development that can appropriately take place within the airport boundary. PPG13: Transport, Annex B provides a tiered approach to this issue. 'Operational' uses clearly have to be within the defined perimeter, while categories of 'related' development 'appropriate to airports' are defined as including transport interchanges, administrative offices, short and long-stay parking. Types of 'less-related' uses are also identified (to include hotels, conference and leisure facilities, offices and retail) but these are only regarded as acceptable at airports if 'explicitly justified' and of an 'appropriate scale relative to core airport related business'. Although it is considerably less clearly worded the general thrust of WSSP policy NE19 appears to be consistent with PPG13.

104. The Council's intention is that policy G1 should not offer support only to operational uses and it seems to me that to restrict it in that way (or, alternatively, to try to clarify or widen the categories of acceptable development by attempting to devise a comprehensive or indicative list of pre-determined uses) would risk making the policy inflexible and at odds with the practical national approach set out in PPG13. In my view all that is required in the interests of soundness is inclusion in policy G1 of a reference to PPG13 in order to underline that the policy's stance is not different from the national one.

105. A further issue concerning policy G1 is whether it should address issues to do with the balance of on-airport and off-airport parking. Much of that debate is based around the objectives, continuing validity, and likely outcomes of the Gatwick Transport Strategy and it seems to me a significant omission that the CS nowhere includes on-going commitment to the '40%' target in that strategy. In my view soundness test vii requires this to be rectified by an appropriate reference at paragraph 8.5 as recommended below. Beyond that I see no reason for introducing any specific policy coverage of the issue in the CS. In any case policies GAT6 to GAT10 of the local plan (which cover airport-related parking in detail) are saved until reviewed in the forthcoming DCDPD and that would be the proper context for considering whether any change of policy emphasis is appropriate in the light of emerging trends and circumstances.

106. Referring briefly to test vi (cross-border issues), I do not consider the CS unsound in the extent of its references to a number of other Gatwick-related issues including arrangements for inter-agency working,

air quality, and sustainable drainage. These matters are already mentioned in paragraph 8.5: supplementing them would merely contribute to loss of strategic focus. In my view these and other suggestions exemplify some participants' lack of appreciation of the fundamental differences between a CS and an old-style local plan.

107. However, there is a further element of unsoundness related to policy G1. This is the identification on the Proposals Map of an area shaded blue, entitled 'proposed development at Gatwick Airport'. The CS and evidence base provide no explanation of (or justification for) this area. It was said to originate in Supplementary Planning Guidance for the airport. There appears to be no core strategic reason to distinguish this part of the G1 policy area and its inclusion on the Proposals Map serves only to confuse. In my view test vii requires its deletion.

108. Turning to policy G2, this provides a major focus of concern about the soundness of the CS. The most fundamental issues here are (a) the terms of the policy to be applied to the area safeguarded against the possible need for a second runway and (b) the geographical extent of the area to be protected in this way.

109. Dealing with issue (a), the terms of the policy, the ATWP says (para 12.3) that *'Land outside existing airports that is needed for future expansion will need to be protected against incompatible development in the intervening period. Under the current planning system, such land is only formally protected once it is either reflected in the local development plan or when planning permission is granted for the airport development.'*

110. 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. I fully recognise that such safeguarding causes negative and unfortunate consequences for some local landowners during an indeterminable period. However, financial remedy for this situation would exist, at least to the extent generally discussed in paras 12.13-17 of the ATWP and applied locally through the operator's Property Market Support Bond scheme. Although this uncertain situation may be highly undesirable, it seems to me strongly preferable in the public interest to the alternative scenarios favoured by some. Under those, developers would (all other planning considerations aside) be constrained in what they built only by their (i) degree of confidence that the runway will never be required, (ii) belief/hope that the layout of any eventual additional airport development could work around obstacles built in the meantime, or (iii) reliance on recovering the costs of abortive short-term development through the compulsory purchase procedure. I therefore recommend slight rewording of policy G2 to meet test vii by setting out the effect of safeguarding more clearly and directly.

111. Turning to issue (b) - the appropriate geographical extent of the safeguarded area - the ATWP (para 11.81) looks to the Gatwick operator to safeguard the land for the potential wide-spaced runway option. The role of the development plan is not covered at this point in the ATWP but the context is set by para 12.3 (quoted above) and PPG13 Annex B also indicates (at para 6) that *'...local authorities should identify and where*

appropriate protect sites and surface access routes, both existing and potential, which could help to enhance aviation infrastructure; and avoid development at or close to an airport or airfield which is incompatible with any existing or potential aviation operations.'

112. Responding to the ATWP's requirement, the operator has defined its preferred limits for the safeguarded area. This was done initially through the airport Outline Master Plan of March 2005 (OMP) which was subject to extensive consultation with local stakeholders. Following consideration of stakeholders' comments (a summary of which was submitted to the examination) the operator defined a revised area extending further to the east and included this within the Interim Master Plan of October 2006 (IMP). The submitted CS reflects the work behind the OMP and adopts the line put forward within it, but the Council now does not oppose the operator's view that the submitted boundary has been rendered unsound by the IMP and should be changed. However, others challenge the rigor of the OMP/IMP as an adequate justification for the more easterly boundary.

113. The safeguarded area defined in the OMP expanded the airport boundary by about 40ha less than the 667ha shown on the indicative map in the ATWP [OMP para 9.20] although it was differently distributed. However, the IMP brings the additional area back to about 667ha [IMP para 9.37], particularly by including more land to the east, up to the M23.

114. The IMP identifies the practical problems and possible prematurity of preparing more than very general concepts and strategies for a complex development which is only contingently required, and which would not be the subject of a detailed planning application before 2014, or built before 2019 at the earliest. However, in my view the IMP (paras 9.23 onwards and drawings 7 & 8) draws reasonably sound general conclusions about the maximum extent of land that should be safeguarded so that possible options are not inappropriately foreclosed.

115. It is possible to criticise or query some individual aspects of the principles at para 9.34 of the IMP, such as the amount of land required (or the locations assumed) for car parking, workshops and servicing, staff facilities, sustainable drainage, pollution control, flood management, highway works (including the diverted A23) and landscaping. Debate can also be had about how far it is appropriate to include offices, hotels and another petrol filling station as necessarily 'front-line' activities. It may be that some aspects of the alternative 'compact airport' approach outlined in the Arup report could prove to have merit.

116. However, it is clear that defining a sound appropriate boundary for such a complex major project is a difficult matter because there remains so much uncertainty about the longer-term required elements of the necessary future development mix. This conclusion is reinforced by my view that it is not unreasonable to include enough flexibility within the safeguarded area to accommodate activities necessary to create the overall elbow room for airport expansion even if such activities are later excluded from the eventual strictly defined airport perimeter. PPG13 Annex B (para 6) seems to me to offer some support for this approach.

117. One example of this is the need to reserve sufficient land to allow for the creation of any necessary new links between the expanded airport and the M23. Despite feasibility studies undertaken by Faber Maunsell, I consider it clear that further work still needs to be done to clarify with the

Highways Agency the nature and extent of any appropriate works. As indicated by the studies, such new links could potentially occupy a significant area of land west of the motorway between junctions 9 and 10. In my view it would be inappropriate to reserve particular corridors for new links at present, especially if those corridors were then frozen as the only candidates (and consideration of other possible options ruled out) by subsequent development outside the selected lines on other land between the M23 and the present airport boundary. A second example of need for flexibility within the safeguarded area is that given in IMP para 9.34 – ie, sites for relocating businesses displaced by the expansion which could otherwise risk closure for want of suitable local sites. While such uses would not normally figure very high on the PPG13 hierarchy of relatedness, national policy on the airport could be harder to achieve without some built-in flexibility of this kind.

118. My overall conclusion is that avoidance of prejudice to national policy requires that a soundly-defined boundary to the safeguarded area must not take an excessively under-inclusive or prematurely restrictive approach. From the evidence presented to me and the considerable discussion of the issue at the examination I do not find the submitted CS boundary sound, still less an even tighter boundary restricted to land west of Balcombe Road. Nor do I think it prudent to define the boundary to omit other sites in the Crawley-Gatwick gap, even those on its southern edge. Safeguarding the area up to the M23, as in the IMP, may represent a 'maximum case scenario' but the overall quantity of land safeguarded would be similar to that envisaged in the ATWP and I do not consider there to be more reliable evidence for any particular reduced alternative. It would be in the interests of Crawley if national policy on Gatwick is clarified as soon as possible so that the cloud of uncertainty can be lifted but in the meantime I recommend that the Proposals Map be changed to follow the safeguarding area boundary defined, after appropriate consultation, in the IMP. I do not consider that the general conclusions of the Crawley SA/SEA report with regard to policy G2 would be invalidated by this approach.

119. Four other brief issues arise in relation to the soundness of the wording of policy G2 and are embraced within my recommendation below. Firstly, I consider that the policy needs some changes of emphasis to bring it more closely in line with national policy in the ATWP. Secondly, consistency requires it to adopt the same terminology as G1 in relation to the type of facilities permissible within any future extended boundary of the airport. Thirdly, I understand the Council's corporate opposition to the second runway and consider it reasonable for that position to be recorded within the strategy, as it is at paragraph 8.2. However, it is inappropriate (in terms of test iv) for that viewpoint to form the introduction to G2. I reflect this view in my recommendation below by deleting the introductory words of the policy.

120. Fourthly, the last paragraph of policy G2 requires deletion. The JAAP cannot be an appropriate vehicle for formal review of a fit-for-purpose safeguarded area defined in the higher-tier CS. This is not to say that the JAAP could not make contingent plans for land within the safeguarding area to be implemented in the event that (and at such time as) national policy removes the requirement for safeguarding. It could also be that the required consultation for any proposals within the safeguarded area revealed that a particular form of development was capable of being compatible with the safeguarding requirement.

121. I conclude that the following policies and paragraphs of part 2/8 are unsound and recommend that they be changed as set out below.

Proposals Map - Delete the blue-shaded area relating to policy G1; and

- Amend the boundary of the Gatwick safeguarded land to reflect the IMP

8.5 [Add at the end] “An important headline target adopted from the Gatwick Airport Transport Plan is that 40% of surface journeys by non-transfer air passengers will be by public transport when the airport’s annual throughput reaches 40 million (forecast in 2015).”

G1 Within the airport boundary as set out on the proposals map, the Council will support the development of facilities which contribute to the safe and efficient operation of the airport as a single runway, two terminal airport subject to satisfactory environmental safeguards being in place. In assessing whether or not particular uses are appropriate within the airport the Council will have regard to the advice in PPG13 (Annex B).

Safeguarded land

8.6 The Government White Paper: The Future of Air Transport creates ~~There is uncertainty over the long term future of Gatwick by identifying the airport. Government air transport policy identifies the need for additional runway capacity in the South East in the form of a with the first new second runway being at Stansted and a second, subject to environmental issues being addressed, built at a third runway at Heathrow. In the event that environmental issues at Heathrow cannot be addressed, then Gatwick is identified as the alternative airport for an additional runway. However, the White Paper accepts that action should not be taken to overturn the 1979 agreement between West Sussex County Council and the then British Airport Authority preventing construction of a second runway at Gatwick before 2019. This uncertain situation may not situation is unlikely to be resolved for some years, in advance of formally adopting a Core Strategy in 2007.~~

8.7 ~~BAA have~~ The White Paper indicates that the airport operator should take steps to safeguard the land needed for the option of a second wide-spaced runway at Gatwick by defining appropriate limits in an airport Master Plan. Gatwick Airport Ltd (GAL) has developed this requirement through the preparation of its Interim Master Plan, October 2006 (IMP). The Council accepts the information in the IMP as adequate justification for the safeguarded area and has included it on the Proposals Map, indicated clearly that they require land to be safeguarded for a second wide spaced runway and that the basis for setting the boundaries of the safeguarded area should be based on the proposals set out in their Outline Master Plan published in March 2005. As BAA’s proposals are in general conformity to the Governments Aviation White Paper proposals, the Council considers them to be a reasonable basis for identifying the boundary of the safeguarded area as shown on the Proposals Map.

8.8 ~~GAL has BAA have~~ confirmed that safeguarding would not affect the provision of any relief or link roads that may be required in the future to serve the strategic development west and north west of Crawley. ~~A further review of the safeguarded area may be required for the north west Crawley area in the light of information and discussions with BAA Gatwick and others regarding the drafting of the West and North West of Crawley Area Action Plan.~~

~~8.9 Should the Government impose a second runway at Gatwick that requires the use of this land, any existing employment provision would need to be relocated to alternative sites. A suggestion put forward in the Manor Royal and County Oak section refers to the possibility of using land currently identified as the North East Sector if this cannot be progressed as a new neighbourhood.~~

G2 ~~Notwithstanding the Council’s opposition to any growth of Gatwick Airport beyond its current single runway, two terminal configuration, land is safeguarded from development, as defined on the~~ The Proposals Map identifies land which will be safeguarded from development which would be incompatible with which would conflict with expansion of the airport to accommodate the construction of an additional wide-spaced runway (if required by national policy) together with a commensurate increase in facilities contributing to the safe and efficient operation of the expanded airport in accordance with advice in PPG13 (Annex B), associated airport facilities.

~~Within this area, development would not be permitted which would prejudice the integrity of the safeguarded area and BAA's ability to bring forward a wide spaced runway, should it be required.~~

~~Small scale Minor development within this area, such as changes of use, and small-scale building works, such as residential extensions which would not prejudice any future proposals for a second runway, would will normally be acceptable. BAA Gatwick will be consulted on all planning applications within the safeguarded area.~~

~~The safeguarded area may be subject to review dependant on the outcome of studies and progress on development options within the area of search for the West and North West of Crawley Area Action Plan.~~

Part 2/10 - Land west and north-west of Crawley

122. The Inspectors' report on the Horsham CS provides a significant benchmark against which to judge the soundness of the linked content of the Crawley CS relating to this future urban extension, the principle of which was established in the WSSP.

123. The concept of defining the maximum extent of the study area in the CS, rather than leaving it to the background work for the Joint Area Action Plan (JAAP), has been endorsed by the Horsham Inspectors. It would be illogical to adopt a different approach in Crawley, so the main issue raised by part 2/10 is whether or not the Proposals Map appropriately defines the scope of the JAAP 'study area'.

124. As the new development is to be an urban extension to Crawley it needs to be fully integrated with the structure of the town. In this respect I find the CS unsound under tests vi-viii as it fails to extend the defined study area across all the land in the arc from Bewbush round to County Oak between the Borough boundary and the defined built-up area [that is, the built-up area as defined in the Local Plan rather than in the CS – see my discussion of part 2/14 below]. Including all this land would not pre-determine that any part of it should be proposed for development in the JAAP. Much of it is affected by strong constraints, including flooding issues, nature conservation designations, conservation area status, and open space uses. However, it is important that all the land should be included in the study, rather than simply ignored and treated as a left-over area between the present outer edge of Crawley and the eastern edge of the development area. If the land is excluded from the study the forthcoming DPD could lose sight of the potential impacts of the new urban extension (whether positive, neutral or negative) upon these important areas on the present edge of Crawley. It would probably fail both to take any appropriate development opportunities (were any to be identified) and to consider and provide for any mitigation or integration measures that may be necessary. I therefore recommend the formal extension of the study area to embrace the areas described above.

125. Exclusion of the above areas also sits oddly against the inclusion of so much overlap to the north-west of Crawley between the study area on one hand and the strategic gap and Gatwick Safeguarding Area on the other. However, I was told that this extensive overlap results mainly from the need to reserve a corridor for the relief road and, overall, I do not regard the overlap as necessary evidence of unsoundness in the CS provided that the JAAP treats the strategic gap and safeguarding areas with the proper degree of seriousness as constraints.

126. Turning to the content of policies W1 and W2, the greatest difference between Crawley CS and the adopted Horsham CS is the policy stance of the two in relation to the need for the proposed relief road between the A264 and A23. The former (through policy W2) makes this a definite requirement, in line with the WSSP, the CATP, and the Borough Council's stated preference. The latter (through policy CP6) adopts a more flexible position, leaving the determination of 'sufficient transport infrastructure' and consideration of the need for the road to be decided through the JAAP. I find this the correct course of action. Soundness in terms of tests iv and vi therefore requires the deletion of policy W2 and the inclusion of words within policy W1 more closely aligned with the relevant parts of Horsham CS policy CP6. As a result of this change the emphasis of paragraph 10.9 also needs to be slightly changed (without removing reference to the Council's preference) and its position moved.

127. There are also two other matters requiring change to bring about sound alignment between the two Core Strategies under tests iv and vi. The first is the treatment of 'employment provision' beyond that associated with the normal requirements of a neighbourhood centre. I have considered the potential role of this development area in relation to part 2/7 of the CS and my conclusion is reflected in the recommendation below. This follows the wording of Horsham policy CP6 but sets the reference in the broader, more current context of the Gatwick Sub-region.

128. The second matter is that I find it inappropriate for the Crawley CS not to include the Horsham reference to new development protecting the setting of Ifield Conservation Area, especially as the Conservation Area is within Crawley and the study area will now cover much of it.

129. I conclude that the following policies and paragraphs of part 2/10 are unsound and recommend that they be changed as set out below.

Proposals Map – extend the study area to include all the land in the arc from Bewbush round to County Oak between the Borough boundary and the defined built-up area [that is, the built-up area as defined in the Local Plan rather than in the CS – see my discussion of part 2/14]

WI A Joint Area Action Plan for the Strategic Development Location West and North West of Crawley will be prepared jointly by Horsham District Council and Crawley Borough Council and will:

- Be supported by further work, studies and consultation documents and stages;
- Cover the Area of Study for the Strategic Development Location West and North West of Crawley, as defined on the Proposals Map;
- Make provision for a high quality mixed-use neighbourhood development comprising of up to 2,500 dwellings (including 40% affordable housing), a new neighbourhood centre (potentially comprising of shops, employment floorspace, a community hall, a primary school, a doctor's surgery, a library, a public house, public open space) ~~and employment provision~~;

* Include the possible provision of new employment, beyond that required in a neighbourhood centre, including the possibility of a strategic employment allocation to meet the needs of the Gatwick Sub-Region;

- Include consideration of other uses which may be required to meet wider community needs;

* Include the provision of sufficient transport infrastructure to meet the needs of the new development while maximising the opportunities for sustainable travel, including reducing dependency on the car by providing access to local facilities and services, providing high quality passenger transport links (such as Fastway and/or a new interchange station) and

ensuring safe, alternative and convenient pedestrian and cycle routes between the development and Crawley and to the countryside;

* Determine whether there is a need for any relief or link road between the A264 and A23, the route for any such road, and the means of providing it;

* Ensure that new development protects and where possible enhances the setting of the Ifield Conservation Area;

- Translate the key principles and objectives for development into policy;
- Outline the masterplanning and sustainability principles for the development.

10.9 [Reword as follows and place before policy W1]

The adopted West Sussex Structure Plan (2001 – 2016) requires the construction of a relief road around the north-western side of Crawley in conjunction with the development of the Strategic Location. As indicated in the Gatwick section, BAA has confirmed that any proposals to accommodate such a road would not be prejudiced by safeguarding proposals. The Borough Council considers that any new development West and North West of Crawley should not be allowed to add to existing traffic problems in the neighbourhoods on the western side of Crawley and should include measures which relieve pressure on the existing road network. In line with the Structure Plan the Council considers that this should be achieved by a form of ‘relief road’ but will work with Horsham District Council to ensure that sufficient transport infrastructure is provided to meet the needs of the new development and that any ~~whatever~~ proposals are finally adopted are in the best interests of sustainability and the local community on both sides of the Borough boundary.

W2 [Delete]

Part 2/11 - North-east sector

130. The North East Sector has long been recognised as a suitable site for development of a new neighbourhood, having first been identified in the WSSP 1993. However, its development was prevented by the Article 14 Direction imposed in 1999 and the Secretary of State’s recent decision on the called-in planning application effectively continues the embargo on development of this land unless and until it can be shown that the ATWP’s preferred option of a third runway at Heathrow cannot be delivered.

131. If this important potential site were not constrained in this way the informal consortium’s substantially developed master plan would be capable of delivering some 1900 units between 2008/09 and 2015/16, as well as opening the way to later provision of up to 800 more dwellings on other land within the identified sector. This level of provision would make the CS sound over the period to 2018 against the requirements of both the WSSP and the draft SEP. However, as the site is currently unavailable the CS will require very early review, as already discussed under part 2/2.

132. The sub-regional housing contribution of Crawley, as set out in the draft SEP to 2026, would require long-term provision of housing at a level unlikely to be achievable without using green-field land such as the North East Sector. I therefore do not consider that the CS should set any further policy restriction on immediate development of this area if the ATP-related constraints were to be removed. To that extent paragraphs 2.14 and 11.6 of the CS are confusing and unsound against tests vii and viii because (taken in combination) they could potentially hold up the well-developed plans for the North East Sector by making release of the area dependent on the timing and outcome of the review of the LDF. In my view the CS should make it clear that the North East Sector will continue

to be a preferred option, to be implemented if and when possible, with the function of the review being to identify land that will be released in clearly defined phases, triggered through appropriate monitoring processes, if the North East Sector still cannot be delivered. My recommended changes to parts 2/2 and 2/11 present the North East Sector in this more positive light – an opportunity to be seized if and when the chance becomes available, rather than one held as a long-term reserve, only to be activated after review of the LDF.

133. I conclude that the following policies and paragraphs of part 2/11 are unsound and recommend that they be changed as set out below.

Change paragraphs 11.1 to 11.10 by replacing them as follows:

11.1 The North East Sector was identified in the West Sussex Structure Plan 1993 as a suitable location for an additional new neighbourhood for Crawley and land was allocated in the Local Plan of 2000 for the development of up to 2700 dwellings and other uses. A planning application for the new neighbourhood was submitted in 1998, but as the Government was intending to bring forward a White Paper on the Future of Air Transport it issued an Article 14 Direction in March 1999 preventing the Council from granting planning permission without his authority.

11.2 The eventual White Paper, issued in December 2003, retained the option of developing a second (wide-spaced) runway at Gatwick to be exercised after 2019 if it proves impossible to pursue the nationally-preferred option of a third runway at Heathrow. In May 2007 the Secretary of State dismissed an appeal against non-determination of the 1998 planning application for the North East Sector on the grounds that if the development were to proceed (a) the configuration of any new runway might have to be altered, which could reduce the ultimate capacity for the airport and (b) aircraft using a second runway would result in noise levels within the new housing area well beyond those likely to cause community annoyance and significantly in excess of 60dB which PPG24 recommends as a desirable upper limit for major noise sensitive development. In addition the Secretary of State considered that circumstances in May 2007 presented no immediate need to release the site to meet housing need judged against provision at Structure Plan rates in the period to 2012.

11.3 A final decision whether or not a second runway will be needed at Gatwick may be several years away. However, in the meantime there will soon be an increasingly pressing need to identify more housing land in Crawley to meet the higher, long-term annual growth requirements set out in the draft South East Plan to 2026. An early review of the Local Development Framework will therefore be undertaken. Notwithstanding this, in view of Crawley's sub-regional role, it is important to retain the option for development at the North East Sector to commence as soon as may be possible if and when this is not prevented by reasons related to national policy safeguarding land for a second runway at Gatwick. The North East Sector is therefore identified and safeguarded as a strategic housing development opportunity to come forward if (and as soon as) this becomes possible.

11.4 Any residential development at the North East Sector will only take place in the form of a sustainable and comprehensively master-planned new neighbourhood, reflecting the existing urban structure of the town. Partial development of the sector would undermine these principles. On the other hand, if Government policy were to require a second runway to be built, the opportunity will be taken to explore alternative forms of development for this area, including accommodating any commercial development displaced from the site of the runway.

Objectives

11.5 The key objectives and principles for development of the North East Sector are:

~~• To minimise the uncertainties arising from the Government Aviation White Paper in terms of the future development of the North East Sector and the overall provision of housing within the Borough;~~

~~• To facilitate the ability for the phasing of the development of the North East Sector in the context of a definitive decision regarding the requirement of a second runway at Gatwick, future Local Development Frameworks, the North East Sector Area Action Plan and Government planning policy guidance;~~

~~• To safeguard the North East Sector for the development of a new neighbourhood if and when this becomes possible without prejudice to the aims of the Air Transport White Paper; secure at~~

~~the appropriate time the development of a new neighbourhood in accordance with the neighbourhood principle;~~

- To ensure that any new neighbourhood here adopts high standards in housing quality, local facilities and services, residential environment and sustainability objectives and principles;

* To ensure that development avoids areas of flood risk and existing or possible future aircraft noise contours of 60 dBA Leq or more;

- To ensure provision of ~~that~~ all necessary local facilities and services, which will include affordable housing, a new neighbourhood centre (potentially comprising ~~of~~ shops, a community hall, a primary school, a doctor's surgery, a library, a public house, public open space) and employment provision ~~are provided;~~

[remaining bullet points unchanged]

NES1 The North East Sector is identified and safeguarded ~~retained as for the development of a new neighbourhood phased to accommodate up to 2,700 dwellings and other uses in the longer term, subject to the Government's decision regarding the requirement for a wide spaced parallel second runway at Gatwick.~~

NES2 If it is able to proceed, the North East Sector must be ~~will be~~ delivered as a sustainable and comprehensively master planned neighbourhood ~~and may be potentially subject to an Area Action Plan.~~ The development will comprise ~~of~~ a high quality mixed use development of 2,700 dwellings (including 40% affordable housing and a mix of dwelling size and type), a new neighbourhood centre (comprising ~~of~~ shops, local employment floorspace, a community hall, a primary school, a doctor's surgery, a library, a public house, public open space, play areas, places of religious worship), park and ride facilities and 5000sq.m of employment provision.

Part 2/14 - The Countryside.

134. PAS guidance on core strategies indicates (p14) that they should '*indicate the strategic approach to be adopted in relation to the open countryside.....if relevant, but without repeating Government policy*'. It further explains (p17) that a CS '*should be sufficiently locally distinctive as to do more than simply reflect national and regional guidance. (It) should add something to show how it (ie, national advice) will be applied to the area having regard to local circumstances. If (the CS has) nothing to add, and national and regional policy is sufficient to deliver sustainable development, (the CS) should not simply repeat it.*' (p17).

135. In my view the only Crawley-specific material in section 14 is the content of policy C2 and the definition on the Proposals Map of redrawn boundaries for the built-up area and the strategic gaps, as discussed in the succeeding paragraphs. Apart from those matters the countryside material, especially policy C1, suffers from a number of defects. It attempts to add local flesh to the bones of national policy but in doing so introduces unnecessary levels of complexity for a CS, seems to be at odds with aspects of national policy (eg by using some 'green belt' terminology in a non green belt context) and inappropriately appears to encourage or pre-determine proposals that are not yet by any means firm, one example being park and ride car parks. The policy's rather lengthy construction also has the clear potential to create a number of differences of understanding and interpretation. I therefore consider that soundness requires policy C1 to be set in a simplified, more strategic form, as recommended beneath. Any necessary review or development of the more detailed saved countryside policies of the Local Plan can be taken forward in the more appropriate context of the forthcoming DCDPD.

136. Dealing with the built-up area boundary, the evidence base contains no explanation of, or evidence for, the changes made in the CS

other than the very brief material at CD16 (paras 9.1-4) and CD17 (paras 4.1-4). The principal change in the boundary is within the area north of Langley Walk between Stafford Road and County Oak. This extends the 'built-up area' to include an extensive area of land comprising playing fields, an equestrian centre and its associated grazing areas, some other large fields forming part of Jersey Farm and a series of smaller areas of undeveloped land between Stafford Road and a brook forming one of the head streams of the River Mole. It may be that part of the reason for this change lies in the earlier inclusion of the Jersey Farm fields as an employment opportunity area at Preferred Options stage, but that option was not taken forward at submission stage. The change remains unexplained and I find no justification for it because the footpath which more or less follows the proposed outer line of the extended built-up area runs through land with a strong rural character. If, as CD16 states and the CS presumably implies, there is to be a presumption in favour of development inside the line of the boundary this could lead to a substantial amount of additional development on this urban edge, yet the implications of this are nowhere recognised or examined. With all the pressures upon land in Crawley at present any release of land for development should take place in a way which is positively planned and managed and upholds the neighbourhood concept. This is all the more important in a situation where the land in question is next to the study area for the JAAP for the West of Crawley urban extension, where the type and timing of any development on both sides of the built-up area boundary would need particularly careful integration (see my discussion of section 10 above). In my view this boundary alteration fails soundness test vii.

137. The other 3 proposed changes to the built-up area boundary, as described in CD17, are less significant, smaller-scale exercises in tidying-up. The only one of these having core strategic significance is the adjustment of the boundary to accommodate the strategic housing opportunity at Bewbush, already discussed under part 2/2. With that one exception I consider the DCDPD the appropriate policy vehicle for reviewing the boundary established in the Local Plan. That would also be the right context for considering the merits or otherwise of the other potential boundary adjustments, whether proposed by the Council in the CS or by others. My recommendation in this respect is set out beneath.

138. Turning to the strategic gaps, the concept of protecting such areas has been a long-standing ingredient of the WSSP. In 2003 a panel report concluded that a simpler approach would be more appropriate in the light of Government policy at the time and the WSSP as a whole. In the panels' view many of the gaps did not have a strategic function and their identification tended to deflect attention from the need to protect the countryside as a whole. However, the County Council did not accept the panel's recommended replacement generic policy aimed at preventing coalescence of towns.

139. National policy in PPS7 does not refer to strategic gaps. It re-introduces some support for the concept of 'local landscape designations' (if formally and robustly assessed and justified) but it is clear that gaps are not landscape-related designations, only policy instruments aimed at strengthening the prevention of development between certain settlements. It is therefore unclear to me that support for the concept can be derived from PPS7.

140. Significantly, the draft RSS recognises the inconsistent approach to strategic gaps across the region, where some counties have designated them and others not. Policy CC10b and paras 1.33-38 aim to secure a more common approach, keeping the focus on strategic gaps. However, para 1.38 leaves the door ajar to identification of local gaps, if justifiable. This aspect of the draft RSS has been subject to considerable debate at the EiP, including the issue of whether there is true need for the additional layers of protection afforded to gaps, given the protection for the countryside in general through PPS7. Consequently the regional basis for taking forward the concept of gaps remains unresolved and indeed highly disputed, especially the principle of local gaps.

141. The uncertainty about future regional policy on gaps is compounded by the way in which the CS interprets gap policies inherited from the WSSP and the Local Plan. The WSSP identified 4 strategic gaps impacting on Crawley, whereas these were taken forward in the Local Plan in a reduced number of areas (3) using different headings. The CS now makes further changes to their number, descriptions and defined boundaries and rather confusingly labels the gaps 'local strategic gaps', which is a clear contradiction in terms.

142. From the above I find that the gaps identified in the CS have unclear status or justification in national and regional policy. With the possible exception of the Crawley-Gatwick gap it may be doubtful whether the CS gaps have a truly strategic function or add anything much to national and regional policies for the protection of the countryside. In the present circumstances I consider it unsound against tests iv and vii for policy C2 to engage in further development of the Local Plan's policies on gaps. If and when the RSS supports retention of the concept and provides a surer policy background, the relevant Local Plan policies and site-specific designations can be reviewed as part of the DCDPD. That would be the right time to assess the merits of the various conflicting changes to the boundaries of the gaps proposed by the Council and by others. In the meantime I consider it inappropriate for the CS to tinker with the defined gaps in Crawley on what may well turn out to be a short-term basis. In the circumstances I recommend deletion of policy C2 and the associated changes to the Proposals Map and continued reliance for the present on Local Plan policies C2-C4, as applied to the areas indicated on the Local Plan Proposals Map.

143. I conclude that the following policies and paragraphs of part 2/14 are unsound and recommend that they be changed as set out below.

14.1 The limited area of countryside within the Borough is an extremely valuable asset for the community which should be protected and enhanced wherever possible. ~~As a consequence, the~~ The approach in this Core Strategy is therefore to limit any not to permit new development within the countryside unless exceptional circumstances and significant benefits to the whole town can be demonstrated. it is generally consistent with national policy in PPS7. This will ~~approach should~~ help to ensure that the countryside is protected for future generations to enjoy.

14.2 West Sussex has long operated the concept of "strategic gaps", intended as policy tools to prevent urban coalescence across often narrow areas of undeveloped land between nearby settlements which could otherwise be vulnerable to development pressures. National policy in PPS7 does not refer to gaps. Although some support is given to the concept of "local landscape designations" where these are formally and robustly assessed and justified, strategic gaps are not normally landscape designations. The draft South East Plan seeks to achieve a more common approach to policy on "gaps" across the region but has been the subject of considerable representations on this issue.

~~14.23 Until the regional framework is clarified it is inappropriate for further changes to be made to the gaps identified in the Local Plan. This issue will therefore be revisited in the context of the Development Control DPD (DCDPD), due for submission to the Secretary of State in January 2009. Part of the countryside is also designated as Local Strategic Gap in order to prevent the town coalescing with surrounding settlements, including Gatwick Airport. The erosion of gaps between Crawley and surrounding settlements would threaten the separation and individual identity and character of Crawley. Representations received during the consultation process for this strategy have revealed mixed views about the need to retain the concept, the roles of various areas as either "strategic" or "local" gaps, and the appropriate extent of any designations. In respect of the need, role and extent of Local Strategic Gaps were mixed. Some supported the retention of gaps in their current form, whilst others proposed small a range of alterations to ensure that the boundaries of any land designated gaps either supports its the strategic function in of preventing coalescence between settlements or enable. Some alterations were also proposed by land and property owners on the basis of enabling more appropriate forms of development at the boundary of a local strategic gap.~~

Objectives

[Retain paragraph 14.3 as paragraph 14.4]

Development Beyond the Built-up Area Boundary

14.45 Open countryside beyond the built up area of the town is important as a natural resource and forms an important setting for the town, even though the amount of countryside within the Borough is relatively small. Generally, the countryside, particularly at the urban fringe, ~~will should~~ be protected from development which does not need a rural location. Where necessary the quality of the countryside should be enhanced, possibly through encouraging informal recreation.

14.5, 14.6, 14.7 [Delete]

~~14.6 As the Core Strategy is not the appropriate vehicle for undertaking a comprehensive review of the built-up area boundary the Proposals Map makes only one change from that shown in the Local Plan, in order to facilitate a strategic housing development at Bewbush. The boundary as a whole will be reviewed in the context of the DCDPD referred to above. The DCDPD will also consider whether there are any Crawley-specific countryside issues requiring further detailed policy development and expression.~~

C1 The countryside beyond the Built-Up Area Boundary ~~will should~~ be protected for countryside uses and enhanced and improved for example, ~~by for~~ informal recreation use. ~~Planning permission for development should only be allowed beyond the Built-Up Area will only be granted if it would be consistent with national policy, particularly that in PPS7: Planning and the Countryside, and requires a countryside location and would be sympathetic to the existing quality and character of the wider countryside.~~ [Delete remainder of policy]

Setting of the Town

14.7 The setting of the town is ~~partly addressed~~ protected through ~~protections of (a) the status of the small area forming designated as part of the High Weald Area of Outstanding Natural Beauty, (b) the countryside status of the area outside the built-up area defined on the Proposals Map, and (c) the continued designation of the strategic gaps brought forward from the Local Plan pending review in the forthcoming DCDPD. The latter are areas given through Policy C1, and through the local Strategic Gap. Strategic Gaps are designated areas of land with additional protection from development in order to protect and enhance the separate identity and character of Crawley and to prevent coalescence with other settlements. Some exceptional forms of development may be permitted as currently provided for in saved Policy C3 of the Adopted Local Plan 2000.~~

14.8 [Delete]

C2 The Council will seek to prevent development within the ~~Local~~ strategic gaps in order to protect the ~~towns separate identity of the named settlements and prevent their and the actual or perceived coalescence. of the town with other surrounding settlements.~~ The following ~~local~~ strategic gaps ~~have been identified on the~~ are brought forward from the Local Plan Proposals Map on an interim basis pending review after adoption of the South East Plan:

- ~~Gatwick Airport and Charlwood~~ Crawley and Gatwick Airport/Horley;
- ~~Gatwick Airport and Manor Royal / County Oak~~ Crawley and Horsham;

- ~~Gatwick Airport and the North East Sector;~~
- ~~Crawley and Pease Pottage.~~

Part 2/15 - The town centre.

144. Policy TC1 is a major element of the CS. I assess its soundness against tests viii-ix under the following issues: - (a) is the nature and scale of TC1 the most appropriate in the circumstances?; (b) is it appropriate for the CS to be site-specific about TCN and, if so, has the boundary been soundly drawn?; and (c) is there a clear mechanism for implementing TCN and is the policy flexible?

145. (a) Nature and scale of policy TC1 Major expansion and repositioning of Crawley town centre has been under consideration for some time. There is policy support from the WSSP and the draft RSS. The former states that *'To help keep retail expenditure within the local area it is likely that Crawley's provision, in particular, will need to grow and it could become a regional retail centre complementing Croydon to the north and Brighton to the south.'* The latter notes that *'a new development is proposed in the north of Crawley town centre to provide the area [ie sub-regional strategy area 9] with a full range of shops, services and facilities.'* In addition, a series of retail studies provide an evidence base for substantial town centre expansion. These began with a retail study published in 2000 [CD33] which identified capacity for additional comparison-based retail floorspace, including the provision of a major department store. In 2003 a study commissioned by the Council and English Partnerships [CD24] concluded that a relatively modest increase in Crawley's market share would allow viable northwards expansion of the centre, subject to relocation of the Town Hall. In December 2005 CBRE was commissioned to undertake a new retail capacity study [CD29/30], while another such study carried out by Grimley for Grosvenor Developments was published in 2006 [CD37/37A].

146. As always with such studies, it is possible to debate some of the underlying assumptions and precise inputs, such as the likely rates of growth of population and per capita spending in the catchment and the allowance to be made for increased floorspace efficiency. However, the studies generally follow conventional methods and all identify substantial capacity for net additional comparison retail floorspace, albeit with some variations as to the quantum. The most recent study by Grimley estimates a 'baseline capacity' for about 33,000sq.m additional comparison retail floorspace in the town centre by 2016 but increases the scope to 56,000sq.m after allowing for certain factors.

147. Generally the studies conclude that Crawley has above-average representation of comparison goods units and a low overall vacancy rate but is mainly a mid-market centre with a weak department store offer and lacking higher-order retailers and independent or unusual retailers of the type that its catchment could be expected to support, partly because of a shortage of suitable units to meet the needs of, for example, fashion retailers. The centre was also found to have below-average representation of convenience units, service units, cafes, restaurants, bars, leisure and entertainment units. No additional capacity is forecast for retail warehouses as the existing units just beyond the centre (of which there are many) are considered to be generally undertrading.

148. The retail studies conclude that much of the impact of substantial new higher-quality retail development of the general size of the proposals in the emerging TCN scheme (which would bring about an overall gain of comparison floorspace of 48,000 sq.m net) would be widely dispersed across a number of higher-order centres such as Central London, Croydon, Brighton, Kingston, Bluewater, Guildford and Eastbourne. While Redhill/Reigate is also identified as a 'primary regional centre' within a 'dynamic network of centres' in the draft RSS these are in reality two separate centres, both much smaller than Crawley in terms of gross floorspace and numbers of units. They are also identified in CD37 as having only 12 and 2 'key attractor' traders respectively, compared with Crawley's 20. The Tym report for Reigate and Banstead Borough Council indicates that Redhill is a 'comparison and leisure destination' while Reigate is a 'convenience destination' with many independent and specialist shops.

149. In my view there is no convincing evidence (either from the more recent studies of 2005 and 2006 or from other sources) to demonstrate that expansion of Crawley within the identified capacity ranges would have a seriously adverse effect on Redhill and Reigate. Nor do I see grounds to justify the conclusion that the CS would only be sound if it limited retail growth in Crawley to 33,000sq.m. Reigate & Banstead Borough Council is considering development options for reinforcing the comparison market share of Redhill, partly in the light of agreement to an increased of local housing growth, and in my judgement it has not been clearly demonstrated that the CS would seriously hamper such ambitions.

150. The CS does not set any quantitative guideline for the retail content of Town Centre North (TCN), whether in the form of a minimum target or maximum limit. In my view it should not be too prescriptive in that respect but it seems to me that it is the proper role of the CS to give some direction to lower-tier DPDs/SPDs, and to the development control process. I therefore recommend some change in that respect, building on the Council's List 1 change to paragraph 15.9.

151. Policy TC1 also specifies that this mixed-use retail-led scheme should include residential, leisure, community and other uses, although again the CS does not provide any quantitative guidelines. I do not support much elaboration but consider that to meet test vii (and in the interests of consistency with part 2/7 of the CS) TC1 should specifically require some provision of high quality office accommodation. However, it will be unnecessary to require in-situ replacement within TCN of the considerable quantum that will be lost as a result of the redevelopment as policy TC2 will offer opportunities for replacement office development elsewhere around the edges of the town centre if this is required. The accompanying text should also include a guideline total of 800 units for the housing element in order to provide a sound buttress under test viii for this key ingredient of the CS. Again, without at least some added detail on these matters the CS can fairly be criticised for being unsound in failing to provide sufficient certainty and direction to lower-tier DPD/SPD.

152. (b) Geographical extent of TCN It might be expected that the role of a CS would be to identify the need for a major expansion of the town centre, provide 'in principle' commitment to it and specify key ingredients. Site-specific detail would then be devolved to a subsequent Town Centre AAP. However, in view of the support for major retail expansion at Crawley in the WSSP and draft RSS, coupled with the progress made in working up the TCN proposals over recent years, I

consider that a critical point has now been reached. In order to give impetus to the next stages of implementing this complex, regionally important scheme I consider it essential not only for policy TC1 to be endorsed but also for appropriate site boundaries to TCN to be defined within the CS now. This will confer commitment upon both the policy and the boundary and allow the necessary further concerted progress to be made immediately in a climate of certainty. GOSE supports that approach. In these unusual circumstances I consider it sound in principle for the CS to adopt a site-specific approach to TCN. Devolving the issue to an AAP would only prolong uncertainty and delay (or even jeopardise) Crawley's development through delivery of TCN.

153. Turning to the details of the boundary, the size of the area defined on the Proposals Map matches the ambitiously large and bold scale of policy TC1 by advancing the defined Main Shopping Centre boundary northwards from the line established at the time of Crawley's designation to include about 14ha of additional land. This extended area is currently occupied by a large number of properties including the Town Hall and its car park, former County Council buildings, a number of large and small office buildings, the post office and its associated sorting depot, the TA centre, a substantial number of houses in Northgate Road, a range of premises currently in retail and other Class A uses, and some vacant recreational buildings.

154. The extension of TCN to cover the area west of High Street was not proposed at Preferred Options stage, despite the developer's identification of that land as an essential part of TCN at the time of their original partnership bid to the Council. However, by Submission stage the Council had accepted the case for its inclusion. Although some concerns were expressed about this late development of the policy, and the publicity given to it, it seems to me that the Council's efforts at publicising it more than met the statutory requirements.

155. In theory the retail (and some other) elements of policy TC1 could probably be met within the site east of High Street consulted upon at Preferred Options stage. However, in my view it would be inappropriate to adopt that more limited approach. While this is a 'retail-led' mixed use scheme the emerging master plan identifies a range of other needs that TCN should seek to satisfy beyond meeting the critical quantitative and qualitative shopping needs, including the two complementary anchor stores. These other uses include class A3-A5 units, D2 leisure units, civic offices, residential units, a new park, and new pedestrian routes. I do not consider that a smaller area would be capable of creating enough space for the comprehensively master-planned, high quality expansion needed to equip Crawley to meet the challenge of evolving beyond its original mid-20th century role as the centre for a Mark 1 New Town (catering mainly for London overspill) into the more broadly focused 21st century sub-regional centre envisaged in the draft RSS. To knit all the required development into the urban fabric there will also need to be scope to rearrange and increase town centre car parking and amend access arrangements at the western and eastern gateways to the extended pedestrian centre. For all the above reasons I do not consider that the identified TCN area is demonstrably unsound.

156. (b) Implementation (test viii) and flexibility (test ix) The Council has now been working on TCN for some time. Following the original feasibility studies in 2002/03 the Council agreed to progress the project in October 2004. At that time it resolved to adopt the TCN Development

Principles Statement [CD31], commit to relocation of the Town Hall, and work with John Lewis Partnership (who wish to open a store in the town) to find a developer. In July 2005 Grosvenor Developments, a major international developer with a considerable track-record in complex town centre schemes, was chosen for that purpose and a cooperation agreement was signed in April 2006. Since then heads of terms have been agreed between Grosvenor and the key tenant, John Lewis, and the master-planning of TCN has picked up pace, including preparation of the 'Town Centre North: Development Principles draft SPD' [CD79], the consultation period for which closed in April 2007.

157. The content and detail of the draft SPD 'cart' cannot be given precedence over the CS 'horse' and in any case my role does not include examining the soundness of the former document. However, the extent of the work put into master-planning in the past year or so, including the preparation of the draft SPD (and the substantial consultation undertaken upon it) is evidence of purposive action being taken by the partners to formulate an appropriate detailed scheme which they will be able to implement. Although there is still some way to go it seems to me, from all the evidence I have seen and heard, that there is a reasonable prospect of them being able to do so. In terms of the delivery mechanism the SPD records (paragraph 18.1) that the Council is working closely with the developer to achieve delivery of TCN in the shortest possible timescale consistent with the statutory process and ensuring effective public and stakeholder engagement. It also states that a comprehensive approach is essential for the successful development of this complex site (paragraph 18.2) and indicates that the developer should work with landowners to secure agreement, that both the developer and the Council will look to acquire properties, and that if necessary the Council will exercise its compulsory purchase powers. Paragraph 18.3 recognises that a phased approach will be required, beginning with relocation of the Town Hall to an alternative site within TCN.

158. At this stage it cannot be guaranteed that all the major requisite necessary contributory factors (eg statutory approvals, land assembly, relocations, and financial viability) will combine to allow policy TC1 to be implemented. However in my view there is evidence that the Council and its experienced partner are developing a sound, well-considered and practical approach towards phased implementation and there is a reasonable prospect of this being achieved. Some uncertainty about the achievable commencement and completion dates is bound to remain at this stage but this will always be the case for a substantial project at this point in its evolution. The developer estimates that the scheme will commence in 2010 and be completed by the target date of 2015 set in Part 3. I have no reason to consider those dates fundamentally unsound, although the matter will need to be monitored.

159. Nonetheless, the CS itself rather lacks explanation of the way that policy TC1 will be implemented. I therefore consider it necessary under soundness tests vii and viii to insert a new paragraph briefly setting out the need for the scheme to be delivered on a comprehensive basis, recording that a development partner has been selected to progress it, and indicating that it will be implemented on a phased basis.

160. With regard to flexibility (test ix), if the CS is changed as indicated in the previous paragraph it may be considered less 'flexible' than it appeared to be before alteration because it would lock more firmly into the situation that has developed. However, I see this as an inevitable

consequence of securing the necessary commitment to implementing a complex scheme, the need for which I have found to be adequately soundly demonstrated.

161. I accept that, looking forward, once the partners commit to a particular scheme in terms of land assembly, finance arrangements and the commencement of the first phase of an agreed scheme, flexibility will be still more reduced. At that point it would become difficult to alter course completely in mid-stream, although there could be room to change the emphasis placed on individual ingredients. However, I do not support calls that the CS should provide for an alternative, more flexible approach allowing for phased redevelopment of individual properties or groups of properties by a range of agencies in accordance with an agreed master plan. In the right circumstances certain phases or elements of the scheme could possibly be implemented in that way. However, I am unconvinced that the CS should depart from the additional text discussed above or seem to make a more organic, decentralised form of implementation appear to be the (or even a) favoured option as it seems to me that a scheme of this type and complexity needs to be strongly directed in a unified, highly focused and timetabled way. I recognise that landowners are in a situation of some uncertainty at present but this should be fairly short-term and adoption of the CS will be significant step towards resolving the uncertainty.

162. Nor do I consider it reasonable at this stage to expect the CS to provide a 'plan B' in the event of the preferred means of implementation failing to achieve development. In my view the nature and scale of policy TC1 is so significant, and so fundamental to the future of the town that if, for some reason, it became impossible to implement in a recognisable form the whole strategy for Crawley town centre would have to be re-assessed through a review of the CS.

163. Other town centre policies Examining these other 'town centre' policies briefly, the title of policy TC2 is confusing and inappropriate. The identified locations are not 'alternatives' to anything else: they represent other opportunities for mixed use developments additional to TCN. Confusion is also introduced by the reference to the 'Primary Shopping Area', instead of the title 'Main Shopping Area' referred to on the Proposals Map. The former term invites inappropriate reference to the 'Primary Shopping Frontage' defined on the Inset Map which is not the relevant comparator. My recommendations remove this unsoundness.

164. There is further inconsistency between TC2's reference to 'sites' and the content of the Inset Map, which identifies the 5 named strategic opportunities by means of asterisks without defining 'site' boundaries. This confused situation is compounded by the fact that some people appear certain about where the boundaries of the opportunity areas lie, reflecting their origin in one way or another in the Local Plan.

165. The Council clearly sees the whole of the area between the Town Centre and the Main Shopping Area boundaries as generally suitable in principle for non-retail mixed-use development/redevelopment of outworn buildings and underdeveloped land, helping to revitalise and diversify the town centre as a whole. In that sense TC2, appearing to bring forward unimplemented site-specific elements of the local plan, seems to me unsound in core strategic terms against test vii. The more appropriate approach is to identify the whole area between the two boundaries as one where suitable opportunities for mixed use development will be

encouraged. The named locations can be retained as indicative examples rather than a comprehensive, site-specific list. My recommendations make the policy sound in those terms. As far as the indicative locations are concerned, I am satisfied from what I heard that they are reasonably sound in terms of tests vii and ix.

166. It will be apparent from the above that I do not find it necessary to identify further sites or locations within the indicative list in TC2 as the whole emphasis of the policy is changed to one of more general welcome for mixed use development at any appropriate location within the area defined on the CS Proposals Map. The area so defined extends the town centre boundary outwards in 3 locations (in addition to TCN) as compared with the Local Plan Proposals Map. This is another example of site-specificity which is unclearly justified in the CS or the evidence base but from what I saw of the nature of these areas the expansions add significantly to the potential created by TC2 for mixed-use development in the area between the Main Shopping Area and the Town Centre boundary and I do not regard them as unsound. I recommend no further expansion of the boundaries shown on the Proposals Map (nor any retractions) but consider that soundness test vii requires that it be made clear in policy TC2 that material net gains in retail floorspace will normally be inappropriate within the area covered by the policy.

167. Referring briefly to policies TC3 and TC4, the intention of these policies is generally consistent with national policy in PPS6, modified in an appropriate way to give preference to TCN in view of its special significance to the town and the investment confidence that will be needed to see it through to implementation. However, inconsistency and confusion are again introduced by inappropriate references in both policies to the 'Primary Shopping Area', while the title of TC4 inappropriately refers to 'Out of town centre development' instead of 'Retail development outside the Main Shopping Area'. Paragraph 15.18 also requires some rewording to bring it clearly into line with national policy. My recommendations deal with this unsoundness.

168. I conclude that the following policies and paragraphs of part 2/15 are unsound and recommend that they be changed as set out below.

15.8 Retail Capacity Studies undertaken in 2000 and again in 2005 and 2006 have identified a need for additional retail floorspace within the Crawley catchment to address unmet expenditure and to prevent leakage. The studies also identify a particular need for quality retail,, particularly a high quality department store, which is not replicated within the sub-region, to claw-back expenditure lost to major centres some distance away, and to reduce retail mileage within the region. The ~~latest~~ study undertaken in ~~(December 2005)~~, indicates that there is capacity to support a development in the order of 45,000 sqm net new retail floorspace by 2016. This would be sufficient to support a quality department store. This study indicates that a development of this nature would be unlikely to have a significant adverse impact on neighbouring centres as the primary claw-back is anticipated to be from major centres with a similar offer.

15.9 The most recent ~~A-retail impact assessment, dated April 2006, has been undertaken to~~ considers the implications of changes in market share resulting from the proposed Town Centre North mixed-use, retail-led development, and the impact this is likely to have on existing Retailers in Crawley and on other town centres. It identifies a 'baseline capacity' for about 33,000sq.m of additional comparison retail floorspace by 2016 but increases this to about 56,000sq.m net retail after allowing for certain other factors. It again concludes that clawback is likely to come from higher order shopping centres rather than neighbouring town centres.

Insert a new paragraph after 15.13 as follows:

The scale and complexity of the Town Centre North scheme is such that it needs to be delivered on a comprehensively master-planned basis. The Borough Council has therefore selected one lead developer to act as its partner in the project. In order to provide the necessary certainty to make progress with the scheme the boundaries of the land required for a comprehensive and successful scheme are defined on the Proposals Map. If necessary the Council will employ its compulsory purchase powers to assist assembly of the site. Implementation of the scheme will be phased, commencing with the construction of a department store and a new (relocated) Town Hall.

TC1 ~~The~~ Town Centre North ~~site~~ is identified and allocated for a major mixed-use, retail led development (in the region of 50,000sqm net gain of comparison floorspace) to help Crawley fulfil its role as a primary regional centre, enhance the retail offer within the subregion, and act as a catalyst for a step change in the facilities, quality and environment of the whole Town Centre. The development will need to be carefully integrated with the current centre and should also include an appropriate range and quantity of high quality offices (including a new Town Hall), about 800 residential units, and a range of leisure, community and other uses. The extent of the site is defined on the Proposals Map.

Area of additional mixed use ~~Alternative Town Centre~~ development opportunities

15.14 Within the area between the Town Centre boundary and the Main Shopping Area boundary the Council wishes to encourage mixed use development in cases where this will maximise the appropriate potential of outworn buildings and underused land and -In order to complement the Town Centre North proposal, several strategic opportunities for mixed use development have been identified on the edge of the Primary Shopping Area (defined on the Proposals Map). These developments will support and diversify Crawley's role as a primary regional centre, provide facilities for the new residents, improve the links between different areas of the Town Centre and create a good living and working environment. Developments within this area These sites could accommodate a mix of uses, particularly employment and residential development. The policy identifies a number of suitable general locations for such development but this is not a comprehensive list and others may emerge. Appropriate the uses are indicated for the identified locations that would be expected on these sites to ensure sufficient provision for a balance of uses across the Town Centre. In addition to the identified uses, but others development may also be possible suitable, such as community or leisure facilities. However, as these areas sites are As this area is located beyond the Primary Main Shopping Area boundary, the only retail provision considered appropriate is convenience retail at on the Haslett Avenue / Telford Place site location. This would meet an identified need without conflicting with the provision of Town Centre North. In appropriate cases Supplementary Planning Documents will be progressed to help bring forward such developments.

15.15 [Delete]

TC2 Mixed use development will be encouraged at suitable locations comprising outworn buildings and under-used land within the Town Centre boundary outside the Main Shopping Area. Such developments will not normally contain any material net gains in retail floorspace. The following sites beyond the Primary Shopping Area boundary are identified as strategic opportunities for mixed use development:

The following broad locations are generally indicated on the Town Centre Inset Map, but this is not a comprehensive list and appropriate developments may be brought forward at other locations :-

- Haslett Avenue/Telford Place - Library / Housing / Employment / Convenience Retail;
- Station Way - Employment / Housing / Interchange improvements;
- West of Pegler Way (Southern Counties) - Housing / Employment;
- Adj Belmont House (Southgate Ave) - Employment / Housing;
- Land west of Traders Market – Employment / Housing

TC3 Additional retail floorspace within the ~~Primary~~ Main Shopping Area will be permitted if it-
[then as submitted]

~~Out of Town Centre~~ Retail Development outside the Main Shopping Area

15.18 One of the Government's key planning objectives is the promotion and enhancement of existing town centres, by focusing development in the centres and encouraging a wide range of services in a good environment, accessible to all. Retail development outside the ~~Town Centre~~

Main Shopping Area therefore needs to be restricted and controlled, in accordance with Government guidance. ~~Edge of centre or out of centre retailing, Out of town, out of centre or edge of centre retailing,~~ including retail warehousing, will only be permitted if need (both quantitative and qualitative) can be proven, the sequential approach has been applied to site identification and it can be demonstrated that the proposal would not have an adverse impact on the Town Centre's vitality and viability. The Council may seek to control the type of goods sold, mezzanine floors or the overall floorspace of a development. Proposals will also have to comply with other policies such as the protection of employment floorspace and greenfield sites.

TC4 Retail development outside the ~~Primary~~ Main Shopping Area, which is not identified in Policy TC2 will not be permitted unless: [then as submitted]

Overall conclusion

169. I have found the CS sound in accordance with the 'procedural tests' i-iii and 'conformity' test v. However, as detailed above, I have identified some serious failures of soundness against 'conformity' test iv and the 'coherence, consistency and effectiveness' tests vi-ix. Crawley's particular circumstances require that a firm foundation is provided for overcoming the current backlog of housing provision and moving securely ahead to the next stages of planning for Town Centre North. Those two important requirements could not be met if the CS were withdrawn. In that context I conclude that these defects of soundness can be rectified by incorporating the changes set out in my various recommendations above, and in appendices 1 and 3 beneath. Nonetheless, the approach of the CS to housing land provision can only be found sound on a very short-term basis. An early review will be required to give more certainty of provision against the emerging longer-term requirements of the South East Plan.

170. I have also found the CS deficient in relation to the requirements of Regulation 13(5). However, this can be rectified by the inclusion of the contents of Appendix 2 beneath.

171. Subject to the above necessary changes the Crawley CS is sound in terms of the requirements of the Act and its associated regulations.

Roy Foster

Inspector

APPENDIX 1

RECOMMENDED HOUSING TRAJECTORY

	2001/02	2002/03	2003/04	2004/05	2005/06	2006/07	2007/08	2008/09	2009/10	2010/11	2011/12	2012/13	2013/14	2014/15	2015/16	2016/17	2017/18
HOUSING REQUIREMENT																	
Base annual requirement	300	300	300	300	300	300	300	300	300	300	300	300	300	300	300	300	300
Built 2001-06 (net)	20	70	103	175	188												
Annual shortfall/surplus	-280	-230	-197	-125	-112												
Cumulative shortfall	-280	-510	-707	-832	-944												
Added reqt to meet deficit in 5 years						189	189	189	189	188	0	0	0	0	0	0	0
Cumulative annual reqt agst WSSP						489	489	489	489	488	300	300	300	300	300	300	300
Cumulative annual reqt agst draft SEP						539	539	539	539	539	350	350	350	350	350	350	350
HOUSING SUPPLY																	
Planning permissions						263	275	244									
Stone Court							65	64									
Haslett Avenue							92	319	324	96							
Small site allowance						6	6	6	6	8							
Large windfalls 4/06 to 11/06							50	50	50	50	50						
Strategic sites																	
Town Centre North												135	135	135	135	135	125
Telford Place								50	131	131							
Dorsten Square												50	50	60			
Ifield Community College									80	90							
Thomas Bennett									60	60	80						
Lucerne Drive								25	75								
North East Sector																	
Total annual supply						269	488	758	726	435	130	185	185	195	135	135	125
CUMULATIVE POSITION AGST WSSP						-220	-221	48	285	232	62	-53	-168	-273	-438		
CUMULATIVE POSITION AGST SEP						-270	-321	-102	85	-19	-239	-404	-569	-724	-939		

APPENDIX 2

[Include the material below as new Appendix 2 in the CS]

Part 1 - Regulation 13(5) statement

Table 1 below fulfils the requirements of Regulation 13(5) of the Town and Country Planning (Local Development) (England) Regulations 2004 by identifying how the policies of the Core Strategy supersede certain policies of the Crawley Local Plan 2000. The legend to the Proposals Map includes indications in brackets (where relevant) of proposals brought forward unchanged from the Local Plan, and the number of the relevant policy.

Table 5-1: Superseded Local Plan policies Conformity Table

Core Strategy Policy	<u>Superseded</u> Local Plan Policy
Core Strategy Chapter 1. Sustainability	
Policy S1 – Achieving Sustainable Development	
Policy S2 – Management of resources and energy efficiency of new development	
Core Strategy Chapter 2. Housing	
Policy H1 – Housing provision	Chapter 7 Housing Policy, H2 – Overall Housing Provision
Policy H2 – Housing development Opportunities	Chapter 7 Housing Policy, H3B – Allocated Housing Sites Chapter 7 Housing Policy, H3C – Allocated Housing Sites
Policy H3 – Housing development locations	
Policy H4 – Making efficient use of land	
Policy H5 – Affordable housing	Chapter 7 Housing Policy, H8 – Subsidised and low cost market housing
Policy H6 – Housing range and type	Chapter 7 Housing Policy, H6 – Dwelling Mix Chapter 7 Housing Policy H7 - Small Dwellings
Policy H7 – Gypsies and Travellers	Chapter 7 Housing Policy H14 is partially dealt with in the Core Strategy

	before the completion of an appropriate needs assessment
Core Strategy Chapter 3. Infrastructure and Community Services	
Policy ICS1 – The location and provision of new community and leisure facilities	Chapter 11 Recreation and Leisure, Policies RL1-3 inclusive – Providing Leisure facilities in Crawley Chapter 11 Recreation and Leisure, Policies RL2 – Providing Leisure facilities in Crawley Chapter 11 Recreation and Leisure, Policies RL3 – Providing Leisure facilities in Crawley
Policy ICS2 – Infrastructure provision	Chapter 12 Community Services, Policies COM1 & 2 – Provision and retention of community services facilities Chapter 12 Community Services, Policy COM2 – Provision and retention of community services facilities
Policy ICS3 – Providing educational needs	
Policy ICS4 – Providing for a new University Campus	
Policy ICS5 – Educational land which becomes surplus	
Policy ICS6 – Providing for primary healthcare needs	
Policy ICS7 – Providing for secondary / higher order healthcare needs	
Core Strategy Chapter 4. Environment	
Policy EN1 - Nature conservation	Chapter 4 The Built and Natural Heritage, Policy BN19 Chapter 5 Use of the Countryside, Policy C5 Areas of Outstanding Natural Beauty
Policy EN2 – Neighbourhood structure and neighbourhood centres	
Policy EN3 – Green spaces and corridors	
Policy EN4 – Greening new development	
Policy EN5 – Protecting and enhancing	Chapter 3 General Development and

the built environment	Design, GD11- Creative Design
Core Strategy Chapter 5. Community Safety	
Policy CS1 – Safety through design	
Policy CS2 – Improvements to the local environment	
Core Strategy Chapter 6. Transport	
Policy T1 – New development and requirements for sustainable transport	Chapter 6 Transport and Access, Policies T1 – Transport Infrastructure Chapter 6 Transport and Access, Policies T2 – Transport Infrastructure
Policy T2 – Park and Ride	
Policy T3 – Parking	
Policy T4 – Improving Rail Stations	
Core Strategy Chapter 7. Local Economy	
Policy E1 - Employment floorspace provision	Chapter 8 Economy, Policy E2 – Employment Provision Chapter 8 Economy, Policy E4 – Land available for development
Policy E2 – Location of new employment development opportunities	Chapter 8 Economy, Policy E1 - General Criteria Chapter 8 Economy, Policy E3A and E3B
Policy E3 – Protection and management of employment floorspace	Chapter 8 Economy, Policy E6 – Local firms Chapter 8 Economy, Policy E7 – Protection of existing employment floorspace Chapter 8 Economy, Policy E10 – Protection of Industrial Areas
Policy E4 – Small employment sites / provision	Chapter 8 Economy, Policy E5 – Small Firms Chapter 8 Economy, Policy E12 – Small Units
Core Strategy Chapter 8. Gatwick Airport	
Policy G1 – Airport Development	Chapter 10 Gatwick Airport, Policy GAT1 – General policies for the growth of business at the airport Chapter 10 Gatwick Airport, Policy GAT2 – General policies for the growth of

	business at the Airport
Policy G2 – Safeguarded land	
Core Strategy Chapter 9. Manor Royal and County Oak	
Policy MC1 – Redevelopment and Intensification	Chapter
Policy MC2 – North of Manor Royal employment opportunities areas	
Core Strategy Chapter 10. Land West and North West of Crawley	
Policy W1 - Joint Area Action Plan	
Policy W2 – The Western Relief Road	
Core Strategy Chapter 11. North East sector	
Policy NES1 – North East Sector	The following LP policies are replaced by NES1 and NES2 in the CS:
Policy NES2 – The North East Sector Neighbourhood	Chapter 7 Housing Policy H3A, Provision for a new neighbourhood Chapter 13 Development of the North East Sector, Policy NES 1 – General requirements Chapter 13 Development of the North East Sector, Policy NES 2 – Sustainable Design Chapter 13 Development of the North East Sector, Policy NES 3 – Housing requirements of the new neighbourhood Chapter 13 Development of the North East Sector, Policy NES 4 & 5 – Other development in the North East Sector Chapter 13 Development of the North East Sector, Policy NES 6 – Facilities for the new neighbourhood Chapter 13 Development of the North East Sector, Policy NES7 – Provision of social infrastructure
Core Strategy Chapter 12. Neighbourhood Structure and Neighbourhood Centres	
Policy NS1 – Neighbourhood Structure	H3A – Provision for a new neighbourhood
Policy NS2 – Neighbourhood Centres	

Core Strategy Chapter 13. Transport corridor between the Town Centre and Three Bridges Station	
Policy TBC1 – Mix of uses and support infrastructure	
Policy TBC2 – Redevelopment of employment premises	
Core Strategy Chapter 14. The Countryside	
Policy C1 - Development beyond the built-up area boundary	Chapter 5 Use of the Countryside, Policy C1- Development beyond the built up area boundary
Policy C2 – Setting of the town	Chapter 5 Use of the Countryside, Policy C2 - Strategic Gaps Policy C3 – Strategic Gaps Policy C4 – Strategic Gaps
Core Strategy Chapter 15. The Town Centre	
Policy TC1 – Town Centre North	Chapter 8 Economy, Policy E8 – North of the Boulevard Chapter 9 Shopping, Policy SH6 – The Boulevard Chapter 9 Shopping, Policy SH4 – Town Centre Regeneration
Policy TC2 – <u>Area of additional mixed use development opportunities</u> Alternative Town Centre development opportunities	Chapter 9 Shopping, Policy SH13 – Town Centre Development Opportunities
Policy TC3 – Town Centre development	Chapter 9 Shopping, Policy SH1 – General Chapter 9 Shopping, Policy SH10 – Primary Shopping Areas Chapter 9 Shopping, Policy SH12 – Town Centre Development Opportunities
Policy TC4 – Retail development outside the Main Shopping Area Out of Town Centre Development	Chapter 9 Shopping, Policy SH2 – General Chapter 9 Shopping, Policy SH3 – General
Policy TC5 – Town Centre living	Linked to Local Plan Chapter 7 Housing.
Policy TC6 – Transport and parking	

Policy TC7 – Town Centre strategy	Chapter 9 Shopping, Policy SH5 – Town Centre Regeneration
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Note Chapter 2 of the Saved Local Plan (2000) and the STRAT 1-3 policies will be superseded by Core Strategy objectives, listed at the beginning of each chapter.

Part 2 – Amendments to the legend to the Proposals Map:

- change 'Manor Royal Estate (MC1)' to 'Manor Royal Buffer Zone (Saved Local Plan policy E15)
- change 'Community Services (ICS1)' to 'Community Services (Saved Local Plan policies COM 3(3), COM 3(6) and COM4
- change 'Recreation and Leisure' to 'Recreation and Leisure (Saved Local Plan policy RL9)

APPENDIX 3

[Material to be included at the end of part 1 of the CS]

SPATIAL VISION	PRINCIPAL STRATEGY REFERENCES
<p>This Local Development Framework Core Strategy takes as its starting point the vision for the Town set by the Local Strategic Partnership and the priority issues which they identified. The vision states:</p> <p>“Crawley will celebrate the diversity of life in the neighbourhoods where residents feel safe, well-served, well-housed and have access to excellent health care. Everyone will have the opportunity to benefit from a first class education and to develop the skills essential to a vibrant and diverse local economy supported by an integrated and accessible transport system. Local people and visitors will enjoy a wide range of cultural and leisure activities in an attractive environment sustained in balance with the town’s economic success.</p> <p>Crawley will be a friendly, prosperous, forward-looking and enjoyable town – a place where people want to live, work and visit.”</p>	<p>Introduction para1.2 Part 1 para 3.1 et seq</p>
<p>The Strategy builds on that vision and, taking into account wider national, regional and sub-regional policies, provides the vision with a planning and spatial perspective extending to 20186 and beyond. At its heart are the principles of sustainable development which underpin the way in which new development should be planned and located.</p> <p>Throughout, the Strategy looks to make the best use of existing resources, capitalising on the strengths of the neighbourhood principle, seeking opportunities for redevelopment and renewal in the most sustainable locations – the Town Centre, the major public transport corridors and the main employment areas – but looking to protect valued features of the natural and built environment both within and around the Town. Up to 20186 and beyond, the Town will continue to grow, as a place to live, as a place to work and as a place which people visit whether to shop, to use the Town’s leisure facilities, to gain access to higher education or to use the local hospital. This is in line not just with the Community Strategy, but also with wider planning policies which recognise the strategic role of Crawley/Gatwick in helping meet the South East Region’s need for sustainable development. The Strategy envisages that:</p>	<p>Introduction paras 1.1 -1.3 Part 2 paras 1.4 and objectives, para 1.5 and policy S1, paras 12.1 and 12.2 Part 2 para 15.1 and objectives para 15.5, objectives para 13.2, policy T1, Policy E2, 4.1 and Environment headline statement Para 2.1 and Housing headline statement Para 7.1 and Economy</p>

	<p>Headline statement</p> <p>Para 3.1 and I & CS Headline Statement</p>
<ul style="list-style-type: none"> By 20186 the Town will have grown in size by some 4500 5400 dwellings helping meet the needs for increased housing in the area. <u>[This figure will be reconsidered through an early review of the LDF to provide security of housing delivery and to take account of the requirements of the South East Plan, when adopted]</u> 	<p>Objectives para 2.5</p> <p>Policy H1</p>
<ul style="list-style-type: none"> Most of the dwellings will have been built on previously developed land and within the existing built up area. Development will have been at higher densities than in the past and the emphasis will have been on smaller dwellings and the delivery of affordable housing. 	<p>Objectives para 2.5</p> <p>Policies H1, H2, H3,H4 and H5 plus related paras</p>
<ul style="list-style-type: none"> The economy will have continued to thrive enabling a diverse range of local regional and national interest to flourish. New employment opportunities will have helped secure a more diverse economic base. with less dependence on Gatwick Airport. Some 280,000 sq.m 320,000 sq m of new employment floorspace will have been constructed as well as retail and other development in the Town Centre, which, in itself, will add to the range of employment opportunities 	<p>Section 7 headline statement;</p> <p>Objectives para 7.4</p> <p>Policy E1</p>
<ul style="list-style-type: none"> Most of the new employment opportunities will have been provided within the built up area, through the redevelopment of sites within Manor Royal, the Town Centre, the Three Bridges Corridor and other employment areas. However, there will have been small extensions to the main employment areas <u>to the north of Manor Royal</u> and there is the possibility of further employment development as part of the comprehensive planning of the area west and north west of Crawley 	<p>Objectives para 7.4</p> <p>Policy E2</p> <p>Objectives para 9.3</p> <p>Objectives para 13.2</p>
<ul style="list-style-type: none"> Growth in the size of the Town as a place to live and work will have been supported by <u>community services</u> to which people have greater accessibility. The Council will have worked with other service providers to secure improved community facilities in locations readily accessible to those who use them and developers will have contributed proportionately to the provisioning of facilities 	<p>Section 3 headline statement</p> <p>Objectives para 3.7</p> <p>Policy ICS2</p>
<ul style="list-style-type: none"> The Town's growth will also have been supported by improvement to the town's transport infrastructure. Whilst some developments may have required alterations or improvement to the road network, the emphasis will have been on other more sustainable forms of transport – buses, trains, cycling and walking. 	<p>Section 8 headline statement</p> <p>Objectives 6.2</p> <p>Objectives 8.4</p>
<ul style="list-style-type: none"> Gatwick, with its national and international communications, will have expanded its operation as a single runway two terminal airport 	
<ul style="list-style-type: none"> Growth and change will, however, have taken place in the context of an underlying concern for the quality of the environment – both the environment as it is experienced on a day to day basis and the longer term environment as 	<p>Section 1 headline statement</p> <p>Objectives para 1.4</p>

<p>experienced by future generations. Both in terms of their location and design, developments will have been judged against their impact on the environment.</p>	<p>Section 4 headline statement Objectives para 4.1</p>
<p>Structurally the Town will have remained largely unchanged although a new neighbourhood will have been built beyond the Borough Boundaries to the west of the Town and this may have been associated with further development to the north west of the Town. <u>If it is no longer deemed contrary to national policy on London's airports, construction of another new neighbourhood at the North East Sector will have commenced.</u></p>	<p>Objectives 10.6</p>
<ul style="list-style-type: none"> The Town Centre will have grown significantly to provide a vibrant heart at the centre of the Town – competing effectively within the region and acting as a new town centre ‘neighbourhood’ 	<p>Objectives para 15.5</p>
<ul style="list-style-type: none"> The neighbourhoods, a fundamental feature of Crawley’s planning, will have accommodated new housing development but will have retained their overall character; neighbourhood centres will have remained the focus of local community activity and opportunities will have been taken to enhance them through development and environmental improvement 	<p>Objectives para 12.3 Policy NS2</p>
<ul style="list-style-type: none"> The main employment areas of Manor Royal and County Oak will have experienced a gradual pace of <u>change and renewal</u> as outworn buildings are replaced by higher quality building premises. The corridor between Three Bridges and the Town Centre will also have undergone substantial change with improved stations at each end and a mix of uses in between. 	<p>Objectives 9.3 Objectives 13.2</p>
<ul style="list-style-type: none"> Outside the existing built up area, changes will have been limited. The Countryside will have been protected for its own right and to help maintain the individual identity of Crawley, Gatwick and surrounding settlements. Land will have been protected for the possible <u>to preserve the option of</u> construction of a new runway at Gatwick <u>unless and until national policy no longer requires it.</u> Land on the north east side of the Town will also have been retained for a new neighbourhood. Construction of this neighbourhood in the longer term will be dependant on Government decisions on a second runway for Gatwick. 	<p>Polices C1 and C2</p>