

# Consultation Statement

## January 2021



Appendix 4:  
Initial Publication Consultation Representations

## **APPENDIX 4: INTITAL PUBLICATION CONSULTATION REPRESENTATIONS**

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| Ref. No.          | Respondent | Policy/ Para | Comments  |
| REP/053           | Quod       | Vision       | <p><b>1 Introduction</b></p> <p>I write on behalf of my client, Aberdeen Standard Investments, in partnership with the Barker Trust (jointly referred to as the “Landowners”), to submit representations to the Regulation 19 Draft Crawley Borough Local Plan (hereafter the “Draft Local Plan”).</p> <p>The Landowners are promoting a c.18ha parcel of land immediately north of Hydehurst Lane (hereafter referred to as the “Site” and identified in a plan at <b>Document 1</b>) for employment uses to assist in meeting the substantial evidenced employment need forecast within the Borough. Redevelopment of the Site would deliver a logical and coordinated extension to the Manor Royal Business District which is identified in the Draft Local Plan (and its supporting evidence base) to be the key business location for Crawley at the heart of the Gatwick Diamond. The Site is available and deliverable, and is not subject to any technical or environmental constraints – full details have previously been provided as part of submissions made to the Call for Sites process. These representations are structured to initially provide an executive summary and overall vision for the redevelopment of the Site, before setting out the Landowners’ specific comments and objections to the Draft Local Plan.</p> <p><b>2 Executive Summary and Vision</b></p> <p>The Draft Local Plan explains that Crawley is firmly established as one of the key economic drivers in the South East – situated at the heart of the Gatwick Diamond and central to the economic focus of the Coast to Coast Local Enterprise Partnership.</p> <p>The Draft Local Plan seeks to protect and enhance Crawley’s role as key economic driver, recognising that there is a significant requirement for additional land to accommodate employment and business needs. The ability for Crawley to meet its substantial employment needs has in the past been geographically constrained, in large part by the safeguarding area around Gatwick Airport.</p> <p>However, there is no longer any case to safeguard land around Gatwick Airport, to the extent current shown, as the Government has selected the Heathrow Northwest Runway to accommodate the additional runway capacity in the South East. The recent Court of Appeal decision will require the Government to re-consult on the Airports National Policy Statement to have regard to the 2016 Paris Agreement on Climate Change, but that does not change the Government’s preference for additional runway capacity at Heathrow compared to other options.</p> <p>There is no evidence of a need for further runway capacity in the South East beyond that to be accommodated at Heathrow. Furthermore, Gatwick Airport has confirmed in their 2019 Masterplan that they are no longer pursuing an additional wide-spaced runway (the purpose behind the previous safeguarding) and are instead preparing a Development Consent Order (“DCO”) application to make best use of the existing runway and standby runway.</p> <p>There is, therefore, no robust evidence (as required by paragraph 104 the National Planning Policy Framework (2019) (“NPPF”) and the Draft Aviation Strategy) for retaining the safeguarding designation to the extent currently drawn in the adopted Local Plan.</p> |

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|                   |            |              | <p>In the absence of a geographic restriction imposed by safeguarding the Draft Local Plan should seek to accommodate the full employment need of c113ha as identified in its published evidence base. Such an approach is required by the NPPF, which dedicates that Local Plans be 'positively prepared' by meeting 'as a minimum' an area's objectively assessed needs.</p> <p>Therefore, in the context of the published evidence base, national policy and up to date circumstances, the Local Plan will be unsound if it seeks to plan for anything less than full employment needs – Policy EC1 should be updated accordingly.</p> <p>The Council intend to defer identification of the most appropriate locations to accommodate employment growth to the North Crawley Area Action Plan ("NCAAP"). It is our view that, in line with the NPPF, the opportunity exists for the Draft Local Plan to allocate sufficient sites now to ensure it delivers the strategic priorities of the area (i.e. enabling Crawley's role as an economic driver), rather than defer those decisions to a later point.</p> <p>Notwithstanding this, if the NCAAP is to proceed, the context of the development plan document as set out in Policy SD3 needs to more clearly reflect the evidence base and current circumstances.</p> <p>As stated in Paragraph 3.18 of the Draft Local Plan there is no evidence to retain the safeguarding around Gatwick Airport. The Government supports expansion at Heathrow Airport and the draft Aviation Strategy offers no support for safeguarding, instead referring back to Paragraph 104 of the NPPF which requires 'robust evidence' – which for the reasons outlined above does not exist. Therefore, the NCAAP should focus on how the boundary of Gatwick Airport may need to be slightly altered to support their 2019 Masterplan aspiration to maximise use of the existing runway and standby runway, and not the wider safeguarding associated with a wide spaced runway option which has no basis or policy support.</p> <p>This would enable the NCAAP to achieve both any necessary small scale safeguarding (if necessary) associated with the use of the standby runway, and importantly enable the Council to plan for the full economic needs of the plan period.</p> <p>The land promoted by the Landowners is one of, if not the, most appropriate location north of Manor Royal to accommodate employment floorspace. The Site is situated approximately 0.6 miles to the south of Gatwick Airport and directly to the north of Manor Royal. The Site extends to c.18ha and comprises greenfield land, the majority of which is used for agricultural purposes and is broadly divided into 4 fields, separated by vegetated boundaries.</p> <p>The Site has the potential to be redeveloped for employment purposes (indicatively c.65,000sqm to 74,000sqm) as a coordinated and planned expansion of Crawley's most important employment location for business floorspace within the Borough. The Site is sustainably located immediately adjacent to the A23 which provides access into Crawley, Gatwick Airport and the M23. The Site would be accessed via an existing high-grade road (Hydehurst Lane) which currently serves units within Manor Royal. No on-site constraints to the development of the Site have been identified which cannot be resolved.</p> |

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|                   |                                    |                   | In summary, as detailed in the Call for Site submission information, the Site is an available and deliverable employment site which will assist in meeting the substantial evidenced need which exists in the Borough.  |
| REP/058           | Reigate & Banstead Borough Council | Vision para. 2.26 | <p>Housing Needs</p> <p>As part of this Regulation 19 Publication RBBC have been asked to formally confirm whether we can meet any of CBC's unmet housing need.</p> <p>Whilst we appreciate the challenges and constraints faced by CBC, we note that the scale of potential unmet housing need in the Regulation 19 Crawley Local Plan is significant. RBBC also faces considerable constraints, including significant extent of Green Belt, AGLV and flooding, which limits our own ability to accommodate growth. The constrained nature of our borough was acknowledged and accepted through Examination of our adopted Core Strategy (2014, reviewed 2019) which recognised that we were unable to fully meet our objectively assessed housing needs in a sustainable manner, giving rise to a shortfall of our own of 2,100-2,700 over our plan period. As such, whilst we are committed to maximising housing supply (as demonstrated through our recent delivery record and housing delivery test score), and to working together to understand how housing needs can be met as fully as possible, we are not in a position to accommodate any of Crawley's identified unmet housing needs.</p> <p>Whilst we appreciate that our Core Strategy recognises that migration between our respective boroughs (and beyond) would continue and be facilitated within the Core Strategy housing requirement of at least 460 dwellings per annum, we would reiterate that there is no specific quantified allowance for Crawley's unmet needs within our adopted housing requirement.</p> <p><b>Suggested Modifications:</b></p> <p>Although there is an allowance within our housing requirement for between 90-130 dwellings to cater for net in-migration into the borough, there is no specific quantified allowance for in-migration from individual boroughs. Notably, the Strategic Housing Market Assessment (SHMA) used to inform our Core Strategy showed that the greatest numbers moving into RBBC were from Greater London and Tandridge, not Crawley. Given this position, to ensure that it is clear for readers that the strategy for meeting Crawley's unmet needs does not include allowances within RBBC's housing requirement, we request that Paragraph 2.27 of CBS's Regulation 19 Local Plan is amended to reflect the fact that there is no specific requirement within our adopted housing requirement to specifically cater for unmet needs within the Crawley / the North West Sussex Housing Market Area.</p> <p>Similarly, in order to be explicit with regards to the strategy to meet Crawley / North West Sussex Housing Market Area unmet housing needs, we also request that Paragraph 2.30 of the Regulation 19 Crawley Borough Local Plan is amended to make it clear that the new neighbourhood level extensions to Horley (the adopted Sustainable Urban Extensions within RBBC's DMP) are to meet RBBC's housing needs and not Crawley / North West Sussex Housing Market Area unmet needs. We also note that Figure 2 below this Paragraph which refers to "Planned Development</p> |

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|                   |                    |                   | <p>Adjacent to Crawley” depicts the Horley Strategic Business Park and not the adopted Sustainable Urban Extensions in / around Horley.</p> <p>For reasons of soundness, we request that with regards to housing market areas, that Paragraph 2.26 of the Regulation 19 Crawley Local Plan is amended to accurately reflect only localised links between Horley and the North West Sussex Housing Market Area (and not our borough as a whole). Whilst we accept that there are some very localised linkages between Horley and the North West Sussex authorities, as defined in the 2008 East Surrey SHMA, RBBC forms part of an East Surrey HMA with Elmbridge, Epsom &amp; Ewell, Tandridge and Mole Valley. As drafted, Paragraph 2.26 could be interpreted as suggesting a much greater degree of interaction between our housing market areas than the evidence supports.</p> <p>Notwithstanding our position, more generally we support the strategy of neighbouring authorities accommodating Crawley’s unmet need where they can deliver this near to the administrative boundary of Crawley (subject to sites being identified as suitable, sustainability appraisal etc.). We also support the strategy of affordable housing provision in these areas being delivered to meet Crawley’s affordable housing needs as otherwise Crawley’s unmet affordable housing need (which the SHMA identifies as a substantial 739 dwellings per annum) may remain unmet as Crawley residents may be unable to qualify for affordable housing in adjoining boroughs.</p> |
| REP/062           | Environment Agency | Vision para. 2.34 | <p>Dear Sir/Madam</p> <p><b>Crawley Submission Local Plan Regulation 19 Consultation</b></p> <p>Thank you for consulting us on the draft Local Plan.</p> <p>Having reviewed your document, we find it “SOUND” subject to some minor changes for clarification purposes.</p> <p><b>DRAFT LOCAL PLAN</b></p> <p><b>Suggested Modifications:</b></p> <p><b>Crawley 2035</b></p> <p><b>Paragraph 2.34 (page 25)</b></p> <p>The last 2 sentences of the paragraph – <i>“Another point that should possibly be included in the section of environmental sustainability is the risk of stress on sewage infrastructure as the population grows. This may lead to negative impacts on water quality.”</i></p> <p>These comments were provided by us after reviewing the draft Local Plan, which have been included in this paragraph, however, this does not explain whether the issue of stress on sewage infrastructure is being included in the Local Plan or not.</p> <p>Please clarify whether stress on sewage infrastructure will be considered in this section on environmental sustainability.</p>   |

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| Ref. No.          | Respondent            | Policy/ Para | Comments   |
| REP/068           | Sussex Wildlife Trust | Vision       | <p>The Sussex Wildlife Trust (SWT) recognises the importance of a plan led system as opposed to a developer led process and supports Crawley Borough Council's (CBC) desire to produce a cohesive Local Plan. Therefore we hope that our comments to this regulation 19 consultation are used constructively to make certain that this proposed submission plan properly plans for the natural capital needed within the Borough and ensures that any development is truly sustainable.</p> <p>Where we are proposing a change to policy or the supporting text, recommended additions are highlighted in <b>bold</b> and deletions are <del>struck through</del>.</p> <p>Crawley 2035 Vision<br/> SWT welcomes the steps CBC have taken to consider and incorporate the comments we made during the Regulation 18 consultation.</p> <p>We acknowledge that CBC have made a number of amendments to the section headed: Protecting the Environment: Sustainability, including taking on board our comments regarding prioritising sustainable transport modes as per paragraph 110 of the National Planning Policy Framework (NPPF). We do feel the council could ensure the plan is more forward think by stating clearly that they will reduce the need to travel as per our Regulation 18 proposed amendment.</p> <p>Changes to the biodiversity wording has been incorporated but we encourage stronger and more positive wording in relation to CBC protected sites. This would be in line with section 174 of the NPPF (2019).</p> <p><b>Suggested Modifications:</b></p> <p>To ensure compliance with National Policy, we therefore recommend the following modifications to the Protecting the Environment section:</p> <p><i>By 2035, significant progress will have been made towards Crawley becoming a carbon neutral town. Active travel and public transport will be significantly improved and supported by a road network that prioritises sustainable transport modes. Electric Vehicles will be promoted along with, and through, e-car clubs. A sustainable road network will be complemented by a good public transport system, giving people choice about how they travel. As a modern town, the technological and communication infrastructure will be in place to ensure residents and businesses have the support needed to develop and grow and reduce their need to travel.</i></p> <p><i>Conserving natural resources to support future growth will be vital to the longevity of the town. Air, noise and water pollution will be reduced. The borough will prepare for the increasing effects of climate change, through adaptation measures including lower water usage standards and delivering a net gain in biodiversity. <b>The borough will protect the connectivity and function of its network of protected sites while delivering wider net gains to the borough's biodiversity.</b> Losses to protected and priority species and habitats will have been avoided and the</i></p> |

| Local Plan Vision |                       |                            |   |
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|                   |                       |                            | <i>delivery of vital ecosystem services, including pollination, flood alleviation and carbon capture, will have been enhanced in order to facilitate a sustainable and resilient future.</i>  |
| REP/068           | Sussex Wildlife Trust | Spatial Context para. 2.34 | <p>SWT is pleased to see that CBC have acknowledge the need for this section to include wording that considers the need for a spatial approach to biodiversity as per 171 of the NPPF.</p> <p>We are pleased to see our amendment for a 5th bullet point has been included in section 2.37.</p> <p><b>Suggested Modifications:</b><br/>We believe that the penultimate line of paragraph 2.34 is an error. We support the sentiment and would support its inclusion in the plan, but do not think it has been edited correctly.</p> |

| <b>Chapter 3. Sustainable Development</b> |                   |                     |  |
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| <b>Ref. No.</b>                           | <b>Respondent</b> | <b>Policy/ Para</b> | <b>Comments</b>  |
| REP/011                                   | Highways England  | SD1                 | <p>Highways England has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the strategic road network (SRN). The SRN is a critical national asset and as such Highways England works to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity. We will therefore be concerned with proposals and policies that have the potential to impact the safe and efficient operation of the SRN. With regards to Crawley, the SRN comprises the M23 and A23, with the M25 nearby.</p> <p><b>Crawley's Unmet Housing Need/ Developments in Vicinity of Crawley</b></p> <p>We note that "Even with further development within the borough, Crawley will not be able to meet its housing needs in full and possibly not all of its employment needs", with a need for 11,280 dwellings (with 5,355 planned for delivery 2020-2035) and 20,541 new jobs. As a result, there is a requirement for neighbouring authorities (especially Horsham, Mid Sussex and Reigate &amp; Banstead) to accommodate Crawley's unmet needs (5,925 dwellings).</p> <p>It is Highways England's view that in order for the overall Local plan and individual developments to accord with national planning and transport policy full, timely coordination with neighbouring authorities will need to be undertaken in assessing the transport impacts upon the local and strategic road networks. This will especially be the case with regard to the significant development to be sited in neighbouring authorities just outside Crawley's boundaries. The sites include the prospective West of Ifield development with associated Crawley Western Relief or Link Road (as outlined in policy ST4) and Horley Business Park developments. In this respect, we note that para 1.14 states "Transport Modelling is to be updated taking into account the cumulative impacts of plans, policies and proposals within adjoining authorities".</p> <p>We note that in addition to development just outside the borders of Crawley, there is the prospective expansion Gatwick Airport and/or North Crawley Area Action Plan as outlined in SD3 within the borough.</p> <p><b>Transport Evidence Base</b></p> <p>We note that the transport evidence base in support of the Local Plan has yet to be prepared, despite the Council consulting on its Reg. 19 plan.</p> <p>We set out our position in June 2019 when consulted on the Infrastructure Plan. It is that because the Local Plan Review involves a change from the current adopted Crawley 2030 Local Plan in terms of the plan years and housing numbers, an updated, robust Transport Assessment will be required.</p> |

| Chapter 3. Sustainable Development |            |              |  |
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|                                    |            |              | <p>It should include evidence on the location of strategic development within the borough. Associated with this, and in their own right, the evidence base will require assessments for the M23 Junctions 9 to 11 and along the M23 Spur to Gatwick. This because the model used previously is now unlikely to be suitable for further use.</p> <p>In this respect, we note that the need for an updated Transport Assessment is acknowledged in Chapter 17, and we have recently been liaising separately with Crawley Borough Council on our input to the transport modelling brief.</p> <p>We therefore look forward to working with Crawley Borough Council and receiving further information on the transport modelling for review.</p> <p>Until this Transport Assessment is undertaken and agreed, together with any mitigation required (demonstrated to be in accordance with standards, fully funded and deliverable), Highways England will have no option but to object to the development proposals outlined in the revised Crawley Local Plan 2020-2035.</p> <p><b>Assessment of Individual Developments</b></p> <p>It should also be noted that all significant developments (even those allocated in the Local Plan), will need to be supported by a robust Transport Assessment (as outlined in policy ST1). In accordance with NPPF and C2/13 Transport Assessment must consider the impact of the development on the Strategic Road Network for the opening year and a future year equivalent to a) 10 years after the application is submitted or b) the end of Local Plan or c) the date at which the whole development is completed, whichever is latest.</p> <p>Therefore, as things stand at this point in time, we do not consider the Local Plan to be legally compliant, sound or compliant with the duty to co-operate.</p> <p>However, this is not to say that it cannot be made so (for example, we are content with the Council's current transport base tender document that sets out the required work to be completed), and we look forward to working with the Council and the appointed consultants on the above and any other relevant matters.</p> <p><b>Suggested Modifications:</b></p> <p>It should also be noted that all significant developments (even those allocated in the Local Plan), will need to be supported by a robust Transport Assessment (as outlined in policy ST1). In accordance with NPPF and C2/13 Transport Assessment must consider the impact of the development on the Strategic Road Network for the opening year and a future year equivalent to a) 10 years after the application is submitted or b) the end of Local Plan or c) the date at which the whole development is completed, whichever is latest.</p> <p>Therefore, as things stand at this point in time, we do not consider the Local Plan to be legally compliant, sound or compliant with the duty to co-operate.</p> |

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|                                    |   |              | However, this is not to say that it cannot be made so (for example, we are content with the Council's current transport base tender document that sets out the required work to be completed), and we look forward to working with the Council and the appointed consultants on the above and any other relevant matters.   |
| REP/023                            | Savills on behalf of St Catherine's Hospice | SD1          | <p>St Catherine's Hospice fully supports CBC's commitment to Sustainable Development and welcome the prospect of working positively with the Council to realise sustainable growth in the Borough.</p> <p>However, paragraph 16 of the NPPF is pertinent, particularly where it states that:<br/> <i>"[Plans should] f) serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area (including policies in this Framework, where relevant)"</i></p> <p>Whilst we agree that the Council should set out their intentions to achieve Sustainable Development in the Borough, it is considered that this is explained sufficiently within the first two paragraphs of Strategic Policy SD1. At present, the extensive list of strategic objectives is superfluous and repetitive; by their nature of being strategic objectives, the importance of these policies is implied throughout the Plan.</p> <p><b>Suggested Modifications:</b><br/> To be found sound, it is suggested that the Council amends Strategic Policy SD1 to state that:<br/> <i>"[...Crawley and the wider Gatwick Diamond and West Sussex and Greater Brighton sub regions.] Development will be supported where it accords with the policies and objective set out in this plan unless material considerations indicate otherwise."</i></p>   |
| REP/061                            | Historic England                            | SD1          | <p>Crawley Submission Local Plan Regulation 19 Consultation</p> <p>Thank you for your email of 20 January 2020 inviting comments on the above consultation document.</p> <p>As the Government's adviser on the historic environment Historic England is keen to ensure that the protection of the historic environment is fully taken into account at all stages of the planning process. This includes formulation of local development policy and plans, supplementary planning documents, area and site proposals, and the on-going review of policies and plans.</p> <p>There are many issues and matters in the consultation document that are beyond the remit and concern of Historic England and our comments are, as required, limited to matters relating to the historic environment and heritage assets. We note that as an early stage in the formulation of a local plan the current document may be subject to significant change and consequently we consider it appropriate to limit our comments to more general matters; we will comment more specifically and in detail at later stages in the plan making process as appropriate. In this respect, you should not take the comments below as the definitive view of Historic England on the matters contained in the plan; they are provided for general guidance in the iterative process of preparing appropriate policies for the historic environment.</p> |

| <b>Chapter 3. Sustainable Development</b> |                          |                     |   |
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| <b>Ref. No.</b>                           | <b>Respondent</b>        | <b>Policy/ Para</b> | <b>Comments</b>   |
|   |                          |                     | <p>The objective of the National Planning Policy Framework, inter alia, to set out a positive and clear strategy for the conservation, enjoyment and enhancement of the historic environment (NPPF, Paragraphs 185); and contain strategic policies to deliver the conservation and enhancement of the historic environment (NPPF, Paragraph 20 d)). These underpin the purpose of the planning system to achieve sustainable development.</p> <p>We welcome the statement within the Crawley 2035: A Vision section that ‘The rich heritage which has shaped what the town is today will be respected, protected and enhanced’. We support the overarching policy in this respect, Strategic Policy SD1: Presumption in Favour of Sustainable Development that includes recognition of this in bullet point 3.</p> <p>A positive strategy in the terms of the NPPF is not a passive exercise but requires a plan for the maintenance and use of heritage assets and for the delivery of development, including within their setting, that will afford appropriate protection for the asset(s) and make a positive contribution to local character and distinctiveness.</p> |
| REP/062                                   | Environment Agency       | SD1                 | <p><b>Crawley Submission Local Plan Regulation 19 Consultation</b></p> <p>Thank you for consulting us on the draft Local Plan.</p> <p>Having reviewed your document, we find it “SOUND” subject to some minor changes for clarification purposes.</p> <p><b>Sustainable Development</b><br/> <b>Strategic Policy SD1: Presumption in Favour of Sustainable Development</b><br/> <b>We recommend the following for clarification purposes.</b></p> <p>Although this policy is directed at Sustainable Development, there is no reference to water resources / water quality. As water quality is closely related to water use, which in turn is an important part of sustainable development.</p> <p><b>Suggested Modifications:</b></p> <p>We would recommend an additional strategic objective within SD1 to ensure that the water environment is also a consideration. For example, no development should impact negatively on the quality or status of water bodies.</p>   |
| REP/026                                   | Rainier Developments LTD | SD2                 | <p>Rainier’s comments regarding enabling healthy physical and mental lifestyles in response to the Regulation 18 consultation remain relevant.</p> <p>Rainier agree in principle with this proposed policy and its intention to facilitate and control development to promote healthy physical and mental lifestyles. NPPF paragraph 96 recognises that access to high quality open spaces can make an important contribution to the health and well-being of communities, the proposed high quality pocket park on the MOKA site will therefore make a significant contribution to achieving healthy lifestyles. The proposals also promote this through the provision of private amenity space, (including a roof garden). The commercial space at ground floor level has been designed to include co-working space. Such facilities will increase opportunities for the social interaction of residents as well and aligning with the wider range of improvements to the public realm and pedestrian infrastructure associated with the Station Gateway scheme.</p>  |

| Chapter 3. Sustainable Development |                            |              |   |
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| Ref. No.                           | Respondent                 | Policy/ Para | Comments  |
|                                    |                            |              | <p><b>Suggested Modifications:</b></p> <p>As currently drafted the policy states that “new development <b>must</b> be designed to achieve healthy, inclusive and safe places”. NPPF paragraph 11 seeks for Local Plans to be flexible in order to respond to rapid change. On this basis we recommend the policy is reworded as follows to ensure the plan is able to respond to rapid change:</p> <p><i>“New development <b>should</b> must be designed to achieve healthy, inclusive and safe places, which enable and support healthy lifestyles and address health and wellbeing needs in Crawley, as identified in the Crawley Joint Strategic Needs Assessment...”</i></p>  |
| REP/029                            | Sport England              | SD2          | <p>Sport England supports this policy and references to Active Design and the Essex Design Guide in respect of major development being required to consider the 10 principles of Active Design.</p> <p><b>Suggested Modifications:</b></p> <p>Sport England suggests that the checklist contained at Appendix A of the Active Design Guidance is referred to in the text at para 3.16 as a means of applicants being able to demonstrate that they have met this requirement.</p>   |
| REP/032                            | West Sussex County Council | SD2          | <p>West Sussex County Council have worked with Crawley Council to develop their “Enabling Healthy Lifestyles and Wellbeing” Policy SD2. WSCC’s Public Health Team formally support Policy SD2 and any other policies supporting and looking to increase health and wellbeing in the area.</p> <p>In addition, we formally support the requirement from developers to complete Health Impact Assessments (HIA) as a ‘must’ have requirement to mitigate negative impacts and unintended consequences as a result of development that may have an impact on increasing health inequalities especially in regards to our most vulnerable population groups. This offer of support is in line with the West Sussex County Council’s Public Health’s position which is to:</p> <ul style="list-style-type: none"> <li>• Recommend that a health impact assessment (HIA) is undertaken for all major plans, policies and development proposals across West Sussex.</li> </ul> |
| REP/068                            | Sussex Wildlife Trust      | SD2          | <p>SWT note that CBC have taken on board our comments relating to section 3.9 and made the proposed amendments to bullet point 4.</p> <p><b>Strategic Policy SD2: Enabling Healthy Lifestyles and Wellbeing</b></p> <p>We note and welcome that amendments have been made to this policy in line with our comments made during the regulation 18 consultation. However we still advise the term high quality be incorporate in relation open space in line with sections 91 and 92 of the NPPF.</p> <p><b>Suggested Modifications:</b></p> <p>We therefore recommend the following amendments to SD2 to ensure it is consistent with National Policy:</p> <p><i>New development must be designed to achieve healthy, inclusive and safe places, which enable and support healthy lifestyles and address health and wellbeing needs in Crawley, as identified in the Crawley Joint Strategic Needs Assessment.</i></p>   |

| Chapter 3. Sustainable Development |                      |              |   |
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| Ref. No.                           | Respondent           | Policy/ Para | Comments  |
|                                    |                      |              | <p><i>In order to maximise opportunities to enable healthy lifestyles, new development must:</i></p> <ul style="list-style-type: none"> <li>• <i>Meet the principles of good urban design and support Crawley’s status as a Dementia Friendly Town, through ensuring legibility of layout, materials and design(Policies CL2 and DD1);</i></li> <li>• <i>Meet the needs of all through the use of the highest standards of accessible and inclusive design (Policy DD2);</i></li> <li>• <i>Provide opportunities for <b>high quality</b> open space, play and recreation (Policies OS1 – OS2);</i></li> <li>• <i>Prioritise the use of accessible and reliable sustainable transport and active travel through providing greater levels of safe and attractive opportunities for active travel (Policies OS3, ST1 – ST2);</i></li> <li>• <i>Be supported by, and not result in a loss of, necessary infrastructure provision (Policies IN1 – IN2);</i></li> <li>• <i>Ensure proposals are safe for future site users and do not result in unacceptable harmful impacts (Policies EP1 – EP6); and</i></li> <li>• <i>Ensure proposals incorporate biodiversity and green infrastructure which enable climate change resilience (Policies GI1 and GI2).</i></li> </ul> <p><i>Major developments must set out how they address the requirements of Policy SD2 as part of the planning application. In order to satisfy this policy requirement, a Health Impact Assessment must be included with qualifying planning applications, as set out in the Local List of Requirements, at the point of submission for validation purposes.</i></p>                                  |
| REP/027                            | LRM Planning Limited | SD3          | <p>On behalf of our clients we are supportive of the establishment of an Area Action Plan for North Crawley, it is entirely appropriate to consider how the area can positively and actively contribute towards the future needs of the Authority.</p> <p>In this regard, we are agree with the Council that the land should no longer be safeguarded for airport expansion. It is plainly the case that a second runway at Gatwick is not an aspiration of the Government and is no longer a viable option for Gatwick Airport. Clearly however by safeguarding the area for growth and development the principle of development that contributes towards the future of the Authority is already firmly established and it is appropriate that this should be allocated for appropriate forms development that are related to the airport and wider growth.</p> <p>Land at Fernhill Road</p> <p>Our clients control land at Fernhill Road within the AAP area and are supportive of the production of an AAP that can address the blight associated with the area. Indeed the site is surrounded by significant strategic infrastructure with two motorways, two towns, a major international Airport and two strategic allocations all within a few hundred metres. Indeed, it is heavily adversely impacted by the airport and the AAP represents a significant opportunity to transform the area positively.</p> <p>It is noted for completeness, that our client’s site is located to the east of Gatwick Airport. It comprises an existing residential bungalow along with vacant land to the north that was previously occupied by 17,000 sqft of greenhouses.</p> |

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|                                    |            |              | <p>The northern section of the site was used for horticultural purposes as a former nursery from the 1930's. Indeed, it contained very intensive commercial uses on site, along with associated old workshops, sheds and storage tanks.</p> <p>However, the greenhouses had become disused and fell into disrepair such that by the 1990's the site was strewn with broken glass from the greenhouses, metal and other litter. Since then the site had become overgrown with nettles and undergrowth that had become interspersed with waste materials and more recent piles of fly tipped rubbish which has become a particular problem in recent years.</p> <p>Given the dangerous conditions of the site and the risk to health and safety, the landowner has recently cleared the waste material and fly tipped spoil from the site in accordance with the necessary disposal procedures.</p> <p>The site is characterized by the noise and associated issues from the Airport, low flying aircraft and motorways. In this regard it is heavily urbanized and at risk of fly tipping and anti-social behaviour.</p> <p>The site is bound:</p> <ul style="list-style-type: none"> <li>- to the east by Fernhill House which comprises residential apartments that are also owned by our client, along with a line of trees and vacant land;</li> <li>- to the south by Fernhill Road;</li> <li>- to the north is an existing field which has been used for car parking; and</li> <li>- to the west is a scrap yard with associated industrial/agricultural buildings.</li> </ul> <p>With regards to its wider context, to the east lies Donkey Lane and a number of existing dwellings and businesses including car parking along Peeks Brooke Lane. In addition the M23 lies some 600 metres away. To the south lies agricultural space with linear / sporadic development to Crawley. A strategic allocation is located some 1,000 metres to the south.</p> <p>To the west lies Balcombe Road (along with some sporadic development) beyond which is Gatwick Airport and its associated infrastructure (some 200 metres from the site). To the north the M23 (Gatwick access spur) lies approximately 300 metres away with a strategic allocation with Horley beyond.</p> <p>We are strongly of the view that the generally poor quality of the area to the east of the area can benefit significantly from investment and improvement. It has become blighted by the significant land uses surrounding it and suffers from numerous problems.</p> <p>Uses</p> |

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| Ref. No.                           | Respondent | Policy/ Para | Comments   |
|                                    |            |              | <p>Given the expected growth in passenger numbers (as set out earlier), elements of the area will inevitably need to be utilised for car parking. However, this should be seen as an opportunity in order to seek to address rogue / illegal operators in unsuitable / unmitigated locations and promote sustainable and innovative means of transfers to the airport (using electric mini buses).</p> <p>Approaching car parking in a proactive and sustainable way, could result in significant improvements in the local area (for instance improved air quality, reduced pressure on routes etc.). Indeed, where car parking is not regularised then impacts are not mitigated.</p> <p>We note that land to the east of the airport, is in close proximity to existing parking areas and can provide a sustainable option for growth that was in line with the previous master plan for the safeguarded area. Indeed, the level of growth in passenger numbers expected from utilising the spare runway (70mppa) is comparable to the second runway master plan which envisaged (79mppa). Clearly therefore additional parking will be required and land to the east of the airport has already been established to be suitable for this.</p> <p>It is noted that the Council believe that parking is an inefficient use of the area and there are more valuable uses for the area. However, given the level of growth, it would be inappropriate to rule this out currently. Indeed, inadequately planning for off-site impacts of the airport will inevitably mean an increase in rogue parking operators, illegal parking and failure to properly and comprehensively plan for impacts.</p> <p><b>Temporary Uses</b><br/> We believe that wording should be included that allows for planning permission to be granted on a temporary basis where appropriate in the same way that GAT2 did within the old local plan. Indeed, given the lead in times for an AAP, it could be important to consider temporary applications to alleviate pressures on an interim basis – such permissions could be time limited and would not prejudice longer term aspirations.</p> <p>We would expect that temporary uses would be more appropriate on sites that have previously been developed, brownfield sites or outside of the areas of biodiversity potential identified on the proposals map. It is noted that such uses can be either be subject to condition or a legal agreement to limit any long term use.</p> |
|                                    |            |              | <p><b>Suggested Modifications:</b><br/> We are supportive of the removal of the Gatwick expansion safeguarding area and the preparation of an AAP for North Gatwick, however, we are strongly of the view that a number of associated amendments are required in order to make the plan compliant with the NPPF. These primarily involve ensuring that the Plan robustly responds to the impacts of the future growth of the airport. Suggested changes include:</p>   |

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|                                    |  |              | c. bringing the preparation of the AAP forward to run in parallel with the Plan process and widening of the scope of SD3 to include sustainable means of addressing existing car parking problems in Crawley (and neighbouring authorities) as well as ensuring that appropriate temporary uses can be permitted without prejudicing the AAP;  |
| REP/028                            | Barton Willmore LLP on behalf of Legal & General | SD3          | <p><b>Land North of Gatwick Airport</b><br/> Legal and General ('L&amp;G') owns some 155 hectares of land immediately to the north of Gatwick Airport within Mole Valley District but adjacent to the boundary with Crawley Borough. L&amp;G submitted representations to the Regulation 18 consultation (16 September 2019). The representations below should be read in conjunction with the previous representations.</p> <p><b>Gatwick Airport</b><br/> Gatwick Airport is identified in the emerging Local Plan as the 'economic core' of the Borough that allows Crawley to be a 'focus for large businesses, travel and retail provision' (paragraph 2.6). The Airport has published a Master Plan (2019) setting out its proposals for future growth and has commenced the Development Consent Order ('DCO') process. The Airport proposes to make efficient use of its existing runways, in line with national policy (Aviation Strategy: making best use of existing runways, June 2018), by bringing its standby runway in to regular use. The Master Plan estimates that this will give rise to an increase from 79,000 to 91,000 direct and indirect jobs associated with the Airport by 2028 (paragraph 5.6.13). This presents a unique opportunity to capitalise on the economic benefits arising from growth at Gatwick.</p> <p>Notwithstanding the above, limited consideration has been given in the Local Plan Review and its evidence base to the impact of the proposed growth at the Airport. Indeed, the Economic Growth Assessment (2020: 'EGA') recognises the important role of the Airport and the economic benefits of expansion (see paragraph 2.27). However, none of the scenarios for forecasting the future requirements for employment space (Chapter 8.0) take account of growth at the Airport. This is in direct conflict with NPPF (2019) paragraph 22 that requires local plans:<br/> '...to anticipate and respond to long-term requirements and opportunities, such as those arising from major improvements in infrastructure.'</p> <p>In short, the impact of expansion of Gatwick is not recognised in the forecasts for future employment needs when the evidence of the Airport indicates a significant increase in jobs. Moreover, no attempt appears to have been made to positively plan to capture the benefits arising from Airport expansion in line with the NPPF. Should the Plan progress on this basis, having regard to the likely timeframes of the Gatwick DCO, there is a significant risk that the Local Plan will be out of date prior to, or shortly after adoption. Given the strategic significance of the Airport in the area, approval of the expansion proposals could give rise to a need for an early local plan review.</p> |

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| Ref. No.                           | Respondent | Policy/ Para | Comments   |
|                                    |            |              | <p>The growth in jobs associated with expansion of the Airport is a significant public benefit weighing heavily in favour of the proposals. A Local Plan formulated in denial or ignorance of the Airport expansion proposals would not be justified and therefore unsound. The intentions of Gatwick are known and are being progressed. Whilst the outcome of the DCO process is not certain at this stage, the Airports NPS is the published policy and the proposals of Gatwick are sufficiently advanced for the Council to be required to consider the impact thereof in order to bring forward a sound plan. The views of Inspectors are clear on planned infrastructure improvements, with the Inspector for the Vale of Aylesbury Local Plan, for example, stating in his interim findings (29 August 2018) that:</p> <p><b>'7) Predictable events should be planned for. Both Heathrow expansion and the Oxford-Cambridge expressway are predictable, known, events. Only the route of the latter is not yet fixed. To be sound, VALP should make contingency plans to accommodate them, not simply abandon its function to a future review of uncertain timescale.'</b></p> <p><b>Economic Needs</b></p> <p>Even without any growth at the Airport, the EGA identifies a need for some additional 33 hectares of employment land in Crawley based on past development rates. However, under the baseline labour supply scenario, which takes account of population growth assumptions based on the Standard Method, this increases markedly to 113 hectares (Table 8.16). Taking account of employment land supply, the EGA identifies a shortfall of 21 hectares against the past development rate requirement and over 100 hectares when population growth is taken into consideration (Table 10.5). The Council is therefore, reliant on adjacent authorities to assist in accommodating this significant unmet need.</p> <p>Historically, authorities such as Horsham and Mid Sussex have sought to accommodate a proportion of unmet housing need from Crawley but accommodation of unmet employment need has been more limited. The spatial strategy of the emerging Local Plan recognises the role of the Airport (but without expansion) and seeks to locate employment development in proximity. Horley Business Park in Reigate and Banstead Borough provides a large office (B1) facility in proximity to the Airport. However, limited if any consideration appears to have been given to the potential of other cross boundary land to assist in meeting unmet employment need.</p> <p>For example, Mole Valley is currently consulting on its emerging Local Plan (Regulation 18). L&amp;G's land to the north of Gatwick Airport has been promoted for employment use associated with the Airport through the Mole Valley Local Plan. Mole Valley's Strategic Housing and Economic Land Availability Assessment (2020: 'SHELAA') discounts the Site from further consideration as '[n]o identified requirement for site allocation for B Class Uses' (Table 19: Site Ref. HK-008). This fails to consider the significant unmet need for B Class employment space from Crawley, not least given the clear spatial relationship to Crawley and the Airport in particular.</p> |

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|                                    |            |              | <p>Full consideration ought to be given to all land capable of accommodating employment uses in proximity to Crawley to assist in meeting the unmet employment space needs identified through the EGA. In addition, further consideration should be given to the expansion proposals of the Airport which would appear highly likely to further increase the employment land requirements and level of unmet need over the Plan period.</p> <p>The Plan does not appear to have been informed by the discharge of the 'Duty to Co-operate' in respect of this fundamental element.</p> <p><b>Removal of Safeguarding</b></p> <p>Land to the south of Gatwick Airport is safeguarded for future airport development. The emerging Local Plan states that the Council it is seeking to challenge the on-going safeguarding of that land as a means of accommodating additional employment and infrastructure development within the Borough (see paragraph 2.8). Whilst the National Policy Statement (June 2018) supports a new runway at Heathrow, there continues to be significant uncertainty over future aviation development.</p> <p>This is recognised in the Aviation 2050 consultation document (December 2018) which states that 'It is prudent to continue with a safeguarding policy to maintain a supply of land for future national requirements' (paragraph 3.66). The NPS does not propose the removal of the safeguarding nor that the safeguarding is or will subject to review. Until such a time as the safeguarding is reviewed, the Local Plan should progress on the basis that the safeguarding will remain and should proactively explore alternative options for accommodating unmet need including cross boundary opportunities. Any proposals that are reliant upon the removal of the safeguarding are not justified nor achievable and would be unsound.</p> <p>The remedy proposed by the Council to address the potential time lag between adoption of the Local Plan and a review of the safeguarding is the preparation of an Area Action Plan ('AAP') for North Crawley. Deferring consideration of this to an AAP is unsound given the fundamental change that would arise and the strategic implications not only for Crawley but beyond. It is for the Local Plan to set the spatial strategy and an AAP is a tool for implementation. Again, the proposal for an AAP on this basis would render the Plan unsound.</p> <p><b>Conclusion</b></p> <p>It is accepted that the Council faces many challenges in accommodating housing needs and employment growth. In terms of population, the evidence base identifies:</p> <ul style="list-style-type: none"> <li>• Greater proportion of younger people (ages 25 to 34) with two-thirds of current population below 45 years of age.</li> <li>• Lower percentage of elderly but disproportionate projected increase compared to other age groups.</li> <li>• High levels of employment and strong demand for additional employment space but a shortfall of between 21ha and over 100ha of employment land over the Plan period.</li> </ul> |

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|                                    |                          |              | <ul style="list-style-type: none"> <li>Housing need of 11,280 to 2035 (based on Standard Method) with land to accommodate circa</li> <li>48% of that need leaving a significant proportion of unmet need.</li> </ul> <p>It also benefits from close proximity to the Airport which is not only a significant contributor to economic growth in its current iteration, but which has ambitious plans for further growth. It is remiss of the Council not to seek to actively plan and capture these benefits for the benefit of the community at large.</p> <p>We recognise that Crawley is effectively 'land locked' with little opportunity for spatial expansion beyond its administrative borders. However, the Duty to Co-operate exists to provide a mechanism for such matters to be addressed in co-operation with the neighbouring authorities. However, unless the needs are properly evidenced in the Plan, the exercise of the Duty to Co-operate will fail, regardless of the ambitions of the relevant authorities. The draft Plan ignores the proposals of the Airport and relies on removal of the existing safeguarding to meet what need the Council does recognise. There is no evidence that the adjacent authorities (see Mole Valley) are planning positively to meet these unmet needs (with and without Airport expansion).</p> <p>The Plan is unsound in this basis. The Duty to Co-operate has not been met.</p> <p>The Plan is not justified nor is it achievable.</p> |
| REP/029                            | Sport England            | SD3          | <p>There is an Artificial Grass Pitch in the north east corner of the large car park area to the east of the runway. The retention of this and any other land or building in sport or recreation use should be assessed against para 97 of the NPPF and not 'balanced' against other uses.</p> <p><b>Suggested Modifications:</b></p> <p>The policy should say that assessment of land and buildings in sport and recreation use will be against para 97 of the NPPF.</p>  |
| REP/033                            | Horsham District Council | SD3          | <p>Thank you for consulting us on the Draft Crawley Borough Local Plan 2020 -2035. We are grateful for the opportunity to be able to comment on your emerging plan. Horsham District Council recognises that your authority faces considerable challenges in ensuring it can meet the future needs of Crawley within what is a tightly bound administrative area. Overall we consider that the plan has positively sought to balance the provision of those future needs with other wider objectives in a manner that contributes to achieving sustainable development.</p> <p>I would also take the opportunity to reaffirm Horsham District Council's commitment to continued close cooperation and joint working between our councils, reflecting our joint housing market area and common functional economic market area.</p> <p>We do have a number of detailed comments on the draft document, which follow and build on comments made in our letter dated 16 September 2019 responding to the earlier Regulation 18 consultation on the Crawley Borough Local Plan 2020-2035. We will provide these separately using comment forms for your ease of reference and inputting, but I</p>   |

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| Ref. No.                           | Respondent                             | Policy/ Para                 | Comments  |          |                |              |           |   |         |                         |        |   |         |                         |        |   |         |                         |        |   |          |                              |        |   |              |                              |        |
|                                    |  |                              | <p>have nonetheless set these out together in this letter – the comments that follow are identical word-for-word to the comment forms.</p> <p>We support this policy in principle, but consider its effectiveness could be improved. It is recognised the AAP will provide opportunities to increase housing and employment provision within Crawley Borough, and this should feed into an assumption that the unmet need will be reduced (see further comments on Policy HP1 in particular).</p> <p><b>Suggested Modifications:</b></p> <p>Request that specific reference is made to fact that the safeguarded land extends into Horsham district, therefore close joint working will be needed to ensure a consistent approach between the AAP and Horsham LP policy on Gatwick safeguarding going forward.</p>  |          |                |              |           |   |         |                         |        |   |         |                         |        |   |         |                         |        |   |          |                              |        |   |              |                              |        |
| REP/035                            | Vail Williams on behalf of Ardmore Ltd | SD3                          | <p>Response on behalf of the Land Consortium on land adjacent Farm for Crawley Borough Council Local Plan Review 2035 Reg. 19 Local Presentations</p> <p>We are writing on behalf of our clients Ardmore Ltd and the consortium of 4 adjacent landowners, in regard to land to the North of Crawley and adjacent to Manor Royal.</p> <p>As per our previous submissions to your Regulation 18 stage in September, and our submission to your Employment Land Trajectory, there are nine sites and five landowners which all wish to act as signatories to this letter and we are appointed by them under the lead member, Ardmore Limited.</p> <p>To confirm, we have attached our masterplan and can confirm that the landowners are as follows:</p> <table border="1"> <thead> <tr> <th>Site no.</th> <th>Land ownership</th> <th>Site address</th> <th>Site area</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Ardmore</td> <td>Land at jersey Farm (A)</td> <td>0.59ha</td> </tr> <tr> <td>2</td> <td>Ardmore</td> <td>Land at Jersey Farm (b)</td> <td>2.18ha</td> </tr> <tr> <td>3</td> <td>Ardmore</td> <td>Land at Jersey Farm (c)</td> <td>8.77ha</td> </tr> <tr> <td>4</td> <td>Willmott</td> <td>Land at Little Dell Farm (A)</td> <td>3.98ha</td> </tr> <tr> <td>5</td> <td>Ohm and Hill</td> <td>Land at Little Dell Farm (B)</td> <td>1.94ha</td> </tr> </tbody> </table> | Site no. | Land ownership | Site address | Site area | 1 | Ardmore | Land at jersey Farm (A) | 0.59ha | 2 | Ardmore | Land at Jersey Farm (b) | 2.18ha | 3 | Ardmore | Land at Jersey Farm (c) | 8.77ha | 4 | Willmott | Land at Little Dell Farm (A) | 3.98ha | 5 | Ohm and Hill | Land at Little Dell Farm (B) | 1.94ha |
| Site no.                           | Land ownership                         | Site address                 | Site area   |          |                |              |           |   |         |                         |        |   |         |                         |        |   |         |                         |        |   |          |                              |        |   |              |                              |        |
| 1                                  | Ardmore                                | Land at jersey Farm (A)      | 0.59ha  |          |                |              |           |   |         |                         |        |   |         |                         |        |   |         |                         |        |   |          |                              |        |   |              |                              |        |
| 2                                  | Ardmore                                | Land at Jersey Farm (b)      | 2.18ha  |          |                |              |           |   |         |                         |        |   |         |                         |        |   |         |                         |        |   |          |                              |        |   |              |                              |        |
| 3                                  | Ardmore                                | Land at Jersey Farm (c)      | 8.77ha  |          |                |              |           |   |         |                         |        |   |         |                         |        |   |         |                         |        |   |          |                              |        |   |              |                              |        |
| 4                                  | Willmott                               | Land at Little Dell Farm (A) | 3.98ha  |          |                |              |           |   |         |                         |        |   |         |                         |        |   |         |                         |        |   |          |                              |        |   |              |                              |        |
| 5                                  | Ohm and Hill                           | Land at Little Dell Farm (B) | 1.94ha  |          |                |              |           |   |         |                         |        |   |         |                         |        |   |         |                         |        |   |          |                              |        |   |              |                              |        |

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|                                    |            |              | 6   | Ardmore         | Land at Little Dell Farm (C) | 0.26ha |
|                                    |            |              | 7   | Maxwell         | Land at Poles Lane (A)       | 1.43ha |
|                                    |            |              | 8   | Rixon and Crook | Land at Poles Lane (B)       | 0.68ha |
|                                    |            |              | 9   | Ardmore         | Land at Spikemead Farm       | 3.67ha |
|                                    |            |              | <p>As per our previous representations, our main areas of comment will understandably be relating to the context, setting and landscape character of the land North of Manor Royal, as well as Gatwick Safeguarding and the Economic Growth policies.</p> <p>Our detailed comments are as follows:<br/> Our clients support the further clarification now provided by Policy SD3 in regard to the Gatwick Airport Ltd and the Aviation Strategy from National Government.<br/> Whilst we appreciate that the Policy designates the area for new Area Action Plan (AAP), we would be grateful of more clarity on the timeline although we understand this information will be contained within the emerging Local Development Scheme (LDS).<br/> We are also concerned that given our two permitted planning applications at Jersey Farm, Policy SD3 states that development which would be incompatible with the Western Link Road search corridor or prejudice to the future comprehensive development of the AAP, will not be permitted. Accordingly, we would like to see that the word 'new' is inserted to reflect our current consented schemes. For information, we are due to be submitting discharge of conditions to ensure this development is implemented as per its Decision Notice, within the next few months following the signing of our s105.<br/> It is also noted that the policy reflects the Crawley Western relief Road (CWRR) under policy ST4. Whilst we do not anticipate any further applications relating to the existing permission, we would seek assurance that our permitted applications would be a material consideration under this policy and policy ST4 in regard to any minor alterations that may be required.<br/> However, we wish it to be noted that in principle we agree with the AAP proposal that will address opportunities within the area, should safeguarding be lifted. We acknowledge the unmet needs in particular relating to economic</p> |                 |                              |        |

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|                                    |  |              | <p>development and, the findings of the evidence base, especially the January 2020 Lichfield's Economic Growth Assessment (EGA) for the Northern West Sussex Area.</p> <p>We also note that paragraph 3.22 states that safeguarding protection would remain until the Adoption of the AAP. At present, it is still unclear as to the length of time proposed for adopting the AAP and, this will further create uncertainty beyond the Adoption of the Local Plan currently programmed for December 2020.</p> <p>We understand that the objective of the AAP as set out in Para 3.23, could look at higher growth scenarios than that of a constrained land supply position as stated in the EGA. We also understand that Para 3.23 looks to consider a comprehensively planned approach to economic development rather than piecemeal applications.</p> <p>However, we are concerned that the comments in para 3.25 in relation to the CWRR in the AAP, state that:<br/> <i>"Further work needs to be established to secure the optimum line of the Crawley Section of this route. Possible alignments of the route may move further north should work on the AAP demonstrate that land is not required for future growth of the airport."</i></p> <p>Regardless of this, policy St4 significantly safeguards some of our client's land. This policy together with the Reasoned Justification (RJ) for para 3.25 will unnecessarily blight a significant area of our site, as shown on the Proposals Map. It indicates that our land will form part of the current arbitrary corridor shown as part of the CWRR, without what appears to be any further justification to the current timeline for delivery, need, route, or scale for this major highway's development. There is no clarity in any transport evidence base at this stage relating to the indicative road proposed, for us to consider. We therefore object to both the Policy St4 in its current form and the Proposals Map allocation and the principle of safeguarding for a relief road. We consider this policy and search corridor to be premature. We further address this under Policy St4, later in our letter, in regard to the impact of any potential road and the uncertainty this policy will create.</p> |
| REP/036                            | Vail Williams on behalf of UK Commercial Property Finance Holdings Limited | SD3          | <p>We are writing this letter on behalf of our client UK Commercial Property Finance Holdings Limited, in response to the Crawley Borough Council (CBC) Regulation 19 Submission draft Local Plan Review 2035 specifically relating to matters which impact on the site at Unit 2 and Unit 3, Charlwood Road, Gatwick Gate.</p> <p>The attached plans identify the site boundaries for Unit 2 and Unit 3, Gatwick Gate. The two units sit adjacent to one another and are located within the existing airport safeguarded land but outside the southern boundary of Gatwick Airport.</p> <p>Our response will reflect the context of the above site and specifically, will comment on the following key proposals in the CBC Submission draft Local Plan 2035:</p> <ul style="list-style-type: none"> <li>- North Crawley Area Action Plan</li> <li>- Main Employment Area designation</li> </ul>   |

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|                                    |                                  |              | <p>In addition, we note the proposed change to the existing Airport Boundary in the immediate area of our client's site therefore, we have provided some commentary on policies relating to the Gatwick Airport boundary as shown on the Local Plan Map.</p> <p>We will also provide some commentary on matters of character, landscaping and development form due to the sites location outside of the built up boundary and within an identified long distance view splay.</p> <p>Our detailed comments are as follows:<br/> This Policy provides clarification on the Council's position to challenge National Government and lift current safeguarding, proposing to designate the land south and east of Gatwick Airport and north of Crawley, for the preparation of an Area Action Plan.<br/> We note in paragraph 3.21 of the reasoned justification for this policy for an Area Action Plan will provide continued opportunity to meet growth need for Gatwick Airport, whilst also enabling the delivery of other development in the Borough. Especially, identified employment need within the District.<br/> In regards to policy SD3, our client supports in principle the proposal for an Area Action Plan. This will present a greater opportunity for employment related development, in accordance with other Local Plan policies on economic growth. Current restrictions in relation to the existing safeguarding policy significantly limits development on our client's site and redevelopment and intensification opportunities for economic growth in the wider area.<br/> Whilst we acknowledge that paragraph 3.22 states that current protections of the previous safeguarding policy will remain until the AAP s adopted, we would appreciate further clarity on the proposed timescale for its delivery, which we understand is due to commence three months from the adoption of the Local Plan. We await the emerging Local Development Scheme (LDS).</p> |
| REP/ 055                           | Savills on behalf of Wilky Group | SD3          | <p><b>Introduction</b><br/> <b>Background</b><br/> This representation is submitted on behalf of the Wilky group (TWG or Wilky), which has a long standing interest in the promotion of strategic employment land within the Crawley Borough Council (CBC) area. It relates to Chapter 3, Sustainable Development, and in particular Policy Sd3 "North Crawley Area Action Plan in the Draft Crawley Borough Local Plan, 2020 (DCBLP).<br/> TWG owns about 63.3 ha (149 acres) of land east of Gatwick Airport and north and south of the M23 spur road between Junctions 9 and 9a. The land south of the M23 spur road is being promoted by TWG as a strategic employment opportunity know as Gatwick Green (the Site). The Site is identified on the plan at <b>Appendix 1</b>, which shows the extent of the Gatwick Green opportunity, comprising about 59 ha (146 acres). TWG owns about 47 ha (116</p>  |

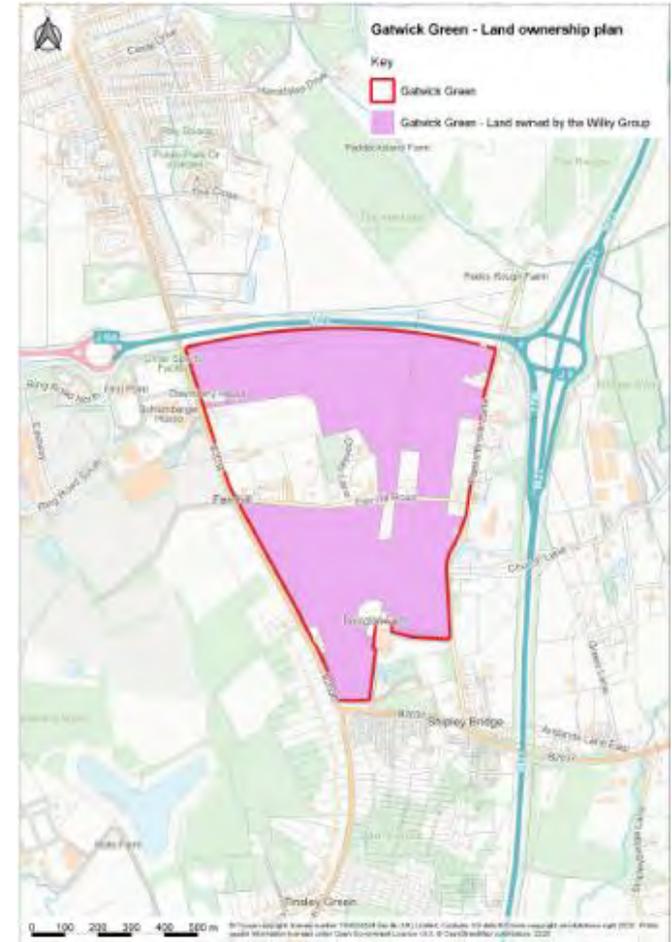
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|                                    |            |              | <p>acres) of land within the Gatwick Green opportunity; about 80% of the Site 0 the extent of land owned by Wilky is shown on the plan at <b>Appendix 1</b>.</p> <p>Wilky and Aberdeen Standard Investments are discussing how they can work together in respect of Wilky's strategic landholding adjacent to Gatwick Airport to bring forward an integrated mixed-use development and co-ordinated infrastructure solution.</p> <p><b>Executive Summary</b></p> <p>TWG has submitted substantive representations on the DCBLP in relation to its land interests east of Gatwick Airport and Balcombe Road to the north of Crawley (59 h). Its case is primarily concerned with the approach in the DCBLP to safeguarding land for future growth in the airport, the proposals to designate the formerly safeguarded land for North Crawley AAP and the short and long term approach to identifying land for strategic employment contained in the Policies EC1 (Sustainable Economic Growth) and SD3 (North Crawley AAP).</p> <p>TWG considers that there is no legal or national policy basis to safeguard land for a second runway at Gatwick and consequently the unmet planning and socio-economic needs of the Borough can be accommodated through the identification of land. Runway capacity has been provided for at Heathrow to meet forecast demand, alongside the expansion of other airports based on their existing runway infrastructure. National policy on aviation and airports therefore no longer requires any safeguarding at Gatwick, so TWG fully supports the removal of blanket safeguarding in the DCBLP.</p> <p>The NPPF requires Local planning Authorities to place significant weight on supporting sustainable economic growth by, inter alia, identifying strategic sites for inward investment to accommodate business needs and wider opportunities. Regional and sub-regional economic policy support focusing growth at Crawley/Gatwick in recognition of the area's current role and future potential. Importantly, the evidence base for the Local Industrial Strategy, which planning policy should reflect, supports the identification of major economic development adjacent to Gatwick, identifying land east of the Airport in this regard.</p> <p>TWG supports the policy to identify land for strategic employment and other needs via an AAP for north Crawley, but has put forward evidence that the unmet economic needs of the Borough are higher than noted in policy. In recognition of this and having regard to the removal of blanket safeguarding, evidence has been put forward to support the identification of Gatwick Green for strategic employment to meet the long-standing and urgent unmet needs of the area. Gatwick Green is immediately available to address the short term shortfall of employment land.</p> <p><b>Policy SD3</b></p> <p>TWG broadly supports Policy SD3 and the designation of the North Crawley AAP area as a means to address the socio-economic needs of Crawley alongside any legitimate and robust long terms needs of the Airport. It is considered</p> |

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|                                    |            |              | <p>that this approach has a number of advantages although it would result in some negative aspects arising from the further delay in resolving the long standing economic and community needs of the borough. However, TWG has some concerns regarding the interim provision for development within the AAP area, which it considers could be addressed through Minor Modifications.</p> <p>The issue of when and by what means land should be allocated for strategic employment is a matter that was addressed by the previous Local Plan Inspector, who recommended an early review of the current Plan to address employment need: TWG supports the AAP approach, but given the pressing need to identify land for strategic employment and the Regulation 19 representations from Gatwick Airport Limited (GAL) that continue to press for ongoing safeguarding, it has submitted evidence in support of the allocation of Gatwick Green in separate representations. In particular, TWG is aware that GAL may continue to press for safeguarding under the emerging DCBLP, in which case the question of whether safeguarding is justified at all, or whether currently safeguarded land should be allocated for employment uses, may be relevant to the Examination as an alternative to the SD3 approach. This is another reason why TWG has submitted the evidence it has. Despite supporting Policy SD3 and its designation of an AAP area.</p> <p><b>North Crawley Area Action Plan – Policy SD3</b><br/> <b>The principle of an AAP</b></p> <p>Policy SD3 of the DCBLP sets out the Council's approach to the proposed North Crawley Area Action Plan (AAP). The AAP replaces the land formerly safeguarded for a second runway for Gatwick Airport: this covers about 619 ha (previously 523 ha). The policy has been introduced in light of the Council's decision to remove blanket safeguarding and provides for a subsequent AAP to address the long term needs of the Airport alongside the long-standing unmet socio-economic needs of the Borough. It also sets out a number of environmental considerations for the AAP to address, and tight controls over development within the AAP areas as an interim arrangement until an AAP is adopted. Policy EC1 cross refers to Policy SD3 insofar as it sets out the strategy for planning for future economic growth, of which the AAP is a key component.</p> <p>The adopted CBLP contains an Area of Search for Strategic Employment Locations (SELS) south and east of Gatwick, an area that is now proposed for the North Crawley AAP. TWG's separate representations on safeguarding (Chapter 10) note that there is no longer any national aviation policy requiring land to be safeguarded at Gatwick. In this context, CBC must prioritise planning to meet the urgent and critical need for strategic employment land and other uses in order to address the pressing and immediate economic needs of the area and its residents. Policy SD3 provides the mechanism whereby these needs can be addressed.</p> <p>TWG broadly supports Policy SD3 and the designation of the North Crawley AAP area as a means to address the socio-economic needs of Crawley alongside any legitimate and robust long terms needs of the Airport. It is considered</p> |

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|                                    |            |              | <p>that this approach has a number of advantages, although it would result in some negative aspects arising from the further delay in resolving the long standing economic community needs of the Borough. The issue of when and by what means land should be allocated for strategic employment is a matter that was addressed by the previous Plan Inspector, who recommended an early review of the current Plan to address employment need: TWG supports the AAP approach, but also recognises that it has some negative consequences, so on this basis, the evidence in support of the allocation of Gatwick Green is presented as part of separate representations by TWG.</p> <p>Insofar as the NPPF requires LPAs to plan positively for sustainable economic growth, allocate strategic sites to meet anticipated needs and address the infrastructure needs to accompany strategic sites (NPPF para 81), the option to bring forward strategic land through the DCBLP should be considered. It is on this basis that evidence has been included in TWG's representations to demonstrate that Gatwick Green is suitable, available, achievable, deliverable and viable.</p> <p><b>Sustainability Assessment</b></p> <p>The SEA contains a sustainability appraisal of the AAP area (Policy SD3) against nine sustainability assessment criteria. This concludes that the AAP area is assessed as offering possible significant positive impacts against 1 criteria, possible positive impacts against 6 criteria and 1 possible negative impact. The assessment concludes as follows:</p> <p><i>"... the land identified for the AAP represents the most sustainable location for strategic employment growth in Crawley. It is a large area of land take, and some areas within the broad identified area will be more sustainable than others – this will be assessed further through the work on the AAP. It would enable highly sustainable, high quality new development to complement and deliver linkages with the existing residential and business communities."</i></p> <p>The findings of the SEA are supported. However, there is one possible negative impact related to the potential for negative impacts against the criteria to "conserve/ Enhance Biodiversity and Landscape" – whilst there may be some negative effects from development, it is considered that the need to provide mitigation and/or compensation, especially under the net biodiversity gain policy in the NPPF (and soon to be mandated in the Environment Bill) will ensure that effects relating to this criterion would be neutral to positive.</p> <p>CBC propose the North Crawley AAP as a mechanism to address any justifiable infrastructure needs of the Airport alongside meeting the other pressing planning and socio-economic needs of the Borough. TWG considers that there is a clear and proper planning case to allocate land to address the socio-economic needs of the Borough, but</p> |

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|          |            |              | <p>acknowledges that the proposed AAP offers a workable, though more protracted, mechanism by which these land use demands can be addressed.</p> <p>Notwithstanding concerns over the employment land requirement in Policy EC1, the approach by the Council to advance an AAP represents a step forward and is supported. However, given the urgent and critical need to redress the long-standing shortfall in economic infrastructure, evidence is presented in separate representation in support of an allocation at Gatwick Green.</p> <p><b>Interim controls over development in the AAP area</b><br/>                     Policy SD3 removes the blanket safeguarding and applies interim controls over development in the AAP area that might prejudice the provision of a second runway at Gatwick. These controls are more restrictive than those in Policy GAT2 and would apply until an AAP is adopted. There is no basis or reasoned justification for applying stricter controls over the former safeguarded area than those contained in Policy GAT2 of the adopted CBLP (2015). Adopted Policy GAT2 provided for “<i>minor development within this area, such as changes of use and small scale building works, such as residential extensions, will normally be acceptable. Where appropriate, planning permission may be granted on a temporary basis</i>”.</p> <p>By contrast, Policy SD3 states that “<i>only minor extensions to existing buildings will be permitted in the previously safeguarded area</i>”, so omitting any reference to change of use, small scale building works temporary uses and the flexibility offered by the previous wording. It is therefore considered that there is a reasonable basis to amend Policy SD3 to reflect the level of controls that were previously applied under adopted Policy GAT2.</p> |



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| REP/055                            | Savills on behalf of Wilky Group | SD3          | <p><b>Suggested Modifications:</b></p> <p><b>Conclusions</b></p> <p>Policy SD3 is supported in principle and is considered to be sound in terms of the tests at paragraph 35 of the NPPF. However, it is considered that the Policy is too restrictive in terms of its interim provisions for development control within the AAP area to be applied until such time as an AAP is adopted. These provisions should be amended via Minor Modifications such that they reflect those contained in adopted Policy GAT3:</p> <p>Therefore replace:<br/> <i>“Until the AAP is adopted only minor extensions to existing buildings will be permitted in the previously safeguarded area...”</i></p> <p>With:<br/> <i>“Until the AAP is adopted, minor development such as changes of use and small scale building works such as residential extensions, will normally be acceptable. Where appropriate, planning permission may be granted on a temporary basis.”</i></p> <p>These changes will ensure the policy maintains the same reasonable level of control over development with flexibility as to the types of development that may be acceptable in the former safeguarded area. This is considered to be a reasonable change that is consistent with the Council’s intentions (DCBLP para 3.22 refers) and that could be addressed via Minor Modifications.</p>                          |
| REP/069                            | Natural England                  | SD3          | <p>Dear Sir/Madam,</p> <p>Planning consultation: Submission draft Crawley Local Plan (Regulation 19)</p> <p>Thank you for your consultation on the above dated 20 January 2020 which was received by Natural England on 20 January 2020</p> <p>Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.</p> <p>Natural England has reviewed the Crawley Local Plan Regulation 19 and accompanying appendices together with the Habitats Regulations Assessment (HRA) and Sustainability Appraisal (SA). Please note that we have not provided comments on all policies but those that are within our remit. Natural England has no comment to make on the policies not covered in this response.</p> <p>We are pleased to see the inclusion of many of our previous comments included within the draft submission. In particular comments relating to Green Infrastructure, Biodiversity and Net Gain. We support the inclusion of the inclusion of a “Proposals involving the creation of dwellings will be required to at least meet the Building Regulations optional requirement for tighter water efficiency, and should, where feasible, achieve a more advanced target of 100</p> |

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|                                    |   |              | <p>litres/person/day. A tighter target of 80 litres/person/day should be met for significant, strategic scale developments. ” within Policy SDC3 Tackling Water Stress.</p> <p>We agree with the findings in the Sustainability Appraisal and Habitats Regulation Assessment.</p> <p>We have no further comments in relation to this submission.</p> <p><b>Suggested Modifications:</b></p>  |
| REP/044                            | Tim North & Associates on behalf of HX Properties Ltd | SD3          | <p>Draft Crawley Borough Local Plan Review 2020-2035 – Regulation 19 Consultation</p> <p>My clients, HX Properties Ltd, support the introduction of Policy SD3 in the Regulation 19 version of the Draft Crawley Borough Local Plan 2020-2035 (hereinafter referred to as the DCBLP) concerning the preparation of a North Crawley Area Action Plan (hereinafter referred to as North Crawley AAP) covering 613 ha of land lying to the north of the existing built up area of Crawley, between the town and London Gatwick Airport. In this regard, they consider that Policy SD3 to be positively prepared, justified, effective and consistent with national policy. It follows that my clients support the removal of a policy in the Regulation 19 version of the DCBLP relating specifically to “safeguarded land”. As your officers will appreciate, my clients raised representations to the Regulation 18 version of the DCBLP in which they expressed a number of concerns centred on the relationship between safeguarded land and employment land provision; the contribution safeguarded land makes in meeting future employment needs; policy formulation relating to safeguarded land, and implications arising from the Gatwick Airport Masterplan 2019. The same issues are as relevant today as they were in September of last year when the Regulation 18 representations on the DCBLP were submitted to your Authority.</p> <p>It is noted in this regard that work on the North Crawley AAP is to commence within three months of the adoption of the DCBLP, which is also fully supported by my clients. In addition, HX Properties Ltd, who are the freehold owners of land situated in the North Crawley AAP, are agreeable in principle either independently, or in conjunction with adjoining landowners, to promote the development potential of land in their ownership for employment generating purposes, and would wish this to be recorded as part of these representations.</p> <p>My clients recognise the contribution made by London Gatwick Airport to the local, regional and national economy, although this factor cannot be considered in isolation. An equally important consideration concerns the requirement for your Council to meet its future development needs over the Plan period as part of the Gatwick Diamond Initiative, and in particular the need to provide a new knowledge based airport-related business hub offering international business connectivity, as well as complying with the underlying objectives of the Coast to Capital Strategic Economic Plan and related Local Industrial Strategy. These future development needs have been, and will continue to be seriously constrained, unless mechanisms such as the North Crawley AAP is put in place to ensure these development needs are provided at the earliest opportunity.</p> |

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|                                    |            |              | <p>The operational needs of the Airport are not the sole determining factor contributing to the continued success of the town and its hinterland population. It is essential that economic development which to date has been constrained, affecting the future success of the local economy, is now to be properly considered through the North Crawley AAP, addressing a range of different needs for future growth, allowing the operational needs of the Airport to be properly considered, alongside any other uses identified through evidence gathering and consultation of the North Crawley AAP.</p> <p>The area covered by the proposed North Crawley AAP has, since 2003, been the subject of “safeguarded land” to accommodate the possible construction of an additional wide spaced runway and associated facilities supporting London Gatwick Airport. A combination of national and local policy considerations, together with the Green Paper entitled “Aviation 2050: The Future of Aviation”, has meant a fundamental change is required to be taken in making the best use of available land to accommodate your Council's future development needs.</p> <p>To date, the Green Paper which sets out draft Government aviation policy, requests airports to make the “<i>best use of their existing runway capacity subject to economic and environmental issues being addressed</i>”<sup>1</sup>. It is said in the same chapter that the Government is supportive of growth that is sustainable development, and will provide the necessary framework for this to happen. This will require a partnership approach between the Government, the regulator and “<i>industry, and other interested parties</i>” to ensure that necessary conditions are met in respect of infrastructure, community investment and environmental measures.</p> <p>The partnership for sustainable growth proposed by the Government is a long term policy objective, which will need to be flexible enough to respond to new information, developments and changing circumstances, in that it will apply to all airports and airline operators in the UK, although many policies would need to be tailored to local circumstances. For example, there could be different policies applied depending on whether an airport was continuing to grow within existing planning approvals, was bringing forward a new planning application to make the best use of existing runway, or in future was potentially seeking permission for a new runway.</p> <p>It can be seen that the timing of this proposed partnership for sustainable growth is totally uncertain. The need for additional runway capacity beyond 2030 is at present required to be proven, with suitable conditions met in respect of sustainability. It has been noted that GAL’s response to the Regulation 18 version of the DCBLP was to state that it considered it “absolutely crucial” that the draft Plan continues to safeguard land at Gatwick for possible development of a future runway to the south of the airport. At a time when GAL through its DCO application has unilaterally decided not to progress a new second runway; this comment is to place its long term needs above those of the local and wider</p> |

<sup>1</sup> Para 3.6 of the Green Paper “Aviation 2050: The Future of UK Aviation” and “Department of Transport (2018): Making Best Use of Existing Runways”

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|                                    |            |              | <p>regional community within the Gatwick Diamond, at the same time failing to properly recognise the full extent of those development needs required to be met over the next 16 year period.</p> <p>In addition, regard should be had to the recent Court of Appeal judgment dated 28<sup>th</sup> February 2020, which upheld the challenge made by Plan B Earth and Friends of the Earth Ltd to the North West Runway at London Heathrow Airport. This was on the basis that the Government, when it published the Airport National Policy Statement (hereinafter referred to as ANPS) had not taken into account the Government's firm policy commitment on climate change in the unincorporated international Paris Agreement.</p> <p>The consequences arising from this judgement comprise an important material consideration when considering the requirements of the Planning Act 2008, including applications seeking the use of existing or proposed runways at airports, and issues of increased passenger throughput and airport capacity matters. Above all, it will have an impact on the timing and extent of expansion of all regional airports in the UK, some of which, i.e. Stansted, are more readily capable of accommodating growth than others.</p> <p>In short, the ANPS was found by the Court of Appeal to be legally flawed, resulting in it having no legal effect unless and until the Secretary of State has undertaken a review of its provisions<sup>2</sup>. This will require amendments being made to the Strategic Environmental Assessment in accordance with the SEA Directive and SEA Regulations, along with consideration being given to the non-CO<sub>2</sub> climate impacts of aviation and the effect of emissions beyond 2050, the latter to be determined in accordance with the precautionary principle, in accordance with CJEU jurisprudence as set out in the "<i>Waddenzee</i>" case.</p> <p>The recent Court of Appeal judgment involving Plan B Earth and Friends of the Earth Ltd cannot fail to have an impact on GAL's intention to submit a DCO application to use the existing stand-by runway routinely together with the existing runway. GAL state that it "<i>is no longer actively pursuing plans for an additional runway</i>", in accordance with paragraph 5.4.1 of the Gatwick Airport Masterplan 2019. This comment cannot be divorced from the existing constrained opportunities for economic development in your Council's administrative area.</p> <p>The Northern West Sussex Employment Growth Assessment Update Report of January 2020 prepared by Lichfields, in conjunction with the advice in the NPPG, assessed three different forecasts for economic growth in Crawley. It focused on baseline job growth; continuation of past Class B development rates, and baseline labour supply, which produced a series of gross land requirements per scenario to 2036 of -1.1ha, 33ha and 113 ha respectively.</p> <p>In terms of Class B gross floorspace, the range extended from 10,360 sq.m. as part of the first scenario, to 143,990 sq.m. of gross floorspace as part of the continuation of Class B development rates, and 476,200 sq.m. based on the</p> |

<sup>2</sup> It is understood at the time of submitting these representations that Heathrow Airport Ltd intends to challenge this decision in the Supreme Court, but this is not the case concerning the Government.

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|                                    |            |              | <p>labour supply scenario. The baseline job growth scenario of -1.1 ha (10,360 sq.m gross floorspace) has not been pursued as it does not factor in the actual market trends in the Northern West Sussex Functional Market Area, and is therefore not an effective basis in planning for economic growth. Against these figures must be considered the impact of “<i>permitted development rights</i>” and the considerable loss of Class B1 (a) floorspace in Crawley to Class C3 residential uses.</p> <p>The 33 ha gross land requirement figure to 2036 has to be seen in context, namely that at present in accordance with your Council’s Employment Land Trajectory, the available land supply pipeline amounts to less than 12ha (62,394 sq.m. floorspace), resulting in an outstanding requirement of 22ha of business land or 81, 595 sq.m floorspace. The forecast of 476,200 sq.m. of gross floorspace to 2036 derived from the baseline labour supply scenario relies on Crawley’s uncapped housing needs figure of 752 dwelling per annum. This considerable quantity and quality of additional employment land can only be accommodated in the longer term on land to the north of Manor Royal and south of London Gatwick Airport, in one or more Strategic Employment Locations, on which the North Crawley AAP will no doubt focus its attention.</p> <p>These figures highlight the importance to be placed on adopting a new approach to what was previously referred to as “<i>safeguarded land</i>”, as it is considered that redevelopment and intensification of underutilised sites in Main Employment Areas for employment use will not have a significant role to play in future employment land provision. The contents of Table 8.14 of the Northern West Sussex EGA Update prepared by Lichfields reveals that based on past development rates, 29,920 sq.m. of new Class B1 (a) /B1(b) floorspace is required in Crawley Borough’ Council’s administrative area. It is understood that the challenge for your Authority is not one of quantitative office supply, but is a qualitative requirement, due to a lack of Grade A office floorspace, although this does not appear to have been fully accepted by local commercial agents.</p> <p>It appears to my clients that the Horley Business Park, situated in Reigate &amp; Banstead Borough Council’s administrative area which is the subject of Policy HOR9 in that Authority’s Development Management Plan covering the period up to 2027 is expected to cater predominantly for Class B1 (a) development to meet sub-regional as well as some local needs arising in the adjoining Authority.</p> <p>It follows that the intention to provide Grade A office accommodation in the Main Manor Royal Employment Area is to follow a similar policy objective to that relating to Horley Business Park, with no consideration given to the extent to which both sites are likely to meet future Class B1 (a) requirements. This is in spite of the fact that Policy HOR9 is unlikely to meet the longer term employment needs of the adjoining Authority.</p> <p><b>Suggested Modifications:</b></p> |

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|                                    |  |              | <p>In this way, it is considered important that the wider employment needs of the Gatwick Diamond Area are considered, particularly at a time when adjoining authorities, such as Mid Sussex District Council, are preparing a Site Allocations DPD which does not appear to meet the wider sub-regional growth intentions.</p> <p>I should be obliged if you could keep this company advised of events concerning the Crawley AAP.</p>   |
| REP/050                            | Montagu Evans on behalf of Homes England | SD3          | <p>Please find enclosed Homes England's representations to Crawley Borough Council's Local Plan Review 2020 – 2035 (Regulation 19).</p> <p>These representations relate to the promotion of Rowley Farm (the "Site") for employment uses across the various B Class uses. Homes England has engaged with previous plan-making stages, in responding to the Call for Sites and Regulation 18 consultation exercises. The representations are set out against the draft policies presented within the Draft Crawley Borough Local Plan 2020 – 2035 consultation version dated January 2020.</p> <p>Rowley Farm is designated as Gatwick Airport Safeguarding land under the current Local Plan, however the Plan explains that the Council are proposing to remove the safeguarding policy through the Local Plan Review and to allocate the land to meet development needs through a future Area Action Plan (AAP). Homes England note and support this strategy. These representations are made on the basis that the safeguarding designation is withdrawn.</p> <p><b>Context</b></p> <p>Homes England are an executive non-departmental public body, sponsored by the Ministry of Housing, Communities and Local Government. Homes England has the aspiration, influence, expertise and resources to drive positive market change. By releasing more land to developers who want to make a difference, Homes England are assisting in the delivery of the new homes England needs and is helping to improve neighbourhoods and grow communities. Homes England works in collaboration with partners who share our ambition. These include local authorities, private developers, housing associations, lenders and infrastructure providers.</p> <p>Within the next few years, Homes England will have invested over £27 billion across our programmes.</p> <p>Homes England's mission is to ensure more homes are built in areas of greatest need, to improve affordability.</p> <p>Homes England has a strong track record in acting as a 'master developer' on schemes such as the Northern Arc in Burgess Hill, Mid Sussex and Northstowe in Cambridgeshire. In the case of Burgess Hill, Homes England acquired the site, which had been identified as a location for major housing delivery for over 10 years but had stalled due to the complexities of land ownership and the need for upfront strategic infrastructure delivery. Homes England worked closely with Mid Sussex District Council, the landowners and the site promoter to acquire the land. At the Northern Arc, Homes England are investing in the required infrastructure to secure early release of the first phases of development. Homes England is deploying our knowledge and delivery expertise to ensure that the scheme comes forward to meet local ambitions.</p> |

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|   |                   |                     | <p>At West of Ifield, we will take a similar approach as the master developer to accelerate the delivery of key infrastructure to enable housing to be built out quickly. Furthermore, acting as a master developer will enable Homes England to maintain the design standards across the scheme from outset to completion as well as delivering significant social, economic and environmental benefits to the existing neighbourhoods of Crawley.</p> <p>Rowley Farm offers significant capacity for employment development across a range of B Class uses. This would complement the emerging proposals at West of Ifield by providing substantial employment opportunities for existing residents and the new resident population at West of Ifield. Additionally, strong transport links would come forward through the delivery of the Western Link. This would lead to sustainable patterns of development for the expansion of Crawley, which is explicitly encouraged by national planning policy.</p> <p>The NPPF (Paragraph 8) outlines that the role of the planning system is to actively manage patterns of growth so that “sufficient land of the right types is available in the right places and at the right time to support growth”. This approach is reinforced by wider Government policy, as set out in the UK Industrial Strategy and Clean Growth Strategy, which collectively seek to promote development that boosts economic growth and productivity, whilst transitioning a low carbon future. Development at Rowley Farm and West of Ifield would support these Government priorities.</p> <p><b>Land at Rowley Farm</b></p> <p>The Site measures 51.05 hectares and comprises part of an agricultural holding known as Rowley Farm. Homes England is the freehold owner of the Site. The Site is located immediately south of Gatwick Airport and abuts the Manor Royal employment area to the east and south. The extent of the Site is outlined in red on the attached plan. It is strategically located relative to the M23 and Gatwick Airport.</p> <p>There are a number of trees across the Site which are primarily located along field margins. There are two established areas of woodland, Huntsgreen Wood in the north east corner and Rowley Wood in the southwest. Both of these are designated as Ancient Woodland with the latter also a Site of Importance for Nature Conservation.</p> <p>The Site contains two listed buildings, namely Rowley Farmhouse (Grade II*) and Crown Post Barn (Grade II). All land with the exception of the immediate areas adjacent to Crawter’s Brook is within Flood Zone 1.</p> <p>The Site can be accessed via either London Road to the north or James Watt Way to the south and there is potential to access the site from Gatwick Road.</p> |
|   |                   |                     | <p><b>Gatwick Safeguarding Land</b></p> <p>As noted above, the Site is designated under Strategic Policy SD3 of the adopted Local Plan as Gatwick Airport Safeguarding land as part of a strategic parcel of land south, east and west of Gatwick Airport. This land has historically been identified to accommodate a second runway to support the growth of the airport if required. In the Regulation 19 version of the Plan the Site is proposed for de-designation under draft Policy SD3.</p>   |

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|                                    |            |              | <p>In June 2018, the Government voted in favour of expanding Heathrow Airport for a third runway. This is manifest in the Airports National Policy Statement (2018), which explains that Heathrow's expansion was chosen as it is "is considered to deliver the greatest net benefits to the UK" when compared to the Gatwick proposal (Para 3.74). It is within the context of the Government's decision to expand Heathrow Airport that the draft Crawley Local Plan Review seeks to remove the safeguarding under draft Policy SD3.</p> <p>Whilst Homes England has no comment on the principle of safeguarding itself, plainly land cannot be safeguarded in perpetuity by planning policy without evidential basis, and particularly so when current evidence suggests this designation is no longer required. On the basis that the Council considers insufficient evidence exists to justify the continued safeguarding of the land, in full or in part, alongside wider development as part of the future North Crawley AAP, then it is considered that this approach could be considered sound in line with the requirements of the NPPF. We remind the Council that the NPPF, under Paragraph 104c, requires a robust evidence base to be in place to realise opportunities for large scale development. We recommend that the Council strengthens its evidence base prior to Examination of the Local Plan so that this is demonstrated. This should be achieved through further discussions with Gatwick Airport Limited, but also by developing its assessment of development needs through the Northern West Sussex Economic Growth Assessment (NWSEGA), Employment and Housing Growth Trajectory and Strategic Housing Land Availability Assessment.</p> <p>It is also understood that the Airport is to submit a DCO to promote an extension to its northern runway. This is set out in the Gatwick Airport Limited masterplan1. Homes England supports this approach to enable the airport to expand, but this also serves as a strong indicator that the safeguarded land south of London Road can be released for development. The policy approach taken is a logical one in ensuring the Plan is justified.</p> <p><b>Preparation of an AAP</b></p> <p>Homes England supports the Council's intention to prepare a future AAP, which will enable the Council to set out its vision for how the Site can come for development and allocate strategic sites for employment and other uses. This will balance the expansion needs of the airport alongside wider development needs. This will also provide Gatwick Airport the opportunity to prepare its own evidence of growth needs and future operational requirements.</p> <p>The future AAP will assess the most appropriate, sustainable locations to accommodate this growth in a comprehensive manner, in ensuring new development is ambitious, appropriate and sustainable. The growth of Manor Royal at Rowley Farm can support the existing employment area, attract major employers and occupiers and help deliver on wider economic objectives.</p> <p>Expanding the well-establish employment base at Manor Royal, the Council's most strategically important employment site, will support growth in growing sectors nationally. This will offer a competitive advantage to Manor Royal and</p> |

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|                                    |            |              | <p>enable the Council to realise housing potential by releasing capacity on brownfield land for housing in Crawley town centre and other parts of the Borough which are sustainably located.</p> <p>The AAP must be developed in partnership between the Council, Homes England and all other landowners within the safeguarded land to ensure that economic and infrastructure growth is delivered in a comprehensive manner.</p> <p><b>General Suitability of Rowley Farm</b></p> <p>The Rowley Farm site is inherently suitable for a strategic employment development. It is sustainably located adjacent to Manor Royal employment area and would be a logical extension to the business hub. It would be likely to attract substantial market interest by developers were it to come forward following a successful allocation, building on synergies with the airport and wider Gatwick Diamond.</p> <p>Homes England has completed an initial employment capacity assessment to identify how many jobs could be delivered on the Site in the future. This has been calculated using the Council's own evidence for floorspace and land requirements within the NWSEGA. At this stage, it is envisaged that the development could achieve circa 5,000 jobs based on Homes England's understanding of land use, market demand and the Site's capacity.</p> <p>This demonstrates that the Site can provide a substantial quantum of employment development as a strategic scale extension to Manor Royal. The direct employment generation is significant, which would also present vast additional numbers of jobs in construction and associated employment. The case for the Site's future allocation and development for employment use is compelling.</p> <p>Rowley Farm is uniquely located directly adjacent to Manor Royal. The expansion of the Borough's strategic employment site at Rowley Farm would build upon the already well established employment base and would be very attractive for investment and securing occupiers. Development at Rowley Farm would also be able to utilise the utilities and telecommunications infrastructure that is in place at Gatwick Farm, including the established transport links available at Gatwick Airport including its train station. As a result development would be delivered more quickly than at other locations in the Borough.</p> <p>The Site could also be developed in a phased manner alongside the delivery of the link road promoted under Policy ST4 and proactively support the priority of the Council and that set out within the Draft Local Plan which seeks to build on the success of the existing employment area of Manor Royal.</p> <p>There are no known, unresolvable constraints to delivery that would prevent the redevelopment of Rowley Farm coming forward. It is acknowledged that the site is leased to an agricultural tenant under the Agricultural Holdings Act 1986. Based on the terms of the lease with the tenant, the landlord has the opportunity to expire the lease at short notice. This can be done on all or part of the land, for example if only part of the land were to benefit from planning permission in the future. The remainder of the land could be retained for agricultural purposes.</p> |

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|   |  |                     | Detailed technical and environmental assessments will be undertaken in due course to ensure that sufficient evidence is provided to underpin the allocation of the Site in the AAP. This will ensure the allocation is sound and based on proportionate evidence as sought by the NPPF.  |
| REP/050                                   | Montagu Evans on behalf of Homes England | SD3                 | <p><b>CRAWLEY BOROUGH COUNCIL LOCAL PLAN REVIEW REGULATION 19</b></p> <p>Please find enclosed representations to Crawley Borough Council's (CBC) Draft Local Plan Review 2020 – 2035 (Regulation 19). We are responding in our capacity as the Government's housing accelerator and as a major landowner / promoter with land interests within and adjoining the Borough boundary.</p> <p>Homes England are an executive non-departmental public body, sponsored by the Ministry of Housing, Communities and Local Government. Homes England has the aspiration, influence, expertise and resources to drive positive market change. By releasing more land to developers who want to make a difference, Homes England are assisting in the delivery of the new homes England needs and is helping to improve neighbourhoods and grow communities. Homes England works in collaboration with partners who share our ambition. These include local authorities, private developers, housing associations, lenders and infrastructure providers. Within the next few years, Homes England will have invested over £27 billion across our programmes.</p> <p>Homes England's mission is to ensure more homes are built in areas of greatest need, to improve affordability. Homes England has a strong track record in acting as a 'master developer' on schemes such as the Northern Arc in Burgess Hill, Mid Sussex and Northstowe in Cambridgeshire. In the case of Burgess Hill, Homes England acquired the site, which had been identified as a location for major housing delivery for over 10 years but had stalled due to the complexities of land ownership and the need for upfront strategic infrastructure delivery. Homes England worked closely with Mid Sussex District Council, the landowners and the site promoter to acquire the land. At the Northern Arc, Homes England are investing in the required infrastructure to secure early release of the first phases of development. Homes England is deploying our knowledge and delivery expertise to ensure that the scheme comes forward to meet local ambitions.</p> <p><b>Purpose of Representations</b></p> <p>Pursuant to Regulation 19 of Town and Country Planning Act (Local Planning) (England) Regulations 2012 these representations are made in respect of the Draft Local Plan to confirm our position in respect of the land interests described within this representation. Homes England also confirms herewith that it wishes in due course to participate in the relevant sessions of the public examination of the Draft Local Plan.</p> <p>The content of this representation therefore sets out our position of support or objection to proposed policies. Where we propose amendments, these are made to ensure that the CBC Draft Local Plan fully meets the soundness test as</p> |

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|                                    |            |              | <p>set out in the National Planning Policy Framework (NPPF) (paragraph 35) therefore ensuring that the Draft Local Plan is positively prepared, justified, effective and consistent with national policy.</p> <p><b>Documents Reviewed</b><br/>           In reaching the conclusions set out in this representation, we have reviewed the following Regulation 19 published consultation documents:</p> <ul style="list-style-type: none"> <li>• Crawley 2035: Draft Crawley Borough Local Plan 2020 – 2035 (January 2020);</li> <li>• Crawley 2035: Local Plan Map;</li> <li>• Sustainability Appraisal/Strategic Environment Assessment Draft Report (January 2020);</li> <li>• Habitats Regulations Assessment Screening Report (January 2020);</li> <li>• Consultation Statement (Draft January 2020) and Appendices;</li> <li>• Infrastructure Plan (January 2020);</li> <li>• Northern West Sussex Strategic Housing Market Assessment Final Report (November 2019);</li> <li>• Strategic Housing Land Availability Assessment (January 2020); and</li> <li>• Retail, Commercial Leisure and Town Centre Neighbourhood Needs Assessment (January 2020) and Appendices.</li> </ul> <p>In addition, we remain cognisant of the wider Draft Local Plan review evidence base and our representations made previously under Regulation 18 (July – September 2019).</p> <p><b>Homes England Land Interests</b><br/>           Homes England own key sites which fall within the CBC Local Plan area. These landholdings comprise Land West of Ifield, Land at Rowley Farm, Land at Forge Wood and Land at Tinsley Lane.<br/> <b>These representations are written only in regard to Land West of Ifield and therefore other landholdings are not described. Separate representations have been submitted where necessary.</b></p> <p><b>Land West of Ifield</b><br/>           This site comprises a specific priority for 2018-2020 in Homes England's Strategic Plan 2018/19<sup>3</sup>. The objective is to progress the promotion of Land West of Ifield as a strategic growth area for a minimum of 3,250 new homes as part of a comprehensive approach to masterplanning and placemaking. This is alongside a published commitment to begin major infrastructure work and commence construction of the first homes on the site by 2022/23. This position has been established following collaborative work that dates back to 2008 and a long history of joint discussion with CBC,</p> |

<sup>3</sup> <https://www.gov.uk/government/publications/homes-england-strategic-plan-201819-to-202223>

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|                                    |            |              | <p>Horsham District Council (<b>HDC</b>) and West Sussex County Council (<b>WSSC</b>) with the intention to bring forward a sustainable new community in line with the principles of the Garden Communities prospectus<sup>4</sup>.</p> <p>The Land West of Ifield site primarily comprises arable and pasture fields bounded by hedgerows and mature trees together with Ifield golf course. Some isolated mature trees are present within some of the fields.</p> <p>All the land being proposed for development is located within Horsham District, but a small portion of the wider site under Homes England's ownership lies within Crawley Borough (Ifield Brook Meadows Local Wildlife Site and Local Green Space).</p> <p>For clarity and through this representation, Land West of Ifield is referred to as the site as shown as SA101 in the HDC Regulation 18 Local Plan. This site is under the control of Homes England.</p> <p>At Land West of Ifield, Homes England will act as a master developer with the aim of seeking to accelerate the delivery of key infrastructure to facilitate housing delivery in an efficient and effective manner. Furthermore, acting as a master developer will enable Homes England to maintain the highest design standards across the scheme through the construction process as well as delivering significant social, economic and environmental benefits to the existing neighbourhoods of Crawley.</p> <p><b>Wider Strategic Opportunity – Land West of Crawley Garden Town</b></p> <p>Land West of Ifield is ideally located to make a significant contribution to the housing needs for Horsham and Crawley and Homes England are therefore in the process of exploring the potential for a wider strategic opportunity for an exemplar Garden Town West of Crawley that would be developed in partnership with CBC, HDC and WSSC.</p> <p>We will utilise our expertise developed through the current Garden Communities programme that supports 23 locations and envisages the delivery of over 200,000 homes by the middle of this century. Homes England want to champion and support ambitious councils who see Garden Communities as a central to their plans for housing and growth.</p> <p>A definitive boundary for the Wider Strategic Opportunity is yet to be determined, and a broad area of search is being considered. This comprises land located north of the A264 from Faygate in the west and extends in an arc north west towards Crawley, Gatwick Airport and the A23. To the east, the site adjoins the neighbourhood of Ifield, in Crawley and Gatwick Airport is to the north, both of which are key urban influences in this area. Although adjacent to the busy road network, the area is predominantly rural in character.</p> <p>The objective of the work related to the wider strategic opportunity is to explore the potential for approximately 10,000 residential dwellings, 10,000 jobs, and a range of infrastructure requirements that will meet the Strategic Housing Market Assessment requirements over more than one Local Plan period.</p> |

<sup>4</sup> Published 4 June 2019 by the Ministry of Housing, Communities and Local Government <https://www.gov.uk/government/publications/garden-communities>

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|                                    |            |              | <p>Part of this area of search is identified as 'Land West of Crawley' under the HDC Draft Local Plan Regulation 18 Consultation. This comprises HDC's Strategic Housing and Employment Land Availability Assessment sites SA101 and SA291 – Land West of Kilnwood Vale. Further land within the area of search is being promoted for housing development to the west of Kilnwood Vale, where the development of a new neighbourhood is already underway, through a positive joint planning approach between CBC and HDC.</p> <p>This wider growth opportunity will span future Local Plans and it is envisaged that it will be brought forward collaboratively with HDC and the other key stakeholders.</p> <p>At this stage, Homes England are exploring under the HDC Regulation 18 Draft Local Plan review appropriate delivery mechanisms but expect to strongly recommend that in order to provide long term certainty to housing delivery across plan periods together with the ability to realise the benefits of the wider strategic opportunity West of Crawley that land is safeguarded for future development beyond the Site Allocations identified in the HDC Regulation 18 Local Plan.</p> <p><b>Benefits of a Wider Strategic Opportunity</b></p> <p>Homes England has identified the potential for a wider strategic opportunity to be brought forward as part of Government's Garden Communities programme<sup>3</sup>. The benefits of exploring delivery of this wider strategic opportunity include:</p> <ul style="list-style-type: none"> <li>• The opportunity to meet long term housing need in a policy compliant, comprehensively planned and sustainable manner – providing clarity around how long-term housing needs for both Horsham and Crawley (in line with the duty-to-cooperate) could be met, integrating with existing communities alongside the delivery of new infrastructure as part of a long-term comprehensive strategy.</li> <li>• The opportunity to protect areas not suitable for development – providing high quality green space that safeguards natural habitats, provides accessible amenity spaces, achieves biodiversity net gain and ensures long-term defensible boundaries and protection against piecemeal development. This will also ensure that development can be planned sustainably with flood risk from all sources mitigated in order to protect current and future users of development and ensure that development does not increase flood risk elsewhere.</li> <li>• Supporting significant investment in multi modal transport infrastructure – supporting the case for significant long-term investment, promoting the use of modern sustainable transport methods and safeguarding the opportunity to adapt to a low carbon future.</li> <li>• Enabling a comprehensive approach to masterplanning and placemaking with early public sector investment enhancing the ability to create high quality, well planned places for the future in line with the objectives of the Building better, Building Beautiful<sup>4</sup> agenda.</li> <li>• The potential for the site to provide significant employment opportunities.</li> </ul> |

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|                                    |            |              | <ul style="list-style-type: none"> <li>• A commitment to new schools, health facilities and other community facilities as part of accessible neighbourhood centres.</li> <li>• Homes England are committed to engaging the community in the design and planning process throughout the project and have undertaken initial consultation through a series of public exhibitions in venues around Crawley and Horsham through January 2020. This consultation focused on public engagement, seeking to appreciate and understand local issues and aspirations for the site. The events were well attended with a total of 726 members of the community visiting over the eight days. 251 feedback forms were received from the exhibitions; in addition to 305 online forms were completed. Engagement will continue with further events scheduled for later in 2020 to test design ideas and concepts. Further information regarding these events will be found online<sup>5</sup> and Homes England will be seeking to publish comprehensive feedback in due course ahead of initial masterplanning.</li> </ul>   |
|                                    |            |              | <p><b>Suggested Modifications:</b></p> <p><b>Publication Consultation Draft: Regulation 19: Homes England Representations</b></p> <p><b>Strategic Policy SD3: North Crawley Area Action Plan</b></p> <p>Homes England welcome the insertion of Strategic Policy SD3: North Crawley AAP and concur with the Council that, at this stage, there is no robust evidence that justifies the continued safeguarding of land for Gatwick Airport expansion. This follows Gatwick Airport Limited (GAL) having confirmed (29th August 2019)<sup>6</sup> the process is now underway for the submission of a Development Consent Order seeking permission to bring its northern runway alongside the main runway by the mid-2020s.</p> <p>In light of evidence available, Homes England agree that the AAP will allow for a pragmatic approach that enables the safeguarding position to be considered first through this Local Plan, with greater time then allowed for the for the growth needs of the Airport to be demonstrated by GAL. The future protection of any land for airport purposes can then be justified alongside consideration of growth potential of the borough in a less constrained scenario and against other development needs as part of the work on the AAP.</p> <p>Homes England note the intentions to commence work on the AAP within three months of adoption of the Local Plan and request to be notified at the earliest possible stages to ensure this process can be supported appropriately.</p> <p>Homes England accept and acknowledge that the Local Plan proposals at this stage will continue to apply the same protections of the previous safeguarding policy to the area identified in the Gatwick Airport Masterplan 2019 until the AAP is eventually adopted.</p> <p><b>Land at Rowley Farm</b></p> <p>In connection with proposed intent to prepare an AAP, Homes England wish to reiterate our consideration that Land at Rowley Farm which is located immediately to the south of Gatwick Airport and abuts the Manor Royal employment</p> |

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|                                    |                            |              | <p>area to the east and south should be considered as a logical extension of the Manor Royal Employment Area (Draft Local Plan Policy EC3) under this AAP process.</p> <p>The justified release of this land from safeguarding through the AAP will provide a significant opportunity to support CBC in meeting development needs within the Borough's boundaries and, as set out in the Economic Growth Chapter, would directly support Policy EC1 which sets the approach to planning for employment needs and references the market preference for this with the Crawley/Gatwick area.</p> <p>Development of the site for Employment use would assist the support and growth of the Gatwick Diamond and contribute to its future success. The importance of the Crawley/Gatwick area to the economic development strategy is acknowledged in the Draft Local Plan where it states at paragraph 9.2 that it <i>"To promote the continued prosperity of the Gatwick Diamond and plan for its future growth, a Gatwick Diamond Local Strategic Statement has been prepared on a joint basis and endorsed by the two county councils and six local authorities covered by the area. The Statement sets out a commitment among local authorities to work together to promote the economic function of the Gatwick Diamond, recognising the strength of Crawley/Gatwick as a business location"</i></p> <p>The site would also strengthen the strategic importance of The Coast to Capital LEP and the Gatwick 360* Strategic Economic Plan to deliver eight economic priorities, one of which seeks to develop business infrastructure and support. There is already a known demand for new, high-quality business space and the site would create a logical extension to Manor Royal, providing the ideal opportunity to encourage further economic growth building on existing infrastructure allowing the cluster of economic activity to grow.</p> <p>Homes England confirms that the Land at Rowley Farm is available for development in the short term and would be confident in demonstrating its complimentary relationship to development potential of Land at West of Ifield. We would also be confident demonstrating compliance with other relevant policies such as Strategic Policy CL8: Development Outside the Built-Up Area which records <i>the area within the Upper Mole Farmlands Rural Fringe where proposals must not create, or are able to adequately mitigate, visual/noise intrusion will be generally supported.</i> The draft policy recognises that this area has an <i>important role in maintaining the separation of the distinct identity of Gatwick Airport from Crawley and the valuable recreational links from the northern neighbourhoods of Crawley into the countryside.</i> Homes England are confident development of Rowley Farm would meet such requirements and Homes England expect to support justification of this under the processes committed to under Policy SD3 and development of the AAP.</p> |
| REP/052                            | Tandridge District Council | SD3          | <p>Thank you for giving us the opportunity to comment on your Draft Crawley Borough Local Plan 2020-2035. We have the following comments to make.</p> <p>It is noted that against the Standard Methodology you have a housing need of 11, 280 (752 dpa) but that the draft Local Plan is proposing provision of 5,355 dwellings, with the majority provided in the first 5 years of the Local Plan</p>  |

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|                                    |            |              | <p>through Forge Wood and the Town Centre. However, it is noted that there remains an unmet need of 5,925 over the plan period and that Crawley will be looking to the adjoining authorities to help meet this need, albeit primarily those within the same HMA, which Tandridge does not fall within.</p> <p>Similar to Crawley, Tandridge is also a heavily constrained district and given those constraints it is unable to meet its identified need. Our Spatial Strategy proposes 6,056 dwellings to 2033, leaving us with an unmet need of 3, 344. Our Local Plan 2013-2033, which is being assessed against the NPPF 2012, is currently going through the examination process and we are waiting on the Inspector's response following the hearings last year.</p> <p>Tandridge notes that the draft Local Plan proposes a North Crawley Area Action Plan, which will assess the land between Gatwick Airport and the town to determine the most appropriate use of the land. This will include consideration of the future growth and operational needs of the airport and the development needs of Crawley, including economic and housing development needs. It is understood that this work could conclude that this land still needs to be safeguarded but also that it may conclude that some land is available to meet housing and/or employment need. However, it is understood that the first step will be to understand the expansion needs of the airport, followed by an understanding of noise contours to be applied in the future, and the need to create an access.</p> <p>Some of this land abuts our administrative area and as such there could be implications for our residents and our infrastructure. We already have concerns about the significant growth in the use of Gatwick Airport and its associated surface access arrangements and the consequential impact on our highway infrastructure. We also have concerns that the development of the North Crawley Area Action Plan area could have significant implications for the highway network within our district. In terms of transport modelling we would expect that regard is had to the cumulative impact of proposed development within nearby authority areas, including our proposed Garden Community at South Godstone and our proposed site allocations, particularly around Smallfield. We would also recommend that your Highway Authority works together with Surrey County Council, as our County Highway Authority, in order to ensure the impact is adequately assessed.</p> <p>We therefore have concerns about the impact upon infrastructure, primarily around transport, but including such things as the treatment of waste water. As such Tandridge would like to be involved in any future consultations in relation to the Local Plan and the proposed AAP.</p> |
| REP/053                            | Quod       | SD3          | <p><b>Gatwick Airport Safeguarding and North Crawley AAP</b></p> <p>The NPPF states that planning policies should “<i>identify and protect, where there is robust evidence, sites and routes which could be critical in developing infrastructure to widen transport choice and realise opportunities for large scale development</i>” (paragraph 101, our emphasis).</p> <p>The Draft Local Plan states that since 2003, Crawley Borough Council (“CBC”) has been required by</p>   |

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|                                    |            |              | <p>Government policy to safeguard land from development in order to accommodate the possible construction of an additional wide spaced runway and associated facilities. This has placed significant constraint on the ability of Crawley to meet its development needs.</p> <p>However, in line with our representations to the Regulation 18 Draft Local Plan, it is noted that the Council accept that 'robust evidence' does not exist to maintain the safeguarding for a second runway and draft Policy GAT2 (Safeguarded Land) has been deleted.</p> <p>Paragraph 3.20 of the Draft Local Plan states:<br/> <i>"The council does not consider there is, at this time, robust evidence to justify the continued safeguarding of land for a further runway at Gatwick, and in light of the other significant needs arising which this land could support, commits to commencing work on an AAP to determine the most appropriate use of this land for future development needs rather than just protecting an extensive area for one use."</i> (our emphasis)</p> <p>There is no evidenced need or policy case for the safeguarding of a second wide spaced runway at Gatwick Airport. Furthermore, Gatwick Airport has itself confirmed in their 2019 Masterplan that they are no longer pursuing an additional wide-spaced runway (the purpose behind the previous safeguarding) and are instead pursuing a DCO application to make optimum use of the existing runway as well as the standby runway.</p> <p>As a result of the removal of Draft GAT2, Draft Policy SD3 identifies that land to the north of Crawley and south and east of Gatwick Airport (which includes the Site) is to be subject to the preparation of the NCAAP.</p> <p>Paragraphs 3.21 and 3.22 state:<br/> <i>"The commitment to producing an AAP for this area presents opportunities to support the growth of airport if this can be justified with robust evidence of need, as well as delivering other requirements. The AAP approach, rather than identifying allocations in this Local Plan, is considered to be pragmatic. It allows for the principle of lifting safeguarding to be considered first, through this Local Plan, and then allows greater time for the growth needs of the Airport to be demonstrated by the airport operator and any future protection of some or all of the land for airport purposes to be justified alongside other development needs as part of the work on the AAP.</i></p> <p><i>On this basis, this Local Plan still needs to apply the same protections of the previous safeguarding policy to the area identified in the Gatwick Airport Masterplan 2019 until the AAP is finally adopted. This recognises that, if there is evidenced need for a future southern runway at Gatwick, this is the only location it could be delivered. Therefore, the amended previously safeguarded area identified on the Local Plan Map will be protected against incompatible development which would add constraints, add costs, or increase the complexity of the development of an additional runway. The Airport Operator will continue to be consulted on all applications within this area. Also, as the work on the AAP may still conclude there is a need to safeguard land for a potential southern runway, it is important to ensure that, until the AAP is adopted, noise sensitive development is not located in an area which could become unacceptably noisy in the future due to air traffic movements from a southern runway."</i> (Our emphasis).</p> |

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|                                    |            |              | <p><b>Market Overview</b></p> <p><b>1.1. National</b></p> <p>Despite the absence of any clarity on the UK's future trading relationships with the EU and elsewhere the occupier market continued to perform well throughout 2019. Take-up reached c.29m sq ft and whilst it was down c.10% on 2018, it was the third best year ever recorded.</p> <p>The most active occupiers in 2019 were third-party logistics providers (3PLs), who accounted for nearly 9m sq ft of take-up, c.30% of the market. This is no surprise as nervous retailers find it easier to commit to pallet positions in the short term versus a direct lease.</p> <p>H2 2019 witnessed some significant larger voids removed from the supply statistics, notably: -</p> <ul style="list-style-type: none"> <li>• Centric341, Andover (341,000 sq ft) let to Westcoast Holdings</li> <li>• M6DC, Cannock (375,000 sq ft) let to Super Smart Services</li> <li>• Unit 1, Imperial Park, Coventry (340,000 sq ft) let to US toy retailer Funko</li> <li>• Thurrock 162, West Thurrock (162,000 sq ft) let to London City Bonds</li> </ul> <p>Nearly 9.5m sq ft of speculative space was delivered into the market in 2019 and a further 4.3m sq ft is set to complete before the end of February 2020. Of that 4.3m sq ft, there are three 500,000-plus sq ft units; IM Properties at Hinckley (532,500 sq ft), Prologis at DIRFT (535,000 sq ft) and Panattoni at EMDC Castle Donnington (525,000 sq ft). Already in 2020, we have seen the letting of Haydock 525, a speculatively developed 525,000 sq ft warehouse let to Kellogg's and also The Range acquiring the former Poundland unit, Wakefield, c.546,000 sq ft. In addition to those transactions several large-scale buildings have been placed under offer. Amazon are under offer at Nottingham 550, 550,000 sq ft and Hinckley 532, 532,000 sq ft. They are looking closely at Bedford 405, 405,000 sq ft and therefore they could account for another c.1.5m sq ft of take-up in Q1 '20. Also, Mountpark Bardon have exchanged with Countryside for a pre-let of c.300,000 sq ft and IM Properties are under offer at Appleby Magna to fund JLR's 2.97m sq ft campus scheme, which will significantly boost 2020 take-up figures.</p> <p>As a result of the wave of speculative development hitting the market in 2019, supply has increased over 12% since the end of 2018. Whilst the level of anticipated development has slowed for 2020, compared to 2018 and 2019, the increased level of supply is, in the short-term, likely to result in a slowing of rental growth. The East Midlands has the most notable increase in supply, however areas such as Greater London and the South East still have significant supply constraints.</p> <p>The market has witnessed an upturn in sentiment following the result of the General Election. The clarity provided has enabled occupiers to more accurately business plan. As a result, we have witnessed business activating requirements which has seen enquiry levels and inspection numbers increase, which should translate into an increase in take-up.</p> |

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|                                    |            |              | <p><b>1.2. Crawley</b></p> <p>According to Co-Star figures the Crawley industrial / warehouse market has accommodation totalling approximately 6.9m sq ft. Average take-up during 2012-2018 was 289,000 sq ft per annum, or 72,250 sq ft per quarter. These figures are off the backdrop of the area having no available land holdings that can accommodate facilities in excess of 75,000 sq ft. Since then St Modwen Park, Gatwick, a 10-acre site and the first opportunity that has been able to satisfy larger scale facilities, has already secured a 100,000 sq ft warehouse pre-let with Gatwick Airport.</p> <p>There have been other notable transactions on speculatively developed accommodation in Crawley, as follows: -</p> <ul style="list-style-type: none"> <li>• Unit 3, Space Gatwick - A new build 37,400 sq ft unit has recently been let to Amazon, to be utilised as a last mile delivery facility. This represents a new operation for the area. In addition, Unit 2, c.47,400 sq ft unit is also under offer. This would see the scheme full occupied.</li> <li>• Unit 5, North Gatwick Gate - A new build c.50,000 sq ft was let on practical completion to Brymac. They were already based in Crawley and have expanded and upgraded their accommodation.</li> <li>• Unit 1 Centron – New build, semi-detached unit was let to MEL Components in the Summer, at a rent reflecting £13.75 psf, exc.</li> </ul> <p>Demand for Crawley warehouse accommodation is generated by several sources: -</p> <ul style="list-style-type: none"> <li>• Communication links, M23 and M25</li> <li>• Access and ability to service southern Home Counties and South London</li> <li>• Critical mass of existing businesses</li> <li>• Gatwick Airport</li> </ul> <p>Increased demand is being witnessed from occupiers currently based within Greater London. Since 2001 London has lost more than 1,310 hectares (3,237 acres) of industrial land, mostly for housing redevelopment. The loss was most significant during the period 2010-2015, when c.40% occurred. In 2015 the southern sub-region had 1,202 ha of industrial land, however since 2006, the South of London region, inc Croydon, has lost 7% of its industrial land. The southern region, on current trends is forecasted to lose another 23 hectares (57 acres) by 2041. A significant proportion is due to be lost from Croydon Borough and given the direct transport links with Crawley this is likely to have an impact on the local market. We anticipate the market will continue to witness increased demand from businesses currently based in South London due to the loss of employment land and accommodation.</p> <p>Additional demand from South London is being generated by the increase in occupational costs, in particular rents. New build accommodation in Croydon is attracting rents of c.£16 psf, exc, consequently Crawley has been viewed as a more cost-effective location.</p> |

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|                                    |            |              | <p>We anticipate the trend of losing employment land, particularly in metropolitan areas, will continue to exert pressure on those existing holdings. Very few parcels of 'new' land are being opened up for employment uses. Most new schemes represent a redevelopment / upgrade of older, tired, obsolete employment stock, no longer suitable for modern occupiers' requirements. The consequence is these have minimal impact on the total supply of accommodation. We consider being able to promote 'new' land such as the subject site will assist in redressing the loss of employment land and release some of pressure on the supply of existing land and buildings.</p> <p>Internet retailing is and will continue to have significant impact on the Crawley market, as it has with other similar towns. More occupiers, both end users and third-party logistics / parcel delivery companies, require 'last touch' facilities in close proximity to their customer base. Crawley is already witnessing demand for such facilities. Amazon, DHL and DPD have taken 'traditional' in the units in Crawley but all require bespoke facilities of c.50,000 – 100,000 sq ft, in the next few years.</p> <p>Crawley has a strong presence of existing warehouse / industrial occupiers that will, over time, generate demand. This demand can be created by either a need to up or down-size, or because they require to upgrade / modernise their facilities. The majority of Crawley accommodation is over 20 / 30 years old. Modern day operations have changed, and most businesses require improved, more efficient facilities. Unit design has therefore evolved to accommodate occupiers' requirements. The improvements in unit design / specification primarily relate to better yard / circulation areas, increased eaves height and improved loading doors provisions. Increased eaves heights and a unit's cubic capacity is particularly pertinent given the increase in occupational costs. More occupiers are looking towards properties that can accommodate either high level racking systems or mezzanine floors, improving units' cost effectiveness.</p> <p>Crawley benefits from businesses servicing Gatwick Airport, notably Virgin Atlantic, Gate Gourmet (airline catering) and flight simulator occupiers such as Oxford Aviation Academy and CAE. Whilst Gatwick Airport is the UK's second busiest airport, handling over 46m passengers last year, in relation to cargo volumes it only the UK's 4th busiest, behind Heathrow, East Midlands and Stansted airports. Many of the cargo / freight operators base themselves at Heathrow and trunk goods to Gatwick via the road network. Crawley therefore isn't a dependant on the airport as locations such as Heathrow.</p> <p>At the end of H1 '19, vacancy only reflected 309,000 sq ft, which represents approx. 4.5% of all stock and approximately 1 year's supply.</p> <p>The following schemes completed in H2 '19: -</p> <ul style="list-style-type: none"> <li>• North Gatwick Gateway – Consists of 5 units, totalling 168,700 sq ft. One unit of c.50,000 sq ft has already been let, therefore available units' range in size from 20,600 – 41,500 sq ft, total c.120,000 sq ft and are available on new FRI leases, quoting £13.75 psf, exc.</li> </ul> |

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|                                    |            |              | <p>• Gatwick 33 – The detached, new build unit extends to c.33,250 sq ft and is situated in close proximity to the subject site. The unit benefits from frontage on to the A23, London Road and consequently they are targeting occupiers that will benefit from the visibility. Quoting rent £15 psf, exc.</p> <p>In addition to those completions highlighted at St Modwen Park Gatwick the business plan is to speculatively develop a unit of c.83,000 sq ft which will be ready for occupation in Q4 '20. We anticipate this will attract strong occupier interest as the market has been starved of available units in excess of 75,000 sq ft. We are aware they are in discussions with several parties including DHL.</p> <p>The Crawley market witnessed several schemes achieving practical completion during 2018 / 19 and the majority provided units from 20,000 – 50,000 sq ft. In the short term this did create a slight over-supply of accommodation. Crawley has recently witnessed substantial rental growth, which provides a barometer of occupational demand. In 2016 Baker &amp; Stonehouse acquired Gatwick 55 a new building detached warehouse / industrial unit of 55,000 sq ft and paid a rent of £10.50 psf, exc. Baker &amp; Stonehouse relocated from south London.</p> <p>In December '19 Brymac acquired 50,000 sq ft at North Gatwick Gateway at £13.75 psf, exc, which demonstrates a c.30% increase over approximately 3 years.</p> <p>The spike in rents, together with the supply levels, may have contributed a slightly longer than expect letting void at Space, Gatwick. Local occupiers haven't previously witnessed the current rental levels and it has taken an extended period of time for these to be accepted as the market level / norm by the Crawley based occupiers. This is however changing as demonstrated by Brymec and MEL Components both committing to new build units at rents of c. £13.75 psf, exc.</p> <p><b>Subject Site</b></p> <p><b>2.1 Scale</b></p> <p>The Crawley and wider South London / M25 is suffering from a shortage of employment land. The subject site provides an opportunity to release a significant single holding that could create c.600,000 – 700,000 sq ft of new accommodation and also include larger scale facilities. The nearest sites that can accommodate a single facility in excess of 100,000 sq ft is as follows: -</p> <ul style="list-style-type: none"> <li>Prologis Park Beddington, Croydon - 23 miles</li> <li>Prologis Park, Weybridge - 32 miles</li> <li>Panattoni Park, Aylesford - 40 miles</li> <li>Nowhurst Business Park, Horsham - 10 miles</li> </ul> <p>With the exception of Horsham, these opportunities are situated in different markets and will be servicing alternative areas. The location of the Horsham site is inferior. It's position is somewhat remote, it is almost 10 miles from the M23 and the distance from Gatwick means it is unlikely to support an airport related operation.</p> |

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|   |                   |                     | <p>The site's scale has significance. It provides the opportunity to attract larger occupiers to the area. Crawley only currently support a handful of units larger than 100,000 sq ft. The scale of the land holding will provide the town a viable option to attract a larger RDC (Regional Distribution Centre) that can service the Southern M25, Home Counties and south London. These would represent new operations to the town and would generate new employment. The site's scale allows the opportunity to be effectively master planned, ensuring the site will provide units which are being demanded by a range of business sizes and types. Being able to accommodate larger facilities will complement the existing Crawley stock.</p> <p>Given the overall size of the Crawley market and the average take-up figures we expect the subject site will be developed in phases. We anticipate the scheme will initially provide an element of speculatively development, the remainder will be promoted for larger, build to suit facilities that may require bespoke elements. For example, DPD, Amazon and DHL all ideally require low-site density facilities that provide additional yard and car / van parking provisions. Further phases of speculative development will be shaped by the initial successes achieved on a speculative or pre-let basis.</p> <p><b>Location / Situation</b></p> <p>The site is situated on the edge of Crawley's main employment zone, Manor Royal Business Park. The Park is home to the majority of the town's warehouse / industrial properties and subsequently businesses. Notable occupiers include Royal Mail (regional sorting hub), Tesco (home delivery facility), Thales, Virgin Atlantic and Caterham.</p> <p>The site's is well positioned to meet the main locational criteria for the majority of Crawley occupiers. It benefits from close proximity to Gatwick Airport, c.2.5 and c.3.2miles from the South and North passenger terminals and c.4.6miles from the Cargo Terminal. It also has easy access to the motorway network with the M23 at junctions 10 and 9, being within 2.8 and 4.6 miles respectively. It would be the nearest employment land released to the airport. Access routes to the motorway is via main roads and commercial areas.</p> <p>The site is within easy walking distance of local amenities, in particular County Oak Retail Park, which is approximately 0.6 miles from the site. This will be attractive to occupiers who are conscious of staff wellbeing and being able to offer amenity within close proximity.</p> <p><b>3. Requirements</b></p> <p>We are currently aware of the following active industrial / warehouse requirements in the Crawley market: -</p> <ul style="list-style-type: none"> <li>• DHL Trade Team – 100,000 sq ft - Requirement with a large yard area for external storage</li> <li>• DHL Express – 50-100,000 sq ft – Parcel delivery depot</li> <li>• Amazon – 100,0000 sq ft – Last mile delivery depot</li> </ul> |

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|   |                   |                     | <ul style="list-style-type: none"> <li>• Creative Technology – 100,000 sq ft - New HQ facility. Based in Horsham, want to remain in the area.</li> <li>• Hermes – 30-70,000 sq ft - Low site density parcel delivery company.</li> <li>• Nyetimber – 80-150,000 sq ft - Drinks' distribution facility.</li> <li>• DPD – 60,000 sq ft - Low site density parcel delivery facility. Have two current requirements, one for Crawley and a south London / M25 area which they are struggling to satisfy.</li> <li>• Arco Aero – c.100-150,000 sq ft - Based north of Gatwick, looking to rationalise operation and upgrade into more suitable premises.</li> <li>• Restore – 80-100,000 sq ft - Based in 4 units in Redhill, want to relocate operation into a single facility.</li> <li>• Trenchard Aviation – 50,000 sq ft - Have facilities in Crawley and Worthing and looking to house in a single facility.</li> </ul> <p>This not an exhaustive list, but it does demonstrate c.1m sq ft of demand. It focuses on larger scale requirements where build to suit solutions maybe considered.</p> <p><b>4. Conclusion</b></p> <p>The warehouse / industrial market is suffering from a shortfall in available land. This is particularly acute in the south London / M25 area as well as well-connected locations in the Southern Home Counties.</p> <p>Demand for warehouse accommodation is strong in Crawley, driven by excellent communication links and businesses need to service the immediate area and wider Southern Home Counties and South London. Demand is also being driven by the changes in retail patterns and the continued move towards internet retailing. Crawley also has the added benefit of being the major employment hub on the Southern M25, complimented by the existence of Gatwick Airport which has created a critical mass of occupiers.</p> <p>The site has excellent characteristics to be brought forward as an employment scheme, being situated on the edge of Manor Royal Business Park and benefiting from excellent links to the motorway network and Gatwick Airport. The scale of opportunity will also provide an opportunity to create larger scale unit that will complement the existing Crawley stock.</p> <p>We consider the site would be very well received by warehouse / industrial market and would be of significant interest to businesses looking to locate in the area, as well as existing companies looking to upgrade their current accommodation.</p> |
|   |                   |                     | <p><b>Suggested Modifications:</b></p> <p>My client welcomes the deletion of Draft Policy GAT 2.</p> <p>In line with the NPPF the Council should identify strategic site allocations to meet identified need as part of the Draft Local Plan thereby removing the need to introduce a further planning policy document.</p>  |

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|                                    |                                    |              | <p>Notwithstanding this, the Council have clearly stated that robust evidence does not exist to maintain the safeguarding for a second runway. On this basis there is no evidence or policy rationale to require the NCAAP to consider if further evidence has materialised for safeguarding for a second runway in the future.</p> <p>The NPPF requires all policies to be evidence based and as no evidence exists for safeguarding (as accepted by the Council) the NCAAP should not even contemplate safeguarding for a second runway. The fact that it does means that Draft Policy SD3 as currently drafted is not justified in accordance with Paragraph 35 of the NPPF and is therefore unsound.</p> <p>The only potential safeguarding the NCAAP should consider is additional land associated with the optimum use of the existing runway and the standby runways. The NCAAP and Draft Policy SD3 should focus on assessing the locations for the Borough economic, housing, community and infrastructure needs.</p> <p><b>Previously Non-Safeguarded Land</b></p> <p>The Draft NCAAP boundary covers areas of land which previously fell outside of the safeguarded area. Draft Policy SD3 states that until the AAP is adopted, only minor extensions to existing buildings will be permitted in the previously safeguarded area which has been amended to correspond to the Gatwick Airport Masterplan 2019. Draft Policy SD3 continues to state that minor extensions to Manor Royal will be permitted on the land outside the amended safeguarded area if they do not prejudice future comprehensive development within the NCAAP area.</p> <p>My client objects to the areas of previously non-safeguarded land being included within the Draft NCAAP boundary. The Draft Local Plan is clear that there is no robust evidence to support the safeguarded area and as such Draft Policy GAT 2 has been deleted. Therefore, the Council are being inconsistent as on one hand they are stating there is no evidence for safeguarding for a second runway and on the other utilising the 2019 Masterplan boundary. There is no justification to have a boundary correlating to a wider safeguarded area when the safeguarding has been removed. Furthermore, Gatwick Airport are not actively progressing a second runway as identified in their 2019 Masterplan. As currently drafted, the draft policy is not justified and contrary to the provisions of the NPPF. The draft policy could be updated so that the all land north of Manor Royal is within the NCAAP boundary but specifically state that small scale extensions north of Manor Royal may be considered in advance of the NCAAP if they can be demonstrated not to prejudice the wider NCAAP area. We consider this further in the next section.</p> |
| REP/058                            | Reigate & Banstead Borough Council | SD3          | <p><i>Safeguarded Land</i></p> <p>We note that the draft submission Local Plan no longer proposes safeguarding land to the north of Crawley and south and east of Gatwick Airport for a potential future second runway. We note that instead Strategic Policy SD3 “North Crawley Area Action Plan” proposes designating this area for the preparation of an Area Action Plan which will commence within three months of the adoption of the Plan. The AAP will assess the needs for future growth and</p>   |

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|                                    |                              |              | operational needs of the airport alongside other development needs arising in Crawley including economic growth, housing, infrastructure, community/ recreational facilities and any other uses identified through the evidence gathering and consultation on the Area Action Plan.   |
|                                    |                              |              | <p><b>Suggested Modifications:</b></p> <p>Whilst we understand that this is being proposed as CBC does not consider that there is, at this time, robust evidence within the draft Aviation Strategy, Aviation 2050, to continue the safeguarding of the land and that continual safeguarding is restricting the provision of land to meet economic, housing, infrastructure, community/ recreation and other needs, we have historically tentatively supported maintaining the safeguarded land in order to provide future flexibility for airport expansion (please note however that this should not be interpreted as Council support for a new southern runway).</p>  |
| REP/ 061                           | Historic England             | SD3          | We have no objection in principle to the designation of Strategic Policy SD3: North Crawley Area Action Plan but it should be noted that there are a number of designated heritage assets (listed buildings and scheduled monuments) within the defined area that would need to be taken account of in future planning of the area. This includes, in particular, listed buildings within and adjacent to the 'Indicative Search Corridor for the Western Link Road (Policy ST4)'.  |
| REP/ 065                           | Mole Valley District Council | SD3          | <p>Thank you for your 'Duty to Cooperate' letter dated 21 January 2020 setting out Crawley Borough Council's position in relation to meeting the boroughs objectively assessed development needs.</p> <p><b>Housing</b></p> <p>CBC calculates their local housing need to be 752 dwellings per annum using the 'Standard Method' set out in planning practice guidance. This equates to a total housing need of 11,280 dwellings over the lifetime of the 15-year plan (2020-2035). Crawley's Local Plan Review identifies the borough's housing land supply to be 5,355 dwellings over the plan period. This leaves a total unmet need figure of 5,925 net dwellings.</p> <p>MVDC recognise the difficulties in delivering sustainable growth and the challenge of effectively balancing competing environmental, social and economic pressures. Nonetheless MVDC are concerned that CBC will have an unmet need of approximately 5,925 net dwellings over the plan period (2020-2035). Based on the reasoning set out below, it is considered MVDC is not in a position to be able to assist CBC in meeting the boroughs unmet housing need.</p> <p><b>Housing Market Area</b></p> <p>CBC say there is already a long-established, effective joint working within the Northern West Sussex (NWS) Housing Market Area (HMA). The NWS HMA comprises Crawley, Horsham, Mid Sussex and a small part of Reigate &amp; Banstead local planning authorities and does not include Mole Valley District.</p> <p>Crawley's unmet housing need established from CBC's adopted Local Plan is being addressed by the combined adopted Local Plans within the NWS HMA. Currently the adopted Local Plans for Horsham and Mid Sussex are</p> |

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|                                    |            |              | <p>anticipated to provide an additional 3,150 dwellings above their objectively assessed housing needs, mostly to meet the unmet housing need arising from Crawley. CBC says that local plan reviews have acknowledged the 3,150 dwellings figure is likely to change in particular because the 'standard method' for calculating local housing need increases the housing needs in Horsham and Mid Sussex above those established in their respective adopted Plans. MVDC considers that as Mole Valley does not form part of the NWS HMA, the responsibility for meeting Crawley's unmet housing needs, in the first instance, would fall to those local planning authorities within NWS HMA.</p> <p><b>Constraints, Green Belt and demonstrating Exceptional Circumstances</b></p> <p>CBC say its adopted Local Plan is acknowledgement that there is very limited land within Crawley for accommodating further development because of the boroughs tight administrative boundaries; the historic Gatwick Airport 'safeguarded' land for a potential southern runway; physical constraints such as aircraft noise contours, flooding, nature conservation constraints, and; few infill opportunities due to the age and planned nature of Crawley New Town. Mole Valley is also heavily constrained. 75% of the district is within the Metropolitan Green Belt and this includes land adjacent to Crawley's administrative boundaries. The district is also constrained by landscape and environmental designations, including the Surrey Hills Area of Outstanding Natural Beauty (AONB) and the Mole Gap to Reigate Escarpment Special Area of Conservation (SAC). As with Crawley, Mole Valley is also constrained by areas prone to flooding and aircraft noise contours associated with Gatwick. In addition, transport links and public transport connections between Mole Valley and Crawley are weak.</p> <p>Mole Valley has published its Draft Local Plan (Future Mole Valley) for consultation between 3 February and 23 March 2020. It is clear from this draft plan MVDC cannot meet its own housing need on brownfield land and/or within the district's existing built-up areas. At this stage, MVDC has not identified any opportunities for part of Mole Valley's housing need to be met by neighbouring local planning authorities. Therefore, having fully explored all other reasonable options for meeting the district's housing need, exceptional circumstances may exist for MVDC to consider some degree of change to Green Belt boundaries. This is one of the principles which is being considered through MVDC's current Regulation 18 consultation.</p> <p>Paragraph 137c of the NPPF 2019 says that before concluding exceptional circumstances exist to just changes to Green Belt boundaries, MVDC has to demonstrate it has examined fully all other reasonable options for meeting its identified need for development. This will include whether the strategy has been informed by discussions with neighbouring authorities about whether they could accommodate some of Mole Valley's identified need for development. Therefore where neighbouring local planning authorities, particularly those in the NWS HMA as they are not constrained by Green Belt boundaries, are capable of meeting their own housing needs then further discussions</p> |

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|                                    |            |              | <p>may be required about whether they could accommodate some of Mole Valley's housing need, to avoid changes to Green Belt boundaries, which both MVDC and the Government attach great importance to<sup>5</sup>. One of the tests for soundness set out in Paragraph 35 of the NPPF 2019 is that plans should be 'positively prepared' in so that the plan provides a strategy which as a minimum seeks to meet the area's objectively assessed needs and is informed by agreements with other authorities so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development.</p> <p>The Crawley submission Local Plan does not plan to meet Crawley's local development needs with a total unmet housing need of 5,925 dwellings and unmet employment need of at least 21ha of employment land. At present there is a lack of clarity as to how these unmet needs will be accommodated.</p> <p><b>Suggested Modifications:</b></p> <p>As indicated in MVDC's responses to the Crawley Local Plan consultation and 'duty to cooperate' letter dated 2 March, CBC should consider bringing forward preparation of the AAP for Land North of Crawley to understand the level of development needs that can be accommodated within the AAP boundary.</p> <p>MVDC would consider the Crawley submission Local Plan to be sound subject to agreeing a Statement of Common Ground that addressed the issues set out in the MVDC's responses to the Crawley submission Local Plan consultation and 'duty to cooperate' letter.</p> <p><b>Area Action Plan for Land North of Crawley</b></p> <p>CBC proposes removing the 'safeguarding' of some 613ha of land for a potential southern runway at Gatwick Airport and preparing an Area Action Plan (AAP) for the future development of this land. The AAP will assess needs for future growth and operational needs of airport alongside other development needs arising in Crawley including for housing, though CBC state housing development would be limited due to aircraft noise contours. CBC would commence work on the AAP after the adoption of the Submission Draft Crawley Local Plan 2035 which is expected in December 2020<sup>6</sup> (notwithstanding the Planning Inspector's recommendations following independent examination of the Local Plan). MVDC supports CBC in seeking to remove the current safeguarding. CBC should consider bringing forward preparation of this AAP to align with the Local Plan Review 2020-2035 in order to determine the amount of housing which can be developed on land within the AAP boundary. It appears that the AAP could potentially contribute towards Crawley's unmet housing need. Without further assessment of land availability in the AAP, it is possible the level of unmet housing need arising from Crawley maybe overstated or non-existent.</p> |

<sup>5</sup> As indicated in Paragraph 133 of the NPPF 2019.

<sup>6</sup> CBC's Local Development Scheme 2019 to 2022.

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| REP/065                                   | Mole Valley District Council | SD3                 | <p><b>Gatwick Airport</b></p> <p>MVDC notes that Policy SD3 signals intent for Crawley Borough Council to produce an Area Action Plan for the land currently safeguarded for a potential second runway at Gatwick Airport. MVDC supports this approach, and will comment on such proposals at the appropriate time. We also note that Policy SD3 safeguards land that corresponds with the Gatwick Airport Masterplan. MVDC has recently published a draft Local Plan for consultation that uses the same updated boundary to safeguard two small parcels of land that fall within Mole Valley District. MVDC welcomes the addition to Policy GAT1 of a reference to Nationally Significant Infrastructure Projects at Gatwick Airport. We agree that point's i-iv must apply to any development proposals at the airport that fall within the scope of the Planning Act 2008.</p>  |
| REP/066                                   | Mid Sussex District Council  | SD3                 | <p><b>Crawley Local Plan Review 2020 – 2035 – Submission version</b></p> <p>Mid Sussex welcomes the opportunity to comment on the submission Crawley Local Plan Review (the Plan) and our detailed comments on the Strategic Policies of the Plan build on our earlier response to the Regulation 18 draft of the Local Plan.</p> <p>Mid Sussex welcomes the further work undertaken by Crawley since the publication of the draft Local Plan and the identification of additional sources of housing supply, resulting in another 550 units. In particular, Mid Sussex supports the revisions to policies which will ensure that there is a more effective use of land in meeting housing and other land use needs in line with the National Planning Policy Framework (NPPF).</p> <p>Mid Sussex has reviewed the Plan and accompanying evidence that has been prepared to support the Plan however it is noted that some of the evidence base, including Transport Assessment, Viability and Habitats Regulation Assessment have not yet been completed and therefore these comments are provided in this context. Mid Sussex may wish to make further comments as and when the evidence base is complete.</p> <p><b>Strategic Policy SD3: North Crawley Area Action Plan</b></p> <p>Mid Sussex <b>supports this policy in principle</b> as it seeks to make more efficient use of land. However, the Council consider that the Policy could be <b>more effective</b>.</p> <p>Policy SD3 makes provision for the preparation of an Area Action Plan (AAP) for the area of land to the south of Gatwick Airport that has historically been safeguarded to accommodate the possible construction of an additional runway and associated facilities. Mid Sussex welcomes the approach to review the opportunities for development within this location, alongside the future growth needs of the airport through an AAP.</p> <p>The Council welcomes the clear commitment to commence work on the AAP within three months of the adoption of the Local Plan as this will provide certainty over its development.</p> |

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|   |                         |                     | However, the Crawley Plan should recognise the significant opportunities presented by this land to take a strategic approach towards consolidating employment land in this location thereby facilitating release of underused employment land elsewhere in the Borough which could be used for much needed housing.  |
| REP/068                                   | Sussex Wildlife Trust   | SD3                 | <p><b>Strategic Policy SD3 North Crawley Area Action Plan</b></p> <p>In the regulation 18 plan there was a policy referenced as Strategic Policy GAT2: Safeguarding Land. This policy, which referred to safeguarding land for Gatwick Airport's expansion, no longer appears within the submission publication. We therefore assume that policy SD3 has superseded that approach and that now the North Crawley Area Action Plan will identify the priorities in the area.</p> <p>In the previous regulation 18 consultation we were unclear how the safeguarded land would be considered under the Local Plan process, however we were clear that SWT does not support the expansion of the airport. While we welcome an approach to create a well-defined vision with the North Crawley Area Action Plan, we are concerned that this will not start until after the Local Plan is adopted. A bold commitment now to potential development in this area, including the Western Arm Link Road, with such limited information to inform this concerns us greatly.</p> <p>We note that the plan talks about working with bordering authorities in relation to this policy, for example with Horsham District Council (HDC). As you will be aware HDC are going through their regulation 18 consultation on their Local Plan Review at this current time. One of the proposed Strategic Locations within the Horsham Local Plan Review relates to Land West of Crawley, Rusper, this appears to border the proposed North Crawley Area Action Plan to the West. We have not had an opportunity to look at HDC Local Plan in detail yet, but question the soundness of this approach of starting the North Crawley Area Action Plan after the adoption of the plan. This will mean we are not able to assess the effectiveness of the both plan policies against the proposals in the North Crawley Area Action Plan.</p> |
| REP/056                                   | Gatwick Airport Limited | SD3                 | <p>The GAL Formal Submission in response to the Regulation 19 draft Plan considers the soundness of specific planning policies proposed within the draft Plan and requests specific amendments to the proposed text of the draft Plan's policies and supporting text. We consider the draft Plan to be in parts to be unsound, not legally compliant and to have failed under the Duty to Co-operate requirements.</p> <p>GAL consider that there are policies with the draft Plan which are contrary to the national policy requirement to safeguard land at Gatwick for future potential expansion and will provide the supporting evidence at the Examination</p> <p>In particular GAL strongly objects to the proposed policy SD3 in the draft Plan for designation of the North Crawley Area Action Plan on land which is currently safeguarded for potential future airport expansion and considers the draft plan is unsound in this respect.</p> <p><b>Town and Country Planning (Local Planning) (England) (Amendment) Regulations 2012.</b><br/> <b>Crawley 2035 Local Plan Review – Draft Submission Local Plan Consultation (Regulation 19) January 2020.</b></p>  |

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|                                    |            |              | <p><b>Formal Response from Gatwick Airport Limited.</b></p> <p>Please find enclosed Gatwick Airport Limited (GAL's) representations on the Draft Submission Crawley Borough Local Plan 2020 – 2035 "Crawley 2035" January 2020 ('the draft Plan').</p> <p>This submission builds on GAL's earlier responses to the Early Engagement Local Plan (Regulation 18, July 2019) and provides our representations to a number of the policies which we consider to be of specific relevance and importance to the operation of the airport, development management and land use planning aspects.</p> <p>As context and background, Gatwick Airport is the UK's second largest airport and the most efficient single-runway airport in the world. It serves more than 230 destinations in over 70 countries with more than 46 million passengers a year on domestic, short and long-haul point-to-point services. These levels of operation are predicted to grow and we have developed our plans for future growth as part of our recently published Airport Masterplan (July 2019). Gatwick is a major economic driver for the Gatwick Diamond and therefore has a significant influence upon not only Crawley borough and the town, but also the wider London and South East Region. Furthermore, Gatwick is Crawley's largest employer generating over 24,000 on-airport jobs and a further 12,000 jobs through related activities. The airport has excellent public transport links and provides good levels of connectivity for residents and workers in the Borough and surrounding areas.</p> <p>This response considers the soundness of specific planning policies proposed within the draft Plan and also requests specific amendments to the proposed text of the draft Plan's policies and supporting text.</p> <p>In preparing this response, we have sought to provide an appropriate level of reasoning and justification for the amendments which are appropriate at this stage. We are willing to participate in the Examination in Public and provide further supporting information and commentary on the draft Plan as currently proposed.</p> <p>In responding to the draft plan, GAL acknowledges that local plans are required to be sufficiently flexible to be able to accommodate needs not anticipated in the Plan and to allow a rapid response to changes in circumstances (NPPF paragraph 11(a)).The draft Plan addresses the existing airport operation in its single runway and two terminal configuration. However, it is essential that the draft Plan is prepared taking into account the sustainable growth of the airport by making best use of its existing runways.</p> <p>The Gatwick Airport Master Plan published in July 2019, is an important consideration in the preparation of the Local Plan and GAL have made it clear that we intend to bring forward an application for Development Consent which will enable the routine use our existing northern runway during the early years of the new Local Plan. Although the proposed northern runway scheme will be subject to a different planning process and not determined by the local planning authority, it is nonetheless crucial that the draft Plan should anticipate this project coming forward and provide the necessary framework in which development may be supported.</p> <p>Furthermore, with the potential for an additional wide-spaced runway and associated infrastructure (to the south of the current airport boundary) coming forward during the lifetime of the Plan period (to 2035) the draft Plan should</p> |

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|   |                   |                     | <p>demonstrate that it is sufficiently flexible to be able to respond to the changes that will arise should this occur. This also forms a significant material consideration that has direct implications for the draft Plan (NPPF para 22). GAL considers that is imperative that the Local Plan continues to safeguard the land around the airport for such potential future airport expansion. The requirement to safeguard land at Gatwick is clearly laid down in existing national policy and is required even more so now given the Court of Appeal ruling on 27th February 2020 to declare the Airports National Policy Statement in relation to a new runway at Heathrow as unlawful. GAL strongly objects to the proposed policy SD3 in the draft Plan (Chapter 3) for designation of the North Crawley Area Action Plan on land which is currently safeguarded for potential future airport expansion and considers the draft plan is unsound in this respect.</p> <p>GAL is keen to engage further with CBC in the next stage of plan preparation and would be pleased to discuss our representations in advance of the preparation of the forthcoming Examination in Public. If you have any further queries, please do not hesitate to contact me.</p> <p><b>Chapter 3: Sustainable Development</b><br/> <b>Policy SD3: North Crawley Area Action Plan</b><br/> GAL Objection to Policy SD3: North Crawley Area Action Plan<br/> GAL strongly objects to the proposed Strategic Policy SD3: North Crawley Area Action Plan which seeks to designate land to the north of Crawley and to the south and east of Gatwick Airport (including land currently safeguarded for a second runway under Policy GAT2 in the adopted Crawley Local Plan) in the form of an Area Action Plan (AAP). GAL considers that the proposed Policy SD3 is contrary to and inconsistent with both current and emerging aviation policy and national planning policy.<br/> GAL's position is that the current Policy GAT2 in the adopted Crawley Local Plan should be continued and that the land around Gatwick should remain safeguarded for an additional runway.<br/> The following sections explain the historical background to the safeguarding of land at Gatwick for a new runway and the relevance of current and emerging aviation and national planning policy.<br/> We then set out the grounds for objecting to Policy SD3 with reference to the national policy position and in light of GAL's Airport Master Plan published in 2019 and end with our conclusion.</p> <p><b>Historical Background to Safeguarding Policy</b><br/> There is a long history of safeguarding of land at Gatwick dating back to 2003. The policy position can briefly be summarised as follows:</p> <p><b>Air Transport White Paper (2003)</b><br/> The origins of the Government's requirement to safeguard land at Gatwick for a second runway derive from the 2003 Air Transport White Paper (ATWP).</p> |

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|                                    |            |              | <p>In relation to Gatwick, the ATWP recognised that in 1979 the British Airports Authority had entered into a 40 year agreement with West Sussex County Council which prevented the commencement of the construction of a second runway at Gatwick before 2019. The Government concluded that it would be highly undesirable to overturn the legal agreement unless there was no alternative way to provide for the identified need for additional runway capacity. The ATWP concluded that alternative options did exist at Stansted and at Heathrow.</p> <p>The Government nevertheless recognised the strong case for a second, wide spaced, runway at Gatwick, and given the uncertainty about whether the Heathrow runway option could be brought forward, it required that land should be safeguarded for a wide spaced runway and associated facilities at Gatwick for development after 2019 in the event that it became clear that the conditions necessary to support Heathrow could not be met.</p> <p><b>Gatwick Interim Masterplan 2006 - defining the safeguarded land</b></p> <p>Whilst the ATWP included an indicative plan of the land that may need to be safeguarded for the second runway, BAA undertook more detailed studies, as part of the preparation of its Gatwick 2006 Interim Master Plan, to refine the boundary of the land that would be safeguarded. Drawings 7 and 8 of the Interim Masterplan show the land to be safeguarded. It reflects a runway separation distance of 1,035m from the existing runway, which is the minimum separation needed for independent mixed mode operations, together with the need for the range of facilities that would be expected to be needed to support the operations of an expanded airport, including a third terminal and associated facilities between the existing and 2nd runway.</p> <p>The area of safeguarded land was subsequently adopted in the Crawley Core Strategy (and referred to in Policy G2) and is now identified in the 2015 Crawley Local Plan (and referred to in Policy GAT2).</p> <p><b>Current Aviation Policy</b></p> <p>In 2011 the Government commenced the process of preparing a new policy framework for UK aviation. This led to a draft Aviation Policy Framework ('APF') being published in July 2012 and the final APF in March 2013. Section 5 relates to 'Planning' and explains that in preparing their local plans, local authorities are required to have regard to policies and advice issued by the Secretary of State. This includes the Aviation Policy Framework, to the extent it is relevant to a particular local authority area.</p> <p>Paragraph 5.9 of the Aviation Policy Framework states:</p> <p><b><i>“Land outside existing airports that may be required for airport development in the future needs to be protected against incompatible development until the Government has established any relevant policies and proposals in response to the findings of the Airports Commission, which is due to report in summer 2015.”</i></b></p> |

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|                                    |            |              | <p>In late 2012, during the preparation of the APF, the Government also set up the Airports Commission ('AC'). Included within the AC's brief was the requirement to examine the nature, scale and timing of any requirements for additional airport capacity to allow the UK to maintain its position as Europe's most important aviation hub.</p> <p><b>The Airports Commission Process</b></p> <p>In its Interim Report the AC concluded that there was a clear case for one net additional runway in London and the South East, to come into operation by 2030. The option of a second full length, wide spaced, runway at Gatwick was one of three options shortlisted for detailed study by the AC (alongside two different options for an additional runway at Heathrow).</p> <p>The AC completed its work with the publication of its Final Report and recommendation to Government in July 2015. Whilst the AC recommended in favour of the North West Runway option at Heathrow, the option put forward by GAL was regarded as a credible option for expansion, capable of delivering valuable enhancements to the UK's aviation capacity and connectivity.</p> <p><b>Airports National Policy Statement (June 2018)</b></p> <p>The Government spent 18 months undertaking further work and studies to inform its view on the way forward and in October 2016 announced its preference for the Heathrow runway option recommended by the AC. Government did confirm at that time that the 2013 Aviation Policy Framework (APF) would remain the Government's policy document on all issues beyond the specific matter of an additional runway at Heathrow Airport, until such time as it is replaced by an Aviation Strategy.</p> <p>In February 2017, Government commenced consultation on a Draft Airports National Policy Statement and in June 2018 the Government laid the final NPS before Parliament. It was designated by the Secretary of State for Transport on 26th June 2018. It is however, important to note four points:</p> <ul style="list-style-type: none"> <li>• That the designated NPS looks ahead to 2030 (para 1.21) and its scope is limited to the provision of the third runway at Heathrow (para 1.40) – other Government policy on airport capacity and wider aviation issues are to be covered in government's emerging Aviation Strategy - 'Future of UK Aviation' strategy which looks ahead to 2050 (para 1.38) (see below).</li> <li>• That all major airports in the south east of England are expected to be full by the mid 2030s and that four of the five main London airports will be full by the mid 2020s (para 2.12)</li> <li>• That the policies set out in the 2013 Aviation Policy Framework still apply (NPS para 1.38)</li> <li>• That the NPS is the subject of several legal challenges and is currently awaiting a judgement in the Court of Appeal.</li> </ul> <p>If the NPS is considered unlawful, depending on the grounds the Government may need to look again at alternative options, including a second runway at Gatwick.</p> |

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|                                    |            |              | <p>In the process of preparing these representations, a judgment was issued in the Court of Appeal on Thursday 27th February that the designation of the Airports NPS is unlawful and therefore has no legal effect. Whilst the Government confirmed it would not appeal the ruling, Heathrow Airport indicated it would seek leave to appeal to the Supreme Court. Therefore, it is not certain, at this moment, what will happen except for the ruling we have from the Court that the Airports NPS, as it currently stands has no effect. However, despite this ruling, the Judge's did not question the need case for additional runway capacity in the UK, rather they have given the Government the opportunity to reconsider the Airports NPS.</p> <p><b>Emerging Government Policy</b><br/> <b>'Aviation 2050 - The future of UK aviation' (December 2018)</b><br/> Alongside finalising the Airports NPS the Government also started to prepare a UK wide Aviation Strategy setting out a long term strategy to 2050 and beyond. In December 2018, the Government published its draft Aviation Strategy, "Aviation 2050: The Future of UK Aviation".<br/> Whilst Government's forecasts show that demand for aviation will continue to grow in the period to 2050, the Government believes that:<br/> <b><i>"The partnership for sustainable growth which the government is proposing is a long term policy framework which will need to be flexible enough to respond to new information, developments and changing circumstances, while providing sufficient long term confidence for the industry and communities."</i> (para 3.9)</b><br/> In relation to whether there is a need for further runways, para 2.12 states that all major airports in the South East of England are expected to be full by the mid 2030s and that four out of five London airports will be full by the mid 2020s (para 2.12). Para 3.13 goes on to explain that the Government believes that any new framework for growth could accommodate additional runways beyond 2030 if a needs case is proven and suitable conditions are met in respect of sustainability. As part of this the Government proposes to ask the National Infrastructure Commission to include airport capacity in future national infrastructure assessments to determine whether there is a needs case for further runways. Paragraph 3.14 explains that if a need is identified, the Government has options for how to reach a decision on location. It states:<br/> <b><i>"At this stage the governments preferred approach is an NPS to set out the criteria but not name specific airports, so leaving it to industry to determine whether and when to bring forward applications."</i></b><br/> In terms of safeguarding of land for growth, para 3.66 of the draft Aviation Strategy acknowledges that several airports currently safeguard land for future developments which could be in a mix of airport, council and private ownership. Para 3.66 then goes on to state that:</p> |

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|                                    |            |              | <p><b><i>“It is prudent to continue with a safeguarding policy to maintain a supply of land for future national requirements and to ensure that inappropriate developments do not hinder sustainable aviation growth” (para 3.66).</i></b></p> <p>Paragraph 3.66 also refers to the fact that the National Planning Policy Framework has restated the Government’s commitment to “identify and protect, where there is robust evidence, sites and routes which could be critical in developing infrastructure to widen transport choice”. It states:</p> <p><b><i>“The government believes that this [the NPPF] provides sufficient guidance for local authorities to consider the future needs of airports and their associated surface access requirements, when developing local plans.”</i></b></p> <p>It is clear therefore that emerging Government policy continues to support the need for the safeguarding of land around airports established historically by the ATWP and more recently by the Aviation Policy Framework. Government believes it is sensible to continue to safeguard land adjacent to airports so that sustainable aviation growth can be protected for future national requirements.</p> <p><b>Other planning policy considerations in relation to safeguarding National Planning Policy Framework (February 2019)</b></p> <p>The National Planning Policy Framework (2019) requires transport issues to be considered from the earliest stages of plan making so that significant development should be focussed on locations which are or can be made sustainable. Paragraph 104 sets out that planning policies should:</p> <p><b><i>“identify and protect, where there is robust evidence, sites and routes which could be critical in developing infrastructure to widen transport choice and realise opportunities for large scale development”</i></b></p> <p>Paragraph 104 e) states planning policies should</p> <p><b><i>“Provide for any large scale transport facilities that need to be located in the area, and the infrastructure and wider development required to support their operation, expansion and contribution to the wider economy. In doing so they should take into account whether such development is likely to be a nationally significant infrastructure project and any relevant national policy statements”</i></b></p> <p>The NPPF is aligned with national aviation policy and reinforces the need to protect sites for large scale transport development and provide for their expansion. The robustness of Gatwick’s proposal for a second full length, wide spaced, runway at Gatwick is evidenced by the Airport Commission’s report, as is the criticality of further runway capacity.</p> |
|                                    |            |              | <p><b>Suggested Modifications:</b></p> <p><b>GAL’s Objection to Policy SD3</b></p> <p><b>Removing safeguarding at Gatwick is inconsistent with and contrary to both existing and emerging Government Aviation Policy</b></p>  |

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|                                    |            |              | <p>The Council recognised in its Regulation 18 consultation draft local plan that, until the final Aviation Strategy is published, the Aviation Policy Framework 2013, makes it clear that land outside existing airports which may be required for airport development in the future needs to be protected against development which would be incompatible with the potential development of future runways. The final Aviation Strategy still has not been published and there are no other material factors that suggest that the Council's approach to safeguarding land should change. Government policy on safeguarding remains unchanged unless and until the Government's 'Future of UK Aviation' strategy policy has been adopted. Claims that the national policy framework on aviation and airports has fundamentally altered since the current Crawley local plan lack any foundation; there has been no suggestion that safeguarding of land at Gatwick for a possible new runway is no longer required.</p> <p><b>Removing safeguarding at Gatwick is inconsistent with and contrary to existing national planning policy.</b><br/>The NPPF (para 104) makes it clear that local planning policies should provide for large scale transport facilities and furthermore should identify and protect sites which could be critical in developing national infrastructure. The difficulties in securing approval for airport expansion projects are well known, and to place additional burdens through removing long established safeguarding policy would impact the sustainability of development and is unnecessary, inappropriate and potentially damaging to the national and regional economy as well as the local economy.</p> <p><b>Gatwick's commitment to and development of a second runway scheme was considered credible by the independent Airports Commission.</b><br/>Gatwick Airport recognises that whilst the Airports National Policy Statement identified Heathrow as the preferred location for the next new runway in the south east in the period to 2030, it did not make any statement in relation to the safeguarding of land. The present policy position is therefore contained in both the existing the Aviation Policy Framework and in the emerging Aviation Strategy. However, in participating in the Airports Commission process and by being shortlisted as one of 3 possible sites for the next new runway, it was acknowledged by the Airport Commission that Gatwick presented both a plausible and a credible option for expansion – capable of delivering valuable enhancements to the UK's aviation capacity and connectivity. This confidence in Gatwick's capability was derived, to a large extent, by the level of detailed design work undertaken to demonstrate that a second runway with associated facilities and surface access improvements could be adequately delivered at Gatwick. Moreover, the contention that GAL's plans for a second runway lack justification is without merit. As noted earlier, the safeguarded land policy position has its origins in the 2003 ATWP based on the information that was available at that time. Subsequently, GAL undertook a major consultation exercise in 2014 as part of the Airports Commission process at which time the expanded boundary was explained (Plan A page 60 GAL Report of Consultation July 2014).</p> |

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|                                    |            |              | <p>6The Gatwick Airport Masterplan 2019 recognises the need to safeguard land for a new runway at Gatwick in the longer term, and that the land currently safeguarded to the south of the existing runway is the only location where a new runway could be delivered. If that land is now allowed to be made available for other development, there would be no other equivalent or equally preferable option available for locating a new wide spaced runway at Gatwick. Removal of safeguarding would therefore severely compromises the Airport's ability to grow as planned in the longer term and reduces the Government's options for how best to make a decision on long-term need in the future (a specific point that was raised in paragraph 3.12 of the draft Aviation Strategy, December 2018) especially if that is likely to result in the need for a new runway in the South East after 2030.</p> <p><b>Removing safeguarding policy would be at the very least premature</b><br/> Even as far back as the ATWP (2003), the Government recognised the strong case for a second, wide spaced, runway at Gatwick, and given the huge uncertainty about whether the Heathrow 3rd runway option could be brought forward by 2030 as envisaged, especially so in the light of the Court of Appeal judgement, the land safeguarded at Gatwick for a wide spaced runway and associated facilities should be protected more so than ever. This uncertainty surrounding delivery of the new 3rd runway at Heathrow remains and for this reason, safeguarded land at Gatwick should not be compromised.</p> <p>Whilst the Airports Commission finally recommended in favour of the North West Runway option at Heathrow, it concluded that the option put forward by GAL was a credible option for expansion, capable of delivering valuable enhancements to the UK's aviation capacity and connectivity. Land safeguarded at Gatwick must therefore continue to be protected should Government policy on Heathrow change in light of the requirements of the Court of Appeal ruling. Any decision that compromises the safeguarded land at Gatwick until the new runway at Heathrow is delivered or until the Government categorically state that it is no longer required for long term safeguarding is premature.</p> <p><b>The Council states that the Area Action Plan approach outlined in Policy SD3, rather than identifying allocations in this Local Plan, is considered to be pragmatic.</b><br/> The Councils approach is confusing, wholly inappropriate and is not pragmatic. Indeed, the approach outlined in Policy SD3 generates confusion and uncertainty for all over the future of the land within the safeguarded area especially in light of the Government's clear position on safeguarding and the Council's intention to commence work on the AAP only after the Plan has been adopted.</p> <p>The Council acknowledges that making a decision as to whether any of the AAP land is available to meet some of the Borough's housing need (or for that matter, any other land use) critically relies on understanding the appropriate noise contours to be applied in the future, but that is not possible until the extent of future growth at Gatwick has been established (paragraph 3.27). This is absolutely correct and underlines exactly why the approach is not pragmatic, it</p> |

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|                                    |            |              | <p>simply creates uncertainty until future growth at Gatwick is fully understood. The prudent course would be to continue with safeguarding in accordance with Government policy until such time that there was a policy change and there is certainty as to the future of the Heathrow North West Runway and the future growth of Gatwick.</p> <p><b>The land currently safeguarded at Gatwick Airport must not be included in the ‘Area of Search for a Western Link Road’</b></p> <p>Until Government confirms its position regarding safeguarding of land at airports through the Aviation Strategy, the land safeguarded at Gatwick Airport must continue to be protected from inappropriate development which would include the Crawley Western Link Road. This strategic road development is required to deliver the development planned in the Local Plan. It should therefore be delivered on land where availability is certain during the Plan period. This is not true of safeguarded land at Gatwick.</p> <p><b>The land currently safeguarded at Gatwick Airport is not required to satisfy employment land needs</b></p> <p>The draft Plan has identified a shortfall in employment land of approximately 21 hectares through the Plan period up to 2035 and therefore employment land needs will be considered alongside the requirement for safeguarding for future airport expansion under an Area Action Plan. GAL believe that the Councils unmet employment land requirements can be sufficiently satisfied elsewhere in the Borough or in adjacent districts which would not prejudice the land which is currently safeguarded by national policy.</p> <p>GAL considers that existing employment sites in the borough could be used more efficiently by means of intensification, redevelopment and design improvements. Vacant employment sites do already exist within the borough, and the Manor Royal Economic Impact Study (2018) clearly identifies significant scope for accommodating new development across a number of sites in this main employment land area.</p> <p>It is crucial that the Council uses Article 4 Directions to prevent the further loss of employment sites to residential development via Permitted Development Rights. The Council has continued to lose valuable employment sites due to the conversion of office buildings to residential accommodation via the prior approval process, and the draft Plan should proactively seek means to resist such loss of its existing employment land stock.</p> <p>Local planning authorities are bound by the statutory Duty to Cooperate when making plans and especially on strategic matters that cross administrative boundaries. GAL considers that employment land opportunities could be further realised through the Council’s Duty to Co-operate and by working with the adjoining authorities of Mole Valley, Tandridge and Reigate and Banstead. The Horley Strategic Business Park has been allocated with the specific purpose of assisting Crawley Borough Council in meeting its unmet employment needs. This presents a significant opportunity for the Council to work with Reigate and Banstead Borough Council to jointly deliver a large-scale employment site and other similar opportunities should be explored. Through positive duty to cooperate arrangements</p> |

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|                                    |            |              | <p>Crawley's unmet employment need could also be satisfied in part within the wider North Western Sussex Area. The forthcoming Burgess Hill 'Hub' for instance could offer Crawley a potential option to meet its unmet industrial land needs.</p> <p>If land currently safeguarded was released for employment land and development that is incompatible with the development of a future runway were to be realised this would mean the land would potentially be lost for potential airport expansion. In fact, the Council's proposed removal of the safeguarded land would mean the loss of the significant positive employment opportunities that would arise from such a nationally significant infrastructure scheme being realised, which would not only be detrimental to the economy of Crawley but also to the economies of their neighbouring local authorities and the wider Gatwick Diamond.</p> <p>The national economic benefits of growing aviation are stated in the Draft Aviation Strategy and in the NPS. These national economic benefits are key to why the Government has retained control over airports policy at a national level and why a local AAP is not the right approach for considering the wider economic direction of the draft Plan. The proposed approach in the draft Plan to remove the safeguarding and the subsequent potential loss of land that could accommodate a further runway at Gatwick is likely to cause considerably greater economic damage to the region and to the nation in the long term than if the land is unavailable for other employment development especially if other short and medium term options exist. If the consequence of this is that some of the borough's unmet employment land need is jointly delivered in neighbouring authorities through the Duty to Cooperate then that position is considered by GAL to a pragmatic and acceptable approach for the draft Plan to adopt.</p> <p>GAL believes that the draft Plan has not fully recognised the significant employment opportunities at Gatwick Airport. GAL considers that there is significant potential for the further use of both buildings and land at the airport to both widen the employment uses at the airport and potentially assist with meeting the Council's need for additional employment space. Gatwick is a highly sustainable location with easy access to central London and Brighton and more locally via local, regional and national train and bus networks, which will continue to be improved significantly within the Plan period to 2035.</p> <p><b>Gatwick's Master Plan provides an appropriate level of detail on the land required for future airport expansion</b></p> <p>6.43 The Gatwick Airport Master Plan 2019 provides illustrative plans (Plans 20, 21, 22 on pg. 168-170) of the land required for a future additional runway. The Airports NPS includes at Annex B a drawing of the proposed Heathrow third runway scheme which has been prepared to a level of detail that is comparable to GAL's additional runway plan. GAL considers that if such level of detail is sufficient for use in the NPS, it must be sufficient for current safeguarding purposes. Furthermore, the NPS does not support a specific detailed scheme and much of its evaluation of comparisons was based on illustrative schemes.</p> |

| Chapter 3. Sustainable Development |                      |                     |  |
|------------------------------------|----------------------|---------------------|--|
| Ref. No.                           | Respondent           | Policy/ Para        | Comments   |
|                                    |                      |                     | <p>GAL undertook an extensive consultation exercise during its submissions to the Airports Commission at which point interested parties including the Council had the opportunity to question the amount of detail or the range of options considered. Safeguarding is undertaken only when there is a possible long term need in the national interest and before plans can be finalised for an extensive and robust consultation process. GAL considers that the NPS / DCO process which requires consultation on illustrative plans would the appropriate time for a more detailed analysis of land uses associated with a potential future runway to be undertaken.</p> <p><b>Conclusions:</b><br/> GAL strongly objects to the inclusion of Strategic Policy SD3: North Crawley Area Action Plan and requests that the current adopted policy regarding safeguarding, as set out in Policy GAT2: Safeguarded Land in the adopted Crawley Local Plan is continued in the emerging Local Plan.<br/> Government is yet to conclude its Aviation Strategy and there has been no suggestion by Government that safeguarding of land at Gatwick for a possible runway is no longer needed. On the contrary, it remains a requirement of national policy to safeguard land for future airport expansion and it would be contrary to Government policy in relation to national infrastructure to remove safeguarding. Therefore, the approach should not be to promote the preparation of the AAP on adoption of the Local Plan; instead, the correct approach should be for the Council to reflect the current Government position on safeguarding land at the airport by continuing to apply the approach set out in Policy GAT 2 in the adopted Local Plan and to commit to a Local Plan review should Government policy change.<br/> GAL considers that it would be imprudent of the Council to discontinue with the standalone safeguarding policy given that the development consent order for the Heathrow third runway project has not yet been made, that the scheme is not clear of legal challenges, and it has not yet been demonstrated that the project is going to proceed, is deliverable or even buildable. This means that the Government may in the future invite Gatwick (and other airports) to bring forward proposals for an additional runway. To not continue to apply the requirements of adopted Policy GAT2 compromises the safeguarded land at Gatwick and until the new runway at Heathrow is confirmed through grant of a DCO and then implemented, the lifting of safeguarding from the draft Plan is plainly premature.<br/> GAL strongly consider that the currently adopted Policy GAT2 needs to be continued in the draft Plan to protect the safeguarded area from development that would materially add to the challenges that come with bringing forward nationally significant infrastructure and add to the complexity, cost and timescale for efficiently and speedily preparing a Development Consent Order application, securing consent, and subsequently bringing the project into operation.</p> |
| REP/027                            | LRM Planning Limited | Crawley 2035 Vision | <p>On behalf of our clients, WT Lamb Holdings we set out herein our representations on the submission consultation draft version of the plan.<br/> Our clients are a family based land owner with a background in the manufacture of high quality brick and stone. They have been operating in and around Sussex for over 100 years and have been an important local employer during that</p>  |

| Chapter 3. Sustainable Development |            |              |  |
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| Ref. No.                           | Respondent | Policy/ Para | Comments   |
|                                    |            |              | <p>time. They control various land holdings in the Crawley and the wider area including a 2.8 ha site at Fernhill Road within the North Crawley Area Action Plan (AAP).</p> <p>They have proposed that their site at Fernhill Road, as a former nursery is a sustainable and suitable location for development associated with the future growth of Gatwick Airport. A scheme has been designed to provide 900 car parking spaces with a shuttle transfer via electric minibus. A detailed application has been submitted along with a suite of technical documents demonstrating that there would be no adverse impacts on local infrastructure rather will provide betterment in terms of offsite highways improvements, biodiversity gain on site and landscape planting.</p> <p>It is our clients view that properly planned and thought through provision of off airport parking in close proximity (within the North Crawley AAP area) is far more appropriate than reliance on dispersed and haphazard car parking in unsustainable locations across Crawley and neighbouring authorities facilitated by a blanket ban on new provision off site that ultimately results in more illegal car parks, rogue operators with no consideration of their impact upon local infrastructure.</p> <p>Our clients are strongly of the view that a comprehensive and planned approach to car parking can achieve a sustainable solution to what has become a problem within the local authority and neighbours by utilising innovative and sustainable approaches to offset any adverse impacts it may had. Given the fact that over the course of the plan period passenger numbers could reach 74 mppa (well over double the 2012 level when the previous local plan was prepared), we are strongly of the view that a new, proactive approach is required within the plan.</p> <p>Our representations are prepared on the basis of the requirements of the National Planning Policy Framework para 35 which requires that plans are:</p> <p>a) Positively prepared – providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;</p> <p>b) Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;</p> <p>c) Effective – deliverable over the plan period, and based on effective joint working on cross boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and</p> <p>d) Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework We will be making separate represents in due course when the AAP is prepared, however in the meantime we set out herein our clients representations on the plan.</p> |

| Chapter 3. Sustainable Development |            |              |  |
|------------------------------------|------------|--------------|--|
| Ref. No.                           | Respondent | Policy/ Para | Comments   |
|                                    |            |              | <p>We are broadly supportive of the vision set out for Crawley in 2035 however we are surprised that it does not seem to mention Gatwick Airport. The vision and strategy set out ambitious targets for growth and plainly the future growth of Gatwick airport will be a fundamental aspect of this.</p> <p>Indeed, it is envisaged that by the end of the plan period Gatwick airport could be at around 74 million passengers per annum (mppa). This is more than doubling the passenger capacity of the airport since 2012 and is an additional 28 mppa from the current level, it is plainly the case that if this level of growth is not properly planned for with a commensurate scale of infrastructure, then this will result in a significant number of adverse impacts across the Borough and neighbouring authorities.</p> <p>As such the plan must deal with the impacts of growth at Gatwick airport. Indeed, NPPF para 2 indicates that the strategic policies must “set out an overall strategy for the pattern, scale and quality of development, and make sufficient provision for: ..... b) infrastructure for transport”. We are strongly of the view therefore that where there are projects of national significance with major scope for growth and impacts upon transport infrastructure, the Plan must ensure that their impacts are fully mitigated. Whilst there will be a wide and far reaching range of impacts of the growth of the airport our clients specific interest is in respect of car parking and moving towards a more sustainable approach to managing off site impacts.</p> <p>Furthermore to not deal proactively with off airport impacts (including car parking) would be contrary to the duty to co-operate as set out in para 26 of the NPPF which indicates that “joint working should help to determine where additional infrastructure is necessary, and whether development needs that cannot be met wholly within a particular plan area could be met elsewhere”. Indeed, it is inevitable that if parking associated with the airport is not dealt with through the plan then there will be adverse impacts not only within Crawley through unmitigated unauthorised parking but also in neighbouring authorities. Accordingly the plan must ensure that the future growth of the airport is fully planned for.</p> <p><b>Suggested Modifications:</b></p> <p>We are supportive of the removal of the Gatwick expansion safeguarding area and the preparation of an AAP for North Gatwick, however, we are strongly of the view that a number of associated amendments are required in order to make the plan compliant with the NPPF.</p> <p>These primarily involve ensuring that the Plan robustly responds to the impacts of the future growth of the airport. Suggested changes include:</p> <p>a. the vision and strategy should include reference to the future growth of the airport and ensuring that impacts associated with expansion are fully mitigated;</p> |

| Chapter 4. Character, Landscape and Development Form |   |              |  |
|--|---|--------------|--|
| Ref. No.   | Respondent                                  | Policy/ Para | Comments   |
| REP/023  | Savills on behalf of St Catherine's Hospice | CL1          | <p>St Catherine's supports the retention of the neighbourhood principle in Crawley. This spatial strategy is rooted in the origins of Crawley in the late 1940s and is one of the distinguishing characteristics of the Town.</p> <p>Notably, Strategic Policy CL1 makes provision for mixed-use and high density development where it outlines that: <i>"Mixed use and higher density development may be compatible with the existing structure of the neighbourhood, particularly if it is situated in sustainable locations such as their neighbourhood centres."</i></p> <p>Though supported in principle, we consider that CBC have missed an opportunity here to promote higher density development adjacent to key transport corridors in Crawley as well as neighbourhood centres.</p> <p>Paragraph 123 of the NPPF emphasises the scope for higher density development to make efficient use of sites, particularly within Authorities where there is an existing or anticipated shortage of land for meeting housing needs.</p> <p><b>Suggested Modifications:</b><br/>To ensure that Strategic Policy CL1 is consistent with National Policy, and therefore found sound, it should be amended to promote higher density development by transport corridors.</p> <p><b>Recommended Changes</b><br/>"[particularly if it situated in sustainable locations, such as] neighbourhood centres or adjacent to transport corridors."</p> |
| REP/068  | Sussex Wildlife Trust                       | CL1          | <p>We note that since the regulation 18 consultation the heading and sections have change in section 4 and 5 of the plan. We will therefore reference the old and new policy to ensure the comments are clear.</p> <p><b>Strategic Policy CL1</b><br/>This policy previously was CD1: Neighbourhood Principles and we are encouraged to see that our amendments have been incorporated</p>   |
| REP/003  | Resident 3                                  | CL2          | <p>My future years on earth, I will have to be more careful, so emphasising your support I very grateful. Therefore Any repairs of existing path accesses would mean less visits to hospital!</p> <p><b>Suggested Modifications:</b><br/>Paths/cycle tracks in Tilgate &amp; to Crawley using electric buggy along footpaths across roads with no drop downs. Also on paths with trees breaking up paths. Services repair parts of paths &amp; roads leaving uneven surfaces to walk along.<br/>My disabilities are manageable at present but as I get older probably not so!<br/>So coming out in the dark is more dangerous so I usually don't!<br/>My accidents on buses, paths have ended up in hospital!</p>  |

| Chapter 4. Character, Landscape and Development Form |  |                              |   |          |                |              |           |   |         |                         |        |   |         |                         |        |   |         |                         |        |   |          |                              |        |   |              |                              |        |   |         |                              |        |   |         |                        |        |   |                 |                        |        |   |         |                        |        |
|--|--|------------------------------|---|----------|----------------|--------------|-----------|---|---------|-------------------------|--------|---|---------|-------------------------|--------|---|---------|-------------------------|--------|---|----------|------------------------------|--------|---|--------------|------------------------------|--------|---|---------|------------------------------|--------|---|---------|------------------------|--------|---|-----------------|------------------------|--------|---|---------|------------------------|--------|
| Ref. No.   | Respondent                             | Policy/<br>Para              | Comments  |          |                |              |           |   |         |                         |        |   |         |                         |        |   |         |                         |        |   |          |                              |        |   |              |                              |        |   |         |                              |        |   |         |                        |        |   |                 |                        |        |   |         |                        |        |
| REP/035  | Vail Williams on behalf of Ardmere Ltd | CL2                          | <p>Response on behalf of the Land Consortium on land adjacent Farm for Crawley Borough Council Local Plan Review 2035 Reg. 19 Local Presentations</p> <p>We are writing on behalf of our clients Ardmere Ltd and the consortium of 4 adjacent landowners, in regard to land to the North of Crawley and adjacent to Manor Royal.</p> <p>As per our previous submissions to your Regulation 18 stage in September, and our submission to your Employment Land Trajectory, there are nine sites and five landowners which all wish to act as signatories to this letter and we are appointed by them under the lead member, Ardmere Limited.</p> <p>To confirm, we have attached our masterplan and can confirm that the landowners are as follows:</p> <table border="1"> <thead> <tr> <th>Site no.</th> <th>Land ownership</th> <th>Site address</th> <th>Site area</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Ardmore</td> <td>Land at Jersey Farm (A)</td> <td>0.59ha</td> </tr> <tr> <td>2</td> <td>Ardmore</td> <td>Land at Jersey Farm (b)</td> <td>2.18ha</td> </tr> <tr> <td>3</td> <td>Ardmore</td> <td>Land at Jersey Farm (c)</td> <td>8.77ha</td> </tr> <tr> <td>4</td> <td>Willmott</td> <td>Land at Little Dell Farm (A)</td> <td>3.98ha</td> </tr> <tr> <td>5</td> <td>Ohm and Hill</td> <td>Land at Little Dell Farm (B)</td> <td>1.94ha</td> </tr> <tr> <td>6</td> <td>Ardmore</td> <td>Land at Little Dell Farm (C)</td> <td>0.26ha</td> </tr> <tr> <td>7</td> <td>Maxwell</td> <td>Land at Poles Lane (A)</td> <td>1.43ha</td> </tr> <tr> <td>8</td> <td>Rixon and Crook</td> <td>Land at Poles Lane (B)</td> <td>0.68ha</td> </tr> <tr> <td>9</td> <td>Ardmore</td> <td>Land at Spikemead Farm</td> <td>3.67ha</td> </tr> </tbody> </table> <p>As per our previous representations, our main areas of comment will understandably be relating to the context, setting and landscape character of the land North of Manor Royal, as well as Gatwick Safeguarding and the Economic Growth policies.</p> <p>Our detailed comments are as follows:<br/> We welcome the approach to combine under one chapter, the issues which were previously separated into Character &amp; Design, and then Landscaping &amp; Landscape Character.<br/> We recognise the need for Policy CL2: Principles of Good Urban Design and the inclusion of criteria a) which adds the need for development proposals to consider the movement corridors, distant views, landmarks and views into and out of adjoining areas.<br/> This is considered to have been important given the existing planning consent for the building on Jersey Farm approved at committee January 2020, and its transition from the urban area of Manor Royal at the Countryside and rural fringe.</p> | Site no. | Land ownership | Site address | Site area | 1 | Ardmore | Land at Jersey Farm (A) | 0.59ha | 2 | Ardmore | Land at Jersey Farm (b) | 2.18ha | 3 | Ardmore | Land at Jersey Farm (c) | 8.77ha | 4 | Willmott | Land at Little Dell Farm (A) | 3.98ha | 5 | Ohm and Hill | Land at Little Dell Farm (B) | 1.94ha | 6 | Ardmore | Land at Little Dell Farm (C) | 0.26ha | 7 | Maxwell | Land at Poles Lane (A) | 1.43ha | 8 | Rixon and Crook | Land at Poles Lane (B) | 0.68ha | 9 | Ardmore | Land at Spikemead Farm | 3.67ha |
| Site no.   | Land ownership                         | Site address                 | Site area   |          |                |              |           |   |         |                         |        |   |         |                         |        |   |         |                         |        |   |          |                              |        |   |              |                              |        |   |         |                              |        |   |         |                        |        |   |                 |                        |        |   |         |                        |        |
| 1  | Ardmore                                | Land at Jersey Farm (A)      | 0.59ha  |          |                |              |           |   |         |                         |        |   |         |                         |        |   |         |                         |        |   |          |                              |        |   |              |                              |        |   |         |                              |        |   |         |                        |        |   |                 |                        |        |   |         |                        |        |
| 2  | Ardmore                                | Land at Jersey Farm (b)      | 2.18ha  |          |                |              |           |   |         |                         |        |   |         |                         |        |   |         |                         |        |   |          |                              |        |   |              |                              |        |   |         |                              |        |   |         |                        |        |   |                 |                        |        |   |         |                        |        |
| 3  | Ardmore                                | Land at Jersey Farm (c)      | 8.77ha  |          |                |              |           |   |         |                         |        |   |         |                         |        |   |         |                         |        |   |          |                              |        |   |              |                              |        |   |         |                              |        |   |         |                        |        |   |                 |                        |        |   |         |                        |        |
| 4  | Willmott                               | Land at Little Dell Farm (A) | 3.98ha  |          |                |              |           |   |         |                         |        |   |         |                         |        |   |         |                         |        |   |          |                              |        |   |              |                              |        |   |         |                              |        |   |         |                        |        |   |                 |                        |        |   |         |                        |        |
| 5  | Ohm and Hill                           | Land at Little Dell Farm (B) | 1.94ha  |          |                |              |           |   |         |                         |        |   |         |                         |        |   |         |                         |        |   |          |                              |        |   |              |                              |        |   |         |                              |        |   |         |                        |        |   |                 |                        |        |   |         |                        |        |
| 6  | Ardmore                                | Land at Little Dell Farm (C) | 0.26ha  |          |                |              |           |   |         |                         |        |   |         |                         |        |   |         |                         |        |   |          |                              |        |   |              |                              |        |   |         |                              |        |   |         |                        |        |   |                 |                        |        |   |         |                        |        |
| 7  | Maxwell                                | Land at Poles Lane (A)       | 1.43ha  |          |                |              |           |   |         |                         |        |   |         |                         |        |   |         |                         |        |   |          |                              |        |   |              |                              |        |   |         |                              |        |   |         |                        |        |   |                 |                        |        |   |         |                        |        |
| 8  | Rixon and Crook                        | Land at Poles Lane (B)       | 0.68ha  |          |                |              |           |   |         |                         |        |   |         |                         |        |   |         |                         |        |   |          |                              |        |   |              |                              |        |   |         |                              |        |   |         |                        |        |   |                 |                        |        |   |         |                        |        |
| 9  | Ardmore                                | Land at Spikemead Farm       | 3.67ha  |          |                |              |           |   |         |                         |        |   |         |                         |        |   |         |                         |        |   |          |                              |        |   |              |                              |        |   |         |                              |        |   |         |                        |        |   |                 |                        |        |   |         |                        |        |

| Chapter 4. Character, Landscape and Development Form |  |                 |   |
|--|--|-----------------|---|
| Ref. No.   | Respondent   | Policy/<br>Para | Comments  |
| REP/036  | Vail Williams on behalf of UK Commercial Property Finance Holdings Limited | CL2             | <p>We are writing this letter on behalf of our client UK Commercial Property Finance Holdings Limited, in response to the Crawley Borough Council (CBC) Regulation 19 Submission draft Local Plan Review 2035 specifically relating to matters which impact on the site at Unit 2 and Unit 3, Charlwood Road, Gatwick Gate.</p> <p>The attached plans identify the site boundaries for Unit 2 and Unit 3, Gatwick Gate. The two units sit adjacent to one another and are located within the existing airport safeguarded land but outside the southern boundary of Gatwick Airport.</p> <p>Our response will reflect the context of the above site and specifically, will comment on the following key proposals in the CBC Submission draft Local Plan 2035:</p> <ul style="list-style-type: none"> <li>- North Crawley Area Action Plan</li> <li>- Main Employment Area designation</li> </ul> <p>In addition, we note the proposed change to the existing Airport Boundary in the immediate area of our client's site therefore, we have provided some commentary on policies relating to the Gatwick Airport boundary as shown on the Local Plan Map.</p> <p>We will also provide some commentary on matters of character, landscaping and development form due to the sites location outside of the built up boundary and within an identified long distance view splay. Our detailed comments are as follows:</p> <p>We note the changes to this chapter which now combines issues of 'character and design' and 'landscaping and landscape character' succinctly within one chapter.</p> <p>We recognise the requirements of policy CL2: Principles of Good Urban Design in particular criteria a) which requires development proposals to <i>"take account of long distance vistas, landmarks, views into and out of adjoining areas, gateways to and between particular areas, and focal points"</i>.</p> |
| REP/061  | Historic England   | CL2             | <p>We note, and support, that Strategic Policy CL2: Making Successful Places: Principles of Good Urban Design requires good design that reflects the defining characteristics of each neighbourhood within the plan area, and that reinforces the existing character and distinctiveness of each; and, that the protection and enhancement of heritage assets is integral to this.</p>  |
| REP/063  | Pegasus Group on behalf of Persimmon Homes Ltd                             | CL2             | <p><b>Strategic Policy CL2: Making successful Places: Principles of Good Urban Design</b> sets out a guidance on the Urban design and issues. The policy identifies a number of requirements that the development proposals will be required to satisfy. The Policy however makes no reference to the National Design Guide that was published in 2019. It sets out a design framework endorsed at a national level.</p>  |

| Chapter 4. Character, Landscape and Development Form |  |                              |  |          |                |              |           |   |         |                         |        |   |         |                         |        |   |         |                         |        |   |          |                              |        |   |              |                              |        |   |         |                              |        |   |         |                        |        |   |                 |                        |        |   |         |                        |        |
|--|--|------------------------------|--|----------|----------------|--------------|-----------|---|---------|-------------------------|--------|---|---------|-------------------------|--------|---|---------|-------------------------|--------|---|----------|------------------------------|--------|---|--------------|------------------------------|--------|---|---------|------------------------------|--------|---|---------|------------------------|--------|---|-----------------|------------------------|--------|---|---------|------------------------|--------|
| Ref. No.   | Respondent                             | Policy/ Para                 | Comments   |          |                |              |           |   |         |                         |        |   |         |                         |        |   |         |                         |        |   |          |                              |        |   |              |                              |        |   |         |                              |        |   |         |                        |        |   |                 |                        |        |   |         |                        |        |
|  |  |                              | The policy further identifies that the development proposals must identify, test, determine and (subject to outcome) embrace, opportunities for increased density, where appropriate and subject to Policies CL3 and CL4. The policy does not set out the minimum densities that need to be achieved through the proposals.  |          |                |              |           |   |         |                         |        |   |         |                         |        |   |         |                         |        |   |          |                              |        |   |              |                              |        |   |         |                              |        |   |         |                        |        |   |                 |                        |        |   |         |                        |        |
| REP/068  | Sussex Wildlife Trust                  | CL2                          | <p><b>Strategic Policy CL2: Making Successful Places: Principles of Good Urban Design</b></p> <p>This policy previously was CD2: Making Successful Places: Principles of Good Urban Design and we are encouraged to see that our amendments have been incorporated.</p>  |          |                |              |           |   |         |                         |        |   |         |                         |        |   |         |                         |        |   |          |                              |        |   |              |                              |        |   |         |                              |        |   |         |                        |        |   |                 |                        |        |   |         |                        |        |
| REP/035  | Vail Williams on behalf of Ardmere Ltd | CL3                          | <p>Response on behalf of the Land Consortium on land adjacent Farm for Crawley Borough Council Local Plan Review 2035 Reg. 19 Local Presentations</p> <p>We are writing on behalf of our clients Ardmere Ltd and the consortium of 4 adjacent landowners, in regard to land to the North of Crawley and adjacent to Manor Royal.</p> <p>As per our previous submissions to your Regulation 18 stage in September, and our submission to your Employment Land Trajectory, there are nine sites and five landowners which all wish to act as signatories to this letter and we are appointed by them under the lead member, Ardmere Limited.</p> <p>To confirm, we have attached our masterplan and can confirm that the landowners are as follows:</p> <table border="1"> <thead> <tr> <th>Site no.</th> <th>Land ownership</th> <th>Site address</th> <th>Site area</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Ardmore</td> <td>Land at Jersey Farm (A)</td> <td>0.59ha</td> </tr> <tr> <td>2</td> <td>Ardmore</td> <td>Land at Jersey Farm (b)</td> <td>2.18ha</td> </tr> <tr> <td>3</td> <td>Ardmore</td> <td>Land at Jersey Farm (c)</td> <td>8.77ha</td> </tr> <tr> <td>4</td> <td>Willmott</td> <td>Land at Little Dell Farm (A)</td> <td>3.98ha</td> </tr> <tr> <td>5</td> <td>Ohm and Hill</td> <td>Land at Little Dell Farm (B)</td> <td>1.94ha</td> </tr> <tr> <td>6</td> <td>Ardmore</td> <td>Land at Little Dell Farm (C)</td> <td>0.26ha</td> </tr> <tr> <td>7</td> <td>Maxwell</td> <td>Land at Poles Lane (A)</td> <td>1.43ha</td> </tr> <tr> <td>8</td> <td>Rixon and Crook</td> <td>Land at Poles Lane (B)</td> <td>0.68ha</td> </tr> <tr> <td>9</td> <td>Ardmore</td> <td>Land at Spikemead Farm</td> <td>3.67ha</td> </tr> </tbody> </table> <p>As per our previous representations, our main areas of comment will understandably be relating to the context, setting and landscape character of the land North of Manor Royal, as well as Gatwick Safeguarding and the Economic Growth policies.</p> <p>Our detailed comments are as follows:<br/>We welcome the approach to combine under one chapter, the issues which were previously separated into Character &amp; Design, and then Landscaping &amp; Landscape Character.</p> | Site no. | Land ownership | Site address | Site area | 1 | Ardmore | Land at Jersey Farm (A) | 0.59ha | 2 | Ardmore | Land at Jersey Farm (b) | 2.18ha | 3 | Ardmore | Land at Jersey Farm (c) | 8.77ha | 4 | Willmott | Land at Little Dell Farm (A) | 3.98ha | 5 | Ohm and Hill | Land at Little Dell Farm (B) | 1.94ha | 6 | Ardmore | Land at Little Dell Farm (C) | 0.26ha | 7 | Maxwell | Land at Poles Lane (A) | 1.43ha | 8 | Rixon and Crook | Land at Poles Lane (B) | 0.68ha | 9 | Ardmore | Land at Spikemead Farm | 3.67ha |
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| Chapter 4. Character, Landscape and Development Form |  |              |   |
|--|--|--------------|---|
| Ref. No.   | Respondent   | Policy/ Para | Comments  |
|  |  |              | In regards to Policy CL3: Local Character and the form of new development, whilst we appreciate the approach of the policy which builds on Regulation 18: policy CD3, there is concern that this policy would require all development to submit such information. Whilst the RJ shows that the area wide character and design assessment programme will also be brought forward and, for more major developments this will need to be supported by developers, we are concerned that the degree of work for minor alterations or smaller scale development will require significant information and assessment on behalf of clients. We look to work with the Council in their preparation of any assessments, especially those in relation to our site adjacent to the Northern Boundary of Manor Royal.   |
| REP/036  | Vail Williams on behalf of UK Commercial Property Finance Holdings Limited | CL3          | <p>We are writing this letter on behalf of our client UK Commercial Property Finance Holdings Limited, in response to the Crawley Borough Council (CBC) Regulation 19 Submission draft Local Plan Review 2035 specifically relating to matters which impact on the site at Unit 2 and Unit 3, Charlwood Road, Gatwick Gate.</p> <p>The attached plans identify the site boundaries for Unit 2 and Unit 3, Gatwick Gate. The two units sit adjacent to one another and are located within the existing airport safeguarded land but outside the southern boundary of Gatwick Airport.</p> <p>Our response will reflect the context of the above site and specifically, will comment on the following key proposals in the CBC Submission draft Local Plan 2035:</p> <ul style="list-style-type: none"> <li>- North Crawley Area Action Plan</li> <li>- Main Employment Area designation</li> </ul> <p>In addition, we note the proposed change to the existing Airport Boundary in the immediate area of our client's site therefore, we have provided some commentary on policies relating to the Gatwick Airport boundary as shown on the Local Plan Map.</p> <p>We will also provide some commentary on matters of character, landscaping and development form due to the sites location outside of the built up boundary and within an identified long distance view splay. Our detailed comments are as follows:</p> <p>We note the requirements set out in Policy CL3: Local Character and the Form of New Development for new development to provide supporting documentation which demonstrates how proposals meet the five components of existing rural and urban structure. However, we are concerned that the degree of work involved in this is significant, especially for minor alterations and smaller scale development.</p> |
| REP/050  | Montagu Evans on behalf of Homes England                                   | CL3          | <p><b>Strategic Policy CL3: Local Character and the Form of New Development</b></p> <p>Draft Strategic Policy CL3 highlights the need for the preparation and use of Area Wide Character and Design Assessments. The supportive text explains that the Council is responsible for preparing such documents, with the support of developers in their delivery. During the Regulation 18 consultation, Homes England raised concerns that</p>   |

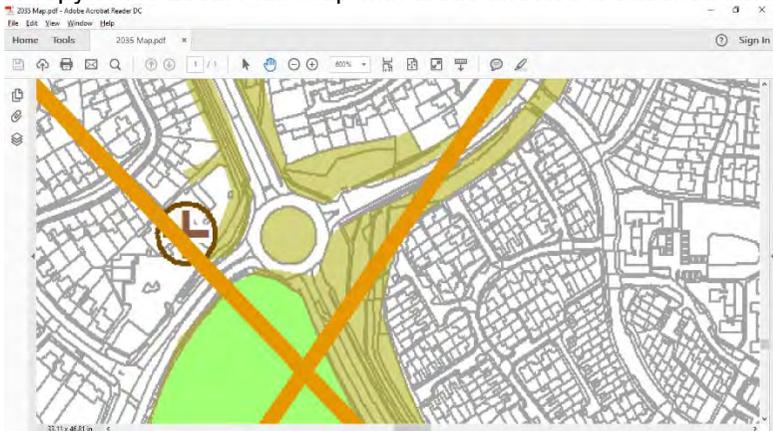
| Chapter 4. Character, Landscape and Development Form |   |                 |  |
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| Ref. No.   | Respondent                                  | Policy/<br>Para | Comments   |
|  |   |                 | <p>this requirement, alongside local urban design framework plans and development briefs, design codes and three-dimensional masterplans, is too onerous.</p> <p><b>Suggested Modifications:</b><br/> Homes England considers these assessments are unnecessary for Crawley as a whole and this could delay development coming forward. Homes England considers that the Council should require these only for larger developments. Homes England reiterates that preparation of such documents is not an effective use of the Council's own resources and it should be for the landowner or developer to lead on the preparation of these assessments. In respect of a future extension to Manor Royal, Homes England suggests that this should form part of the AAP process itself. This would secure a positive design outcome as sought by Policy CL3, whilst avoiding a duplication of evidence base work.</p>  |
| REP/061  | Historic England                            | CL3             | <p>We support Strategic Policy CL3: Local Character and Design of New Development; particularly in its reference to protecting, enhancing and reinforcing 'heritage assets and their settings'.</p> <p>The location, design and use of future development can contribute to local identity and distinctiveness, and safeguarding heritage significance. We agree that Policies CL4-CL6 set out a series of design parameters that will help to ensure that high-quality design is achieved in new development and sustainable forms of urban planning are delivered, including the protection of heritage assets.</p>  |
| REP/068  | Sussex Wildlife Trust                       | CL3             | <p>Strategic Policy CL3: Local Character and the form of New Development</p> <p>This policy was previously CD3 Local Character and design of new development. We note that there is now a different layout to this policy, but that our amendments appear to have been incorporated in relation to NPPF paragraph 171. This is welcome.</p>  |
| REP/023  | Savills on behalf of St Catherine's Hospice | CL4             | <p>St Catherine's supports the Council's promotion of sustainable modes of transport in Strategic Policy CL4, including the promotion of sustainable development with compact layout and scale.</p> <p>However, it is considered that the 5-8 minute walking distance set out point 8 is too reductionist and does not reflect prevalent research in active transport or account for future trends in sustainable travel. Notably, in their report 'Planning for Walking1', the Chartered Institution for Highways and Transportation (CHIT) identified that:</p> <p><i>"For bus stops in residential areas, 400 metres has traditionally been regarded as a cut-off point and in town centres, 200 metres (DOENI, 2000). People will walk up to 800 metres to get to a railway station, which reflects the greater perceived quality or importance of rail services."</i></p> <p>St Catherine's Hospice is located 800m from Crawley Train Station, a circa. 10 minute walk. In accordance with the report above, this is considered an appropriate distance to encourage residents to walk to the Station.</p> |

| Chapter 4. Character, Landscape and Development Form |                             |                 |   |
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|  |                             |                 | <p><b>Suggested Modifications:</b><br/>The draft Local Plan does not outline the Council's rationale for incorporating a 5-8 minute walking distance cut off and it is unclear as to why CBC have quoted this in their policy. As such, St Catherine's request that Strategic Policy CL4 is modified to reflect research on walking distances, providing flexibility to bring forward schemes that would otherwise be considered less sustainable.</p> <p><b>Recommended Changes</b><br/>"[Be planned and located adjacent to stations, stops or interchanges along existing segregated, high capacity, high frequent public transport corridors and their stops/interchanges. A contribution may be required to fund or part-fund the expansion of the same (see Policy ST1 and the Planning Obligations Annex); and]<br/>Be designed and laid out so that it ensures that future habitants are within c. 10 minute walking distance of such rail stations or bus stops."</p>  |
| REP/033  | Horsham District Council    | CL4             | <p>We support this policy in principle, but consider its effectiveness could be improved.</p> <p><b>Suggested Modifications:</b><br/>Change sought: Request clearer cross reference to Policy CL4 which specifies minimum densities.</p>  |
| REP/066  | Mid Sussex District Council | CL4             | <p><b>Crawley Local Plan Review 2020 – 2035 – Submission version</b><br/>Mid Sussex welcomes the opportunity to comment on the submission Crawley Local Plan Review (the Plan) and our detailed comments on the Strategic Policies of the Plan build on our earlier response to the Regulation 18 draft of the Local Plan.<br/>Mid Sussex welcomes the further work undertaken by Crawley since the publication of the draft Local Plan and the identification of additional sources of housing supply, resulting in another 550 units. In particular, Mid Sussex supports the revisions to policies which will ensure that there is a more effective use of land in meeting housing and other land use needs in line with the National Planning Policy Framework (NPPF).<br/>Mid Sussex has reviewed the Plan and accompanying evidence that has been prepared to support the Plan however it is noted that some of the evidence base, including Transport Assessment, Viability and Habitats Regulation Assessment have not yet been completed and therefore these comments are provided in this context.<br/>Mid Sussex may wish to make further comments as and when the evidence base is complete.</p> <p><b>Suggested Modifications:</b><br/>Strategic Policy CL4: Effective Use of Land: Sustainability, Movement and layout<br/>Mid Sussex <b>supports</b> this policy in principle however considers that it could be <b>more effective</b>.<br/>The NPPF is clear that where there is a shortage of land for meeting identified housing needs policies should ensure the use of land is optimised. Whilst this policy seeks the effective use of land it needs to be clear about how this will be achieved.</p> |

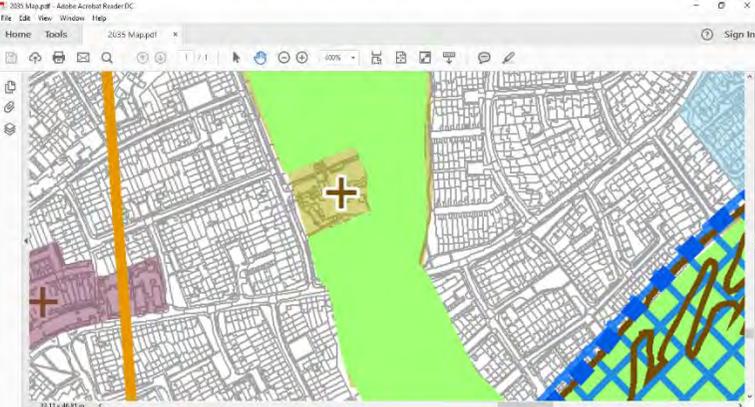
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|  |   |                 | <b>Change required:</b> Policy needs clarity over how policy objectives will be achieved.  |
| REP/010  | Home Builders Federation                    | CL5             | <p>Part a is unsound as it has not been justified<br/>It is not appropriate for part of this policy to require master plans or development briefs for all major developments. We recognise the importance of master planning and development briefs for strategic large-scale developments but to require developments as small as 10 units to undertake such a process is disproportionate and unjustified. The Council must reconsider the threshold at which it considers master planning to be necessary to avoid unnecessary costs being placed on smaller developments.<br/>We would also recommend that the policy states what the Council considers to be a larger development. At present this is referenced in paragraph 4.67 but we would suggest that this is included in the policy for the purposes of clarity.</p> <p><b>Suggested Modifications:</b><br/>A more appropriate threshold is for the use of master planning and development briefs are included in this policy.</p>  |
| REP/023  | Savills on behalf of St Catherine's Hospice | CL5             | <p>St Catherine's supports the Council's proposals to introduce minimum density standards to targeted areas in Crawley.<br/>The NPPF clearly supports the use of minimum densities at paragraph 123 where it outlines that:<br/><i>"Where there is an existing or anticipated shortage of land for meeting identified housing needs, it is especially important that planning policies and decisions avoid homes being built at low densities, and ensure that developments make optimal use of the potential of each site. In these circumstances:</i><br/>a) <i>Plans should contain policies to optimise the use of land in their area and meet as much of the identified need for housing as possible. This will be tested robustly at examination, and should include the use of minimum density standards for city and town centres and other locations that are well served by public transport. These standards should seek a significant uplift in the average density of residential development within these areas, unless it can be shown that there are strong reasons why this would be inappropriate;</i><br/>b) <i>The use of minimum density standards should also be considered for other parts of the plan area. It may be appropriate to set out a range of densities that reflect the accessibility and potential of different areas, rather than one broad density range...</i>"</p> <p>St Catherine's Hospice is seeking to erect circa. 60-70 dwellings at a density of 96 dwelling per hectare (dph) at Malthouse Road, as demonstrated in the appended illustrative masterplan (Appendix 2.0 and 3.0). Notably draft Strategic Policy CL5 requires a minimum density of 45-70 dwellings per hectare for all major developments (under 80 units) within the Built-Up Area Boundary. The illustrative proposals therefore accord with this draft policy.</p> |
| REP/033  | Horsham District Council                    | CL5             | We support this policy in principle, but consider it is not justified as stands and that its effectiveness could be improved.  |

| Chapter 4. Character, Landscape and Development Form |  |                              |   |          |                |              |           |   |         |                         |        |   |         |                         |        |   |         |                         |        |   |          |                              |        |   |              |                              |        |   |         |                              |        |   |         |                        |        |   |                 |                        |        |   |         |                        |        |
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|  |  |                              | <p>We welcome that the policy sets out minimum densities that are higher than previously used. This is an important means of ensuring no stone is unturned in seeking to maximise meeting identified housing needs in Crawley. However it is not clear what the evidence is for selecting these specific density ranges. This should be made fully transparent to ensure that the policy is justified.</p> <p>It is also not clear from this policy exactly where these densities would apply: although examples are given, this does not provide sufficient certainty. Therefore the policy is not fully effective.</p> <p><b>Suggested Modifications:</b><br/>           Change sought: It is considered necessary to prepare a densification study to consider, amongst other things, appropriate densities. This should include a spatial analysis of what is appropriate, or transparently present the evidence already gathered to evidence this.</p>   |          |                |              |           |   |         |                         |        |   |         |                         |        |   |         |                         |        |   |          |                              |        |   |              |                              |        |   |         |                              |        |   |         |                        |        |   |                 |                        |        |   |         |                        |        |
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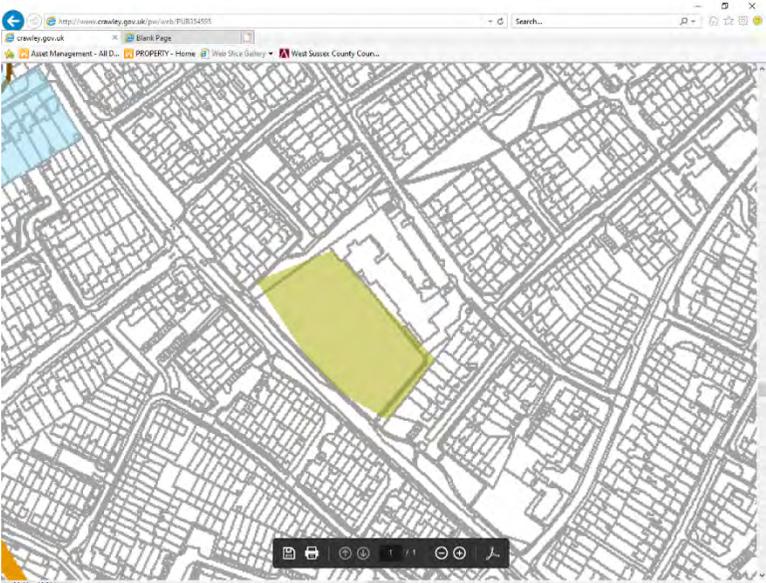
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| Ref. No.   | Respondent                  | Policy/<br>Para | Comments   |
|  |                             |                 | <p>Our detailed comments are as follows:<br/>           We welcome the approach to combine under one chapter, the issues which were previously separated into Character &amp; Design, and then Landscaping &amp; Landscape Character.<br/>           This amended policy now requires a significant level of information for all major development in regard to Masterplans or Development Briefs. Whilst we appreciate larger strategic sites will be required and should do so, this is very onerous if you are using the major development definition. It is also not clear what “larger schemes” are. We would therefore suggest that further clarity is added to this policy especially in regard to criteria a) <i>which states that Development Briefs and Masterplans would be required in areas “where there is a need to guide and promote change”</i>.</p>  |
| REP/066  | Mid Sussex District Council | CL5             | <p><b>Crawley Local Plan Review 2020 – 2035 – Submission version</b><br/>           Mid Sussex welcomes the opportunity to comment on the submission Crawley Local Plan Review (the Plan) and our detailed comments on the Strategic Policies of the Plan build on our earlier response to the Regulation 18 draft of the Local Plan.<br/>           Mid Sussex welcomes the further work undertaken by Crawley since the publication of the draft Local Plan and the identification of additional sources of housing supply, resulting in another 550 units. In particular, Mid Sussex supports the revisions to policies which will ensure that there is a more effective use of land in meeting housing and other land use needs in line with the National Planning Policy Framework (NPPF).<br/>           Mid Sussex has reviewed the Plan and accompanying evidence that has been prepared to support the Plan however it is noted that some of the evidence base, including Transport Assessment, Viability and Habitats Regulation Assessment have not yet been completed and therefore these comments are provided in this context. Mid Sussex may wish to make further comments as and when the evidence base is complete.</p> <p><b>Suggested Modifications:</b><br/>           Strategic Policy CL5: Form of New Development – Layout, Scale and Appearance<br/>           Mid Sussex <b>supports this policy in principle</b> as it seeks to make more efficient use of land. However, the Council consider that the Policy could be <b>more effective</b>.<br/>           The Council <b>supports</b> the concept of ‘compact development’ and the inclusion of density standards on some locations within the Town. However, the Council consider that the Policy could be <b>more effective</b> by being clearer. Whilst the Policy sets out minimum density standards across the Borough it states that residential density standards will be informed by Area Character Assessment. It is unclear from the supporting evidence if these Assessments have already been undertaken, and if not who will be responsible for preparing these.<br/> <b>Change required:</b> Make the application of the policy clearer.</p> |

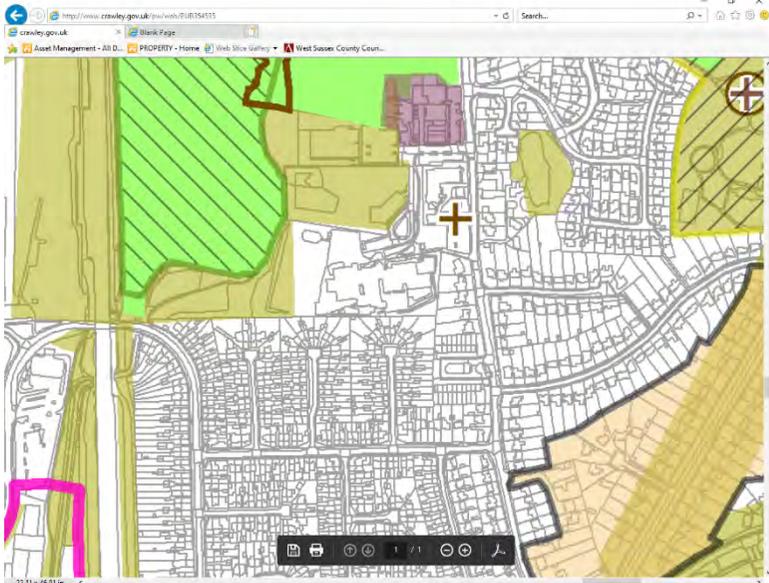
| Chapter 4. Character, Landscape and Development Form |  |              |   |
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| Ref. No.   | Respondent                                     | Policy/ Para | Comments  |
| REP/026  | Rainier Developments Ltd                       | CL6          | <p>Strategic Policy CL5 is a revised version to Strategic Policy CD4 (b) of the Regulation 18 version Draft Local Plan. Rainier welcome removal of the upper limit for high density development in favour of defining high density development as a 'minimum' of 200 dwellings per hectare. Rainier also support the removal of identifying a limit to the storey height of new development which is controlled by other policies in the Local Plan.</p> <p><b>Suggested Modifications:</b><br/>See Regulation 18 response</p>  |
| REP/006  | West Sussex County Council Property and Assets | CL6          | <p>(Copied from GI3)<br/>The land at Cheals Roundabout is held for strategic infrastructure purposes, and to ensure that the road remains safe and can be well maintained. This representation was raised in our earlier response of 22 August 2019 in response to the Local Plan Review, and we would request reassurance that our objection has been considered and is reflected in this latest version in order to demonstrate that the plan is Positively Prepared.<br/>A copy of the Local Plan Map with areas affected is attached below.</p>  <p>As a consequence we would request:</p> <ul style="list-style-type: none"> <li>• Removal of the designations of 'Structural landscaping' to the areas to the north and east of the roundabout shaded olive green, and also</li> <li>• Removal of the designation as 'Biodiversity Opportunity Areas' of the area to the south of the roundabout shaded bright green.</li> </ul> |

**Chapter 4. Character, Landscape and Development Form**

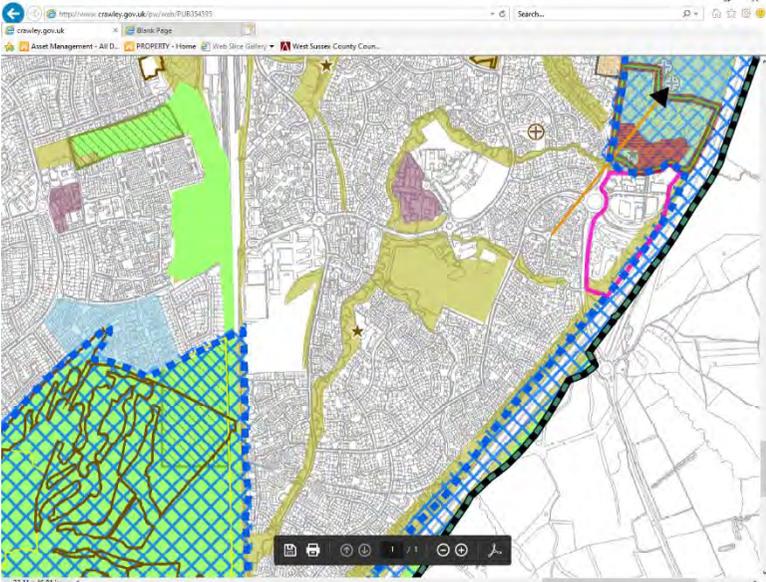
| Ref. No. | Respondent                                     | Policy/<br>Para | Comments  |
|----------|--|-----------------|---|
|          |  |                 | <p><b>Suggested Modifications:</b><br/>                     In order to demonstrate that the Plan is positively prepared and is informed by agreement with WSCC we would request:</p> <ul style="list-style-type: none"> <li>• Removal of the designations of 'Structural landscaping' to the areas to the north and east of the roundabout shaded olive green, and also</li> <li>• Removal of the designation as 'Biodiversity Opportunity Areas' of the area to the south of the roundabout shaded bright green.</li> </ul>   |
| REP/006  | West Sussex County Council Property and Assets | CL6             | <p><b>The Oaks Primary School</b> is proposed to be designated as a 'Biodiversity Opportunity Area' (bright green) and an area of 'Structural landscaping' (olive green). An extract of the Local Plan Map with areas affected is attached below. These designations may serve to compromise or constrain (see para 3.4) the statutory obligation placed upon the Council to meet any future need to create additional spaces at the school, particularly in view of the proposed new housing allocations in Tilgate.</p>  <p>We therefore wish to object to the proposed designations for the reasons set out above and in order to demonstrate that the Plan is positively prepared and is informed by agreement with WSCC, namely that the areas are already protected due to their status, and that there may be a future requirement to increase the capacity of the schools to accommodate additional children.</p> <p><b>Suggested Modifications:</b><br/>                     To remove the school fields and buildings at The Oaks Primary School from the list of proposed designated areas of 'Biodiversity Opportunity Area' (bright green) and an area of 'Structural landscaping' (olive green) within the</p> |

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| Ref. No. | Respondent  | Policy/<br>Para | Comments   |
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|          |   |                 | proposed Local Plan in order to demonstrate that the Plan is positively prepared and is informed by agreement with WSCC.   |
| REP/006  | West Sussex County Council<br>Property and Assets | CL6             | <p><b>Our Lady Queen of Heaven School</b> is proposed to be designated as an area of ‘Structural landscaping’. An extract of the Local Plan Map with areas affected is attached below. This designation may serve to compromise or constrain (see para 3.4) the statutory obligation placed upon the Council to meet any future need to create additional spaces at the school.</p>  <p>We therefore wish to object to the proposed designations for the reasons set out above, and in order to demonstrate that the Plan is positively prepared and is informed by agreement with WSCC namely that the areas are already protected due to their status, and that there may be a future requirement to increase the capacity of the schools to accommodate additional children.</p> |

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|--|--|--------------|--|
| Ref. No.   | Respondent                                     | Policy/ Para | Comments   |
|  |  |              | <p><b>Suggested Modifications:</b><br/>           To remove the school fields at Our Lady Queen of Heaven School from the list of proposed designated areas of Structural landscaping within the proposed Local Plan in order to demonstrate that the Plan is positively prepared and is informed by agreement with WSCC.</p>  |
| REP/006  | West Sussex County Council Property and Assets | CL6          | <p>Areas in <b>Milton Mount Primary School</b> are proposed to be designated as areas of 'Structural landscaping'. An extract of the Local Plan Map with areas affected is attached below. This designation may serve to compromise or constrain (see para 3.4) the statutory obligation placed upon the Council to meet any future need to create additional spaces at the school.</p>  <p>We therefore wish to object to the proposed designations for the reasons set out above, and in order to demonstrate that the Plan is positively prepared and is informed by agreement with WSCC namely that the areas are already protected due to their status, and that there may be a future requirement to increase the capacity of the schools to accommodate additional children.</p> |

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| Ref. No. | Respondent                                     | Policy/ Para | Comments   |
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|          |  |              | <p><b>Suggested Modifications:</b><br/>                     To remove the school fields at Milton Mount Primary School from the list of proposed designated areas of Structural landscaping within the proposed Local Plan in order to demonstrate that the Plan is positively prepared and is informed by agreement with WSCC.</p>  |
| REP/006  | West Sussex County Council Property and Assets | CL6          | <p>Areas within <b>Oriel High School</b> are proposed to be designated as areas of 'Structural landscaping'. An extract of the Local Plan Map with areas affected is attached below. This designation may serve to compromise or constrain (see para 3.4) the statutory obligation placed upon the Council to meet any future need to create additional spaces at the school.</p>  <p>We therefore wish to object to the proposed designations for the reasons set out above, and in order to demonstrate that the Plan is positively prepared and is informed by agreement with WSCC namely that the areas are already protected due to their status, and that there may be a future requirement to increase the capacity of the schools to accommodate additional children.</p> |

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| Ref. No.   | Respondent               | Policy/<br>Para | Comments   |
|  |                          |                 | <p><b>Suggested Modifications:</b><br/>To remove the school fields at Oriel High School from the list of proposed designated areas of Structural landscaping within the proposed Local Plan in order to demonstrate that the Plan is positively prepared and is informed by agreement with WSCC.</p>   |
| REP/040  | SKY Gem Properties Ltd   | CL6             | <p>Our land under the title, WSX212622, on Northgate Avenue, in Three Bridges is included in structural landscape. I believe this is by mistake. Enforcement Notice was served before the current Local Plan was adopted. It was notified to the Council that we are appealing. Hence, the inclusion should have been suspended until the decision of Inspector. Appeal was heard on 18th November 2016 under the reference; APP/Q3820/C/15/3141077. The decision was notified by email on 16th January 2017. Read paragraphs 3, 10 and 11. There was no planning history before we purchased this land. This is not true. This land was part of Mitchell's Farm and was designated for residential development by Commission For Newtown's.</p> <p>Crawley borough Council appealed against the decision of Inspector in High Court. Appeal was dismissed. Decision came from Queens Bench Division Planning court under reference; CO/913/2017, on 21st March 2017.</p> <p>In National Planning Policy Framework under paragraph 019 and reference ID: 37-018-20140306 it is stated that; A Local Green Space does not to be in public ownership. However, the local planning authority (in the case of local plan making) or the qualifying body (in the case of neighbourhood plan making) should contact landowners at an early stage about proposals to designate any part of their land as Local Green Space. Landowners will have opportunities to make representations in respect of proposals in a draft plan.</p> <p>We never ever been contacted for any proposal. How we could have made any representation?</p> <p>This site is also ignored for residential development.</p> <p><b>Suggested Modifications:</b><br/>Remove our land from Structural Landscaping on Local Plan Map. This will be in line with National Planning Policy Framework. After this modification Local Plan will be legally compliant and sound.<br/>Consider our land for residential development.</p> |
| REP/068  | Sussex Wildlife Trust    | CL6             | <p>Strategic Policy CL6: Structural Landscaping<br/>This policy was previously within section 5 under policy LC1. We note that our proposed amendments have been incorporated and now sit within section 4.70.</p>   |
| REP/033  | Horsham District Council | CL7             | <p>We support this policy in principle, but consider that its effectiveness could be improved.<br/>The long distance view splays shown are extensive and cover a significant proportion of Crawley. It is important that well-designed higher-density proposals are not stymied by Policy CL7, given the significant unmet development needs and the importance of leaving no stone unturned in meeting this need.</p>   |

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| Ref. No.   | Respondent   | Policy/<br>Para | Comments   |
|  |  |                 | <p><b>Suggested Modifications:</b><br/>Change sought: Request that the policy includes clarification text to make clear that appropriately-designed higher density development will still be appropriate in the important and valued views areas, subject to the provisions of this policy.</p>  |
| REP/036  | Vail Williams on behalf of UK Commercial Property Finance Holdings Ltd | CL7             | <p>We are writing this letter on behalf of our client UK Commercial Property Finance Holdings Limited, in response to the Crawley Borough Council (CBC) Regulation 19 Submission draft Local Plan Review 2035 specifically relating to matters which impact on the site at Unit 2 and Unit 3, Charlwood Road, Gatwick Gate.</p> <p>The attached plans identify the site boundaries for Unit 2 and Unit 3, Gatwick Gate. The two units sit adjacent to one another and are located within the existing airport safeguarded land but outside the southern boundary of Gatwick Airport.</p> <p>Our response will reflect the context of the above site and specifically, will comment on the following key proposals in the CBC Submission draft Local Plan 2035:</p> <ul style="list-style-type: none"> <li>- North Crawley Area Action Plan</li> <li>- Main Employment Area designation</li> </ul> <p>In addition, we note the proposed change to the existing Airport Boundary in the immediate area of our client's site therefore, we have provided some commentary on policies relating to the Gatwick Airport boundary as shown on the Local Plan Map.</p> <p>We will also provide some commentary on matters of character, landscaping and development form due to the sites location outside of the built up boundary and within an identified long distance view splay. Our detailed comments are as follows:</p> <p>We also note that our client's site is within a long distance view splay as identified on the Local Plan Map and therefore, Policy CL7: Important and Valued Views remains relevant for any future proposal to the site and surrounding area.</p> <p>On behalf of our client, we seek further clarification on what this policy would mean for any redevelopment within the Main Employment Area and its relationship with the AAP process, in terms of what would be considered acceptable and how this will be assessed.</p> |
| REP/057  | Deloitte LLP on behalf of Universities Superannuation Scheme           | CL7             | <p>Draft Policy CL7 'Important and Valued Views' identifies that for Long Distance Views:<br/><i>"The points from which the view can be enjoyed must remain unobstructed by development in the foreground. Where the view is to an identified feature, development is required to protect and/or enhance this feature".</i></p> <p><b>Suggested Modifications:</b><br/>USS generally supports BCC's commitment to protecting and/or enhancing Important and Valued Views. However, it is important that Draft Policy CL7 does not overly restrict development. The western part of the Site is on the</p>  |

| Chapter 4. Character, Landscape and Development Form |  |                              |   |          |                |              |           |   |         |                         |        |   |         |                         |        |   |         |                         |        |   |          |                              |        |   |              |                              |        |   |         |                              |        |   |         |                        |        |   |                 |                        |        |   |         |                        |        |
|--|--|------------------------------|---|----------|----------------|--------------|-----------|---|---------|-------------------------|--------|---|---------|-------------------------|--------|---|---------|-------------------------|--------|---|----------|------------------------------|--------|---|--------------|------------------------------|--------|---|---------|------------------------------|--------|---|---------|------------------------|--------|---|-----------------|------------------------|--------|---|---------|------------------------|--------|
| Ref. No.   | Respondent                             | Policy/ Para                 | Comments  |          |                |              |           |   |         |                         |        |   |         |                         |        |   |         |                         |        |   |          |                              |        |   |              |                              |        |   |         |                              |        |   |         |                        |        |   |                 |                        |        |   |         |                        |        |
|  |  |                              | <p>eastern boundary of a Long Distance View. Therefore, USS recommends that Draft Policy CL7 is updated to provide flexibility and an exception to the policy to allow for well-designed development to ensure it does not unnecessarily restrict sustainable development.</p> <p><b>Conclusion</b></p> <p>In summary, USS considers that the emerging draft Crawley Local Plan can be considered 'sound', subject to implementing USS's recommendations, as set out above. USS strongly recommends that CBC ensure that the emerging document does not hinder the ability of Main Employment Areas to provide appropriate alternative development.</p>   |          |                |              |           |   |         |                         |        |   |         |                         |        |   |         |                         |        |   |          |                              |        |   |              |                              |        |   |         |                              |        |   |         |                        |        |   |                 |                        |        |   |         |                        |        |
| REP/061  | Historic England                       | CL7                          | We support Strategic Policy CL7: Important and Valued Views and the supporting reasoned justification that seek to protect views of heritage assets and within historic areas.  |          |                |              |           |   |         |                         |        |   |         |                         |        |   |         |                         |        |   |          |                              |        |   |              |                              |        |   |         |                              |        |   |         |                        |        |   |                 |                        |        |   |         |                        |        |
| REP/035  | Vail Williams on behalf of Ardmore Ltd | CL8                          | <p>Response on behalf of the Land Consortium on land adjacent Farm for Crawley Borough Council Local Plan Review 2035 Reg. 19 Local Presentations</p> <p>We are writing on behalf of our clients Ardmore Ltd and the consortium of 4 adjacent landowners, in regard to land to the North of Crawley and adjacent to Manor Royal.</p> <p>As per our previous submissions to your Regulation 18 stage in September, and our submission to your Employment Land Trajectory, there are nine sites and five landowners which all wish to act as signatories to this letter and we are appointed by them under the lead member, Ardmore Limited.</p> <p>To confirm, we have attached our masterplan and can confirm that the landowners are as follows:</p> <table border="1"> <thead> <tr> <th>Site no.</th> <th>Land ownership</th> <th>Site address</th> <th>Site area</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Ardmore</td> <td>Land at jersey Farm (A)</td> <td>0.59ha</td> </tr> <tr> <td>2</td> <td>Ardmore</td> <td>Land at Jersey Farm (b)</td> <td>2.18ha</td> </tr> <tr> <td>3</td> <td>Ardmore</td> <td>Land at Jersey Farm (c)</td> <td>8.77ha</td> </tr> <tr> <td>4</td> <td>Willmott</td> <td>Land at Little Dell Farm (A)</td> <td>3.98ha</td> </tr> <tr> <td>5</td> <td>Ohm and Hill</td> <td>Land at Little Dell Farm (B)</td> <td>1.94ha</td> </tr> <tr> <td>6</td> <td>Ardmore</td> <td>Land at Little Dell Farm (C)</td> <td>0.26ha</td> </tr> <tr> <td>7</td> <td>Maxwell</td> <td>Land at Poles Lane (A)</td> <td>1.43ha</td> </tr> <tr> <td>8</td> <td>Rixon and Crook</td> <td>Land at Poles Lane (B)</td> <td>0.68ha</td> </tr> <tr> <td>9</td> <td>Ardmore</td> <td>Land at Spikemead Farm</td> <td>3.67ha</td> </tr> </tbody> </table> <p>As per our previous representations, our main areas of comment will understandably be relating to the context, setting and landscape character of the land North of Manor Royal, as well as Gatwick Safeguarding and the Economic Growth policies.</p> | Site no. | Land ownership | Site address | Site area | 1 | Ardmore | Land at jersey Farm (A) | 0.59ha | 2 | Ardmore | Land at Jersey Farm (b) | 2.18ha | 3 | Ardmore | Land at Jersey Farm (c) | 8.77ha | 4 | Willmott | Land at Little Dell Farm (A) | 3.98ha | 5 | Ohm and Hill | Land at Little Dell Farm (B) | 1.94ha | 6 | Ardmore | Land at Little Dell Farm (C) | 0.26ha | 7 | Maxwell | Land at Poles Lane (A) | 1.43ha | 8 | Rixon and Crook | Land at Poles Lane (B) | 0.68ha | 9 | Ardmore | Land at Spikemead Farm | 3.67ha |
| Site no.   | Land ownership                         | Site address                 | Site area   |          |                |              |           |   |         |                         |        |   |         |                         |        |   |         |                         |        |   |          |                              |        |   |              |                              |        |   |         |                              |        |   |         |                        |        |   |                 |                        |        |   |         |                        |        |
| 1  | Ardmore                                | Land at jersey Farm (A)      | 0.59ha  |          |                |              |           |   |         |                         |        |   |         |                         |        |   |         |                         |        |   |          |                              |        |   |              |                              |        |   |         |                              |        |   |         |                        |        |   |                 |                        |        |   |         |                        |        |
| 2  | Ardmore                                | Land at Jersey Farm (b)      | 2.18ha  |          |                |              |           |   |         |                         |        |   |         |                         |        |   |         |                         |        |   |          |                              |        |   |              |                              |        |   |         |                              |        |   |         |                        |        |   |                 |                        |        |   |         |                        |        |
| 3  | Ardmore                                | Land at Jersey Farm (c)      | 8.77ha  |          |                |              |           |   |         |                         |        |   |         |                         |        |   |         |                         |        |   |          |                              |        |   |              |                              |        |   |         |                              |        |   |         |                        |        |   |                 |                        |        |   |         |                        |        |
| 4  | Willmott                               | Land at Little Dell Farm (A) | 3.98ha  |          |                |              |           |   |         |                         |        |   |         |                         |        |   |         |                         |        |   |          |                              |        |   |              |                              |        |   |         |                              |        |   |         |                        |        |   |                 |                        |        |   |         |                        |        |
| 5  | Ohm and Hill                           | Land at Little Dell Farm (B) | 1.94ha  |          |                |              |           |   |         |                         |        |   |         |                         |        |   |         |                         |        |   |          |                              |        |   |              |                              |        |   |         |                              |        |   |         |                        |        |   |                 |                        |        |   |         |                        |        |
| 6  | Ardmore                                | Land at Little Dell Farm (C) | 0.26ha  |          |                |              |           |   |         |                         |        |   |         |                         |        |   |         |                         |        |   |          |                              |        |   |              |                              |        |   |         |                              |        |   |         |                        |        |   |                 |                        |        |   |         |                        |        |
| 7  | Maxwell                                | Land at Poles Lane (A)       | 1.43ha  |          |                |              |           |   |         |                         |        |   |         |                         |        |   |         |                         |        |   |          |                              |        |   |              |                              |        |   |         |                              |        |   |         |                        |        |   |                 |                        |        |   |         |                        |        |
| 8  | Rixon and Crook                        | Land at Poles Lane (B)       | 0.68ha  |          |                |              |           |   |         |                         |        |   |         |                         |        |   |         |                         |        |   |          |                              |        |   |              |                              |        |   |         |                              |        |   |         |                        |        |   |                 |                        |        |   |         |                        |        |
| 9  | Ardmore                                | Land at Spikemead Farm       | 3.67ha  |          |                |              |           |   |         |                         |        |   |         |                         |        |   |         |                         |        |   |          |                              |        |   |              |                              |        |   |         |                              |        |   |         |                        |        |   |                 |                        |        |   |         |                        |        |

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| <b>Ref. No.</b>   | <b>Respondent</b>  | <b>Policy/<br/>Para</b> | <b>Comments</b>   |
|   |  |                         | <p>Our detailed comments are as follows:<br/>           We welcome the approach to combine under one chapter, the issues which were previously separated into Character &amp; Design, and then Landscaping &amp; Landscape Character.<br/>           Policy CL8: Development Outside the Built-Up Area<br/>           We are aware that our site is within the Upper Mole Farmlands Fringe and that this was an important factor in determining our recent planning applications. We assume that further detailed of the Landscape Character Assessment will evolve as part of the AP process and the wider Character Assessments that are being brought forward by the Council. We acknowledge paragraph 4.78 regarding interim position for development coming forward ahead of the AAP adoption.</p>   |
| REP/036   | Vail Williams on behalf of UK Commercial Property Finance Holdings Ltd | CL8                     | <p>We are writing this letter on behalf of our client UK Commercial Property Finance Holdings Limited, in response to the Crawley Borough Council (CBC) Regulation 19 Submission draft Local Plan Review 2035 specifically relating to matters which impact on the site at Unit 2 and Unit 3, Charlwood Road, Gatwick Gate.<br/>           The attached plans identify the site boundaries for Unit 2 and Unit 3, Gatwick Gate. The two units sit adjacent to one another and are located within the existing airport safeguarded land but outside the southern boundary of Gatwick Airport.<br/>           Our response will reflect the context of the above site and specifically, will comment on the following key proposals in the CBC Submission draft Local Plan 2035:<br/>           - North Crawley Area Action Plan<br/>           - Main Employment Area designation<br/>           In addition, we note the proposed change to the existing Airport Boundary in the immediate area of our client's site therefore, we have provided some commentary on policies relating to the Gatwick Airport boundary as shown on the Local Plan Map.<br/>           We will also provide some commentary on matters of character, landscaping and development form due to the sites location outside of the built up boundary and within an identified long distance view splay. Our detailed comments are as follows:<br/>           We acknowledge that our client's site is outside of the Built-Up Area boundary, as identified on the Local Plan Map and policy CL8: Development Outside the Built-Up Area. We support criteria set out within this policy, specifically criteria i) which seeks to ensure development is grouped within existing buildings to minimise visual impact.<br/>           We also acknowledge that our client's site is located on the northern edge of the Upper Mole Farmland Rural Fringe and therefore, must give consideration to impact on this landscape character area.<br/>           We note that there is a requirement in policy CL8 for development within the proposed AAP area to comply with both the criteria in policy SD3 and the criteria of policy CL8 and acknowledge in paragraph 4.78, the interim position</p> |

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| Ref. No.   | Respondent                               | Policy/<br>Para | Comments   |
|  |  |                 | for development coming forward ahead of the AAP adoption. We assume that the AAP will address in more detail, the Landscape Character Assessment to be brought forward as the AAP evolves.   |
| REP/050  | Montagu Evans on behalf of Homes England | CL8             | <p><b>Strategic Policy CL8: Development Outside the Built-Up Area</b><br/>This policy deals with development outside of the built-up area. One of the character areas identified is the “West of Ifield Rural Fringe” within which “proposals which respect this area of locally special rural fringe, its nature conservation and recreation value, its positive relationship with the urban edge and links to the wider countryside will be encouraged.”</p> <p><b>Suggested Modifications:</b><br/>Whilst Homes England generally supports this policy and agrees that the location of new development should be carefully considered, the potential relationship to wider housing growth and the need for housing across the wider area must also be addressed.<br/>However, in accordance with the long held recognition of the potential for this area to the west (HDC Local Plan Regulation 18 Site Allocation ‘West of Crawley’) to present an opportunity to contain essential links to new housing, Homes England maintains the position that the policy should acknowledge the potential for pedestrian and cycle links across this area to link any new development (which will include amenities such as schools to meet demand in Crawley) to existing communities. The following alternative amendments to Policy CL8 ‘West of Ifield Rural Fringe’ are proposed as underlined:<br/><u>“Proposals which respect this area of locally special rural fringe, its nature conservation and recreation value, its positive relationship with the urban edge will be encouraged while recognising the potential for appropriately planned and designed pedestrian and cycle links between the edge of the existing settlement and potential new development to the west. Such links must respect the Local Green Space designation which is relevant to the area’s particular qualities of nature, heritage, recreation, landscape, tranquillity and access to the wider countryside.</u><br/>This amendment is necessary to fulfil CBC’s duty to ensure the plan is positively prepared and effective thus acknowledging and providing flexibility for the Land West of Ifield Site Allocations and wider strategic opportunities being considered through the preparation of the Horsham Local Plan to be brought forward also ensuring maximum opportunity to link with existing neighbourhoods. Failure to acknowledge this would also make CL8 inconsistent with other policies with the CBC Local Plan, for example Policy H3g (x) discussed below, and Policy CL4 (5) (ii) and (iii) that require major development to connect development to areas of rural open space/green space and to ensure new route alignments follow direct desire lines allowing for through routes to be straight and direct, providing clear, legible and obvious linkages to adjoining areas.<br/>In accordance with the Reasoned Justification this wording is consistent with CBC’s acknowledgement that Rural fringe areas require a policy approach which respects their unique character and role whilst also encouraging</p> |

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| Ref. No.   | Respondent                  | Policy/<br>Para | Comments  |
|  |                             |                 | sustainable development which can enhance access and interaction with the area from Crawley's neighbourhoods. The proposed change also accords with the main aim of CL8 which is to ensure that these areas do not become suburban in nature.   |
| REP/061  | Historic England            | CL8             | Strategic Policy CL8: Development Outside the Built-Up Area is supported.   |
| REP/066  | Mid-Sussex District Council | CL8             | <p><b>Crawley Local Plan Review 2020 – 2035 – Submission version</b></p> <p>Mid Sussex welcomes the opportunity to comment on the submission Crawley Local Plan Review (the Plan) and our detailed comments on the Strategic Polices of the Plan build on our earlier response to the Regulation 18 draft of the Local Plan.</p> <p>Mid Sussex welcomes the further work undertaken by Crawley since the publication of the draft Local Plan and the identification of additional sources of housing supply, resulting in another 550 units. In particular, Mid Sussex supports the revisions to policies which will ensure that there is a more effective use of land in meeting housing and other land use needs in line with the National Planning Policy Framework (NPPF).</p> <p>Mid Sussex has reviewed the Plan and accompanying evidence that has been prepared to support the Plan however it is noted that some of the evidence base, including Transport Assessment, Viability and Habitats Regulation Assessment have not yet been completed and therefore these comments are provided in this context. Mid Sussex may wish to make further comments as and when the evidence base is complete.</p>                     |
|  |                             |                 | <p><b>Suggested Modifications:</b></p> <p>Strategic Policy CL8: Development Outside the Built-up Area</p> <p>Mid Sussex <b>supports this policy in principle</b> however considers that it could be <b>more effective</b>.</p> <p>Mid Sussex made comments on the previous draft in relation to policy CL8: Development Outside the Built-up Area. Whilst we welcome the changes which have been made to the policy, the objective of the policy remains the same. Therefore, we wish to reiterate that opportunities for development within these areas should be positively assessed, particularly as Crawley has an unmet housing need.</p> <p>There can be opportunities for development within designated areas, including the AONB. As a rural district, the majority of Mid Sussex housing supply is within the countryside (i.e. outside built-up areas) and Mid Sussex District Council's spatial strategy allocates land for development in the AONB to meet its adopted housing requirement, which includes some of Crawley's unmet need.</p> <p><b>Change required:</b> This policy needs to be amended to be a positively framed policy which promotes and supports some development outside of the Built-Up Area.</p> |

| <b>Chapter 4. Character, Landscape and Development Form</b> |                       |                         |  |
|---|-----------------------|-------------------------|--|
| <b>Ref. No.</b>   | <b>Respondent</b>     | <b>Policy/<br/>Para</b> | <b>Comments</b>  |
| REP/068   | Sussex Wildlife Trust | CL8                     | <p>Strategic Policy CL8: Development outside the Built Up Area.</p> <p>This policy was previously with section 5 under Strategic Policy LC5. We maintain our position that the presumption should be against any development within the Worth Way Local Wildlife Site (LWS). Additionally, given the valuable habitats it contains, any development within Tilgate Country Park must ensure the conservation and enhancement of biodiversity.</p> <p>However we do note that if the council proceed with this area for development our comments relating to biodiversity have been incorporated into the policy wording.</p> |

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| Ref. No.                                     | Respondent               | Policy/ Para | Comments   |
| REP/033                                      | Horsham District Council | DD1          | We support this policy which is clear in its encouragement of efficient use of land as part of good design.  |
| REP/059                                      | Surrey County Council    | DD1          | <p>We consider that the Crawley Local Plan is legally compliant, sound and compliant with the duty to co-operate, but wish to emphasise the importance of maintaining the policy wording set out below.</p> <p><b>Suggested Modifications:</b></p> <p>As Surrey's landfill capacity is limited, we support the requirement, included within policies DD1, H3d and H3e, for waste and recycling storage to be designed into new housing development schemes. These measures will minimise waste by ensuring that it is managed at the highest practical point on the waste hierarchy. For this reason, we suggest minor modifications to policies DD1, H3d and H3e, to include a requirement for the sustainable management of construction, demolition, and excavation waste. These modifications would be in accordance with West Sussex Waste Local Plan Policy W23: 'Waste Management within New Development'.</p> <p>As Surrey's landfill capacity is limited, we welcome the requirement, included within policies DD1, H3d and H3e, for waste and recycling storage to be designed into new housing development schemes. These measures will minimise waste by ensuring that it is managed at the highest practical point on the waste hierarchy. For this reason, we suggest minor modifications to policies DD1, H3d and H3e, to include a requirement for the sustainable management of construction, demolition, and excavation waste. These modifications would be in accordance with West Sussex Waste Local Plan Policy W23: 'Waste Management within New Development'.</p> |
| REP/061                                      | Historic England         | DD1          | In Strategic Policy DD1: Normal Requirements of All New Development we suggest inclusion of a reference to heritage in bullet b); e.g. 'Retain and reuse existing buildings occupying a site or demonstrate why this is not feasible, viable or desirable. This is particularly relevant in the case of building, structures or landscape features that are of heritage significance or contribute to local character, setting and context'.   |
| REP/068                                      | Sussex Wildlife Trust    | DD1          | <p><b>Strategic Policy DD1 Normal Requirements of All New Development</b></p> <p>This policy was previously within section 4 and referenced as CD6 Normal Requirements of all New Development. SWT are pleased to see the amendments proposed have been included.</p>  |
| REP/010                                      | Home Builders Federation | DD2          | Strategic Policy DD2 requires that all new build dwellings should be constructed in accordance with optional Building Regulations Requirement of M4 (2) for accessible and adaptable dwellings. As the Council will be aware if they want to adopt the optional standards for M4 (2) and M4 (3) then this should only be done in accordance with the paragraph 127f of the NPPF and the supporting guidance in paragraph 56-005 to 56-011 of PPG. In particular we would draw the Council's attention to footnote 46 of the NPPF which states that: "... planning policies for housing should make use of the Government's optional technical standards for accessible and adaptable housing where this would address an identified need for such properties".   |

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| Ref. No.                                     | Respondent | Policy/ Para | Comments   |
|  |            |              | <p>The draft local plan considers the evidence supporting this policy at paragraph 5.20. This paragraph outlines that there is an increasingly elderly population that it is close to the national average and with the number of people with long term health problems or disabilities increasing by 7,000 people by 2039. However, on further examination of the Council's Strategic Housing Market Assessment (SHMA) we note that further evidence on the health issues facing residents of Crawley indicate that the increase in individuals with mobility problems is expected to increase by the much lower level of 1,808 people around 30% of the homes that will be delivered in this local plan.</p> <p>The study goes on to recognise that many of these individuals will remain within their own homes but despite this consider it sensible to design housing to be adapted in the future. We would agree that it may be sensible for some homes to be built provide adaptable accommodation but the evidence does not support the need for all homes to be built to this level. As outlined above footnote 46 is clear that Councils should make use of the optional technical standards only where they would "address an identified need for such properties". Had the Government intended all homes to be built to this standard then it would have taken the decision to require all new homes to be built to this standard. However, this is not the approach that has been taken and the Council's policy should reflect their identified needs.</p> <p>The Council's evidence also fails to consider the number properties that will have been adapted to date, and those that will be adapted to meet their owner's needs during the plan period. The Council's SHMA acknowledges that existing residents who will need a more accessible in this plan period are unlikely to move and that the majority of those in such need will already reside in the Borough. As such it must be expected that many of those in needs will meet their needs by adapting their current home. This will both increase the stock of adapted homes and reduce the overall need for such accommodation. Given that PPG requires the accessibility and adaptability of the existing housing stock to form part of the Council's assessment of needs it will be important for these considerations to be taken in to account.</p> <p>It is the HBFs opinion that M4 (1) standards are likely to be suitable for most residents. There may be a need for some new dwellings to be built to M4(2) especially specialist housing but there is not the need for all new dwellings to be built to M4(2) as not all existing older residents will move home and those that do move may not choose to live in a new dwelling. We therefore do not consider the requirement for all homes be built to part M4 (2) to be justified and that a more proportionate approach is taken.</p> <p>We are also concerned regarding the restrictions relating to the flexible application of this policy. Whilst we welcome the flexibility it is not consistent with national policy to only apply these in exceptional circumstances. Paragraph 56-008 does not distinguish the type of site where flexibilities can be applied and states that where strep free access cannot be achieved then neither optional standard should be applied.</p> <p><b>Suggested Modifications:</b><br/> We would therefore suggest that the policy amended as below<br/> <del>In exceptional circumstances, flexibility may be applied in the application of this policy requirement for:</del></p> |

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| Ref. No.                                     | Respondent               | Policy/ Para | Comments   |
|  |                          |              | <p><del>a) specific small scale infill developments</del><br/> <del>b) flats above existing shops or garages</del><br/> <del>e) Stacked maisonettes where the potential for decked access to lifts is restricted.</del></p> <p><u>There will be circumstances where step free access cannot be achieved or will make development unviable. In such situations, the Council will not apply this policy.</u></p>   |
| REP/021                                      | Gladman Developments Ltd | DD2          | <p>These representations are submitted by Gladman in response to the current Regulation 19 consultation on the Crawley Local Plan 2035. Gladman specialise in the promotion of strategic land for residential development with associated community infrastructure. Gladman has considerable experience in the development industry across a number of sectors, including residential and employment development. From that experience, we understand the need for the planning system to provide local communities with the homes and jobs that are needed to ensure that residents have access to a decent home and employment opportunities. 1.2.1 The Crawley Local Plan 2030 was adopted in December 2015 and covers the period up to 2030. The Council are now in the process of preparing a new Local Plan. This new Local Plan will cover the period from 2020 to 2035 (a 15-year period) providing the policy framework and site allocations for this period. The revised Framework (2019) sets out four tests that must be met for Local Plans to be considered sound. In this regard, we submit that in order for the Local Plan to be sound it is fundamental that the Crawley Local Plan Review is: Gladman also has a wealth of experience in contributing to the Development Plan preparation process, having made representations on numerous local planning documents throughout the UK and having participated in many Local Plan public examinations. It is on the basis of that experience that the comments are made in this representation. Through this submission, Gladman have sought to provide our thoughts on a number of the proposed policies. Gladman submit that the Council will need to carefully consider some of its policy choices and ensure that its evidence base is up-to-date and robust in light of changing circumstances and the changes brought about by the revised National Planning Policy Framework (NPPF) (2019).</p> <p><b>Context</b><br/> <b>Positively Prepared</b> – providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;<br/> <b>Justified</b> – an appropriate strategy, taking into account the reasonable alternatives,<br/> <b>Effective</b> – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and <b>Consistent with national policy</b> – enabling the delivery of sustainable development in accordance with the policies in the Framework.</p> |

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| Ref. No.                                     | Respondent | Policy/ Para | Comments   |
|  |            |              | <p>On 24th July 2018, the Ministry of Housing, Communities and Local Government (MHCLG) published the Revised National Planning Policy Framework which was subsequently updated in February 2019. These publications form the first revisions of the Framework since 2012 and implement changes that have been informed through the Housing White Paper, The Planning for the Right Homes in the Right Places consultation and the draft Revised Framework consultation. The revised Framework (2019) introduces a number of major changes to national policy and provides further clarification to national planning policy as well as new measures on a range of matters. Crucially, the changes to national policy reaffirms the Government’s commitment to ensuring up-to-date plans are in place which provide a positive vision for the areas which they are responsible for to address the housing, economic, social and environmental priorities to help shape future local communities for future generations. Paragraph 16 of the Framework (2019) states that Plans should:</p> <p>National Planning Policy Framework</p> <ul style="list-style-type: none"> <li>a) <i>Be prepared with the objective of contributing to the achievement of sustainable development;</i></li> <li>b) <i>Be prepared positively, in a way that is aspirational but deliverable;</i></li> <li>c) <i>Be shaped by early, proportionate and effective engagement between plan-makers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees;</i></li> <li>d) <i>Contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals;</i></li> <li>e) <i>Be accessible through the use of digital tools to assist public involvement and policy presentation; and</i></li> <li>f) <i>Serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area (including policies in this Framework, where relevant).</i></li> </ul> <p>To support the Government’s continued objective of significantly boosting the supply of homes, it is important that the Local Plan Review provides a sufficient amount and variety of land that can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay<sup>1</sup>.</p> <p>To be considered sound at Examination the Local Plan Review will need to meet all four of the soundness tests set out in paragraph 35 of the Framework (2019).</p> <p>To support the Government’s continued objective of significantly boosting the supply of new homes, it is important that the Local Plan provides a sufficient amount and variety of land that can come forward without delay where it is needed to meet housing needs.</p> |

<sup>1</sup> : NPPF – Paragraph 60

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|  |            |              | <p>In determining the minimum number of the amount of homes needed, strategic plans should be based upon a local housing needs assessment, defined using the standard method unless there are exceptional circumstances to justify an alternative approach.</p> <p>2.1.7 Once the minimum number of homes that is required has been defined, Paragraph 67 of NPPF 2019 requires a Local Planning Authority to have a clear understanding of the land available in their area through the preparation of a strategic housing land availability assessment (SHLAA). This assessment should be used to identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability. Paragraph 67 requires a supply of:</p> <p>2.1.8 Annex 2 of NPPF 2019, provides updated definitions for the terms 'deliverable' and 'developable'. These are:</p> <p>a) Specific, deliverable sites for years one to five of the plan period; and</p> <p>b) Specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15 of the Plan.</p> <p><b><i>'To be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years. In particular:</i></b></p> <p><b><i>a) Sites which do not involve major development and have planning permission, and all sites with detailed planning permission, should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within five years (for example because they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans).</i></b></p> <p><b><i>b) Where a site has outline planning permission for major development, has been allocated in a development plan, has a grant of permission in principle, or is identified on a brownfield register, it should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years.'</i></b></p> <p><b><i>'To be considered developable, sites should be in a suitable location for housing development with a reasonable prospect that they will be available and could be viably developed at the point envisaged.'</i></b></p> <p>Local Authorities are required to meet the assessed housing need as defined by the Standard Method as a <b>minimum</b>, unless any adverse impacts would significantly and demonstrably outweigh the benefits of doing so. Where it is found that full delivery of housing needs cannot be achieved (owing to conflict with specific policies of the NPPF), Local Authorities are required to engage with their neighbours to ensure that identified housing needs can be met in full (see Paragraph 35 of the NPPF 2019).</p> <p>Securing the full and timely delivery of housing is a key objective of NPPF 2019. Paragraph 73 of NPPF 2019 confirms the need for local planning authorities to identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years' worth of housing. This should include a 5%, 10% or 20% buffer to the five-year supply depending on local circumstances.</p> |

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|  |            |              | <p>The NPPF 2019 introduces the need for local planning authorities to ensure that housing delivery is maintained in alignment with the minimum requirements of the Plan over the duration of the plan period. The Housing Delivery Test provides a measure of how many homes are delivered in an authority over a rolling 3-year period in contrast to its housing requirement or need. Where delivery falls below specific thresholds of the housing requirement, the Housing Delivery Test identifies specific actions or consequences required to be implemented to strengthen the future supply.</p> <p><b>Planning Practice Guidance</b><br/> The Government published updates to its Planning Practice Guidance (PPG) on 13th September 2018. The updated PPG provides further clarity on how specific elements of the revised Framework should be interpreted when preparing Local Plans. This Crawley Local Plan will need to follow this additional guidance.<br/> Strategic Policy DD2 relates to standards for accessible and inclusive design. This policy requires that all new development should be in accordance with the optional Buildings Regulation M4(2) ‘accessible and adaptable dwellings’ and that 5% of dwellings on major development schemes should be built to M4(3) ‘Wheelchair user dwellings’. The policy provides an element of flexibility in that it sets out that in exceptional circumstances, flexibility to these policy requirements may be applied, providing the development meets certain criteria.<br/> With regards to the optional technical standards for accessible and adaptable homes, if the Council wish to include a policy in the Local Plan adopting any of these optional standards, M4 (2) and M4 (3), which policy DD2 seeks to do, then this should only be done in accordance with the NPPF (2019) specifically paragraph 127.f, footnote 46 and also the guidance contained in the PPG.<br/> Footnote 46 states <i>“planning policies for housing should make use of the Government’s optional technical standards for accessible and adaptable housing where this would address an identified need for such properties.”</i> Any such policies would need to be based on relevant and up to date evidence regarding identified need in order to justify specific policy requirements.</p> <p><b>Suggested Modifications:</b><br/> Gladman refer to the PPG which sets out the evidence necessary to justify a policy requirement for M4 (2) and M4 (3). Specifically, paragraph ID 56-007 which states: <i>“There is a wide range of published official statistics and factors which local planning authorities can consider and take into account, including:</i><br/> 5.1.5 The Council will need to be able to demonstrate through robust up to date evidence the need for these policy requirements. Gladman are unclear whether there is sufficient evidence to demonstrate the need for all new dwellings to be M4 (2) and the basis for the requirement for 5% of dwellings to be built to M4 (3).<br/> <i>The likely future need for housing for older and disabled people (including wheelchair user dwellings).<br/> Size, location, type and quality of dwellings needed to meet specifically evidenced needs (for example retirement homes or care homes).</i></p> |

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| Ref. No.                                     | Respondent | Policy/ Para | Comments  |
|  |            |              | <p><i>The accessibility and adaptability of existing housing stock.</i><br/> How needs vary across different housing tenures.<br/> <i>The overall impact on viability.</i>" (ID: 56-007-20150327)</p>   |
| REP/054                                      | Habinteg   | DD2          | <p>Habinteg has 50 years' experience as a registered provider of accessible and inclusive housing. Our mission is to provide and promote accessible and adaptable homes so that disabled and non-disabled people can live together as neighbours. Our response therefore focuses on issues of access and inclusion that we believe are vital to the development of a plan to serve the needs of the whole population of Crawley.</p> <p>Habinteg strongly supports the approach to accessible and adaptable homes. The specific mention in Policy DD2 that "All new dwellings must be capable of adapting to the changing needs of residents through the application of building regulation Part M Category 2 – accessible and adaptable dwellings" is significant and welcome in helping to ensure that access and inclusion is prioritised in Crawley.</p> <p>This emphasises for us that alongside an increased supply of accessible and adaptable homes it is critical that an adequate number of homes are built to Category M4 (3) wheelchair user dwelling standard. Habinteg's <i>Forecast for Accessible Homes</i> also found that just 1% of homes outside London are set to be built to wheelchair dwelling standards between 2019 and 2030. With the lack of wheelchair user homes across the country it is essential that a proportion of all new homes built are delivered to that standard.</p> <p><b>Suggested Modifications:</b><br/> Policy DD2 says "In exceptional circumstances, flexibility may be applied in the application of this policy requirement for:<br/> a. specific small scale infill developments; b. flats above existing shops or garages; c. stacked maisonettes where the potential for decked access to lifts is restricted." We believe the language should be firmer where developers would be asked to prove why the standard can't be met, with this being something that is argued out at the planning permission stage.</p> <p>We do not underestimate the positive benefits of making a commitment to inclusive design. We know that the provision of a suitably accessible home in a welcoming and inclusively designed neighbourhood can transform the lives of people who are so often left to 'make do' in unsuitable accommodation.</p> <p>Our tenants have told us that having their need for accessible homes met can have wide ranging positive impacts, from the ability to access their children's rooms to read a bedtime story, to the ability to cook a family meal, and to come and go as they wish to visit family and friends. We also know that disabled people who have their needs for accessible homes met are four times more likely to be in work than those who don't. From a public services perspective accessible housing can help make hospital discharge faster, can help minimise expenditure residential care settings and can make reduce demand from domiciliary care.</p> |

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|  |                                |              | <p>According to the NHS there are 1.2 million wheelchair users in the UK nationally making up 2% of the UK population. Crawley according paragraph 2.20 has a population of 111,700 2,334 (2%) could be wheelchair users.</p> <p>We would like to see Crawley set a similar requirement for wheelchair user dwellings as that set down in the London Plan which requires that, 10% of new homes comply with Part M4 (3) Standard (the other 90% required to be built to part M4 (2) accessible and adaptable standard). Given the lack of wheelchair accessible properties available in general across the country, Habinteg believes that a 10% requirement of Part M4 (3) homes should be considered as a starting point for all local plans.</p> |
| REP/026                                      | Rainier Developments LTD       | DD3          | <p>Strategic Policy DD3 is a revision to Strategic Policy CD11 of the Regulation 18 Draft Local Plan. Rainier reiterate our support that all new dwellings should be delivered in accordance with National Space Standards. We note Policy DD3 'encourages' new high-density residential developments in excess of 80 units to achieve higher standards. Rainier are concerned that this may not make most efficient use of deliverable land, particularly in constrained town centre sites.</p> <p><b>Suggested Modifications:</b><br/>See Regulation 18 response</p>  |
| REP/005                                      | Thames Water Utilities Limited | DD4          | <p>We support the reference to taking account of existing sewerage and water infrastructure when planting trees. Thames Water recognises the environmental benefits of trees and encourages the planting of them. However, the indiscriminate planting of trees and shrubs can cause serious damage to the public sewerage system and water supply infrastructure. In order for the public sewers and water supply network to operate satisfactorily, trees, and shrubs should not be planted over the route of the sewers or water pipes.</p>  |
| REP/026                                      | Rainier Developments LTD       | DD4          | <p>Rainier are generally supportive of the Strategic Policy DD4 (revision of Strategic Policy LC3 of the Regulation 18 Draft Local Plan) which seeks to enhance the built form through provision of new tree planting or equivalent soft landscaping. The policy seeks one new tree or 'equivalent soft landscaping' for each new dwelling. The equivalent soft landscaping to one new tree is not defined. We suggest this is quantified.</p> <p><b>Suggested Modifications:</b><br/>See Regulation 18 response</p>  |
| REP/005                                      | Thames Water Utilities Limited | DD5          | <p>(Copied from DD4)</p> <p>We support the reference to taking account of existing sewerage and water infrastructure when planting trees. Thames Water recognises the environmental benefits of trees and encourages the planting of them. However, the indiscriminate planting of trees and shrubs can cause serious damage to the public sewerage system and water supply infrastructure. In order for the public sewers and water supply network to operate satisfactorily, trees, and shrubs should not be planted over the route of the sewers or water pipes.</p>   |
| REP/023                                      | Resident 10                    | DD5          | <p>Conscious that I have left things too late to comment as fully as I might have wished, I would make two points.</p>  |

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| Ref. No.                                     | Respondent               | Policy/ Para | Comments  |
|  |                          |              | <p><b>Suggested Modifications:</b><br/> First, with regard to Policy DD5: Tree Replacement Standards: whilst the first three sentences of paragraph 5.42 are good, the subsequent text should be amended to eliminate the possibility of an interpretation that adequate compensation can actually be achieved let alone <u>ensured</u> by replacement. It should be acknowledged that whilst the principle of 'replacement standards' has its place, there will without doubt, be instances in which some trees will be held to be literally irreplaceable; and whilst this still might not be sufficient to safeguard them against every development related eventuality, their loss or removal would need to be recognised as constituting an impact that would be beyond any compensation available through the planning system.</p>  |
| REP/026                                      | Rainier Developments LTD | DD5          | <p>We agreed that mitigating the loss of trees is important however, the number of replacement trees required by Strategic Policy DD5 (and formerly by Strategic Policy LC4 of the Regulation 18 Draft Local Plan) does not have full regard to the girth or maturity of the proposed replacement trees.<br/> As currently worded neither Strategic Policy DD4 nor DD5 consider the viability implications associated with the proposed commuted sum for the cost of new and replacement tree planting which should be considered alongside other Section 106 contributions.</p> <p><b>Suggested Modifications:</b><br/> See Regulation 18 response</p>   |
| REP/068                                      | Sussex Wildlife Trust    | DD5          | <p><b>Strategic Policy DD5 Tree Replacement Standards</b><br/> This policy was previously within section 4 and referenced as LC4 Tree preplacement standards. We recommended changes to the supporting text and we acknowledge this has been incorporated in to the submission version in section 5.40.</p>   |
| REP/056                                      | Gatwick Airport Limited  | DD6          | <p><b>Policy DD6: Aerodrome Safeguarding</b><br/> GAL support the need for a standalone policy in the draft Plan on Aerodrome Safeguarding but GAL considers the need for amendments to strengthen and clarify the supporting introductory text and wording of Policy DD6.</p> <p><b>Suggested Modifications:</b><br/> <b>Paragraph 5.46: Proposed Amendment</b><br/> Aerodrome safeguarding differs to the principle of safeguarding land for a possible additional runway to the south of Gatwick Airport. Instead, it relates to how a development could impact on <i>aerodrome and flight</i> safety. Aerodrome safeguarding assesses, for example, the height and design of proposed development or construction equipment that might be used (such as cranes) which could create a potential risk to <del>the airport</del> <i>safe flight operations</i> through impacts on <del>radar</del> <i>navigational aids, Instrument Flight Procedures (IFPs), infringement of the Obstacle Limitation Surfaces (OLS) and creating a 'physical' obstacle or the creation of building induced turbulence.</i> It also considers the potential risk to aviation created by large landscaping schemes, <del>lighting designs and new water bodies which could attract birds hazardous to</del></p> |

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|  |                         |              | <p><del>aviation</del> SUDS, the creation of wetlands and water bodies and building design such as the incorporation of large areas of flat/shallow pitched roofs. All have the potential to attract birds hazardous to aviation and in turn increase the bird strike risk to the aerodrome. Other factors to be taken into consideration are lighting design and renewable energy schemes to ensure that they will not be distracting to pilots and ATC and there is no impact on radar or glint and glare. The Public Safety Zone (PSZ) also needs to be taken into consideration as this limits any development within that zone.</p> <p><b>Policy DD6 Aerodrome Safeguarding: Proposed Amendment</b><br/> Development will only be supported if it is consistent with the continued safe operation of Gatwick Airport. Where required, the Local Planning Authority will consult with the <del>airport</del> aerodrome operator and/or the operator of technical sites (e.g. radar stations) on relevant proposals in the aerodrome safeguarded areas. Statutory consultation responses may require that restrictions are placed on the height or detailed design of buildings, structures or other developments to avoid impacts on the <del>airport</del> aerodrome, including those relating to navigational aids, <i>Instrument Flight Procedures (IFPs)</i> or on developments which may increase bird strike risk, create building-induced turbulence or including lighting that could pose a hazard to the safe operation of the <del>airport</del> aerodrome. Proposals that cannot be mitigated to the satisfaction of the statutory consultees are considered to be a hazard to aircraft safety and will be refused.</p> |
| REP/061                                      | Historic England        | DD7          | We support Non-Strategic Policy DD7: Advertisements in its references to considering the effects on the character of the locality, including 'scenic, historic, architectural or cultural value or features' in sub-paragraph a).  |
| REP/068                                      | Sussex Wildlife Trust   | DD7          | Strategic Policy DD7 Advertisements.<br>This policy was previously within section 4 and referenced as CD8 Advertisements. Although we recommended a standalone bullet point we acknowledge that the impact of light pollution on sensitive species and habitats have been included in bullet point (b).  |
| REP/056                                      | Gatwick Airport Limited | DD7          | <b>Policy DD7: Advertisements</b><br>GAL supports the inclusion of Policy DD7 (e) as it identifies the important need for aerodrome safeguarding to be considered.   |

| Chapter 6. Heritage |                  |              |  |
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| Ref. No.            | Respondent       | Policy/ Para | Comments   |
| REP/061             | Historic England | HA1          | <p>We support the broad intention of Strategic Policy HA1: Heritage Assets</p> <p><b>Suggested Modifications:</b></p> <p>But suggest the following amendments to strengthen the purpose of the policy and better reflect the intentions of the NPPF:</p> <p>Revise the final bullet point of the first paragraph to read Other assets with non-designated archaeological interest, assets of equivalent significance to scheduled monuments. <del>Especially within Archaeological Notification Areas in Crawley identified by West Sussex County Council</del> to reflect NPPF paragraph 194 and footnote 63.</p> <p>In paragraph 2 replace 'not lost' with conserved and enhanced to meet the test of NPPF paragraph 194.</p> <p>Add into paragraph 4 – 'If, in exceptional circumstances, as defined by paragraph 194 of NPPF, .... And it has been demonstrated to achieve substantial public benefits that outweigh that harm or loss,...' to reflect the intention of NPPF paragraph 195.</p> <p>Amend paragraph 5 to: 'In exceptional cases where a heritage asset is considered to be suitable for loss or replacement, <del>and it has been demonstrated its site is essential to the development's success</del> by being in accordance with the above criteria, proposals will be subject to a requirement to record the asset(s) concerned. The scheme of investigation, including the Historic England Recording Level, is to be agreed with the council in advance of its implementation and will reflect the importance and nature of the asset and the impact of the proposal'. This wording would better reflect NPPF paragraphs 195 and 196.</p> <p>We would like assurance that an up-to-date Evidence Base exists for the historic environment elements of the Crawley Local Plan or that such is in preparation. Paragraph 1.14 of the draft Local Plan includes reference to 'ASEQs and Locally Listed Buildings Heritage Assessment; ... Landscape Character Assessment; Historic Parks &amp; Gardens Review; ...' which date from 2010, 2012, and 2013 respectively. We have been unable to locate any other directly relevant more recent reports or studies. Paragraph 6.8 et al refer to the Crawley Heritage Strategy (2008), but no update to this appears to exist. The only other reference to possible evidence is given in footnote 61 on page 78.</p> <p>A Heritage Topic Paper or similar assessment document prepared in advance of, or alongside (if not already undertaken), the local plan can be a useful tool to amplify and elaborate on the delivery of the positive heritage policies in the Local Plan. Some local planning authorities have chosen to support their conservation strategy within the Local Plan using a topic specific SPD.</p> <p>These comments are based on the information provided by you at this time and for the avoidance of doubt does not reflect our obligation to advise you on, and potentially object to, any specific development proposal which may subsequently arise from this or later versions of the plan and which may, in our view, have adverse effects on the historic environment.</p> |

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|                     |   |              | If you would like further advice on the content of this letter or to discuss how the draft Local Plan could be revised to better reflect the intention of the NPPF, please contact me.  |
| REP/23              | Savills on behalf of St Catherine's Hospice | HA2          | <p>In the Regulation 18 representations we highlighted the capacity for redevelopment to improve the setting of Conservation Areas. Whilst we welcome Policy HA2's recognition of opportunities to improve conservation areas by remediating ungainly buildings, it is considered that the Local Plan can develop this by specifying areas that will enhance the setting of these heritage asset.</p> <p>Notably, Planning Practice Guidance (ref: 18a-003-20190723), states that:<br/> <i>".. Plan-making bodies should identify specific opportunities within their area for the conservation and enhancement of heritage assets, including their setting. This could include, where appropriate, the delivery of development that will make a positive contribution to, or better reveal the significance of, the heritage asset, or reflect and enhance local character and distinctiveness with particular regard given to the prevailing styles of design and use of materials in a local area."</i></p> <p>Currently, the draft Local Plan allocates Land East of Balcombe Road, Poundhill and St Catherine's Hospice, Malthouse for development in Strategic Policy H2 (Key Housing Sites). However, neither Strategic Policy HA2 nor Strategic Policy H2 highlight the potential for these developments to enhance the setting of the Conservation Areas.</p> <p>Strategic Policy HA2 could be strengthened in accordance with paragraph 127 of the NPPF, specifically where it states that planning policies should facilitate development that is:<br/> <i>"sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities."</i></p> <p>Significantly, paragraph B5 of the Sustainability Appraisal (SA) notes that "despite having grown considerably over a short period of time, Crawley's neighbourhoods have retained distinctive characters." Paragraph B6 also comments that "there are currently eleven conservation areas in the borough, defined as areas of special architectural or historic interest, the character or appearance of which it is desirable to preserve or enhance."</p> <p>The site analysis in the SA notes that the St Catherine's Hospice site will have a significant positive impact on the Built Environment, stating that is "is previously developed and its reuse will address a vacant site, part of which lies within a Conservation Area so will need appropriate design."</p> <p>This implies that the Council acknowledges that there is potential for the redevelopment of St Catherine's Hospice to enhance the setting of Malthouse Road Conservation Area, and also demonstrates that despite high levels of growth in the past, neighbourhoods in Crawley have retained their special characteristics. This sentiment should be drawn into Policy to highlight the positive impact new development and good design can have on Conservation Areas in Crawley.</p> <p><b>Suggested Modifications:</b><br/> As previously noted in paragraph 3.16 of this representation, the NPPF promotes the implementation of policy mechanisms to promote higher density development in constrained Authorities. CBC should reconsider the policy to</p> |

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| <b>Ref. No.</b>            | <b>Respondent</b>                                   | <b>Policy/ Para</b> | <b>Comments</b>  |
|                            |   |                     | <p>outline support for sensitive and innovative redevelopments within, or adjacent to, Conservation Areas and explicitly encourage higher densities, good design and appropriate change across Crawley. This will provide more confidence to developers looking at these sites and will help to realise housing delivery whilst conserving heritage assets in the Borough.</p> <p><b>Recommended Changes</b><br/>           [Conformity with the requirements of this Policy should be demonstrated as part of the Heritage Impact Assessment as part of the Heritage Impact Assessment]<br/>           The Council supports the redevelopment of suitable sites found within, or adjacent to, Conservation Areas where it can be demonstrated that the proposals will contribute to an improvement to the setting of the Conservation Area and promote well designed, innovative and higher density development in these sensitive locations.</p> |
| REP/061                    | Historic England                                    | HA2                 | We support policy Strategic Policy HA2: Conservation Areas.  |
| REP/061                    | Historic England                                    | HA4                 | Strategic Policy HA4: Listed Buildings and Structures is supported.  |
| REP/041                    | Ifield Village Conservation Area Advisory Committee | HA6                 | <p>IVCAAC supports the policies within these sections of the plan as they relate very much to the Ifield Village Conservation Area which has considerable heritage in terms of buildings, artefacts and road layout and varied open space that needs to be protected to retain the character of the village.</p> <p><b>Suggested Modifications:</b><br/>           However the designation of part of the open space as a Village Green is not acknowledged in HA6 nor in the map in OS on page 90. We have submitted a separate comment about this in relation to HA6.</p>  |
| REP/061                    | Historic England                                    | HA7                 | Strategic Policy HA7: Heritage Assets of Archaeological Interest is supported.   |

| Chapter 7. Open Space, Sport & Recreation |   |              |   |
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| Ref. No.                                  | Respondent  | Policy/ Para | Comments  |
| REP/033                                   | Horsham District Council                            | OS1          | We support this policy in principle, but consider that its effectiveness could be improved. If an area of open space is surplus to requirements, it presents an opportunity to re-use the site for housing and could potentially include new public recreation space. This in turn helps reduce the unmet development needs.  |
|   |   |              | <p><b>Suggested Modifications:</b><br/>Change sought: Request that Policy OS1 is worded more positively to more explicitly acknowledge the opportunities presented by surplus open space to support meeting housing need whilst improving recreational opportunities, and to better reflect Policy H3f.</p>   |
| REP/041                                   | Ifield Village Conservation Area Advisory Committee | OS1          | IVCAAC supports the policies within these sections of the plan as they relate very much to the Ifield Village Conservation Area which has considerable heritage in terms of buildings, artefacts and road layout and varied open space that needs to be protected to retain the character of the village.   |
|   |   |              | <p><b>Suggested Modifications:</b><br/>However the designation of part of the open space as a Village Green is not acknowledged in HA6 nor in the map in OS on page 90. We have submitted a separate comment about this in relation to HA6.</p>   |
| REP/066                                   | Mid Sussex District Council                         | OS1          | <p><b>Crawley Local Plan Review 2020 – 2035 – Submission version</b><br/>Mid Sussex welcomes the opportunity to comment on the submission Crawley Local Plan Review (the Plan) and our detailed comments on the Strategic Policies of the Plan build on our earlier response to the Regulation 18 draft of the Local Plan.<br/>Mid Sussex welcomes the further work undertaken by Crawley since the publication of the draft Local Plan and the identification of additional sources of housing supply, resulting in another 550 units. In particular, Mid Sussex supports the revisions to policies which will ensure that there is a more effective use of land in meeting housing and other land use needs in line with the National Planning Policy Framework (NPPF).<br/>Mid Sussex has reviewed the Plan and accompanying evidence that has been prepared to support the Plan however it is noted that some of the evidence base, including Transport Assessment, Viability and Habitats Regulation Assessment have not yet been completed and therefore these comments are provided in this context. Mid Sussex may wish to make further comments as and when the evidence base is complete.</p> |
|   |   |              | <p><b>Suggested Modifications:</b><br/>Mid Sussex <b>supports this policy in principle</b> but considers that it could be <b>more effective</b>.<br/>Policy OS1 protects against development which would affect the use of open spaces, sport and recreational spaces unless it meets certain criteria. Given the limited supply of suitable housing land in Crawley, this policy should recognise the significant opportunities presented by the Gatwick Expansion Safeguarding to rationalise open space in order to release land for much needed housing.</p>  |

| <b>Chapter 7. Open Space, Sport &amp; Recreation</b> |                       |                                |  |
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| <b>Ref. No.</b>                                      | <b>Respondent</b>     | <b>Policy/ Para</b>            | <b>Comments</b>  |
|  |                       |                                | <b>Change required:</b> The Policy needs to be amended to cross reference to Policy SD3 as the opportunities presented by the Gatwick Expansion Safeguarding land  |
| REP/029  | Sport England         | Planning Obligations Annex OS2 | Should be made clearer that the third paragraph (financial contributions towards enhancement of existing facilities for increased demand) is not appropriate where paragraph 2 applies in respect of playing fields as it is not in accord with para 97 of the NPPF or Sport England's playing field policy<br><br><b>Suggested Modifications:</b><br>Clarification of this is required. Existing playing fields and pitches unless demonstrated to be surplus to requirements through the evidence base (PPS) are to be replaced with equivalent or better provision in terms of quantity and quality and in a suitable location. |
| REP/068  | Sussex Wildlife Trust | OS2                            | Strategic Policy OS2: Provision of Open Space and Recreational Facilities<br>We note that a number of amendments have been made to this policy including the amendments we suggested.  |

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| Ref. No.                            | Respondent                     | Policy/ Para | Comments   |
| REP/001                             | Resident 1                     | IN1          | <p>Letter to Opinion, The Editor, Crawley Observer</p> <p>Dear Sirs, I was interested to read your articles 24<sup>th</sup> Jan plans for 10,000 new homes at Ifield and say on the future blueprint for Crawley. Infrastructure Covers a Multitude of important headings. A collective term for the fixed installations and facilities such as water?</p> <p>We have had times when the reservoirs have been very low and wishing for rain. Water is a worldwide problem. The Murrumbidgee Irrigation is one of nine New South Wales Irrigation Companies that regulate and trade water. A sad time for dairy farmers and rice growers when you can't get water. The Crops suffer and the dairy farms close.</p> <p>The population of Crawley known was 109,900 in 2014 and if the population growth continues to grow by 2020 could be 115,700</p> <p>I ask the question "are we going to get the Planning Policies Covered by the Strategic Priorities". I doubt it as it all costs money. Our increased Council tax will not pay for it.</p> <p>Crawley hospital was built and completed in 1962 and extensions built 1970 and 1981. Originally a full range of Services, Outpatient Care and Accident and Emergency were given, but by 2008 much was moved to East Surrey Hospital.</p> <p>I understand that Conservative M.P: for Crawley henry Smith has spoken on this subject and think it a good idea to send him a copy of this letter for interest.</p> <p>So is Crawley hospital part of the infrastructure? I think is. This is not mentioned by name in the report. People are at their best if they have good health.</p> <p>Gatwick Airport, I think will have a second runway in the future. Look at all the building going on in the area and should I say anticipated building like the 10,000 homes in Ifield. Maybe this comes under the heading of Infrastructure for transport?</p> <p>Hope is that things will get better, we will see!<br/>(Enclosed Letter from Henry Smith MP)</p> |
| REP/005                             | Thames Water Utilities Limited | IN1          | <p>As you will be aware, Thames Water are the statutory sewerage undertaker for the Borough.</p> <p>We support Policy IN1 and paragraph 8.10 in principle, but consider that there should be specific mention in the Policy to wastewater/sewerage infrastructure, similar to the separate policy IN3 on telecommunications.</p> <p>Thames Water seeks to co-operate and maintain a good working relationship with local planning authorities in its area and to provide the support they need with regards to the provision of water supply and sewerage/wastewater treatment infrastructure.</p> <p>Water and wastewater infrastructure is essential to any development. Failure to ensure that any required upgrades to the infrastructure network are delivered alongside development could result in adverse impacts in the form of internal and external sewer flooding and pollution of land and water courses and/or low water pressure.</p>   |

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|                                     |                         |              | <p>A key sustainability objective for the preparation of Local Plans and Neighbourhood Plans should be for new development to be co-ordinated with the infrastructure it demands and to take into account the capacity of existing infrastructure. Paragraph 20 of the revised National Planning Policy Framework (NPPF), February 2019, states: “Strategic policies should set out an overall strategy for the pattern, scale and quality of development, and make sufficient provision for... infrastructure for waste management, water supply, wastewater...”</p> <p>Paragraph 28 relates to non-strategic policies and states: “Non-strategic policies should be used by local planning authorities and communities to set out more detailed policies for specific areas, neighbourhoods or types of development. This can include allocating sites, the provision of infrastructure...”</p> <p>Paragraph 26 of the revised NPPF goes on to state: “Effective and on-going joint working between strategic policy-making authorities and relevant bodies is integral to the production of a positively prepared and justified strategy. In particular, joint working should help to determine where additional infrastructure is necessary....”</p> <p>The web based National Planning Practice Guidance (NPPG) includes a section on ‘water supply, wastewater and water quality’ and sets out that Local Plans should be the focus for ensuring that investment plans of water and sewerage/wastewater companies align with development needs. The introduction to this section also sets out that “Adequate water and wastewater infrastructure is needed to support sustainable development” (Paragraph: 001, Reference ID: 34-001-20140306).</p> <p><b>Suggested Modifications:</b></p> <p>Addition to Policy IN1: “The Local Planning Authority will seek to ensure that there is adequate water and wastewater/sewerage infrastructure to serve all new developments. Developers are encouraged to contact the water/waste water company as early as possible to discuss their development proposals and intended delivery programme to assist with identifying any potential water and wastewater network reinforcement requirements. Where there is a capacity constraint the Local Planning Authority will, where appropriate, apply phasing conditions to any approval to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of the relevant phase of development.”</p> <p>It would also be helpful to amend the supporting paragraph 8.10 to refer to the Thames Water free Pre-Planning service which confirms if capacity exists to serve the development or if upgrades are required for potable water, waste water and surface water requirements. Details on Thames Water’s free pre planning service are available at: <a href="https://www.thameswater.co.uk/preplanning">https://www.thameswater.co.uk/preplanning</a></p> |
| REP/012                             | Department of Education | IN1          | DfE supports the reference to developer contributions being sought for education schemes. However, it is noted that a number of housing delivery policies include intensification, infill, extensions and changes of use, which are more likely to cumulatively generate the need for school places, but are unlikely to justify the need for new built physical education   |

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|                                     |            |              | <p>infrastructure on site in isolation. Therefore, DfE would recommend that policy IN1 clarifies that where development generates the need for new school places, developer contributions will be sought.</p> <p>DfE notes that the draft Local Plan anticipates an annual housing target of 451 dwellings per year until 2024/25 and then 255 dwellings per year until the end of the plan period in 2035. This will place additional pressure on social infrastructure such as education facilities. The Local Plan will need to be 'positively prepared' to meet the objectively assessed development needs and infrastructure requirements.</p> <p>Please note that there are two routes available for establishing a new school. Firstly, a local authority may seek proposals from new school proposers (academy trusts) to establish a free school, after which the Regional Schools Commissioner will select the successful trust. Under this 'local authority presumption route' the local authority is responsible for finding the site, providing the capital and managing the build process. Secondly, school proposers can apply directly to DfE during an application round or 'wave' to set up a free school. The local authority is less involved in this route but may support groups in pre-opening and/or provide a site. Either of these routes can be used to deliver schools on land that has been provided as a developer contribution. DfE has published further general information on opening free schools<sup>1</sup> as well as specifically in relation to opening free schools in garden communities.<sup>2</sup></p> <p>DfE welcomes reference within the plan's vision to the role of education provision in creating stronger communities. Paragraph 1.20 refers to collaboration between Crawley Borough Council and other authorities and infrastructure providers to meet forecast demands. You will be aware of two live free school projects in Crawley, being delivered directly by DfE through the 'wave' approval route explained above in paragraph 5, rather than West Sussex County Council. These projects include:</p> <ul style="list-style-type: none"> <li>• Gatwick Free School – which is open on a site at 23 Gatwick Road and in the process of securing permanent planning permission; and</li> <li>• Forge Wood High School – which does not yet have an identified site.</li> </ul> <p>12. Due to these projects, it would be helpful to include DfE in your discussions about infrastructure provision, involving us in the position statements the plan refers to in paragraph 1.21. There should be collaborative working between DfE, Crawley Borough Council and West Sussex County Council on education provision to meet the needs of the borough. Paragraph 2.21 of the draft Local Plan recognises the unusual population profile in Crawley, with around two thirds of the population under the age of 45 and forecast demographic change leading to increased demand for educational facilities. However, there are no proposals in the plan to allocate sites for education, and the draft Infrastructure Delivery Plan (IDP) provides very little detail on school provision to meet demand from anticipated housing growth. The lack of detail on</p> |

<sup>1</sup> <https://www.gov.uk/government/collections/opening-a-free-school>

<sup>2</sup> <https://www.gov.uk/government/publications/establishing-a-new-school-free-school-presumption>

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|                                     |            |              | <p>school provision in the current Local Plan is one of the reasons why it has been difficult to successfully progress schemes for new education provision in the Crawley area.</p> <p>For the plan to be effective and positively prepared, the IDP should identify which developments the planned school provision will serve (including cumulative or windfall developments where appropriate), the costs of provision, the predicted timescales in line with the housing trajectory, and the funding sources for each identified education project. The IDP should be prepared in conjunction with an updated viability assessment to ensure that realistic education costs are factored into any decisions about the amount and type of developer contributions that will be required.</p> <p>15. Viability assessment should inform options analysis and site selection, with site typologies reflecting the type and size of developments that are envisaged in the borough. This enables an informed judgement about which developments would be able to deliver the range of infrastructure required, including schools, leading to policy requirements that are fair, realistic and evidence-based. In accordance with Planning Practice Guidance, there should be an initial assumption that applicable developments will provide both land and funding for the construction of new schools. The total cumulative cost of complying with all relevant policies should not undermine deliverability of the plan, so it is important that anticipated education needs and costs of provision are incorporated at the outset, to inform local decisions about site selection and infrastructure priorities.<sup>3</sup></p> <p>Site allocations (for standalone school sites or schools within housing developments) should also seek to clarify requirements for the delivery of new schools, including when they should be delivered to support housing growth, the minimum site area required, any preferred site characteristics, and any requirements for safeguarding additional land for future expansion of schools where need and demand indicate this might be necessary.</p> <p>While it is important to provide this clarity and certainty to developers and the communities affected by development, retaining a degree of flexibility about site specific requirements for schools is also necessary given that the need for school places can vary over time due to the many variables affecting it. DfE therefore recommends the Council consider highlighting in the next version of the Local Plan that:</p> <ul style="list-style-type: none"> <li>- specific requirements for developer contributions to increasing capacity of existing schools and the provision of new schools for any particular site will be confirmed at application stage to ensure the latest data on identified need informs delivery; and that</li> <li>- Requirements to deliver schools on some sites could change in future if it were demonstrated and agreed that the site had become surplus to requirements, and is therefore no longer required for school use.</li> </ul> <p>With regard to the consultation questions on key infrastructure priorities and whether any community facilities are missing or need improvement (page 83), DfE recommends that the next version of the Local Plan make reference to the provision</p> |

<sup>3</sup> PPG on viability and planning obligations: <https://www.gov.uk/government/collections/planning-practice-guidance>

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|                                     |            |              | <p>of new schools on suitable sites when required, with a key priority that the provision of infrastructure should be in step with housing development, making appropriate use of developer contributions.</p> <p>With regard to the consultation questions for draft Policy IN1 (Infrastructure Provision), asking whether the proposed approach is appropriate, justified and consistent with the Community Infrastructure Levy (CIL) Regulations, DfE advises that the approach is reviewed following the introduction of the revised CIL Regulations on 1st September 2019. The CIL Charging Schedule should be reviewed alongside the Local Plan review, giving consideration to new Planning Practice Guidance on viability, CIL and planning obligations as well as the new CIL Regulations which remove the pooling limitation on planning obligations and allow both CIL and Section 106 funding to be used for the same item of infrastructure. These considerations are fundamental to your assessment of the deliverability of the plan, including the size of any infrastructure funding gap and how developer contributions should be secured. All phases and types of education should be considered, including the need for special educational needs provision, with needs and plans for provision set out in the plan.</p> <p>20. We note the statement in the IDP that provision of schools will form part of the calculation of CIL and additional funding sources will need to be considered. In light of the removal of the Section 106 pooling restriction and increased flexibility in how CIL and Section 106 funds are used, we recommend that the Council revisit this matter and consider using Section 106 planning obligations for the provision of new schools and school expansions in all cases where the development will give rise to a need for new school places and there is insufficient capacity in applicable schools to meet that need. It is important to consider the size of any CIL funding gap and whether there will be sufficient CIL funds available to cover the cost of these school places. If CIL will be insufficient or unavailable at the point of need, it would be preferable to seek developer contributions through a planning obligation, to mitigate the direct impacts of development. One of the tests of soundness is that a Local Plan is 'effective', meaning the plan should be deliverable over its period. In this context and with specific regard to planning for schools, there is a need to ensure that education contributions made by developers are sufficient to deliver the additional school places required to meet the increase in demand generated by new developments. DfE notes that as set out in Strategic Policy IN1 and in the IDP, the Council will review CIL rates to ensure appropriate rates are levied and the cost of providing school places is secured. DfE welcomes the specific reference within this policy to education contributions being specifically sought through developer contributions for the reasons set out below and also as relevant to Crawley being situated within a two-tier system, and the cross-boundary issues.</p> <p>Local authorities have sometimes experienced challenges in funding schools via Section 106 planning obligations due to limitations on the pooling of developer contributions for the same item or type of infrastructure. However, the revised CIL Regulations remove this constraint, allowing unlimited pooling of developer contributions from planning obligations and the use of both Section 106 funding and CIL for the same item of infrastructure. The advantage of using Section 106 relative to CIL for funding schools is that it is clear and transparent to all stakeholders what value of contribution is being</p> |

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|                                     |            |              | <p>allocated by which development to which schools, thereby increasing certainty that developer contributions will be used to fund the new school places that are needed. DfE supports the use of planning obligations to secure developer contributions for education wherever there is a need to mitigate the direct impacts of development, consistent with Regulation 122 of the CIL Regulations.</p> <p>DfE would be particularly interested in responding to any update to the Infrastructure Delivery Plan/Infrastructure Funding Statement, viability assessment or other evidence relevant to education that may be used to inform revisions to local planning policies or the CIL charging schedule. As such, please continue to engage with DfE and consult us on any relevant future consultations.</p> <p><b>Suggested Modifications:</b><br/> The following policy amendments are proposed:<br/> ... <i>This will include the seeking of planning obligations towards <b>the provision of school places where the need for places is generated by the new development.</b> Specific Education schemes related to the development...</i><br/> 3. In addition to this, we request a minor amendment either to this policy or its supporting text, to clarify that developer contributions may be secured retrospectively, when it has been necessary to forward fund infrastructure projects in advance of anticipated housing.</p> <p>In order to comply with this national policy, the Local Plan should safeguard land for the provision of new schools and school expansions where appropriate. When new schools are developed, local authorities should also seek to safeguard land for any future expansion of new schools where demand indicates this might be necessary, in accordance with Planning Practice Guidance and DfE guidance on securing developer contributions for education.<sup>4</sup></p> <p>Crawley Borough Council should also have regard to the Joint Policy Statement from the Secretary of State for Communities and Local Government and the Secretary of State for Education on Planning for Schools Development<sup>5</sup> (2011) which sets out the government's commitment to support the development of state-funded schools and their delivery through the planning system.</p> <p>In light of the above and the Duty to Cooperate on strategic priorities such as community infrastructure (NPPF para 24-27)<sup>6</sup>, DfE encourages close working with local authorities during all stages of planning policy development to help guide the development of new school infrastructure and to meet the predicted demand for primary and secondary school places. Please add DfE to your list of relevant organisations with which you engage in preparation of the plan.</p> |

<sup>4</sup> <https://www.gov.uk/government/publications/delivering-schools-to-support-housing-growth>

<sup>5</sup> <https://www.gov.uk/government/publications/national-planning-policy-framework--2>

<sup>6</sup> NPPF paragraph 24-27 specifies that this collaborative working should include infrastructure providers.

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| Ref. No.                            | Respondent                                  | Policy/ Para | Comments   |
|                                     |   |              | <p>Where there is significant cross-boundary movement of school pupils between a borough and adjoining areas, DfE recommends that the Council covers this matter and progress in cooperating to address it as part of its Statement of Common Ground.<sup>7</sup> This should be regularly updated during the plan-making process to reflect emerging agreements between participating authorities and the Council's own plan-making progress.</p> <p>As recommended above, construction costs and land requirements should be incorporated in the viability assessment to ensure that any barriers to delivery are identified early, to inform the Council's planning and prioritisation of infrastructure delivery. Government 'basic need' grant for the creation of new school places does not include funding for land acquisition. Therefore, it is particularly important that education land required within large development sites is provided at no cost to the local authority wherever possible, and pooled developer contributions (Section 106 and/or CIL) are secured for the purchase of standalone sites for new schools. We request that you consider carefully the appropriate balance of CIL and Section 106 funding for education, to ensure that new schools and school expansions can be delivered when they are needed, in step with housing development. Our guidance on securing developer contributions for education provides further advice on the types of education need that should be considered, and how to calculate the costs of provision.<sup>8</sup></p>   |
| REP/023                             | Savills on behalf of St Catherine's Hospice | IN1          | <p>Please see accompanying representations.</p> <p>Strategic Policy IN1 stipulates that existing services and facilities will be protected unless a replacement is provided or there is sufficient alternative provision available. Whilst we support this policy in principle, it is considered that the Council should recognise opportunities to replace lost infrastructure adjacent to the CBC's boundary.</p> <p>As previously noted, St Catherine's Hospice is currently undergoing the process of relocating to an enhanced facility in Pease Pottage. Whilst this will relocate the services to the neighbouring District of Mid Sussex, the facility will be relocated within 2.5 miles of its present location, enabling the provision of improved palliative care services to Crawley residents. Therefore, there will be no net loss of care in this area.</p> <p>As such, CBC should adopt a more flexible approach to the provision of infrastructure, recognising the unique land constraints within CBC. And the capacity for neighbouring areas to absorb some services, subsequently facilitating the redevelopment of key housing sites. Notably, within policy IN1, the Council make provision for new development to coordinate with the delivery of infrastructure on and off the site.</p> <p>Strategic Policy IN1 stipulates that existing services and facilities will be protected unless a replacement is provided or there is sufficient alternative provision available. Whilst we support this policy in principle, it is considered that the Council should recognise opportunities to replace lost infrastructure adjacent to the CBC's boundary.</p> |

<sup>7</sup> NPPF paragraph 27; and the PPG on Plan-Making - <https://www.gov.uk/guidance/plan-making#maintaining-effective-cooperation>

<sup>8</sup> <https://www.gov.uk/government/publications/delivering-schools-to-support-housing-growth>

| Chapter 8. Infrastructure Provision |                      |              |   |
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| Ref. No.                            | Respondent           | Policy/ Para | Comments  |
|                                     |                      |              | <p>As previously noted, St Catherine’s Hospice is currently undergoing the process of relocating to an enhanced facility in Pease Pottage. Whilst this will relocate the services to the neighbouring District of Mid Sussex, the facility will be relocated within 2.5 miles of its present location, enabling the provision of improved palliative care services to Crawley residents. Therefore, there will be no net loss of care in this area.</p> <p>As such, CBC should adopt a more flexible approach to the provision of infrastructure, recognising the unique land constraints within CBC. And the capacity for neighbouring areas to absorb some services, subsequently facilitating the redevelopment of key housing sites. Notably, within policy IN1, the Council make provision for new development to coordinate with the delivery of infrastructure on and off the site “including where infrastructure is located outside of Crawley but serves development within Crawley.”</p> <p><b>Suggested Modifications:</b><br/>Please refer to appended Representation<br/>In accordance with this, the principle of provisioning services outside, but close to, Crawley should be expanded across the Policy.</p> <p><b>Recommended Changes</b><br/>“[Existing infrastructure services and facilities will be protected where they contribute to the neighbourhood or town overall, unless]<br/>There is sufficient alternative provision of the same type in the area or an equivalent replacement or improvement is provided (including where this infrastructure is located outside of Crawley, but serves the town overall).”</p> |
| REP/027                             | LRM Planning Limited | IN1          | <p>We are supportive in general terms of policy SN1 which indicates that development will be permitted where it is supported by the delivery and maintenance of infrastructure both on site and off site. Clearly this must relate to Gatwick airport and its off-site impacts including car parking.</p> <p>We believe it is therefore contrary to NPPF to not adequately provide for elements of infrastructure associated with car parking.</p> <p><b>Suggested Modifications:</b><br/>We are supportive of the removal of the Gatwick expansion safeguarding area and the preparation of an AAP for North Gatwick, however, we are strongly of the view that a number of associated amendments are required in order to make the plan compliant with the NPPF. These primarily involve ensuring that the Plan robustly responds to the impacts of the future growth of the airport. Suggested changes include:<br/>d. Policy IN1 should ensure that infrastructure associated with airport growth is fully provided for.<br/>Indeed, we believe that it is necessary to proactively and positively plan for the impacts associated with the future growth of the airport. Importantly, this can be done in a sustainable and innovative way that is in contrast to the tendency towards rogue and unauthorised parking operators.</p>   |

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| <b>Ref. No.</b>                            | <b>Respondent</b>  | <b>Policy/ Para</b> | <b>Comments</b>   |
| REP/039                                    | Crawley CCG        | IN1                 | <p>Crawley Clinical Commissioning Group (CCG)<br/>The CCG is mindful of the minimum projected new housing numbers to 2035 being 5355. This will relate to a potential increase of 13,387 new residents/patients across the borough.<br/>Crawley Borough Council will already be aware that current and recent past new house and flat building spanning the past 4 years has created significant pressure on a number of Crawley's GP practices delivering Primary Care NHS services.<br/>In relation to this, in the absence of Section 106, the CCG has made a Community Infrastructure Levy (CIL) bid to the council for NHS capital infrastructure improvements so that Pound Hill Medical Group and Saxonbrook, Northgate Surgery could carry out internal redesign projects to enable these practices to be able to accommodate more patients as a result of new areas of building in the town within their catchment areas.<br/>However, whilst these bids were approved in cabinet there has apparently been insufficient CIL monies which the council has had to satisfy the above bids which were relatively modest in size.</p> <p><b>Suggested Modifications:</b><br/>Given the minimum increase in new building forecast by Crawley Borough Council to 2035, the CCG would like Primary Health care elevated so that as far as CIL distribution is concerned, it becomes a priority sector as other local authorities have done E.G. Reigate &amp; Banstead Borough Council, Tandridge District Council and recently, Horsham District Council where CIL has been fully adopted.<br/>The importance of this cannot be stressed enough as there are limited allocations of NHS capital funding available This will enable those GP practices operating from older premises to be able to benefit from infrastructure funding for capital improvements where there are new housing developments within their own catchment areas. This will then be an advantage to the residents of Crawley and will take some of the pressures away to enable new patients to be taken on.</p> |
| REP/062                                    | Environment Agency | IN1                 | <p><b>Infrastructure Provision</b><br/><b>Strategic Policy IN1: Infrastructure Provision</b><br/>Last Paragraph <i>"Where appropriate, developer contributions will be sought in the form of planning obligations to address site specific issues, in accordance with the tests in the CIL Regulations."</i></p> <p><b>Suggested Modifications:</b><br/>Considering the threat to water quality from the growing population and large developments, it would be beneficial to include water quality monitoring in section 106 agreements to ensure no deterioration of the status of water bodies, especially with large developments. Monitoring should be during construction and post-construction. Water quality should be more clearly highlighted as a concern, as has been done for example with air quality and green infrastructure. Water quality has been included within infrastructure, but impacts on water quality are wide ranging and not only related to provision of sewage infrastructure.</p>  |

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| Ref. No.                            | Respondent                     | Policy/ Para | Comments   |
| REP/056                             | Gatwick Airport Limited        | IN1          | <p><b>Policy IN1: Infrastructure Provision</b></p> <p>Gatwick supports strategic policy IN1 Infrastructure provision and specifically the permitted development of infrastructure, which relates to Gatwick's growth ambitions. GAL considers the Councils approach to developer contributions through CIL and s106 is appropriate, providing that s106 agreements accurately reflect the nature and challenges of the development consistent with the NPPF tests.</p>   |
| REP/005                             | Thames Water Utilities Limited | IN2          | <p>Local Plans should consider the requirements of the water companies for land to enable them to meet the demands that will be placed upon them as recognised in paragraph 8.10 This is necessary because it will not be possible to identify all the water and wastewater/sewerage infrastructure required over the plan period due to the way water companies are regulated and plan in 5 year periods (AMPs). Thames Water are currently in the AMP6 period which runs from 1st April 2015 to 31st March 2020 and does not therefore cover the whole Local Plan period. AMP7 will cover the period from 1st April 2020 to 31st March 2025.</p> <p><b>Suggested Modifications:</b></p> <p>Addition to Policy IN2: "The development or expansion of waste water facilities will normally be permitted, either where needed to serve existing or proposed development in accordance with the provisions of the Development Plan, or in the interests of long term waste water management, provided that the need for such facilities outweighs any adverse land use or environmental impact that any such adverse impact is minimised."</p>   |
| REP/012                             | Department of Education        | IN2          | <p>Policy IN2 considers the provision of new infrastructure. With regards to education, the relevant elements of the policy are that community facilities (including education) may be provided alongside allocated housing sites where there is evident need, suitability in relation to the community needs and compliance with other relevant planning policies.</p> <p>6. It should be noted that the NPPF (paragraph 94) sets out that:<br/><i>It is important that a sufficient choice of school places is available to meet the needs of existing and new communities. Local planning authorities should take a proactive, positive and collaborative approach to meeting this requirement, and to development that will widen choice in education.</i></p> <p>7. As such, the policy approach at IN2 must reflect the need for sufficient choice and proactivity in planning for school places, rather than simply relating to existing communities.</p> <p>8. The policy goes on to state that:<br/><i>Subject to the requirements above, education facilities may be considered acceptable as an alternative use on sites allocated for uses including housing where the educational need met is demonstrated to outweigh the needs that would have been met by the allocated use(s).</i></p> <p>9. Whilst we welcome the inclusion of specific reference to education provision as requested in DfE's Reg 18 representations, this specific wording is too restrictive and could lead to challenges when delivering much needed school places as part of this policy. Indeed, the IDP notes that there is a need for c.8-10FE of secondary school capacity and no</p> |

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| Ref. No.                            | Respondent | Policy/ Para | Comments   |
|                                     |            |              | <p>suitable sites have yet been identified. It would therefore be advisable to create a more supportive and proactive policy position in relation to school place planning. When implemented, the policy would require the applicant to demonstrate that the education development would meet needs outweighed by the need for new housing. This comparison exercise is inherently flawed as it is not possible to compare the acuteness of education need versus housing need. In any case, a shortage of school places would be exacerbated further by new housing development that does not include sufficient provision. Without a sufficiently flexible approach to infrastructure delivery, to encourage the location of infrastructure where new housing is located, the plan is not sound.</p> <p>DfE supports the sustainability objectives of draft Policy IN2 (New Infrastructure Provision). As explained above, DfE recommends that sites for schools are allocated in the plan, but in the absence of specific allocations the plan should at least recognise that essential community infrastructure such as schools may be considered an acceptable alternative use to other allocated uses, provided the location is proven to be environmentally sustainable and suitable to meet the needs of the community served. This is important in view of the land availability constraints in the borough and the importance of providing infrastructure for existing and new communities. It would also align with the “great weight” placed on the provision of school places in the NPPF. Making this clear in the plan would simplify the decision-making process when planning applications are considered. DfE requests this clarification in answer to the consultation question on page 85, asking whether the wording needs further clarification in the policy or elsewhere.</p> <p>While there appears to be an intention to roll forward existing allocations from the adopted Local Plan, the Council should consider afresh the need for education facilities and the mechanisms for delivery, taking account of the latest Planning Practice Guidance and DfE guidance on securing developer contributions for education. As noted above, the absence of detail on education provision in the current Local Plan has been an issue for school delivery in the Crawley area.</p> <p>Whether in addition to or in replacement of the IDP, the Council should set out education infrastructure requirements for the plan period within an Infrastructure Funding Statement<sup>9</sup>. Where additional need for school places will be generated by housing growth, the statement should identify the anticipated CIL and Section 106 funding towards this infrastructure. The statement should be reviewed annually to report on the amount of funding received via developer contributions and how it has been used, providing transparency to all stakeholders.</p> <p>DfE would be particularly interested in responding to any update to the IDP/Infrastructure Funding Statement, viability assessment or other evidence relevant to education which may be used to inform local planning policies and CIL charging schedules. As such, please add DfE to the database for future consultations on relevant plans and proposals.</p> <p><b>Suggested Modifications:</b><br/>Therefore, we would propose the following changes to the policy:</p> |

<sup>9</sup> PPG on Plan-Making: <https://www.gov.uk/guidance/plan-making#maintaining-effective-cooperation>

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| Ref. No.                            | Respondent                 | Policy/ Para | Comments   |
|                                     |                            |              | <p>The provision of community facilities alongside housing within sites allocated for uses including housing may <b>will</b> be considered acceptable where:</p> <ul style="list-style-type: none"> <li>- there is an evident need for the type of facility concerned;</li> <li>- the infrastructure/facilities are suitable to meet the needs of the community served <b>and the needs of future communities</b>;</li> <li>- the proposal complies with other policies in this Plan, including any site-specific requirements for additional or replacement services, facilities, enhancements, safeguards,</li> </ul>  |
| REP/032                             | West Sussex County Council | IN2          | <p><b>Policy IN2 The Location and Provision of New Infrastructure:</b> It should be noted, demand for education provision in Crawley has increased in recent years. A free school (under Wave12) for secondary education has been authorised. Sites are being investigated, however, there is difficulty in finding a site. The new school is necessary to fulfil current demand and it is expected to provide further capacity in the area.</p> <p><b>Suggested Modifications:</b><br/>If, for whatever reason, the Free School is not delivered, there will be an impact on education provision to serve any additional housing development within the Borough within the plan period and an alternative secondary school site(s) will need to be found to serve both current and future secondary demand.</p> |
| REP/067                             | Resident 15                | IN2          | <p><b>Health provision</b> – I can't see there has been provision in your plans for health care for the additional population these 10,000 houses will bring. Crawley and East Surrey hospitals are at breaking point and waiting times are being extended over the time scale that is unacceptable and this is bringing more stress and misery to patients and families. How on earth will they cope with another 20,000 patients is just ludicrous. It's the same for doctor's surgeries they just can't cope and many in Crawley are unable to sign on any more patients. Health provision must be catered for with a new hospital and doctors' surgeries being included in the plans and built <b>before</b> any of the homes.</p>   |
| REP/056                             | Gatwick Airport Limited    | IN2          | <p><b>Policy IN2: Location and Provision of New Infrastructure</b><br/>Gatwick generally supports strategic policy IN2 and the provision of new or improved infrastructure in appropriate locations where the facilities are required and the provision of community facilities alongside housing. GAL welcomes paragraph 8.13 identifying the need to support the development of transports hubs.</p>   |
| REP/032                             | West Sussex County Council | IN3          | <p>West Sussex County Council have worked with Crawley Borough Council to develop their Policy INF3. WSCC encourage Crawley Borough Council's ambition ensure coverage of gigabit-capable full fibre infrastructure, which is in line with the government's target for all premises to be able to access gigabit speeds by 2025.<br/>WSCC strongly supports that planning authorities hold policies that prioritise how, in making planning deliberations, they ensure developers make provision for gigabit-capable full fibre network and welcomes Policy IN3 in ensuring all development - residential, employment and commercial - is future ready.</p>  |

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| Ref. No.                            | Respondent  | Policy/ Para | Comments   |
|                                     |             |              | We appreciate that reference is particularly made to ' <i>gigabit-capable full fibre infrastructure</i> ' in order to provide future-proofed broadband services and to support the delivery of future technologies.  |
| REP/045                             | Resident 13 | IN3          | <p>Digital communication infrastructure is playing an ever increasing role in the population's everyday lives. However it is now becoming a fundamental requirement in the provision of business services as well as providing key social economic benefits by supporting health, education and social services. Resilient digital communications is also fundamental to the management of all the other key infrastructure elements, electricity, gas, water (including flood management), emergency services and road management as well as providing the underlying structure for mobile digital service such as 5G and Fibre to the Premises (FTTP). While all these services are provided by others, it is a serious omission for the local government not to have policies in place to enable and support the planning of Crawley's digital communication infrastructure to help develop the supply of digital communications to its residence and businesses in the 21 century as it does with the other infrastructure elements already mentioned. I would argue that for the future development of the area, a holistic approach to digital communications infrastructure is as important and the other policies already covered in this document.</p> <p><b>Suggested Modifications:</b><br/>The inclusion of a digital communication infrastructure policy in the local plan. This will involve quite a bit of additional work as it has not been included at all before.</p> |

| <b>Chapter 9. Economic Growth</b> |                   |                         |   |
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| <b>Ref. No.</b>                   | <b>Respondent</b> | <b>Policy/<br/>Para</b> | <b>Comments</b>   |
| REP/011                           | Highways England  | EC1                     | <p>Highways England has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the strategic road network (SRN). The SRN is a critical national asset and as such Highways England works to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity. We will therefore be concerned with proposals and policies that have the potential to impact the safe and efficient operation of the SRN. With regards to Crawley, the SRN comprises the M23 and A23, with the M25 nearby.</p> <p><b>Crawley’s Unmet Housing Need/ Developments in Vicinity of Crawley</b><br/> We note that “Even with further development within the borough, Crawley will not be able to meet its housing needs in full and possibly not all of its employment needs”, with a need for 11,280 dwellings (with 5,355 planned for delivery 2020-2035) and 20,541 new jobs. As a result, there is a requirement for neighbouring authorities (especially Horsham, Mid Sussex and Reigate &amp; Banstead) to accommodate Crawley’s unmet needs (5,925 dwellings).</p> <p>It is Highways England’s view that in order for the overall Local plan and individual developments to accord with national planning and transport policy full, timely coordination with neighbouring authorities will need to be undertaken in assessing the transport impacts upon the local and strategic road networks. This will especially be the case with regard to the significant development to be sited in neighbouring authorities just outside Crawley’s boundaries. The sites include the prospective West of Ifield development with associated Crawley Western Relief or Link Road (as outlined in policy ST4) and Horley Business Park developments. In this respect, we note that para 1.14 states “Transport Modelling is to be updated taking into account the cumulative impacts of plans, policies and proposals within adjoining authorities”.</p> <p>We note that in addition to development just outside the borders of Crawley, there is the prospective expansion Gatwick Airport and/or North Crawley Area Action Plan as outlined in SD3 within the borough.</p> <p><b>Transport Evidence Base</b><br/> We note that the transport evidence base in support of the Local Plan has yet to be prepared, despite the Council consulting on its Reg 19 plan. We set out our position in June 2019 when consulted on the Infrastructure Plan. It is that because the Local Plan Review involves a change from the current adopted Crawley 2030 Local Plan in terms of the plan years and housing numbers, an updated, robust Transport Assessment will be required. It should include evidence on the location of strategic development within the borough. Associated with this, and in their own right, the evidence base will require assessments for the M23 Junctions 9 to 11 and along the M23 Spur to Gatwick. This because the model used previously is now unlikely to be suitable for further use.</p> |

| Chapter 9. Economic Growth |                          |                 |  |
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| Ref. No.                   | Respondent               | Policy/<br>Para | Comments   |
|                            |                          |                 | <p>In this respect, we note that the need for an updated Transport Assessment is acknowledged in Chapter 17, and we have recently been liaising separately with Crawley Borough Council on our input to the transport modelling brief. We therefore look forward to working with Crawley Borough Council and receiving further information on the transport modelling for review. Until this Transport Assessment is undertaken and agreed, together with any mitigation required (demonstrated to be in accordance with standards, fully funded and deliverable), Highways England will have no option but to object to the development proposals outlined in the revised Crawley Local Plan 2020-2035.</p> <p><b>Suggested Modifications:</b><br/> It should also be noted that all significant developments (even those allocated in the Local Plan), will need to be supported by a robust Transport Assessment (as outlined in policy ST1). In accordance with NPPF and C2/13 Transport Assessment must consider the impact of the development on the Strategic Road Network for the opening year and a future year equivalent to a) 10 years after the application is submitted or b) the end of Local Plan or c) the date at which the whole development is completed, whichever is latest.<br/> Therefore, as things stand at this point in time, we do not consider the Local Plan to be legally compliant, sound or compliant with the duty to co-operate. However, this is not to say that it cannot be made so (for example, we are content with the Council's current transport base tender document that sets out the required work to be completed), and we look forward to working with the Council and the appointed consultants on the above and any other relevant matters.</p> |
| REP/033                    | Horsham District Council | EC1             | <p>We support this policy in principle, but consider that its effectiveness could be improved. We note the predicted shortfall in employment land supply and have also noted the request recently made by Crawley Borough Council as part of the Duty to Cooperate for Horsham District to assist in meeting this need.<br/> Horsham District is seeking to significantly increase the number of high quality jobs in the District to ensure that the employment needs of significant housing growth needed in the District is met and provides choice for residents to live and work locally. There is a clear synergy between this and providing for the needs of Crawley. As you will be aware land to the West of Crawley, but is within Horsham District is being promoted for development. Whilst no decision has been made as to whether it would be appropriate to allocate this site, we would expect any strategic housing development in Horsham District to include significant levels of employment of a type that is attractive to new residents of that development, on a '1 job per household' basis, to increase the sustainability of the new community and reduce the need to travel.<br/> It is therefore important that the joint working outlined in Strategic Policy EC1 (v) leads to new employment that primarily meets the need of the new communities born of any strategic development.</p> <p><b>Suggested Modifications:</b></p>   |

| <b>Chapter 9. Economic Growth</b> |  |                         |  |
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| <b>Ref. No.</b>                   | <b>Respondent</b>                                | <b>Policy/<br/>Para</b> | <b>Comments</b>  |
|                                   |  |                         | <p>Change sought: It is requested that Policy EC1 has text added to clarify that any employment development provided as part of strategic sites 'at' Crawley, but outside its boundaries, is planned to meet the needs of the Crawley/Gatwick FEMA first and foremost, and provide local jobs.</p> <p>Paragraph 9.23 (Strategic Policy EC1: Sustainable Economic Growth) The effectiveness of Policy EC1 could be further improved by making the change set out below.</p> <p>Change sought: Amend text to clarify that whilst the scope for strategic employment growth will be investigated as part of a North Crawley AAP, the priority will be to accommodate additional housing within Crawley borough, insofar as is commensurate with other local plan policies.</p>  |
| REP/034                           | Vail Williams on behalf of Surrey County Council | EC1                     | <p>Response to Crawley Borough Council Regulation 19 Local Plan Review 2035 for land at Nexus Parcel Three on behalf of Surrey County Council. We are writing on behalf of our clients Surrey County Council (SCC) in regard to their site and development opportunities at Nexus Parcel 3, 2-3 Gatwick Road, Crawley.</p> <p>We would like to make the following Local Plan representations particularly in regard to Economic Growth policies in the emerging Local Plan, as proposed under the Local Plan Consultation Regulation 19. These comments build on our representations to the Regulation 18 stage, in our letter dated 16<sup>th</sup> September 2019.</p> <p>Our representations are based on how this would impact on the future opportunity and delivery of any future development on Parcel Three. As you are aware, Parcel Three currently remains undeveloped although Surrey County Council are actively looking to bring forward development on this site within the short term.</p> <p><b>Chapter 9: Economic Growth</b></p> <p>Firstly, further to representations to the Regulation 18 stage, we welcome the restructuring of this chapter and the evolution of the policies as you read through the chapter.</p> <p>Our client wishes to provide support for the recognition in paragraph 9.6 that Manor Royal is the focus for business led economic growth in the Borough and that the Main Employment Areas will be required to make effective use of the land within them. This is consistent with the effective use of land by SCC across Parcels One and Two at Nexus, Gatwick Road.</p> <p>We also note that the importance of employment land is further evidenced by the Lichfield's Economic Growth Assessment (EGA) for the Northern West Sussex Area (January 2020). This document shows that in a constrained land supply scenario, there is a need for 33ha of business land over the plan period, with a 21 ha deficit and 12 ha identified in the Employment Land Trajectory (ELT). We note that our site is contained within the Employment Land Trajectory as being available within years 1-5 and we can confirm that this is the case.</p> <p>Our specific comments on the policies themselves are as follows:</p> |

| <b>Chapter 9. Economic Growth</b> |  |                         |   |
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| <b>Ref. No.</b>                   | <b>Respondent</b>                      | <b>Policy/<br/>Para</b> | <b>Comments</b>   |
|                                   |  |                         | <p>Policy EC1: Sustainable Economic Growth</p> <p>On behalf of our clients SCC, we support the continued acknowledgement that Crawley has a key role as a key economic driver in the Gatwick Diamond, and that the current 21 ha deficit in a constrained land supply position. We also note that our site forms part of the 12 ha identified in the ELT. We support criteria i) which seeks to build upon and protect the established role of Manor Royal as a key business location, and criteria ii) that ensures the Main Employment Areas are protected in order to remain the focus for sustainable economic growth.</p>  |
| REP/035                           | Vail Williams on behalf of Ardmore Ltd | EC1                     | <p>Further to representations at the Regulation 18 stage, we welcome the restructure of this Chapter and the evolution of policies as you read the document. As previously mentioned under Policy SD3, we recognise that unmet employment needs are considered to be addressed as part of the AAP process, following the adoption of this Local Plan.</p> <p>We also support the recognition in paragraph 9.6 that states that Manor Royal is the focus for business led economic growth in the Borough and that the Main Employment Areas will be required to make effective use of land within them.</p> <p>The Northern West Sussex Area EGA (January 2020) shows that in a constrained land supply scenario, there is a need for 33ha of business land over the plan period, with an existing deficit of 21ha and 12ha identified in the Employment Land Trajectory (ELT).</p> <p>We support the text in paragraph 9.10 which states that further growth would exist in an unconstrained land supply position, and that for employment land a Strategic Employment Location (SEL) to the north of Manor Royal and south and/or east of the Airport, would be the most likely location.</p> <p>We also support paragraph 9.12 which states that given the limited land available, business land supply is not undermined. However, this does appear to be at odds with policy ST4 which safeguards further land for the potential delivery of the CWRR.</p> <p>However, we do support the latter text in paragraph 9.12 relating to small extensions to Manor Royal which will be supported where they positively contribute to business-led economic growth.</p> <p>Our client wishes to support the recognition of the Local Plan and the EGA, that in an unconstrained scenario 113 ha of B-class business land would be required. We therefore support paragraphs 9.13 and 9.14 which suggest a SEL in the AAP area would be the most appropriate area, as per the call for sites and the ELT. Whilst we note that in the immediate timeframe Crawley will work with other surrounding LPAs regarding its unmet need we would also consider that the timeframe for the AAP is such that the need can be met locally if safeguarding is lifted.</p> <p>Our specific comments on the policies within Economic Growth Chapter are as follows:</p> |

| Chapter 9. Economic Growth |  |              |  |
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| Ref. No.                   | Respondent   | Policy/ Para | Comments   |
|                            |  |              | <p>We support the continued acknowledgement of Crawley's key role as a key economic driver in the Gatwick Diamond, and the current 21 ha deficit in a constrained land supply position. We also support the retention of the B-use classes within Manor Royal, and criteria iv) which supports small extensions to Manor Royal.</p> <p>As stated previously, we also support the role of the AAP in principle to determine the location of any SEL. However, we urge this process to be completed as quickly as possible to provide clarity over the location of any proposals to meet unmet employment land need.</p> <p>We consider that we could identify potentially 23.6 ha of land, providing between 49,000 sqm and 52,200 for B-use class floorspace as part of our site proposals, as considered in our initial indicative layouts. This considers both a CWRR scenario and a non CWRR scenario.</p> <p>We would also wish to engage with CBC in further discussions to discuss this further, as the Local Plan Review and the AAP progresses.</p>  |
| REP/036                    | Vail Williams on behalf of UK Commercial Property Finance Holdings Ltd | EC1          | <p>Chapter Nine: Economic Growth</p> <p>Firstly, we acknowledge the changed structure of this chapter which has been amended from the Regulation 18 draft Local Plan. We consider the amended structure to read logically in terms of the evolution of policies through the chapter.</p> <p>On behalf of our client, we support the statement in paragraph 9.6 that the focus for all Main Employment Areas is to: <i>protect and build upon the economic role and function of these locations, having regard to their individual form and character, to make effective use of these locations for sustainable economic growth.</i></p> <p>We recognise that in the Northern West Sussex Area EGA (January 2020) it is identified that in a constrained land supply scenario, there is a need for 33ha of business land in the Borough over the plan period.</p> <p>We also support, in principle, the text in paragraph 9.10 in relation to a potential Strategic Employment Location (SEL) to the north of Manor Royal and south and/or east of the Airport. However, as referred to above in terms of an AAP, we seek further clarification on what this would look like and the timescale for delivery.</p> <p>Our client's site is located within the boundary for a Main Employment Area and therefore is protected to '<i>remain a focus for sustainable economic growth</i>', in accordance with policy EC1: Sustainable Economic Growth. Our client supports this policy, specifically, the support to redevelop and intensify Main Employment Areas, as the most sustainable opportunity for contributing to the Borough's unmet need for B-class business land.</p> |
| REP/046                    | First Plan on behalf of Aggregate Industries UK Ltd, Cemex UK          | EC1          | <p><b>RESPONSE ON BEHALF OF CRAWLEY GOODS YARD OPERATORS</b><br/> <b>DRAFT CRAWLEY 2035 LOCAL PLAN SUBMISSION CONSULTATION DRAFT</b></p> <p>Firstplan are instructed by Aggregate Industries UK Ltd (AI), Cemex UK Operations Ltd (Cemex), Day Group Ltd (Days) and Brett Group to provide the following response to the submission consultation draft of the Crawley Borough Local Plan 2020 – 2035.</p>  |

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|                                   | Operations Ltd,<br>Day Group Ltd<br>and Brett<br>Group |                         | <p><b>Relevant Background Information</b><br/>As the Borough Council are fully aware, our clients jointly operate Crawley Goods Yard - an established rail fed aggregates depot and safeguarded railhead. The goods yard has the capacity to handle a million tonnes of aggregate a year with the potential for expansion in the future. The site supports additional key minerals infrastructure and related development including two concrete batching plants, an asphalt plant and construction and demolition waste recycling plant.</p> <p>The operators of the Goods Yard were fully involved in the last Local Plan process which led to specific wording in the adopted version of Policy H2 regarding the Tinsley Lane site. This requires that development on this site must be “<i>planned, laid out and designed to minimise potential future conflicts and constraints on the important minerals function of the adjacent safeguarded minerals site</i>”. The operators were subsequently also involved in providing comments in response to consultation undertaken in the preparation of the Tinsley Lane Development Brief (Adopted April 2017). This now includes at Section 7 guidance on Noise. Crawley Goods Yard is also part of the Manor Royal Employment Area and therefore draft Policies EC1, EC2 and EC3 are relevant. These draft policies seek to protect the employment area for employment uses and encourage intensification of underutilised sites.</p> <p><b>Suggested Modifications:</b><br/>The Goods Yard operators are generally supportive of these policies and have no detailed comments on them.</p>  |
| REP/050                           | Montague<br>Evans<br>On behalf of<br>Homes<br>England  | EC1                     | <p><b>Strategic Policy EC1: Sustainable Economic Growth</b><br/>As noted by the NWSEGA Final Report (2020), Crawley represents the dominant commercial centre in West Sussex and drives demand for employment space. It is referred to by the Council as the “Heart of the Gatwick Diamond”. The NWSEGA Report forms part of the Council’s employment evidence base to inform the draft Plan. The NWSEGA identifies a number of economic indicators that reinforce this, not least that Crawley attracts “significant activity and commands the highest rents” (Paragraph 5), compared to neighbouring districts. Crawley Borough has also experienced rapid job growth over the last 20 years, which exceeds both the South East and the UK averages. The Borough also records the largest employment base in North West Sussex, with particularly strong employment growth having been driven by transportation, storage and support services sectors. The Coast 2 Capital LEP Strategic Economic Plan 2018-2030 sets out the LEP’s objectives for economic development. The Plan targets a programme of growth under the vision of becoming the most dynamic non-city region in England. Key to this strategy is the intention to invest in sustainable growth through improvements to business infrastructure and space, recognising the opportunity to retain existing businesses, attract new industries and foster innovation.</p> <p>Within the context of the NWSEGA, Draft Strategic Policy EC1 sets out the Council’s growth ambitions for the Plan period. It points to a need for a total of 33 hectares of B Class business land in the Borough across the Plan period</p> |

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|                            |            |                 | <p>to 2035, of which 12 hectares is identified through intensification of existing sites. Homes England acknowledges and supports the Council's intention to intensify existing employment sites, by using a "brownfield first" approach as per the NPPF. The 21 remaining hectares of land is to be located on new sites through the future AAP, in the form of Strategic Employment Locations.</p> <p>Homes England note that the NPPF expects strategic policies to provide a <i>"clear strategy for bringing sufficient land forward, and at a sufficient rate, to address objectively assessed needs over the plan period"</i>.</p> <p>It is noted that the need figure presented by Policy EC1 is not a target. It is a minimum requirement and should be expressed as such. It is also conservative, especially so in the context of unconstrained need which is 113 hectares as explained by Paragraph 9.10 of the draft Plan.</p> <p>The NWSEGA Report undertakes forecasting by drawing on 3 future scenarios:</p> <ol style="list-style-type: none"> <li>1) Baseline Job Growth: forecast of job growth by sector based on recent trends and projections at the regional level versus historic growth in the region;</li> <li>2) Past Development Rates: using past development rates to reflect market demand and development patterns to determine future space needs; and</li> <li>3) Baseline Labour Supply: labour supply based scenario based on population projections and demographic assumptions to inform the Strategic Housing Market Assessment e.g. an assessment of housing growth and resident workforce and impacts on total labour supply.</li> </ol> <p>The NWSEGA Report then concludes that the Council should apply the Past Development Rate (i.e. the 'mid-growth' scenario), as a minimum (Paragraph 8.74):</p> <p><i>"It is therefore recommended that the Council consider planning to accommodate the past take-up based requirement as a minimum, to enable historically strong levels of employment development to continue in the Borough over the new plan period"</i>.</p> <p>The Council has applied this scenario to Policy EC1. Homes England consider that there are shortcomings to this approach, and Paragraph 8.6 of the NWSEGA Report concedes that <i>"the ultimate judgement as to the level of need that [Crawley] should plan for is not purely quantitative, and that there will be a number of qualitative factors to consider"</i> (our emphasis).</p> <p>The shortcoming of using this methodology is that it does not adequately recognise that supply side constraints have influenced past economic growth in the Borough. The business base in Crawley has diversified beyond its historic dependency on aviation and airport specific businesses to a broad business base including financial and professional, research and development, engineering and life sciences.</p> <p>It is clear that there is suppressed demand in the market. This is evidenced by the following extract from the Coast 2 Capital LEP Commercial Property Study (2019), the key evidence base document which underpins the LEP's Draft Local Industrial Strategy. It identifies that:</p> |

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|                            |            |                 | <p><i>“Agents indicate that the biggest challenge facing the Gatwick Diamond is a lack of land for development, restricting the ability for large occupiers to find appropriate space to locate and grow”</i> (our emphasis).</p> <p>The Commercial Property Study cites Unilever leaving Crawley to relocate to Leatherhead as an example of a lack of supply of premises for large businesses. This is despite Crawley’s substantial economic growth potential, due to its public transport accessibility via the M23 and Gatwick Airport Train Station.</p> <p>The same study identifies Crawley as a significant development opportunity by meeting the current demand for employment floorspace, particularly in logistics and research and development sectors which are growing sectors nationally. Discussions with commercial agents at Montagu Evans suggest that there is significant market demand for these sectors at Rowley Farm, as well as for commercial office space. The Council should be proactive in responding to growing markets through the Plan, particularly in the context of clear evidence to do so as noted above.</p> <p>The clear market demand for B Class floorspace must be recognised by the Plan to ensure compliance with national policy, which requires planning policy to set out a <i>“clear economic vision and strategy which positively and proactively encourages sustainable economic growth, having regard to Local Industrial Strategies”</i> (NPPF Paragraph 81). The Commercial Property Strategy is a key piece of evidence that will inform the LEP’s emerging Local Industrial Strategy and so should be duly considered by the Council.</p> <p>Further, the NWSEWA Report assesses employment needs based on the fixed geography of Northern West Sussex (comprising Crawley Borough Council, Horsham District Council and Mid Sussex District Council) which it considers to be a Functional Economic Market Area (FEMA). The FEMA is not a realistic reflection of the function of the true FEMA and this should be expanded to pick up on sub-regional demand in the wider strategic area straddling numerous additional Local Planning Authorities in south Surrey and west East Sussex. Sub-regional demand is greater than the area geographically limited to the Northern West Sussex FEMA.</p> <p>The NPPF is clear that planning policies should help create the conditions for businesses to invest, expand and adapt. In doing so, <i>“significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development”</i>.</p> <p>The Council should be seeking to harness the opportunities of the Gatwick Diamond and proximity to the airport, which is not currently being achieved by the draft Plan by utilising the Past Development Rates scenario. Should West of Ifield come forward for development, long term, significant housing growth will result in greater demand for jobs? The opportunity to locate employment in an area that can be accessed sustainably is logical and should be facilitated by the Council. As explained in Homes England’s representations for West of Ifield, the future Western Link corridor will secure better integration with Manor Royal employment area. Investment in infrastructure to facilitate clean growth was identified by the LEP in its 2019 Local Industrial Strategy draft Economic Profile consultation. The Plan would be supporting this objective through planning for Crawley’s growth in this way.</p> |

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|                            |            |                 | <p>As such, the Council should be proactively looking at ways to align with market interest to facilitate business growth to meet current needs and future opportunities. Homes England will continue to engage with the Council and LEP in the development of the Plan and its policies in respect of economic development.</p> <p>Policy EC1 and its supporting evidence base should be reviewed in light of the matters raised above to ensure the Plan can be found sound. Homes England suggests that the Council re-considers the forecasting methodology and FEMA it is relying upon in the draft Plan, and subject to determining the need to retain a safeguarding parcel, increase the minimum requirement for employment land under Policy EC1.</p>   |
| REP/053                    | Quod       | EC1             | <p><b>Sustainable Economic Growth</b></p> <p>The NPPF requires planning policies to help create the conditions in which businesses can invest, expand and adapt with significant weight to be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development (paragraph 80).</p> <p>Paragraph 81 explains that planning policies should:</p> <p><i>“a) set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth, having regard to Local Industrial Strategies and other local policies for economic development and regeneration;</i></p> <p><i>b) set criteria, or identify strategic sites, for local and inward investment to match the strategy and to meet anticipated needs over the plan period;</i></p> <p><i>c) seek to address potential barriers to investment, such as inadequate infrastructure, services or housing, or a poor environment; and</i></p> <p><i>d) Be flexible enough to accommodate needs not anticipated in the plan, allow for new and flexible working practices (such as live-work accommodation), and to enable a rapid response to changes in economic circumstances”.</i></p> <p>The Northern West Sussex Economic Growth Assessment Update (“EGA”) (January 2020) sets out three specific employment growth forecasts that are considered through the Draft Local Plan.</p> <p>The first of these is the ‘Baseline Labour Demand’ - projections of employment growth in the main Class B sectors (labour demand) derived from economic forecasts – provides a land requirement of -1.1ha.</p> <p>The second is the ‘Past Development Rates’ – consideration of past trends in completions of employment space - this provides a requirement for 33ha of business land (143,990sqm), which is planned for through draft Policy EC1. Between 2011 and 2018 Crawley experienced gross annual completions of 15,100sqm per annum which forms the basis of this scenario. The majority of development has occurred in Manor Royal in recent years.</p> <p>The third is the ‘Baseline Labour Supply’ - estimates of future growth of local labour supply based on demographic assumptions i.e. the housing target of 752 dwelling per annum – provides a forecast of 113ha business land</p> |

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| Ref. No.                   | Respondent | Policy/<br>Para | Comments   |
|                            |            |                 | <p>(476,200sqm), which Policy EC1 commits to investigate further through the NCAAP.<br/>(See attached Economic case for Redevelopment Barker Trust Land, Crawley and Phase OO, Barker Trust Land, Hydehurst Lane, Crawley).</p> <p><b>Introduction</b></p> <p>The National Planning Policy Framework requires planning policies and decisions to create the conditions in which businesses can invest, expand and adapt. As such, planning policies should “<i>set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth</i>”<sup>1</sup>. In drafting its revised Local Plan, Crawley Borough Council (CBC) must follow these requirements and should take the opportunity to plan for growth. It should take advantage of its excellent labour and locational advantages and, in order to meet its aspirations for sustainability, it should remove the barrier of what the borough itself terms an “<i>uncertain business land supply position</i>”<sup>2</sup>.</p> <p>The Draft Local Plan commits to delivering just over a third of the land that needs to be delivered to continue its past growth trajectory and delivering less than 10% of its maximum potential demand based on labour supply projections<sup>3</sup>. The Local Plan fails to support development on land safeguarded for Gatwick’s expansion, even though it acknowledges that this will not now come forward. In delaying this decision to a further Area Action Plan and in failing to secure even the bare minimum employment land need set out in its Economic Growth Assessment, CBC’s Draft Local Plan fails to meet the requirements of the NPPF. It fails to adequately account for the economic opportunities and risks facing the borough, fails to plan for its full economic potential and therefore fails to positively and proactively plan for sustainable economic growth.</p> <p>It also risks losing out on significant benefits of sites such as the Barker Trust Land (“The Site”) coming forward, including employment, GVA, business rates and construction expenditure. The Landowner’s aspirations for the Site include up to 800,000 sqft of B1a, B1c, B2 and/or B8 floorspace.</p> <p>Delaying the allocation of adequate employment land until after the Local Plan process will foster market uncertainty. Firms seeking to grow, or improve the quality of their property, will have reduced options and will start to look elsewhere.</p> <p>This Report sets out Crawley’s economic context and potential and how the inclusion of sites such as the Barker Trust Land in the Local Plan will deliver local and strategic economic benefits and will be essential to meeting local need and planning policy aspirations.</p> |

<sup>1</sup> MHCLG, 2019. National Planning Policy Framework Paragraphs 80-81

<sup>2</sup> Crawley Borough Council, 2020. Crawley 2035: Draft Crawley Borough Local Plan 2020 – 2035

<sup>3</sup> Lichfields, 2020. Northern West Sussex EGA Update : Final Report, Table 10.5

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|                            |            |                 | <p>The Report is structured as follows:</p> <ul style="list-style-type: none"> <li>• <b>Crawley Today:</b> sets the economic context for the Barker Trust Land (The Site) and Crawley, highlighting the potential for growth, as well as the risks the borough faces from failing to plan adequately for the future.</li> <li>• <b>Proposed Development:</b> sets out the potential for redevelopment at the Site</li> <li>• <b>The Benefits of Development:</b> sets out how delivery of the Site will bring about economic benefits including jobs, business rates and locally generated Gross Value Added (GVA).</li> <li>• <b>Conclusions.</b></li> </ul> <p><b>Crawley today<br/>Overview</b></p> <p>Crawley has a strong economic track record. Jobs within the borough have increased by 30% over the last 20 years<sup>4</sup>. The borough has access to a highly skilled labour force within its travel to work area, excellent local, national and international travel links and is one of the most productive areas of the country<sup>5</sup>.</p> <p>Crawley has benefited significantly from Gatwick Airport but the airport does not exert as much of an influence over the local commercial property market as it once did<sup>6</sup>. Crawley has successfully diversified its commercial base, driven by firms seeking more affordable rents outside London and by its prime location for internet retailers and domestic logistics including Amazon, DPD and DHL<sup>7</sup>. Crawley has recently witnessed substantial rental growth, which provides a barometer of occupational demand<sup>8</sup>.</p> <p>Although the borough has many strategic strengths, there are some signs of economic weakness, and in the absence of a proactive plan for growth, these may become a threat to long term prosperity. There is a highly constrained employment land supply in the borough – a large proportion of the most suitable land is currently safeguarded for the expansion of Gatwick Airport. According to real estate advisors, DTRE, very few parcels of new land are being opened up for employment uses. Meanwhile the trend of losing employment land to permitted development and housing elsewhere, particularly in metropolitan areas such as Croydon, is expected to continue to exert pressure on those existing holdings in the wider South East – providing a continued opportunity for growth in Crawley<sup>9</sup>.</p> |

<sup>4</sup> Lichfields, 2020. Northern West Sussex EGA Update: Final Report, p.13

<sup>5</sup> Centre for Cities, 2016. Economic Outlook 2016

<sup>6</sup> Lichfields, 2020. Northern West Sussex EGA Update: Final Report, Paragraph 7.9

<sup>7</sup> DTRE, 2020. Market Report.

<sup>8</sup> DTRE, 2020. Market Report.

<sup>9</sup> DTRE, 2020. Market Report.

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| Ref. No.                   | Respondent | Policy/<br>Para | Comments  |
|                            |            |                 | <p>Crawley is one of the only cities in the South East to have experienced a decline in productivity between 2015 and 2018 – a time when productivity in Reading, London and Milton Keynes, for example, increased by more than £7,000 of additional GVA per year per worker<sup>10</sup>. While Crawley is well connected to a highly skilled workforce, the skills within the borough itself are below the national average and well behind other cities in the South East<sup>11</sup>. At the same time, Crawley has an ageing stock of business space that will not meet the needs of its growing, modernising tenants (such as Amazon) without more investment. The majority of Crawley’s stock is more than 20 years old<sup>12</sup>.</p> <p>The Capital to Coast Strategic Economic Plan<sup>13</sup> has set out its 2030 vision to be that:<br/> <i>[Its] major urban centres – Brighton &amp; Hove, Croydon and Crawley – will be ranked alongside the most productive places in the UK. Our successful towns will be on a path to greater prosperity, reversing the creeping trend of becoming dormitory towns for London, and building the facilities for growing businesses which bring high quality jobs to local people.</i></p> <p>The evidence shows that positive and proactive planning, particularly in the delivery of employment floorspace, will be critical to achieving this aim and avoid falling productivity because of employment stock that fails to meet modern needs.</p> <p><b>The Site</b><br/> The Site is situated on Hydehurst Lane in Northgate ward. Part of the Site is currently safeguarded for the potential expansion of Gatwick Airport. This safeguarding is proposed to be reviewed through a forthcoming Area Action Plan, but is not being reviewed as part of the current Local Plan process.</p> <p>The Site is bounded by the Manor Royal Industrial Estate to the south, which is one of the South East’s leading mixed employment hubs and the largest business park in the “Gatwick Diamond<sup>13</sup>”. The area to the south of the Site is predominantly employment and hotel space. Overall, 29% of Crawley’s employment is located in Manor Royal (28,000 jobs)<sup>14</sup>.</p> |

<sup>10</sup> Centre for Cities, Cities Data Tool, 2019

<sup>11</sup> ONS, 2019. Annual Population Survey 2018

<sup>12</sup> DTRE, 2020. Market Report.

<sup>13</sup> The Gatwick Diamond, the cluster of towns in East Surrey and West Sussex surrounding Gatwick airport, has a combined economy of £24 billion and 368,000 jobs (Capital to Coast Local Enterprise Partnership, 2018. Strategic Economic Plan. p. 10)

<sup>14</sup> Lichfields, 2020. Northern West Sussex EGA Update : Final Report, para 3.27

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|                            |            |                 | <p>The Site has excellent national and international transport links via Gatwick Airport, the A23 and the M23, and Thameslink rail services. It is well positioned to meet the main locational criteria of most Crawley occupiers. It is 4km and 5km from the South and North passenger terminals respectively and 7.4km from the Cargo Terminal. It has easy access to the motorway network with both Junction 9 and 10 of M23 within 6km. Access routes to the motorway are via main roads and through predominantly commercial areas with limited sensitivity from neighbouring uses such as residential<sup>15</sup>. If allocated, it has the potential be the nearest new employment land to the airport.</p> <p>Rail access via Three Bridges, Gatwick and Crawley railway stations offers direct links to Central London and Brighton taking less than an hour in each direction, as well as access to areas such as Luton and Reading. Public transport links within Crawley are also good with commuter use higher than in any other area of West Sussex. The Site is within easy walking distance of local amenities, in particular County Oak Retail Park, just 500m from the Site. This will be attractive to modern occupiers who are highly conscious of staff wellbeing and being able to offer local shops and services close to work.</p> <p>Manor Royal's 240 hectares include headquarters for Virgin Atlantic, CGG, Thales, Varian Medical Systems, Elekta, Vent-Axia, and Doosan Babcock Energy. The 2014 Northern West Sussex Economic Growth Assessment<sup>16</sup> suggested that the Site was much better than alternative local redevelopment options. The 2020 update to this Assessment emphasises the importance of Manor Royal in terms of quality of offer and concentration of business including large corporate occupiers. However, it also has constraints including a shortage of B2 Use Class space (with supply not meeting demand), and very few new options for either very large (more than 100,000 sqft) or very small-scale industrial stock (less than 10,000 sqft).</p> <p>Manor Royal has been a focus of investment in recent years, including speculative investment indicating developer confidence. The Draft Local Plan states that, "<i>Manor Royal will continue to be the focus for business-led economic growth, and will be protected and promoted for B-Class and business-supporting uses, particularly through the re-use and intensification of existing sites</i><sup>17</sup>." However, having largely exhausted current supply, without a comprehensive plan for growth in place, the current land supply constraint "<i>raises questions regarding where the next strategic development opportunity will come from.</i><sup>18</sup>"</p> <p><b>Economic context</b></p> |

<sup>15</sup> DTRE, 2020. Market Report.

<sup>16</sup> NLP, 2014. Northern West Sussex Economic Growth Assessment

<sup>17</sup> Crawley Borough Council, 2020. Crawley 2035: Draft Crawley Borough Local Plan 2020 – 2035 para 9.12

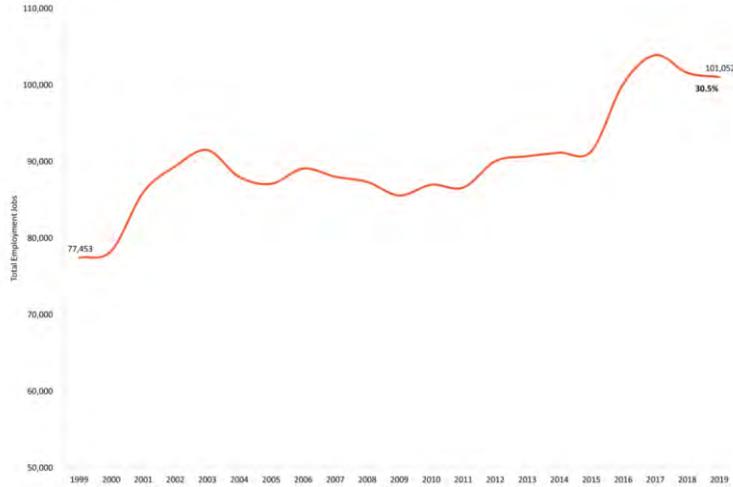
<sup>18</sup> Lichfields, 2020. Northern West Sussex EGA Update : Final Report, pg 103

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|                            |            |                 | <p>Crawley sits among the most productive and innovative regions in the UK, benefitting from high concentrations of economic activity and access to a highly skilled workforce. It has high workplace wages (in the top 10 of UK cities) and a very high ratio of private to public sector jobs (the highest in the UK). However, its relative level of productivity has fallen in recent years – from 9th most productive City in 2015, and above the national average, to 19th and below the national average in 2018<sup>20</sup> indicating that it is not keeping up with productivity gains elsewhere. In its Draft Local Plan, Crawley recognises its strength and its regional role stating, <i>“Crawley/Gatwick is the leading economic driver in the Gatwick Diamond, forming the economic heart of the Coast to Capital Local Enterprise Partnership area. The Local Plan seeks to protect and enhance Crawley’s role as a key economic driver. There is a strong demand from businesses wishing to locate in Crawley borough, and a significant requirement for additional land to accommodate B-Class business needs<sup>19</sup>.”</i></p> <p>According to the 2018 Business Register and Employment Survey (BRES), the largest sector in Crawley is transport and storage, accounting for 24% of total employment in the borough. Business administration, accounting for 18% of total employment in Crawley, is the next largest sector. Education and health sectors are underrepresented at about 10% of all employment (compared to 22% across the South East).</p> <p>Between 2015 to 2018 the manufacturing sector grew by 56% against a backdrop of steady employment growth in the sector nationally. Manufacturing is concentrated mostly in computers and electronics. Construction (+50%), Business administration &amp; support services (+31%) and Public administration &amp; defence (+13%) also experienced growth. The long-term trend of Crawley’s employment growth is set out in the chart from Lichfields/Oxford Economics below (Figure 1)<sup>20</sup>. This shows resilience through the 2008 recession and a very strong recovery thereafter. Growth has tailed off in the last two years.</p> |

<sup>19</sup> Crawley Borough Council, 2020. Crawley 2035: Draft Crawley Borough Local Plan 2020 – 2035 para 9.11

<sup>20</sup> Lichfields, 2020. Northern West Sussex EGA Update : Final Report, Figure 3.3

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|          |            |                 | <p>Figure 1: Crawley Total Employment Jobs (1999-2019) taken from The North Western Sussex EGA</p>  <p>Source: Oxford Economics (2018) / Lichfields analysis</p> <p><b>Labour Market</b></p> <p>Crawley has a large, highly skilled and well-connected labour catchment area. Its travel to work area (TTWA) includes 600,000 people. A total of 43% of working aged (16-64) residents have Level 4 qualifications or above (degree or equivalent) – the average across the TTWAs in the UK is 34%. Managers, directors, senior officials or in professional occupations account for 36% of working aged residents in the TTWA. However, the Coast to Capital Local Enterprise Partnership identifies Crawley itself is an area with a relative weakness in skills. At the last Census, 22% of Crawley residents had a degree or equivalent qualification, compared to 30% across the South East.</p> <p>Crawley and North West Sussex have very high self-containment rates at 65% and 60% respectively<sup>21</sup> (compared to 47% in Berkshire, for example)<sup>22</sup>, while 40% of all employees in Crawley also live in the borough<sup>23</sup>. Given the</p> |

<sup>21</sup> Proportion of working residents that work in the same area  
<sup>22</sup> Lichfields, 2020. Northern West Sussex EGA Update: Final Report, para 3.33  
<sup>23</sup> Census 2011. WU01UK - Location of usual residence and place of work by sex

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|                            |                         |                 | <p>economic pull of London, this shows the potential of the Crawley economy and the potential for growth to benefit local residents. For example, the train links between London and Crawley, Royal Tunbridge Wells or Guildford are broadly similar but the propensity for workers to travel to London is substantially lower in Crawley – at only 9% of workers, compared to 16% from Guildford and 19% from Tunbridge Wells<sup>28</sup>. This means that growth here has the potential to benefit Crawley and Sussex residents. Median wages for both workers and residents are higher than the South East and national averages.</p>  |
|                            |                         |                 | <p><b>Suggested Modifications:</b><br/> The EGA recommends the Council consider accommodating the Past Development Rates requirement as a minimum and states that there could also be scope to plan to accommodate the higher level of economic growth associated with the Baseline Labour Supply.<br/> As such, Draft Policy EC1 identifies that there is need for “a total of 33 hectares (143,990sqm floorspace) new B-class business land in the borough. Opportunities for approximately 12ha (63,279sqm) are identified within the borough, resulting in an outstanding requirement of 21 hectares additional land (80,711sqm) for B-Class business uses over the Plan period to 2035.” Adopting a low growth rationale based on previous development rates due to a historically constrained land supply is clearly planning for the bare minimum forecast need.<br/> As identified in the Economic Case for Redevelopment enclosed at <b>Document 2</b>, the Draft Local Plan commits to delivering just over a third of the land that needs to be delivered to continue its past growth trajectory (c.12ha of the 33ha) and delivering less than 10% of its maximum potential demand based on labour supply projections. The Draft Local Plan fails to meet the requirements of the NPPF as it is not effective nor justified. The minimum level identified (33ha) is so substantially below the amount required to meet the Baseline Labour Supply scenario (113ha), that it may put at risk the future economic prosperity of Crawley, undermine the strength of the area as an employment hub and create unsustainable travel patterns.<br/> The Sustainability Appraisal (SA) sets out the risks of failing to adopt a robust approach to employment land provision. The text below refers to a “do nothing” scenario, where no specific local employment land policy is in place and the NPPF is the default position:</p> |
| REP/056                    | Gatwick Airport Limited | EC1             | <p><b>Policy EC1: Sustainable Economic Growth</b><br/> GAL object to Policy EC1 as drafted. GAL object to new employment development on land currently safeguarded by national policy for future potential airport expansion. (<i>GAL’s has made comment on employment land delivery in its objection to Policy SD3 North Crawley Area Action Plan</i>).<br/> The draft Plan has identified a shortfall in employment land of approximately 21 hectares through the Plan period up to 2035 and therefore employment land needs will be considered alongside the requirement for safeguarding for future airport expansion under an Area Action Plan – proposed Policy SD3. GAL strongly disagrees with this</p>  |

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|                                   |                              |                         | <p>proposal in the draft Plan and believe that the Councils unmet employment land provision can be sufficiently satisfied by other planning mechanisms such as article 4 directions or the duty to co-operate and which would not prejudice the land which is currently safeguarded by national policy.</p> <p>GAL considers that existing employment sites in the borough could be used more efficiently by means of intensification, redevelopment and design improvements. Vacant employment sites do already exist within the borough, The Manor Royal Economic Impact Study (2018) clearly identifies significant scope for accommodating new development across a number of sites in this main employment land area.</p> <p>Local planning authorities are bound by the statutory Duty to Cooperate when making plans and especially on strategic matters that cross administrative boundaries. GAL considers that employment land opportunities could be further realised through the Councils Duty to Co-operate and by working with the adjoining authorities of Mole Valley, Tandridge and Reigate and Banstead. The Horley Strategic Business park has been allocated with a specific purpose of assisting Crawley Borough Council in meeting its unmet employment needs and it presents a significant opportunity for the Council to work with Reigate and Banstead Borough Council to jointly to deliver a large scale employment site. Through positive duty to cooperate arrangements Crawley's unmet employment need could also be satisfied in part within in the wider North Western Sussex Area.</p> <p>The proposed approach in the draft Plan to remove the safeguarding and the subsequent loss the employment opportunities associated with a potential future NSIP at Gatwick is likely to be of considerably greater economic damage to the catchment of Crawley, than the economic benefits of delivering the employment land burden in during the lifetime of the Plan.</p> |
| REP/065                           | Mole Valley District Council | EC1                     | <p><b>Economic growth</b></p> <p>The constrained land supply position in Crawley means there is also an unmet need for employment land of a minimum of 21 hectares over the Plan period according to Crawley's Employment Land Trajectory. The unmet need for employment land has previously been significantly affected by the uncertainty of a possible additional runway at Gatwick Airport and the need to safeguard land for this reason.</p> <p>However, it is now understood that CBC proposes through Policy SD3 to explore the possibility of removing the 'safeguarding' of 613 hectares of land to the north of Crawley, which has been designated for an Area Action Plan (AAP) to meet the future growth and operational needs of the airport alongside other development needs within Crawley, including housing.</p> <p>Although MVDC would support CBC in utilising the land for non-airport uses, the following points should also be taken into consideration:</p> <ul style="list-style-type: none"> <li>- The NWS EGA update 2020 concluded that NWS authorities (Crawley, Horsham and Mid Sussex) continue to operate as a broad functional economic market area (FEMA). Given that Mole Valley does not form part of the</li> </ul>  |

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|                                   |                   |                         | <p>NWS FEMA, MVDC is of the view that the responsibility for meeting Crawley's unmet employment needs, in the first instance, would fall to those local authorities within the NWS FEMA and then subsequently, if necessary, those areas with which influential economic linkages exist, which doesn't include Mole Valley.</p> <p>- The EGA update 2020 also stated that there is potential for a greater level of business growth based on the 'unconstrained' uncapped local housing need figure of 752 dwellings per annum. This can only be planned for if current constraints on land supply are lifted. Using this approach, the EGA identifies an 'unconstrained' employment land requirement of 113ha for Crawley. CBC consider this amount of employment land is likely to be needed should further major urban extensions to Crawley come forward.</p> <p>- Regarding the AAP proposed for the land north of Crawley, it is noted that work on it would commence within three months of the adoption of the Local Plan. CBC should consider bringing its preparation forward to align with the Local Plan Review 2020-2035 in order to determine the amount of housing which can be developed on land within the AAP boundary. It appears that the AAP may be able to contribute towards meeting Crawley's housing need. Therefore, without further assessment of land availability in the AAP, it is possible that the level of unmet housing need arising from Crawley maybe overstated or non-existent.</p> <p>Furthermore, as has been previously stated within MVDC'S Regulation 18 consultation response, there are significant physical and policy constraints on development in the south eastern part of Mole Valley, adjacent to Crawley, which limit the potential for growth in this area. Transport links between Mole Valley and Crawley are weak, mainly comprising rural lanes with limited capacity. The only A-road connections are the A217 and A264/A24. The A217 reduces to a single carriageway north of the CBC boundary and serves only one small settlement (Hookwood) in Mole Valley before continuing north to Reigate. The A264/24 is far from a direct route; the A264 lying to the south of Crawley and connecting to the A24 some 5km south of Mole Valley's boundary. Public transport connections are also weak, with only limited bus services in the rural parts of southern Mole Valley.</p> <p>Gatwick Airport is a major constraint, both in physical terms and in terms of the consequences of air traffic on the southern part of Mole Valley. The south eastern part of Mole Valley is also significantly impacted by flooding (Flood Zones 2 and 3).</p> <p>For the reasons outlined above, we consider that Mole Valley would be unable to accommodate CBC's unmet employment land needs owing to the identified physical and policy constraints, in conjunction with the limited available employment land within the south eastern part of the District.</p> |
| REP/066                           |                   | EC1                     | <b>Crawley Local Plan Review 2020 – 2035 – Submission version</b>  |

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|                            | Mid-Sussex District Council      |                 | <p>Mid Sussex welcomes the opportunity to comment on the submission Crawley Local Plan Review (the Plan) and our detailed comments on the Strategic Polices of the Plan build on our earlier response to the Regulation 18 draft of the Local Plan.</p> <p>Mid Sussex welcomes the further work undertaken by Crawley since the publication of the draft Local Plan and the identification of additional sources of housing supply, resulting in another 550 units. In particular, Mid Sussex supports the revisions to policies which will ensure that there is a more effective use of land in meeting housing and other land use needs in line with the National Planning Policy Framework (NPPF).</p> <p>Mid Sussex has reviewed the Plan and accompanying evidence that has been prepared to support the Plan however it is noted that some of the evidence base, including Transport Assessment, Viability and Habitats Regulation Assessment have not yet been completed and therefore these comments are provided in this context. Mid Sussex may wish to make further comments as and when the evidence base is complete.</p> <p><b>Suggested Modifications:</b><br/> <i>Mid Sussex supports this policy in principle however considers that it could be <b>more effective</b> in achieving the areas needs. Policy EC1 (iii) currently encourages the redevelopment and intensification of under-utilised sites in Main Employment areas. However, the opportunities presented by the Gatwick Expansion Safeguarding for rationalising Main Employment areas, have not been taken. This is missing an opportunity to release land for much needed housing.</i></p> <p><b>Change required:</b> <i>The Policy needs to be amended to make a cross reference to Policy SD3 as the opportunities presented by the Gatwick Expansion Safeguarding land should form part of a comprehensive spatial strategy for meeting development needs.</i></p> |
| REP/067                    | Resident 15                      | EC1             | Employment – where will 20,000 people work? I understand that the current unemployment in the South East is only 0.5% below the national average so where on earth are all these additional people going to find work?  |
| REP/055                    | Savills on behalf of Wilky Group | EC1             | <p><b>Background</b></p> <p>This representation is submitted on behalf of The Wilky Group (TWG or Wilky), which has a long-standing interest in the promotion of strategic employment land within the Crawley Borough Council (CBC) area. It relates to Chapter 9, Economic Growth, and specifically Policy EC1, Sustainable Economic Growth in the draft Crawley Borough Local Plan, 2020 (DCBLP).</p> <p>TWG owns about 63.3 ha (149 acres) of land east of Gatwick Airport and north and south of the M23 spur road between Junction 9 and 9a. The land south of the M23 spur road is being promoted by TWG as a strategic opportunity know as Gatwick Green (the site). The site is identifies on the plan at <b>Appendix 1</b>, which shows the extent of the Gatwick Green opportunity, comprising about 59 ha (146 acres). TWG owns about 47 ha (116 acres)</p>  |

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|                                   |                   |                         | <p>of land within the Gatwick Green opportunity; about 80% of the site – extent of land owned by Wilky is shown on the plan at <b>Appendix 1</b>.</p> <p>Wilky and Aberdeen Standard Investments are discussing how they can work together in respect of Wilky's strategic landholding adjacent to Gatwick Airport to bring forward an integrated mixed-use development and co-ordinated infrastructure solution.</p> <p><b>Executive Summary</b></p> <p>TWG has submitted substantive representations on the DCBLP in relation to its land interests east of Gatwick Airport and Balcombe Road to the north of Crawley (59 ha). Its case is primarily concerned with the approach in the DCBLP to safeguarding land for future growth of the airport, the proposal to designate the formerly safeguarded land for the North Crawley AAP and the short and long term approach to identifying land for strategic employment constrained in Policies EC1 (Sustainable Economic Growth) and SD3 (North Crawley AAP). TWG considers that there is no legal or national policy basis to safeguard land for a second runway at Gatwick and consequently the unmet planning and socio-economic needs of the Borough can be accommodated through the identification of land. Runway capacity has been provided for at Heathrow to meet forecast demand, alongside the expansion of other airports based on their existing runway infrastructure. National policy on aviation and airports therefore no longer requires any safeguarding at Gatwick, so TWG fully supports the removal of blanket safeguarding in the DCBLP.</p> <p>The NPPF requires Local planning Authorities to place significant weight on supporting sustainable economic growth by, <i>inter alia</i>, identifying strategic sites for inward investment to accommodate business needs and wider opportunities. Regional and sub-regional economic policy support focusing growth at Crawley/Gatwick in recognition of the area's current role and future potential. Importantly, the evidence base for the Local Industrial Strategy, which planning policy should reflect, supports the identification of major economic development adjacent to Gatwick, identifying land east of the airport in this regard.</p> <p>TWG supports the policy to identify land for strategic employment and other needs via an AAP for north Crawley, but has not put forward evidence that the unmet economic needs of the Borough are higher than noted in policy. In recognition of this and having regard to the removal of blanket safeguarding, evidence has been put forward to support the identification of Gatwick Green for strategic employment to meet the long-standing and urgent unmet needs of the area. Gatwick Green is immediately available to address the short term shortfall of employment land.</p> <p><b>Policy EC1</b></p> <p>Policy EC1 of the DCBLP sets out the Council's approach to planning for sustainable economic growth by acknowledging Crawley's key role in the Gatwick Diamond; the short term requirement for 33 ha of land for B-class</p> |

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|                                   |                   |                         | <p>uses against a supply of 12 ha; identifying Manor Royal as the key business location in Crawley; identifying the Main Employment Areas for economic growth and redevelopment for employment; supporting small-scale extensions to Manor Royal; working with neighbouring authorities to accommodate Crawley's unmet business land needs, and addressing further employment growth including the scope for Strategic Employment Locations (SELs) through the North Crawley Area Action Plan (AAP) under Policy SD3.</p> <p>TWG broadly supports Policy SD3 and the designation of the North Crawley AAP area as a means to address the proposer planning and socio-economic needs of Crawley alongside any legitimate and robust long term needs of the Airport. It is considered that this approach has a number of advantages, although it would result in some negative aspects arising from the further delay in resolving the long standing economic and community needs of the Borough. The decision to defer these matters to a separate AAP does not mean that the key policy on economic growth in the DCBLP (EC1) should be based on a narrow and unsound assessment of the Borough's economic needs to 2035. Rather, Policy EC1 must identify the full extent of those economic requirements and the means by which they are to be addressed. Policy EC1 falls short of these requirements – consequently, it is considered that in relation to this matter, the policy is not sound against the tests of soundness set out at paragraph 35 of the National Planning Policy Framework (NPPF).</p> <p>The issue of when and by what means land should be allocated for strategic employment is a matter that was addressed by the previous Local Plan Inspector, who recommended an early review of the current Plan to address employment need: TWG supports the AAP approach, but also recognises that it has some negative consequences, so on this basis, the evidence in support of the allocation of Gatwick Green is presented as part of this representation. The evidence will also be relevant in the event that the approach proposed by SD3 is not followed and the issue of whether to continue safeguarding or alternatively allocate land for other uses become relevant as part of the Examination.</p> <p>This representation therefore sets out of the evidence in support of the above position, with reference to existing regional and sub-regional policy and studies and a review of the Council's North West Sussex Economic Growth Assessment (EGA<sup>24</sup>). Evidence is also put forward to demonstrate that the regional/sub-regional demand for strategic employment floorspace and economic infrastructure is far greater than identified by the Council's geographically-limited EGA.</p> <p>The representation will therefore outline the significant and acknowledged demand for employment floorspace in the Crawley/Gatwick area at the 'Heart of the Gatwick Diamond', and the variable quality of existing building/land stock to meet the identified demand. The case is also made for such provision to be in the form of high-quality and</p> |

<sup>24</sup> North West Sussex EGA Update, Final Report, Lichfields for Crawley BC, January 2020

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|                            |            |                 | <p>flexible employment development for B8/B1/B2/C1 and related uses in a high density masterplanned business quarter that is connected by multiple modes of sustainable transport on land east of Gatwick Airport known as Gatwick Green.</p> <p>National planning policy and guidance requires that CBC must plan positively to address its economic needs and that this is critical to achieving a Local Plan that is sound. The representation will set out why Policy EC1 is <u>not considered to be sound with regard to the requirement for employment land</u> such that it is not in accordance with the four soundness tests contained in the NPPF (para 35).</p> <p><b>National policy &amp; guidance on economic development</b></p> <p>The NPPF (February 2019) notes that local planning authorities should place significant weight on supporting <u>economic growth</u> and <u>productively</u> taking account of local business needs and <u>wider opportunities for development</u>. Policies should allow each area to build on its strengths, counter any weakness and address the challenges of the future. In particular, <u>areas with high levels of productivity should be allowed to capitalise on their potential</u> so that Britain can be a global leader in innovation: driving productivity improvements is the core vision contained in the Government's Industrial Strategy<sup>25</sup>. The NPPF goes on to require planning policies to proactively and positively encourage sustainable economic growth with regard to Local Industrial Strategies (LISs); identify strategic sites for inward investment; address any barriers to investment, and incorporate flexibility to accommodate needs not articulated in the plan. Also highlighted is the need to plan for storage and distribution uses and take account of their specific locational requirements (paras 80-82).</p> <p>Government guidance on providing for economic development needs is set out in Planning Practice Guidance (PPG – 025 Ref IDs: 2a-025-20190220 to 2a-032-20190722). To ensure robust evidence on business needs, local authorities should liaise closely with the business community and take account of Local Industrial Strategies (LISs). Councils should take a 'best fit' Functional Economic Market Area (FEMA) and then assess the existing employment land stock; the pattern of land supply and loss; evidence of market demand from local data, market intelligence, surveys of business needs, discussions with developers / agents and evidence from business forums; wider market signals on growth, diversification and innovation, and any evidence of market failure. Above all, this requires close liaison with the business community to understand current and future requirements.</p> <p>In relation to market signals, PPG states that Councils need to look at current and robust data on labour demand (jobs/employment forecasts). Labour supply (demographically derived forecasts of the economically active population, i.e. future employees); the trends in take-up of employment land; future property market requirements, and consultation with relevant organisations and study business trends, models and employment statistics, taking</p> |

<sup>25</sup> Industrial Strategy: Building fit for the future, HM Government, 2017

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|                            |            |                 | <p>account of longer term economic cycles. This work will reveal any quantitative or qualitative mismatches in demand and supply and which market segments are under or over-supplied. Councils should look at a range of robust data to understand the requirements for office, general business and distribution space and which market segments are over/under supplied.</p> <p>PPG contains specific guidance on the needs of the logistics sector given its role in the efficient supply of goods, and therefore economic productivity which is a key part of the UK Industrial Strategy. It goes on to note that strategic logistics facilities need significant amount of land with access to strategic transport networks and that where a need exists. Councils should collaborate with infrastructure providers and other interested parties to identify the scale of need. Likewise, Councils need to understand the needs of specialist or new sectors including through clustering of certain industries to support collaboration, innovation, productivity and sustainability.</p> <p>Overall therefore, the NPPF and PPG requires that plan-making authorities must address their economic needs in their local plans, which requires an overriding strategy on how and where those needs are to be met. This is critical to achieving a Plan that is sound in accordance with the tests in the NPPF (para 35). The adopted CBLP contains an Area of Search for Strategic Employment Locations (SELS) south and east of Gatwick, an area that now proposed for the North Crawley AAP. TWG's separate representations on safeguarding (Chapter 10) note that there is no longer any national aviation policy requiring land to be safeguarded at Gatwick. In this context, CBC must prioritise planning to meet the urgent and critical need for strategic employment land and other uses in order to address the pressing and immediate economic needs of the area and its residents.</p> <p>In the context of the above policy and guidance, it is considered that the Council's overall approach to identifying future economic needs based on the North West Sussex Economic Growth Assessment (EGA) falls short of what is required. The geography of the EGA is limited to North West Sussex, when national policy and guidance and all the regional and sub-regional studies emphasise the need for a wider assessment covering the Crawley/Gatwick sub-area traversing parts of north West Sussex and south east Surrey. Evidence in this representation also points to an under-assessment of future land and floorspace needs that is at variance with the ambitious economic objectives for the Crawley/Gatwick area and with the findings of Savills' economic market analysis undertaken for TWG. This representation sets out the extent of these concerns that need to be addressed if the EGA is to form a sound basis for informing the DCBLP.</p> <p><b>Regional Policy and Infrastructure</b></p> <p>An assessment of the demand for employment land and floorspace in the wider Crawley/Gatwick area requires a clear understanding of the regional and sub-regional economic and infrastructure policy context. These policies all point directly to the rationale for, and potential of, concentrating a significant level of economic activity in the wider Crawley/Gatwick area, taking advantage of its existing strengths and potential to build on these through</p> |

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|                            |            |                 | <p>sustainable economic growth. This policy cannot be realised without significant provision of integrated economic infrastructure: employment land, community transport, highways, transport interconnections, broadband, education, housing and leisure.</p> <p>A review of the relevant regional and sub-regional studies and policy documents is contained at <b>Appendix 2</b>. The core strategies and policy recommendations in these documents are summaries below.</p> <ul style="list-style-type: none"> <li>• <b>The Gatwick Diamond Initiative: Local Strategic Statement (LSS, 2012<sup>26</sup>)</b> - This states that the primary focus for new business development will be in the areas around Gatwick, combined with transport investment in the Crawley/Gatwick regional hub. The Gatwick Diamond authorities have committed to work together to deliver the objectives of the LSS – joint working between the West Sussex and Surrey members has been limited in this regard.</li> <li>• <b>Coast to Capital Strategic Economic Plan (SEP, 2018<sup>27</sup>)</b> - This identifies <u>Gatwick Airport as the driver of, and location for, economic growth given its place at the geographical and economic heart of the region.</u> The airport is the beating heart of business in the region and “<i>central to our plans to unlock future productivity and prosperity for our area as a whole</i>”. Delivering priorities at Crawley/Gatwick will therefore require land for growth and development linked to private-public investment in infrastructure. Business parks at Horsham, Burgess Hill and Horley will not be sufficient to meet future needs and in terms of capacity are significantly behind many other parts of the South East.</li> <li>• <b>Coast to Capital Local Industry Strategy (LIS)</b> – The LEP has released a suite of evidence base documents, two of which (the Commercial Property Study (CPS) and the draft Economic (DEP))<sup>28 29</sup> contains a number of key findings and recommendations (Savills emphasis): <ul style="list-style-type: none"> <li>• There is <u>demand</u> for office and industrial space across the region and vacancy rates are low – <u>addressing barriers</u> to new development could enable growth and diversification in the business base (DEP, page 104, (4)).</li> <li>• The region suffers from a <u>lack of high quality office and industrial space</u>, which reduces its ability to expand and attract higher value business, which in turn may be <u>holding back the economy</u> (DEP, Page 105, (6)).</li> </ul> </li> </ul> |

<sup>26</sup> Gatwick Diamond Local Strategic Statement, Gatwick Diamond Local Authorities [excluding Tanbridge DC], March 2012

<sup>27</sup> Gatwick 360 The Coast to Capital Strategic Economic Plan 2018-2030, Coast to Capital LEP, 2018

<sup>28</sup> Coast to Capital Commercial Property Study, Hatch Regeneris, December 2019

<sup>29</sup> Coast to Capital Local Industrial Strategy, Draft Economic Profile, Hatch Regeneris, September 2019

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|                            |            |                 | <ul style="list-style-type: none"> <li>• The limited clusters of business activity in the region have not been acknowledged and there has been <u>little to no development of business parks or clusters over the last thirty years</u> 0 this lack of critical mass of related activities <u>limits the benefits of agglomeration</u> (DEP, page 104, (6)).</li> <li>• R&amp;D development in the regional has occurred in an ad hoc way <u>leading to a relatively low amount of external public or private investment</u> (DEP, page 104, (7)).</li> <li>• Other areas (e.g. Thames Valley and Manchester) <u>extract more value and investment from their international airports</u> and supply chains (DEP, page 104, (8)).</li> <li>• The forecast demand for office space around Crawley/Gatwick is around <u>1.1 M to 3.2 M sq ft to 2050</u> (CPS, para 7.42) and for industrial/warehousing space between 118,000 sq ft and 254,000 sq ft annually (CPS, para 7.55).</li> <li>• The biggest challenge facing the Gatwick Diamond is the <u>lack of land for development</u>, restricting the ability of large occupiers to find appropriate space (CPS, para 7.50).</li> <li>• Demand is strong for industrial space, especially for 'last mile delivery; warehousing – evidence suggests that <u>Crawley and Gatwick with their excellent transport links are well placed to meet this demand</u>, which is outweighing supply (CPS, para 7.54).</li> <li>• Gatwick Airport represents a significant driver for development going forward – <u>land east of the Airport would be well-positioned to capture a significant proportion of this demand</u> given its location close to the Airport (CPS, para 7.55).</li> <li>• The opportunity for a wider <u>Airport City</u> concept around Crawley/Gatwick has been identified to capitalise on the area's proximity to the Airport, Manor Royal and Crawley town centre (CPS, para 10.7).</li> </ul> <p><b>Recommendation 3</b> of the CPS is to actively support and drive forward the Gatwick Airport City Aspirations, noting that the initiative represents the biggest opportunity to increase the quantum and quality of commercial space in the region, whilst diversifying the property to offer to drive agglomeration, economic growth and productivity (para 10.7). The CPS goes on to suggest some actions or interventions to help facilitate development, including providing resources to support the opportunity; options for an Enterprise Zone; a Development Corporation, and public funding for infrastructure and discussions with Government to garner support (para 10.9). Paragraph 10.10 of the CPS concludes that these ambitions should feature prominently in the Local Industrial Strategy (LIS) alongside discussions with Government to signal to local authorities, stakeholders and decision-makers that this key project could transform the property of the region and should be supported.</p> |

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| Ref. No.                   | Respondent | Policy/<br>Para | Comments  |
|                            |            |                 | <ul style="list-style-type: none"> <li>• <b>West Sussex Economic Growth Plan (2018<sup>30</sup>)</b> - The EGP identifies five priority themes, the second of which is to <u>maximise the opportunities from Gatwick by creating and supporting higher value employment in a wide zone of opportunity around the Airport.</u></li> <li>• <b>Gatwick's Economic Contribution Through Trade and Investment (2018<sup>31</sup>)</b> – Acknowledges the importance of the Airport in facilitating international trade and investment and attracting clusters of high-value industries within the Gatwick Diamond area including sectors that depend upon cargo and passenger services.</li> <li>• <b>Gatwick Growth Board Connectivity Study (2017<sup>32</sup>)</b> – This identifies a range of major improvements to the transport network in the Gatwick area to serve the ongoing expansion of the Airport and by implication could also serve wider economic growth from major employment development.</li> <li>• <b>TfSE Economic Connectivity Review (2018<sup>33</sup>)</b> – Proposes focusing transport investment at economic hubs, industrial clusters, international gateways and regional growth centres.</li> </ul> <p>A common theme amongst these studies / strategies is a spatial strategy that includes a focus on growth and transport investment in the Crawley/Gatwick area, recognising the potential to take advantage of close proximity to the Airport (the UK's second largest) and land within the safeguarded area for the second runway that could be utilised for this purpose.</p> <p>At a sub-regional level, the focus from all past and current studies is that the Gatwick/Crawley area at the 'Heart of the Gatwick Diamond' represents a major strength in the region economy, but one that is underperforming and underutilised in terms of its potential to raise the economic value of the area to a level similar to that in East Surrey or Berkshire. The regional and sub-regional/County studies <u>all single out of the Crawley/Gatwick area for major growth and strategic mixed-use employment development and transport infrastructure investment.</u></p> <p>Of significance, the evidence base for the LIS identifies major benefits of the Airport City opportunity near Gatwick Airport, noting that about 150 ha of land in this area could be brought forward for this purpose with the land east of the Airport being well placed to capture a significant proportion of the future demand in this strategic and regionally-important location. The evidence base acknowledges the need to lift the safeguarding area for the second runway to realise this potential – the opportunity can now be considered with the removal of safeguarding from the DCBLP.</p> |

<sup>30</sup> West Sussex County Council Economic Growth Plan 2018-2023, WSCC, May 2018

<sup>31</sup> Gatwick's Economic Contribution Through Trade and Investment, Oxford Economics for GAL, June 2018

<sup>32</sup> Gatwick Growth Board Connectivity Study, Arup for GAL, July 2017

<sup>33</sup> Economic Connectivity Review, Final Report, TfSE, July 2018

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|----------------------------|------------|-----------------|---|
| Ref. No.                   | Respondent | Policy/<br>Para | Comments  |
|                            |            |                 | <p>The NPPF notes that planning policies should set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth, having regard to Local Industrial Strategies and other local policies for economic development and regeneration (para 81). On this basis, provides a sound basis for bringing forward a policy framework to facilitate the Gatwick Green opportunity alongside other land, infrastructure and transport investment.</p> <p><b>Crawley's employment land requirement and supply</b></p> <p>CBC has revised its 2014 Economic Growth Assessment (EGA, 2020<sup>34</sup>) for the North West Sussex Functional Economic Area (FEMA); pursuant to a joint approach with Horsham and Mid Sussex District Councils under the Duty to cooperate (dtC). The report was based on a geographic area defined by the travel-to-work area and related housing market area to provide a detailed analysis of Crawley's forecast job growth, and corresponding business-led economic land supply and floorspace needs over the next 15 years. The EGA report has informed policies on the economy in the DCBLP. CBC state that it provides a detailed analysis of Crawley's forecast job growth, and corresponding business-led economic land supply and floorspace needs over the next 15 years. The EGA has assessed the future growth scenarios and floorspace requirements using three methodologies:</p> <ul style="list-style-type: none"> <li>• Forecasting based on baseline job growth</li> <li>• Past development rates continuing</li> <li>• Baseline labour supply (linked to household growth)</li> </ul> <p>These projections / forecasts generate land requirements for B-class uses over the period 2019 to 2036 of -1-1 ha (baseline job growth – labour demand), 33 ha (past development (take-up) rates) and 113 ha (baseline labour supply – based on the Standard Method to assess housing need). The baseline job growth requirement is not recommended as a basis for policy given that it is not optimistic about future job creation. The EGA concludes that projected population growth could be the most significant driver of economic growth in Crawley over the Plan period, and that the market has demonstrated that appetite exists to deliver new employment floorspace. The EGA therefore recommends that the Council consider planning to accommodate the past take-up based requirement as a minimum, to enable historically strong levels of employment development to continue in the Borough. It goes on to recommend that there could be scope to plan to accommodate the higher level of economic growth associated with the baseline labour supply scenario in an unconstrained employment land supply position, subject to the lifting of the safeguarding constrained affecting 613 ha of land south and east of the Airport.</p> |

<sup>34</sup>North West Sussex EGA Update, Final Report Lichfields on behalf of Crawley Borough Council, Horsham District Council, Mid Sussex District Council, January 2020

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| Ref. No.            | Respondent                               | Policy/ Para                                | Comments   |  |   |   |   |  |   |                     |         |       |        |         |          |                   |          |       |        |       |         |
|---------------------|--|---|--|--|---|---|---|--|---|---------------------|---------|-------|--------|---------|----------|-------------------|----------|-------|--------|-------|---------|
|                     |  |   | <p>Savills has undertaken a review of the EGA (<b>Appendix 3</b>) which comes to the following conclusions with regard to the EGA projections / forecasts:</p> <ul style="list-style-type: none"> <li>• The minimum employment land requirement in the EGA of 33 ha is inadequate to support the future economic growth in Crawley as it is based on historic constrained rates of delivery.</li> <li>• An analysis of the property market area concludes that the DCBLP should plan of a minimum of 70 ha to reflect market demand over the near term.</li> <li>• Taking account of the current land supply of 12 ha, the DCBLP should be planning to accommodate about 58 ha of employment land.</li> <li>• The forecast of need derived from purely demographic forecasts is stated in the EGA as c113 ha: market signals and other factors could indicate a need for a higher requirement: so this is the minimum amount of land that needs to be planned for in the DCBLP / North Crawley AAP.</li> </ul> <p><b>Table 4.1</b> summaries these considerations by showing the different employment land requirements set out in the EGA and contained in the assessment by Savills in <b>Appendix 3</b>.</p> <p><b>Table 4.1- Comparison of employment land requirements</b></p> <table border="1"> <thead> <tr> <th>Use</th> <th>EGA Baseline Job Growth land requirement</th> <th>EGA Past Development Rates land requirement</th> <th>EGA Baseline Labour Supply land requirement</th> <th>Savills baseline Jobs Growth land requirements</th> <th>Savills baseline Labour supply land requirement</th> </tr> </thead> <tbody> <tr> <td>B use class (gross)</td> <td>-1.1 ha</td> <td>33 ha</td> <td>113 ha</td> <td>70.2 ha</td> <td>&gt; 113 ha</td> </tr> <tr> <td>B use class (net)</td> <td>-13.1 ha</td> <td>21 ha</td> <td>101 ha</td> <td>58 ha</td> <td>&gt;101 ha</td> </tr> </tbody> </table> <p>In summary, the review by Savills considers that there is a need to plan for about 70 ha of employment land in Policy EC1 to reflect a forecast of unconstrained need and at least 113 ha of land over the DCBLP period: these levels of development need to be planned for through the DCBLP and/or the North Crawley AAP. The assessment concludes that proximity to the Airport is an important ingredient in optimising the level of economic benefits to support the economic growth of the region. It concludes that Gatwick Green is ideally placed to deliver these benefits and is available, deliverable and viable.</p> | Use  | EGA Baseline Job Growth land requirement        | EGA Past Development Rates land requirement | EGA Baseline Labour Supply land requirement | Savills baseline Jobs Growth land requirements | Savills baseline Labour supply land requirement | B use class (gross) | -1.1 ha | 33 ha | 113 ha | 70.2 ha | > 113 ha | B use class (net) | -13.1 ha | 21 ha | 101 ha | 58 ha | >101 ha |
| Use                 | EGA Baseline Job Growth land requirement | EGA Past Development Rates land requirement | EGA Baseline Labour Supply land requirement  | Savills baseline Jobs Growth land requirements | Savills baseline Labour supply land requirement |   |   |  |   |                     |         |       |        |         |          |                   |          |       |        |       |         |
| B use class (gross) | -1.1 ha                                  | 33 ha                                       | 113 ha   | 70.2 ha  | > 113 ha  |   |   |  |   |                     |         |       |        |         |          |                   |          |       |        |       |         |
| B use class (net)   | -13.1 ha                                 | 21 ha                                       | 101 ha   | 58 ha  | >101 ha   |   |   |  |   |                     |         |       |        |         |          |                   |          |       |        |       |         |

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| Ref. No.                   | Respondent | Policy/<br>Para | Comments  |
|                            |            |                 | <p><u>Of the land within the North Crawley AAP area, only the land at Gatwick green has the high level of accessibility and potential for quality connectivity that a highly sustainable employment-led mixed-use urban quarter requires.</u></p> <p><b>Crawley’s employment land supply</b><br/> The shortfall in Crawley’s employment land supply has increased from 35 ha in the adopted CBLP to c 101 ha in the DCBLP. Against employment land requirements of between 70 ha (Savills revised) and at least 113 ha, Crawley has a very small supply of employment land of only 12 ha. The supply is wholly reliant on the re-use and intensification of existing employment sites to create net gains in floorspace. There is significant uncertainty around the deliverability and quality of the future supply of new floorspace, which in any event ill not provide large sites for major new occupiers, warehouse and distribution uses, or cooperate occupiers.<br/> In terms of supply, Manor Royal is somewhat constrained in growing its footprint and has some qualitative drawbacks; the scope to expand Manor Royal is also limited. A recent study by Styles Harold Williams (SHW<sup>35</sup>) shows that whilst there is estimated to be potential for up to 4.7M sq ft of additional business floorspace in the Gatwick Diamond area, only one site is located at Crawley/Gatwickm being the Horley Business Park (HBO0 between Horley and Gatwick. The Regulation 18 DCBLP referenced the HBP as a source of supply to meet Crawley’s unmet needs, Policy HOR9 from Reigate and Banstead’s Development Management Plan<sup>36</sup> (DMP) is reproduced at <b>Appendix 4</b> – this shows that the site is 31 ha and is proposed for up to 200,000 sqm of predominantly B1 floorspace and up to 10,500 sqm of related community uses. Whilst no longer referenced in the DCBLP as a source of floorspace to help meet Crawley’s unmet needs, it is nevertheless worth recording the shortcomings of the HBP in this regard. A plan showing the HBP in relation to the site is included at <b>Appendix 5</b>. The supply of land in RBBC without the HBP allocation is only just sufficient to meet locally generated employment land needs RBBC relies heavily on the intensification and redevelopment of small sites (71%), which are an inherently unpredictable source of supply. The only large opportunity is at Salfords north of Horley (22,500 sqm). Furthermore, the SHW report states that HPB is 70 ha, but the allocation is for only 31 ha with, based on TWG’s review, a net developable area only 18 ha and a correspondingly reduced capacity of c 72, 000 sq m (c 775, 008 sq ft), which suggests that the site is not strictly strategic. If the smaller sites fail to materialise, RBBC would need to increasingly rely on the HBP to meet its locally generated employment needs which would further undermine the ‘strategic’ nature of the allocation. In summary, there is a clear risk that the HBP, intended to be a strategic employment site, will in part be taken up by locally generated economic demand and provide only limited land for sub-regional needs.</p> |

<sup>35</sup> Potential Business Parks within the Gatwick Diamond Area, prepared by SHW for the Gatwick Diamond Initiative, October 2018

<sup>36</sup> Reigate and Banstead Local Plan Development Management Plan (Adopted September 2019)

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| Ref. No.                   | Respondent | Policy/<br>Para | Comments   |
|                            |            |                 | <p>The Council is therefore relying to a large extent on inherently uncertain sources of land/floorspace supply that would fall significantly short of the requirement to meet the long term needs of the Borough / wider sub-region. There is therefore significant risk the Borough's economy could under-perform; that the sub-region / region could see its major economic driver lose ground relative to other regions and that the proper planning and socio-economic needs of the population would remain unfulfilled.</p> <p>A greater concern should be that the pipeline of land to meet short term needs over the next five years is very limited, amounting to only 12 ha. This is a reduction from the 23 ha available when the CBLP was adopted in 2015. Crawley therefore has an employment land supply crisis that has been left unresolved since about 2013. The available land supply to meet the unmet needs associated with Crawley/Gatwick is therefore limited in both qualitative and quantitative term, and there remains a need for one or more Strategic Employment Locations (SELS) within in the Council's AoS. Collectively, the studies suggest a significant need for strategic employment land near to Crawley/Gatwick – <u>of the land within the Area of Search (AoS), the land at Gatwick Green represents a premier location with high levels of accessibility and potential for quality connectivity as a highly sustainable employment-led mixed-use urban quarter. Gatwick green therefore represents the most sustainable and high-profile market-facing option.</u></p> <p><b><u>CBC's policy response</u></b></p> <p>The Council has put forward a policy response in the DCBLP to enable the unmet employment needs of the Borough and the sub-region to be addressed – this comprises the removal of blanket safeguarding for the second runway at Gatwick and the designation of the North Crawley Area Action Plan under Policy SD3 (and referenced in Policy EC1) to make provision for meeting the economic, infrastructure and community needs of the Borough. The AAP would also address any long term land requirements related to planned expansion proposals for the airport. In the interim period until an AAP is adopted, Policy EC1 makes provision for limited sources of land and floorspace supply to meet the short term unmet needs of the Borough, which the EGA identifies as c 21 ha. Policy EC1 therefore relies on a combination of protection measures and a range of uncertain and unreliable sources of floorspace supply. The key elements of Policy EC1 are;</p> <ul style="list-style-type: none"> <li>• Protected Manor Royal as the key business location for Crawley at the heart of the Gatwick Diamond.</li> <li>• Protect the Main Employment Areas.</li> <li>• Encourage the redevelopment of the Main Employment Areas.</li> <li>• Support minor extensions to Manor Royal.</li> <li>• Provide for 12 ha of employment land to meet economic needs.</li> <li>• An outstanding requirement of 21 ha of land (81,596 sqm) for B-class uses up to 2035.</li> </ul> |

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| Ref. No.                   | Respondent | Policy/<br>Para | Comments  |
|                            |            |                 | <ul style="list-style-type: none"> <li>• The need to work with neighbouring authorities to assess the scope to accommodate Crawley's outstanding business land needs in appropriate and outstanding locations that are accessible to Crawley.</li> <li>• The potential for future employment growth in Crawley, including the scope for Strategic Employment Location(s), will be determined through the North Crawley AAP.</li> </ul> <p>Given the commitment to undertake an AAP to address the unmet needs of Crawley, Policy EC1 relies heavily on the limited sources of employment land and floorspace related to the existing Main Employment Areas. The DCBLP adopts the land requirements of 33 ha based on past development rates which it acknowledges is a constraints-led approach (DCBLP paras 9.9 and 9.20). the unconstrained land requirement of 113 ha is identified in the DDCBLP (para 9.9) as forming the basis of the AAP (para 9.10): this will review the potential of the 619 ha AAP area to accommodate strategic employment land – areas north of Manor Royal and east of Gatwick area identified in this regard.</p> <p>Whilst it is acknowledged that the key to unlocking additional land supply is the AAP, the DCBLP should identify and adopt an unconstrained assessment of future employment needs as the basis for its economic strategy, which should be reflected in Policy EC1 and be consistent with Policy SD3's proposed removal of blanket safeguarding. This would be consistent with the advice in the NPPF that requires LPAs to proactively and positively encourage sustainable economic growth. This approach would be consistent with that used in the adopted CBLP (2015), where a shortfall of 35 ha was identified in the adopted Policy EC1. The DCBLP should therefore reference the unconstrained land requirement of at least 70 ha to address needs in the near term and at least 113 ha to address needs to 2035, acknowledging that much of this would be addressed by the AAP. This would reflect the unconstrained and objectively assessed needs of the Borough and form a robust strategic basis for the AAP.</p> <p>The policy identifies an approach to addressing the urgent unmet needs of the Borough via an AAP. This approach is supported, though it does have some negative aspects related to the ongoing delay in addressing the Borough's unmet needs. Insofar as the NPPF requires LPAs to plan positively for sustainable economic growth, allocate strategic sites to meet anticipated needs and address the infrastructure needs to accompany strategic sites (NPPF para 81), the option to bring forward strategic land through the DCBLP should be considered. It is on this basis that evidence has been included in TWG's representations to demonstrate that Gatwick Green is suitable, available, achievable, deliverable and viable.</p> <p>Evidence on behalf of TWG contained in separate representations on Chapter 10 sets out in detail support for the removal of blanket safeguarding from the DCBLP. With safeguarding removed from the Plan, the potential to identify Strategic Employment Locations in the DCBLP represents an option that would avoid the negative consequences of the AAP approach identified in this representation.</p> |

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| Ref. No.                   | Respondent | Policy/<br>Para | Comments   |
|                            |            |                 | <p><u>Overall, the proposal to advance an AAP for North Crawley as referenced in the Policy EC1 is supported. However, based on the above, it is considered the Policy EC1 is not sound specifically in relation to the fact it is based on a constrains-led assessment of the employment and land requirements of the Borough. It is therefore considered to be unsound</u> against the tests of soundness in the NPPF (para 35) in that it is not positive, has not been justified, would not be effective in delivering growth in the economy, and is inconsistent with national policy. Additionally, the approach of the Policy is inconsistent with draft Policy SD3.</p> <p>Notwithstanding concerns over the employment land requirement in Policy EC1, the approach by the Council to advance an AAP represents a step forward and is supported. However, given the urgent and critical need to redress the long-standing shortfall in economic infrastructure, evidence is presented in support of an allocation at Gatwick Green.</p> <p><b>Gatwick Green</b></p> <p>TWG has undertaken a review of the EGA incorporating a market analysis focusing on the scale and nature of the demand potential at and around Gatwick Airport (<b>Appendix 3</b>). The review concludes that there is a short term need for about 70 ha of employment land – taking account of the available supply, the level of unmet need is about 58 ha (143 acres). The opportunity can be delivered by Gatwick Green, a mixed-use employment opportunity on about 59 ha (146 acres) in a highly sustainable location.</p> <p>Gatwick Green is a proposed integrated mixed-use development and co-ordinated infrastructure solution which currently forms part of the land that is identified as an AAP under Policy SD3 of the DCBLP. Whilst still at an early stage, it is anticipated that the development could comprise the following:</p> <ul style="list-style-type: none"> <li>• About 160,000 sqm GEA of B1 (c), B2 industry and B8, warehousing, distribution and logistics.</li> <li>• About 52,500 sqm GEA of B1 office / R&amp;D.</li> <li>• About 52,000 sqm GEA of hotel use.</li> <li>• Supporting education uses for apprenticeships &amp; staff training.</li> <li>• An integrated amenity centre including ancillary shopping, leisure, dining and community uses.</li> <li>• High quality open space with mobility interchange hub.</li> <li>• Sustainable mobility at the heart of the masterplan design, with dedicated public transport, pedestrian and cycle infrastructure.</li> <li>• Ancillary car parking with Electric Vehicle Charging facilities.</li> </ul> <p>A copy of the Development Framework Plan (DFP) is included at <b>Appendix 6</b>: this comprises two plans showing (1) a concept for the whole Site and (2) a concept for the land owned by TWG, which comprises about 47 ha or 80% of the whole Site. The above land use budget reflects the whole 59 ha site – the alternative 47 ha site is suitable and viable, so represents an equally deliverable and strategic opportunity.</p> |

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|                            |            |                 | <p>Gatwick Green represents a strategic opportunity to bring forward a highly sustainable mixed-use employment area, offering a unique opportunity to deliver significant benefits to all three of the key components of sustainability:</p> <p><b>Economic</b> – Significant economic benefit – thee and other benefits will ensure north east West Sussex and the Gatwick/Crawley/Horely area can be elevated in terms of its economic and employment profile to form a regional economic hub of national and international significance at the major global air transport gateway.</p> <p><b>Social</b> – Significant qualitative and qualitative social benefits including for example a significant increase in jobs of at least 6,5000; the diversification of local job opportunities; an increase in higher-value / professional/managerial jobs to increase opportunities for promotion, help retain employees and reduce current levels of out-commuting; increased apprenticeships jointly aligned with local colleges; redress long term unemployment; provide enhanced job security through a stronger economy; enhance average earnings to help deprivation and child poverty, and strengthen links with further and tertiary education institutions in the region to help raise skills levels.</p> <p><b>Environmental</b> – Significant environmental benefits including for example the social value of reductions in CO2 emissions from zero carbon energy, building design and transport solutions; the incorporation of green infrastructure into the masterplan with added habitat value through enhanced connectivity and habitat enrichment; habitat creation designed into the development; a net gain in biodiversity through a package of measures including biodiversity offsetting; opportunities for environmental research and education, and improved urban air quality from clean transport solutions.</p> <p>Gatwick Green therefore represents a unique and unrivalled opportunity due to the following attributes.</p> <ul style="list-style-type: none"> <li>• Delivers a <b>socially-sustainable mixed-use employment location</b> that facilitates knowledge-transfer and a healthier working environment.</li> <li>• Delivers <b>higher-value employment opportunities</b> to redress out-commuting and offer chances for career progression in an area overly dependent on skilled and semi-skilled work at Gatwick.</li> <li>• Diversifies the economy around Gatwick by <b>transforming and rebalancing</b> the local and sub-regional economy.</li> <li>• Delivers <b>smart growth and additionality</b>.</li> <li>• Provides <b>enhanced apprenticeship and training</b> opportunities aligned with the objective of local collages.</li> <li>• <b>Adjacency</b> to Gatwick Airport, which is critical to attracting sectors that need near-airport locations.</li> <li>• <b>High visibility</b> from the M23 and access to rail infrastructure.</li> <li>• <b>Strong</b> commercial floorspace <b>demand</b>.</li> </ul> |

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| Ref. No.   | Respondent         | Policy/<br>Para | Comments   |                    |                   |  |                   |  |                   |                                 |                    |  |                    |                                |                    |
|  |                    |                 | <ul style="list-style-type: none"> <li>• Ability to attract <b>regional and national organisations</b> across a range of sectors.</li> <li>• The <b>absence of any alternative opportunity</b> with the same connectivity and high profile.</li> <li>• Meets the current <b>unmet economic needs and future demand profile</b>.</li> <li>• Injects significant additional <b>long term expenditure</b> into the local economy.</li> <li>• Adds a <b>significant amount to the regional GVA</b> and local authority revenue.</li> <li>• Redresses the <b>shortage of high-grade employment floorspace</b> in an optimum location.</li> <li>• Delivers <b>significant sustainable transport infrastructure</b> to enhance accessibility, reduce emissions and improve air quality in an area of intense economic activity.</li> <li>• <b>Complementarity</b> with Gatwick Airport's growth plans in its Master Plan 2019, including the DCO for the use of the standby runway.</li> <li>• <b>Complementarity</b> with Manor Royal and Crawley town centre.</li> </ul> <p>It is of significance that other European airports are developing complimentary economic hubs or zones in their hinterland – e.g. Manchester, Luton, Birmingham, Frankfurt, Schiphol, Zurich and Munich. In terms of deliverability, the Gatwick Green site is free of any statutory national environmental designations and benefits from a strategic and highly sustainable location, with the ability to connect with national transport networks (airport, mainline rail and SRN) and be served by and expand local sustainable transport networks (Fastway, local bus services, cycle ways and footpaths).</p> <p>A number of evidence based documents have been prepared to support the allocation of Gatwick Green for strategic employment. These update previous work from 2009 and conclude that there are no significant impediments to the site's development, subject to including a range of sustainability and mitigation measures to address either policy requirements or site specific circumstances. These reports are appended to this representation as follows:</p> <table border="0"> <tr> <td>Transport Strategy</td> <td><b>Appendix 7</b></td> </tr> <tr> <td>Environmental and Utilities Preliminary Assessment</td> <td><b>Appendix 8</b></td> </tr> <tr> <td>Updated Preliminary Ecological Appraisal (PEA)</td> <td><b>Appendix 9</b></td> </tr> <tr> <td>Hedgerow Regulations Assessment</td> <td><b>Appendix 10</b></td> </tr> <tr> <td>Landscape Character and Visual Appraisal</td> <td><b>Appendix 11</b></td> </tr> <tr> <td>Heritage Constraints Appraisal</td> <td><b>Appendix 12</b></td> </tr> </table> <p>The negative consequence of not meeting the short, medium and long term economic and social needs of the Borough's current and future population are significant. These consequences are outlined in Table 55.1 below alongside the benefits offered by Gatwick Green.</p> | Transport Strategy | <b>Appendix 7</b> | Environmental and Utilities Preliminary Assessment | <b>Appendix 8</b> | Updated Preliminary Ecological Appraisal (PEA) | <b>Appendix 9</b> | Hedgerow Regulations Assessment | <b>Appendix 10</b> | Landscape Character and Visual Appraisal | <b>Appendix 11</b> | Heritage Constraints Appraisal | <b>Appendix 12</b> |
| Transport Strategy                                 | <b>Appendix 7</b>  |                 |  |                    |                   |  |                   |  |                   |                                 |                    |  |                    |                                |                    |
| Environmental and Utilities Preliminary Assessment | <b>Appendix 8</b>  |                 |  |                    |                   |  |                   |  |                   |                                 |                    |  |                    |                                |                    |
| Updated Preliminary Ecological Appraisal (PEA)     | <b>Appendix 9</b>  |                 |  |                    |                   |  |                   |  |                   |                                 |                    |  |                    |                                |                    |
| Hedgerow Regulations Assessment                    | <b>Appendix 10</b> |                 |  |                    |                   |  |                   |  |                   |                                 |                    |  |                    |                                |                    |
| Landscape Character and Visual Appraisal           | <b>Appendix 11</b> |                 |  |                    |                   |  |                   |  |                   |                                 |                    |  |                    |                                |                    |
| Heritage Constraints Appraisal                     | <b>Appendix 12</b> |                 |  |                    |                   |  |                   |  |                   |                                 |                    |  |                    |                                |                    |

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| Ref. No.  | Respondent  | Policy/<br>Para  | Comments  |                       |                         |                           |  |  |  |   |  |  |  |                  |   |   |   |   |   |   |   |  |   |  |   |   |  |
|   |   |  | <p><b>Table 5.1 – Assessment of key socio-economic issues and solutions</b></p> <table border="1"> <thead> <tr> <th>Socio-economic Issues</th> <th>Provisions in the DCBLP</th> <th>What Gatwick Green offers</th> </tr> </thead> <tbody> <tr> <td>Unmet demand for C 111 ha of employment land</td> <td>Providing for about 12 ha of employment land</td> <td>About 59 ha of land available for a mixed-use employment development in a highly connected location.</td> </tr> <tr> <td>Lack of high quality grade A floorspace</td> <td>The employment land proposed is unlikely to provide the quality of floorspace needed at scale.</td> <td>Provides a strategic opportunity that has the locational attributes to attract high quality employment uses from a range of sectors.</td> </tr> <tr> <td>The need for one or more Strategic Employment Locations (SELs)</td> <td>No SELs provided</td> <td>Offers a SEL located in the adopted Area of Search for such</td> </tr> <tr> <td>Redressing unsustainable level of out commuting</td> <td>Limited provision of employment land will not reverse the increasing trend towards out-commuting.</td> <td>A major increase in high quality jobs to capture out-commuters to London.</td> </tr> <tr> <td>Poor prospects for employment/job progression</td> <td>Limited provision of employment land will not provide sufficient high quality jobs.</td> <td>High quality occupiers attracted to Gatwick Green will provide jobs to enable job/career progression and higher earnings.</td> </tr> <tr> <td>Productivity behind competing economic areas in the South East</td> <td>Limited provision of employment land with little potential for strategic B8 uses, will offer no real improvement in productivity.</td> <td>The high level of connectivity combined with the ability to accommodate strategic B8 uses will offer significant productivity gains.</td> </tr> <tr> <td>Lack of sustainable transport networks and alternative modes around the Airport</td> <td>The land provided for CBLP is not of a scale or location that could contribute to or provide significant enhancements to sustainable transport infrastructure</td> <td>The scale of Gatwick Green and its critical mass offers the opportunity for significant investment in sustainable transport infrastructure and services.</td> </tr> </tbody> </table> <p>This representation outlines a range of socio-economic benefits that Gatwick Green offers. The precise mix of employment uses will need to be refined, but the current concept is based on 60% B2 industry and B8 warehousing and distribution. Whilst not traditionally seen as offering the same level of socio-economic benefits as</p> | Socio-economic Issues | Provisions in the DCBLP | What Gatwick Green offers | Unmet demand for C 111 ha of employment land | Providing for about 12 ha of employment land | About 59 ha of land available for a mixed-use employment development in a highly connected location. | Lack of high quality grade A floorspace | The employment land proposed is unlikely to provide the quality of floorspace needed at scale. | Provides a strategic opportunity that has the locational attributes to attract high quality employment uses from a range of sectors. | The need for one or more Strategic Employment Locations (SELs) | No SELs provided | Offers a SEL located in the adopted Area of Search for such | Redressing unsustainable level of out commuting | Limited provision of employment land will not reverse the increasing trend towards out-commuting. | A major increase in high quality jobs to capture out-commuters to London. | Poor prospects for employment/job progression | Limited provision of employment land will not provide sufficient high quality jobs. | High quality occupiers attracted to Gatwick Green will provide jobs to enable job/career progression and higher earnings. | Productivity behind competing economic areas in the South East | Limited provision of employment land with little potential for strategic B8 uses, will offer no real improvement in productivity. | The high level of connectivity combined with the ability to accommodate strategic B8 uses will offer significant productivity gains. | Lack of sustainable transport networks and alternative modes around the Airport | The land provided for CBLP is not of a scale or location that could contribute to or provide significant enhancements to sustainable transport infrastructure | The scale of Gatwick Green and its critical mass offers the opportunity for significant investment in sustainable transport infrastructure and services. |
| Socio-economic Issues   | Provisions in the DCBLP   | What Gatwick Green offers  |   |                       |                         |                           |  |  |  |   |  |  |  |                  |   |   |   |   |   |   |   |  |   |  |   |   |  |
| Unmet demand for C 111 ha of employment land                                    | Providing for about 12 ha of employment land  | About 59 ha of land available for a mixed-use employment development in a highly connected location.   |   |                       |                         |                           |  |  |  |   |  |  |  |                  |   |   |   |   |   |   |   |  |   |  |   |   |  |
| Lack of high quality grade A floorspace   | The employment land proposed is unlikely to provide the quality of floorspace needed at scale.  | Provides a strategic opportunity that has the locational attributes to attract high quality employment uses from a range of sectors.                     |   |                       |                         |                           |  |  |  |   |  |  |  |                  |   |   |   |   |   |   |   |  |   |  |   |   |  |
| The need for one or more Strategic Employment Locations (SELs)                  | No SELs provided  | Offers a SEL located in the adopted Area of Search for such  |   |                       |                         |                           |  |  |  |   |  |  |  |                  |   |   |   |   |   |   |   |  |   |  |   |   |  |
| Redressing unsustainable level of out commuting                                 | Limited provision of employment land will not reverse the increasing trend towards out-commuting.   | A major increase in high quality jobs to capture out-commuters to London.  |   |                       |                         |                           |  |  |  |   |  |  |  |                  |   |   |   |   |   |   |   |  |   |  |   |   |  |
| Poor prospects for employment/job progression                                   | Limited provision of employment land will not provide sufficient high quality jobs.   | High quality occupiers attracted to Gatwick Green will provide jobs to enable job/career progression and higher earnings.                                |   |                       |                         |                           |  |  |  |   |  |  |  |                  |   |   |   |   |   |   |   |  |   |  |   |   |  |
| Productivity behind competing economic areas in the South East                  | Limited provision of employment land with little potential for strategic B8 uses, will offer no real improvement in productivity.                             | The high level of connectivity combined with the ability to accommodate strategic B8 uses will offer significant productivity gains.                     |   |                       |                         |                           |  |  |  |   |  |  |  |                  |   |   |   |   |   |   |   |  |   |  |   |   |  |
| Lack of sustainable transport networks and alternative modes around the Airport | The land provided for CBLP is not of a scale or location that could contribute to or provide significant enhancements to sustainable transport infrastructure | The scale of Gatwick Green and its critical mass offers the opportunity for significant investment in sustainable transport infrastructure and services. |   |                       |                         |                           |  |  |  |   |  |  |  |                  |   |   |   |   |   |   |   |  |   |  |   |   |  |

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|                            |            |                 | <p>grade A offices (of which the Site would be 20%). research<sup>37</sup> demonstrates that high quality B8 / industrial uses can deliver the following benefits:</p> <ul style="list-style-type: none"> <li>• Logistics is a crucial element of industrial real estate and an essential component of UK infrastructure, supporting supply chains across the country and providing large numbers of high quality jobs to local people.</li> <li>• Successful communities need to include a mix of uses that make sustainable places where people can live, work, and enjoy leisure time.</li> <li>• Industrial development forms part this mix by offering a range of employment opportunities, including highly skilled, well paid jobs to those living within the local area.</li> <li>• As well as supplying local employment, infrastructure and training, the logistics sector's economic productivity makes a huge contribution to UK plc and supports businesses and people up and down the country through the timely delivery of goods and services.</li> <li>• Provides a comparatively lower percentage of part-time jobs and higher wages when compared with the national average.</li> </ul> <p>The research also concludes that the logistical sector has very specific location and land requirements that must be taken into account by LPAs in making their local plans. Gatwick Green offers a unique opportunity to advance a development that closely matches the optimum site profile for logistics.</p> <p><b>Sustainability and options for employment land</b></p> <p>The SEA contains a sustainability appraisal of the AAP area (Policies EC1 and SD3) against nine sustainability assessment criteria. This concludes that the AAP area is assessed as offering possible significant positive impacts against 1 criteria, possible positive impacts against 6 criteria and 1 possible negative impact. The assessment concludes as follows:</p> <p><i>"Land identified for the AAP represents the most sustainable location for strategic employment growth in Crawley. It is a large area of land take, and some areas within the broad identified area will be more sustainable than others – this will be assessed further through the work of the AAP. It would enable highly sustainable, high quality new development to complement and deliver linkages with the existing residential and business communities."</i></p> <p>The findings of the SEA are supported. There is one possible negative impact related to the potential for negative impacts against the criterion to "Conserve/ Enhance Biodiversity and Landscape" – where there may be some</p> |

<sup>37</sup> DELIVERING THE GOODS, The economic impact of the UK logistics sector, Turley for British Property Federation, December 2015 and What Warehousing Where? Understanding the Relationship between Homes and Warehouse to Enable Positive Planning Turley for British Property Federation, March 2019

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|                            |            |                 | <p>negative effects from development, it is considered that the need to provide mitigation and/or compensation, especially under the net biodiversity gain policy in the NPPF (and soon to be mandated in the Environment Bill) will ensure that effects relating to this criterion would be neutral to positive.</p> <p>Savills has undertaken a high-level sustainability assessment of the Gatwick Green site using the same methodology as adopted in the Council's SEA. The Gatwick Green SEA is contained at <b>Appendix 13</b> to this representation. It demonstrates that the site has a sustainability profile that is more positive than that for the whole AAP area: this provides clear evidence that the Gatwick Green site is a highly accessible location and can be developed in a very sustainable manner consistent with national planning and environmental policy.</p> <p>In relation to alternative sites in the AAP area, Savills has undertaken an evaluation of the larger employment site contained in the Employment Land Trajectory against nine assessment criteria – report is contained at <b>Appendix 14</b>. The assessment concludes that Gatwick Green and the land at Rowley Farm represent the most suitable sites in the AAP area, with other sites having relative merits. Of the two strategic sites, Gatwick Green offers some advantages in relation to its contribution towards meeting strategic policy objectives, its closer proximity to the Airport, its potential for greater connectivity and in its availability and ability to deliver within the period of the DCBLP. This is a high-level assessment, but it does illustrate that Gatwick Green represents the prime site within the AAP area to deliver early employment development that will best serve the strategic planning and economic policies relating to the Crawley/Gatwick area within the of the LEP and Gatwick Diamond. The assessment also shows that Gatwick Green has a stronger sustainability profile compared to other sites within the AAP area.</p> <p>Suggested Modifications:<br/>Policy EC1 – Soundness</p> <p>In summary, it is concluded that whilst Policy EC1 is positive in relation to its overall employment strategy, the extent of available short term employment land supply and its reference to the proposed AAP under Policy SD3, it is not considered to be sound in relation to the constraints-led basis of the employment land requirement of 33 ha. The basis for Policy being not sound is therefore limited to this issue and based upon the following findings in relation to the employment land requirement:</p> <ol style="list-style-type: none"> <li>1. Policy EC1 has not adopted a proactive and positive approach to planning for economic growth as required by the NPPF.</li> <li>2. Policy EC1 has under-assessed the employment land needs of the Crawley/Gatwick area for the near term, which based on a reassessment by Savills offers a more realistic assessment of demand of c 70 ha in line with PPG.</li> </ol> <p>It is therefore considered that the DCBLP is not sound in relation to its policies on employment and the economy because (1) it does not identify the full extent of the need for employment land so has not therefore been positively</p> |

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|                                   |                                    |                         | <p>prepared, and (2) it is not consistent with national policy, which requires that LPAs proactively encourage sustainable economic growth with regard to the Local Industrial Strategy (NPPF, paras 60-82) – the regional economic evidence combined with the clear direction in the LIS evidence base, provides a sound basis for bringing forward the Gatwick Green opportunity alongside other land, infrastructure and transport investment.</p> <p>To make Policy EC1 and the Reasoned Justification sound, it should state that there is a need for a total of 70 ha (173 acres) of new B-class business land in the Borough to address needs in the interim period until an AAP is adopted. Taking account of the land supply of 12 ha, Policy EC1 should also state that there is an outstanding requirement of 58 ha of employment land. Further, the requirement of 113 ha based on the forecast labour supply referenced at paragraphs 9.13, 9.18 and 9.19 of the DCBLP, should be revised to a “at least 113 ha” with reference added to state that this is a minimum requirement and could be higher one account is taken of policy and market considerations and further improvements in the current low level of local labour retention.</p> <p>In view of the significant level of unmet employment land, evidence is attached to this representation that supports a Strategic Employment Location (SEL) at Gatwick Green between Balcombe Road and the M23, a site largely controlled by TWG and deliverable within the Plan period. Evidence put forward by TWG shows that Gatwick Green is available now to meet the short term net shortfall in employment land of c 58 ha.</p> <p>On the basis of the evidence in this representation and separate representations by TWG on safeguarding (Chapter 10), and the employment Land Trajectory, the land at Gatwick Green should be considered for strategic employment within use classes B8, B2, B1 AND C1, including ancillary uses within use classes A1 – A4 and D1.</p> <p><b>Appendices sent by email on 2/3/10 and attached separately</b></p> |
| Rep/058                           | Reigate & Banstead Borough Council | EC2                     | <p>Economic Needs</p> <p>We welcome the amendment requested at Regulation 18 stage to proposed Policy EC1 “Sustainable Economic Growth” which removes the hierarchy for delivering new strategic employment land. We remain committed to joint working on strategic employment needs, but this amendment removes potential uncertainty for residents living within RBBC.</p> <p>We support in broad terms of the commitment in proposed Policies EC1 “Sustainable Economic Growth” and EC2 “Economic Growth in Main Employment Areas” to make best use of and intensify existing employment areas. We note that the intention of these policies is in line with our DMP Policies EMP1 “Principal Employment Areas”, EMP2 “Local Employment Areas” and EMP4 “Safeguarding Employment Land and Premises”.</p> <p>Thank you for the opportunity to comment earlier on a previous draft version of the Northern West Sussex Economic Growth Assessment Update as part of duty to co-operate discussions. We note that the study has identified a need for -1.1ha employment needs (baseline job growth scenario), 33.0ha past development rates</p>   |

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|                                   |  |                         | <p>scenario) and 113.0ha (baseline labour supply scenario) and that Lichfields (Paragraph 8.74 North West Sussex Economic Growth Assessment Update) considers that for Crawley “the baseline job growth scenario does not appear to provide a robust scenario for positively planning for future employment space” and “that the Council [should] consider planning to accommodate the past take-up based requirement as a minimum, to enable historically strong levels of employment development to continue in the Borough over the new plan period”. The Regulation 19 Crawley Borough Local Plan therefore seeks as a minimum to provide employment needs in line with the past development rates scenario. When subtracting the available land supply pipeline, it is stated that this gives an outstanding business land need of 21ha. This outstanding business land need however does not take into account any employment needs that are proposed to be met on the Horley Strategic Employment Site, Policy HOR9 of RBBC’s Development Management Plan. In addition to helping to meet RBBC’s strategic office needs, the Horley Strategic Business Park was also allocated to help meet CBC’s unmet strategic office needs. Taking into consideration the 45,513sqm of CBC’s unmet strategic office needs proposed to be accommodated on the Horley Strategic Employment Site, we consider that there is no unmet need for office accommodation (surplus of 62,524sqm baseline job growth scenario; surplus of 69,884sqm past development rates scenario; and surplus of 40,279sqm labour supply scenario).</p> <p>In relation to potential unmet need for industrial, manufacturing and distribution accommodation, given our policy position (i.e. an up-to-date Local Plan) we can confirm that we are not able to assist in meeting this unmet need. We note that one option proposed to meet the identified unmet manufacturing and distribution needs arising in the Crawley is to assess the future growth needs of the airport for the safeguarded land to the north of Crawley and to the south and east of Gatwick Airport, and to determine whether the future growth needs of the airport require any, or all of the land. If not, it is proposed that a sustainable site/s within the area will be designated to accommodate strategic employment needs based on Crawley’s unconstrained business land requirements. Should this land be designated for employment needs, to ensure the approach is justified / effective, we consider that this provision should be focussed to meeting Crawley’s unmet strategic manufacturing, industrial and distribution uses.</p> |
| REP/034                           | Vail Williams on behalf of Surrey County Council | EC2                     | <p>Chapter 9: Economic Growth</p> <p>Firstly, further to representations to the Regulation 18 stage, we welcome the restructuring of this chapter and the evolution of the policies as you read through the chapter.</p> <p>Our client wishes to provide support for the recognition in paragraph 9.6 that Manor Royal is the focus for business led economic growth in the Borough and that the Main Employment Areas will be required to make effective use of the land within them. This is consistent with the effective use of land by SCC across Parcels One and Two at Nexus, Gatwick Road.</p>  |

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|                            |            |                 | <p>We also note that the importance of employment land is further evidenced by the Lichfield's Economic Growth Assessment (EGA) for the Northern West Sussex Area (January 2020). This document shows that in a constrained land supply scenario, there is a need for 33ha of business land over the plan period, with a 21 ha deficit and 12 ha identified in the Employment Land Trajectory (ELT).</p> <p>We note that our site is contained within the Employment Land Trajectory as being available within years 1-5 and we can confirm that this is the case. Our specific comments on the policies themselves are as follows:</p> <p>Policy EC2: Economic Growth in Main Employment Areas</p> <p>We support this policy which reiterates the commitment to retaining economic growth and supporting the economic function of the main employment areas, such as Manor Royal.</p> <p><b>Suggested Modifications:</b></p> <p><i>“Without a locally specific strategy in place, the economic growth requirements of the borough and the wider sub-region cannot be pro-actively planned for or accommodated. This is particularly the case given Crawley’s constrained land supply, which necessitates a clear strategic vision and policy approach through the Local Plan in order to balance the conflicting needs of housing and employment provision, Land plan positively to meet Crawley’s business land needs. Absence of a clear policy approach directing employment growth to the most appropriate locations for sustainable economic growth creates uncertainty as to how employment and housing needs will be accommodated. Without a clear local vision that places Crawley at the centre of the economic growth for the wider area, there is a risk that Crawley’s key economic function will be eroded, potentially impacting negatively upon the growth within Crawley and the wider Gatwick Diamond.” (Our emphasis)</i></p> <p>Paragraph 9.23 of the Draft Local Plan states that should the NCAAP “confirm that less land is required for the future growth of the airport, resulting in a less constrained land supply position, the AAP will revisit the Baseline Labour Supply scenario (113ha business land requirement) to update and if necessary revise the business land requirement”.</p> <p>The SA states that the proposed NCAAP solution would “allow for a continuation of Crawley’s supply-led approach in the early part of the Plan period, protecting the designated main employment areas for economic growth and supporting their intensification, whilst considering the scope for small scale extensions of Manor Royal to provide additional business-led employment land.” It continues state that the NCAAP will allow “a full assessment of the scope to accommodate the higher level of business growth”.</p> <p>However, given the scale of the gap between what is proposed to be secured in the Draft Local Plan and the Baseline Labour Supply this approach leaves too much uncertainty about future provision. This uncertainty and risk of under-provision brings with it the precise risks that have been articulated by the SA with respect to a scenario that fails to pro-actively plan for growth in accordance with the NPPF.</p> |

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|                            |            |                 | <p>In failing to secure even the bare minimum employment land need set out in its EGA the Draft Local Plan fails to meet the requirements of the NPPF. It fails to adequately account for the economic opportunities and risks facing the Borough; fails to plan for its full economic potential; and therefore fails to positively and proactively plan for sustainable economic growth. If the Council do not prepare the plan in a more positive manner this will result in an unsound plan.</p> <p>To ensure the plan is proactive and is effective the 'Baseline Labour Supply' forecast of 113ha business land, which Policy EC1 commits to investigate further through the NCAAP, should be assessed as part of the Local Plan Review.</p> <p>The Employment Land Trajectory identifies that only 11.53ha of employment floorspace (62,394sqm) can be provided within the Borough – which results in unmet need of 81,596sqm based on Draft Policy EC1 and 413,806sqm in the Baseline Labour Supply scenario. The importance of sustainable economic growth at is at the core of the NPPF, with planning policies helping to build a strong and competitive economy by ensuring that the right type of land is readily available in the right areas to support innovation and improved productivity.</p> <p>The delay in allowing growth south of Gatwick Airport is negatively impact upon growth prospects. The continued protection of this land does not accord requirements of the NPPF to reallocate land with no reasonable prospect of use under its current allocation via the revised Local Plan process for another use.</p> <p>Paragraph 9.14 of the Draft Local Plan states that given its connectivity to Gatwick Airport, Manor Royal and existing transport links, land identified for the NCAAP represents the most appropriate location in which to explore opportunities to help accommodate Crawley's outstanding business land needs.</p> <p>Manor Royal is a major contributor to the Crawley and West Sussex Economies and is central to the future economic prosperity of the Borough. The Draft Local Plan states that, "<i>Manor Royal will be seen as a premier business park, attracting sustained business investment that will deliver high value employment and higher levels of productivity and economic growth.</i>" The continuing constraint on its growth and the uncertainty about how and when this constraint will be removed poses a significant threat to the sustainable growth of this employment area and the Borough's wider economy.</p> <p>As detailed in the Economic Case for Redevelopment, the Site's scale sets it apart as it provides the opportunity to attract larger occupiers to the area, in addition to allowing existing operators with significant growth potential to stay in the area. Crawley currently only offers a handful of units larger than 100,000sqft. The scale of the Site also allows the opportunity to effectively masterplan and phase development to provide a range of unit sizes and typologies which could then satisfy a range of business needs and be responsive over time.</p> <p>The Site is sustainably located immediately adjacent to the A23 which provides immediate access into Crawley, Gatwick Airport and the M23. The Site is surrounded by a network of footways, which are relatively wide and often set back from the carriageway by a grass verge. Bus stops are located within walking distance of the Site along</p> |

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|                                   |                                     |                         | <p>the A23 and Fleming Way and provide access to several routes, including Gatwick Airport, which provides interchange opportunities with bus and rail modes. The Site would be accessed via an existing high-grade road (Hydehurst Lane) which is owned by the Landowners and currently serves units within Manor Royal.</p> <p>As identified in the Call for Sites submission no on-site constraints to redevelopment have been identified which cannot be resolved. For example, a public right of way crosses the Site which could either be diverted or incorporated within the development options for the Site. Also, a number of existing utilities are present on Site, including overhead electricity transmission cables, which could either be avoided or diverted. Existing attenuation storage areas on Site would either be retained as part of the development or relocated elsewhere.</p> <p>The Site represents a natural and logical extension to the adjoining the Manor Royal complementing its established role as the premier location for business floorspace within the Borough. The Site is the most appropriate location north of Manor Royal to meet part of the Borough's significant unmet employment need. As such, the Site should be released for development as part of the Draft Local Plan to meet some of the unmet employment need as an extension to Manor Royal. The Site should be removed from the Draft Policy SD3 policy boundary and included within the Manor Royal boundary under Draft Policy EC1 and the draft policy text amended accordingly.</p> <p>This will assist in ensuring that Draft Local Plan has been proactively prepared and helps create the conditions in which businesses can invest, expand and adapt in and objectively assessed need can be met in accordance with the NPPF. In addition to assisting the Council in meeting its employment need, the redevelopment of the Site also has a number of economic benefits which are detailed in Section 5 of the Economic Case for Redevelopment.</p> <p>Notwithstanding our position, should the Council continue to identify the Site as being within the boundary of the NCAAP our client will work with the Council to realise the redevelopment of the Site (subject to the amends detailed above with regards to Gatwick Airport and small scale extensions north of Manor Royal). However, it is our firm belief that the Council should, in order to meet its own development and policy aspirations as well as the requirements of the NPPF to proactively and positively plan for growth, release the Site for employment redevelopment as part of the Draft Local Plan. The Site has the potential to bring forward employment land at the scale, type and location that should place it as a high priority site for development and this should be reflected in the Draft Local Plan.</p> |
| REP/035                           | Vail Williams on behalf Ardmore Ltd | EC2                     | Further to representations at the Regulation 18 stage, we welcome the restructure of this Chapter and the evolution of policies as you read the document. As previously mentioned under Policy SD3, we recognise that unmet employment needs are considered to be addressed as part of the AAP process, following the adoption of this Local Plan.   |

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|                            |  |                 | <p>We also support the recognition in paragraph 9.6 that states that Manor Royal is the focus for business led economic growth in the Borough and that the Main Employment Areas will be required to make effective use of land within them.</p> <p>The Northern West Sussex Area EGA (January 2020) shows that in a constrained land supply scenario, there is a need for 33ha of business land over the plan period, with an existing deficit of 21ha and 12ha identified in the Employment Land Trajectory (ELT).</p> <p>We support the text in paragraph 9.10 which states that further growth would exist in an unconstrained land supply position, and that for employment land a Strategic Employment Location (SEL) to the north of Manor Royal and south and/or east of the Airport, would be the most likely location.</p> <p>We also support paragraph 9.12 which states that given the limited land available, business land supply is not undermined. However, this does appear to be at odds with policy ST4 which safeguards further land for the potential delivery of the CWRR.</p> <p>However, we do support the latter text in paragraph 9.12 relating to small extensions to Manor Royal which will be supported where they positively contribute to business-led economic growth.</p> <p>Our client wishes to support the recognition of the Local Plan and the EGA, that in an unconstrained scenario 113 ha of B-class business land would be required. We therefore support paragraphs 9.13 and 9.14 which suggest a SEL in the AAP area would be the most appropriate area, as per the call for sites and the ELT. Whilst we note that in the immediate timeframe Crawley will work with other surrounding LPAs regarding its unmet need we would also consider that the timeframe for the AAP is such that the need can be met locally if safeguarding is lifted.</p> <p>Our specific comments on the policies within Economic Growth Chapter are as follows:</p> <p>We acknowledge the Council's commitment to retaining economic growth and supporting the economic function of the Borough's Main Employment Areas.</p> <p>We support the recognition in the policy that, employment generating development is supported within the designated areas "<i>where is makes for an efficient use of land or buildings and contributes positively to sustainable economic growth [...] and to the overall economic function of Crawley.</i>"</p> |
| REP/036                    | Vail Williams on behalf of UK Commercial Property Finance Holdings Limited | EC2             | <p>In addition, our client supports policy EC2 'Economic Growth in Main Employment Areas' which supports the provision of employment-generating development in designated Main Employment Areas. Specifically, we support the strategy for retaining policy protection employment land/floorspace within these Main Employment Areas.</p>  |

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| REP/046                           | First Plan on behalf of Aggregate Industries UK Ltd, Cemex UK Operations Ltd, Day Group Ltd and Brett Group | EC2                     | <p><b>RESPONSE ON BEHALF OF CRAWLEY GOODS YARD OPERATORS</b><br/> <b>DRAFT CRAWLEY 2035 LOCAL PLAN SUBMISSION CONSULTATION DRAFT</b><br/>           Firstplan are instructed by Aggregate Industries UK Ltd (AI), Cemex UK Operations Ltd (Cemex), Day Group Ltd (Days) and Brett Group to provide the following response to the submission consultation draft of the Crawley Borough Local Plan 2020 – 2035.</p> <p><b>Relevant Background Information</b><br/>           As the Borough Council are fully aware, our clients jointly operate Crawley Goods Yard - an established rail fed aggregates depot and safeguarded railhead. The goods yard has the capacity to handle a million tonnes of aggregate a year with the potential for expansion in the future. The site supports additional key minerals infrastructure and related development including two concrete batching plants, an asphalt plant and construction and demolition waste recycling plant.<br/>           The operators of the Goods Yard were fully involved in the last Local Plan process which led to specific wording in the adopted version of Policy H2 regarding the Tinsley Lane site. This requires that development on this site must be “<i>planned, laid out and designed to minimise potential future conflicts and constraints on the important minerals function of the adjacent safeguarded minerals site</i>”. The operators were subsequently also involved in providing comments in response to consultation undertaken in the preparation of the Tinsley Lane Development Brief (Adopted April 2017). This now includes at Section 7 guidance on Noise.<br/>           Crawley Goods Yard is also part of the Manor Royal Employment Area and therefore draft Policies EC1, EC2 and EC3 are relevant. These draft policies seek to protect the employment area for employment uses and encourage intensification of underutilised sites.</p> <p><b>Suggested Modifications:</b><br/>           The Goods Yard operators are generally supportive of these policies and have no detailed comments on them.</p> |
| REP/057                           | Deloitte LLP on behalf of Universities Superannuation Scheme  | EC2                     | <p><b>Crawley Submission Draft Local Plan (Regulation 19)</b><br/> <b>Representations on behalf of Universities Superannuation Scheme</b><br/>           Deloitte Real Estate is instructed by Universities Superannuation Scheme (USS) to advice on planning matters in respect of its commercial asset at Denvale Trade Park, Haslett Avenue, Crawley (‘the Site’). USS therefore has an active interest in the formulation of planning policy at Crawley Borough Council (CBC) and welcomes the opportunity to respond to the Crawley Submission Draft Local Plan (Regulation 19).<br/>           The Submission Draft Local Plan sets out planning policies to guide development in the borough from 2020 to 2035. The document, once adopted, will replace the currently adopted Crawley Borough Local Plan 2015 - 2030. CBC is inviting comments regarding the ‘soundness’ and legal compliance of the publication document as part of a formal consultation until 2 March 2020. On 26 February 2020, DRE and CBC agreed an extension of time to</p>   |

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|                                   |                   |                         | <p>comment until 6 March 2020. All representations received will be forwarded to the Inspector alongside the document itself for Examination.</p> <p><b>The Site and Surroundings</b><br/> The Site is located adjacent to the eastern boundary of Crawley Town Centre, approximately 400 metres north east of Crawley Train Station. The Site currently consists of 18 trade/commercial units that were originally granted planning permission under use classes B1c, B2, B8. The tenants include Screwfix, Halfords Autocentre, Bathstore, Energie Fitness Crawley and Formula One Autocentres. The Site is accessed off a roundabout on the A2220/Haslett Avenue. To the east, west and south of the Site there are industrial uses and to the north, beyond the A2220/Haslett Avenue, is a residential area.</p> <p><b>Planning History</b><br/> Planning permission was granted on 9 June 2000 for the erection of 18 units, associated car parking and landscaping for either Use Class B1c, B2 and B8 uses with ancillary showroom or a Sui Generis (Motor/vehicle showroom) use in units 1, 2, 7, 8, 9 and 10. Since the original permission, there have been several applications relating to change of use and the Site now operates under a range of uses including Use Class A1, B1c, B2, B8 and D2.</p> <p><b>Adopted Planning Policy</b><br/> The Crawley Borough Local Plan 2015 – 2030 was adopted in December 2015. Policy EC2 ‘Economic Growth in Main Employment Areas’ designates the Site within the ‘Three Bridges Corridor’ Main Employment Area. The Site is also designated as part of a Priority Area for District Energy Networks as identified in Policy ENV7 ‘District Energy Networks’. The western part of the Site is also within a ‘Long Distance View Splay’ as designated by Policy CH8 ‘Important Views’.</p> <p><b>Submission Draft Local Plan</b><br/> The Submission Draft Local Plan proposes to continue to designate the Site as a Main Employment Area under Draft Policy EC2 ‘Economic Growth in Main Employment Areas’. The Draft Policy seeks to protect and improve the existing economic areas, maximising the potential to utilise existing employment sites before other sites are considered.<br/> The Draft Local Plan also proposes to continue to designate the Site within a Priority Area for District Energy Networks under Draft Policy SDC2 ‘District Energy Networks’. The Draft Policy identifies that all development proposals within a priority area that would involve the creation of a new dwelling or over 1000sqm of internal floor space, must incorporate an energy strategy.</p> |

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|                            |            |                 | <p>Additionally, the Draft Local Plan Map shows that the western part of the Site is proposed to continue to be within a Long Distance View Splay as designated under Draft Policy CL7 'Important and Valued Views'.</p> <p><b>Suggested Modifications:</b></p> <p><b>USS Response</b></p> <p>The National Planning Policy Framework (NPPF) (2019) sets out that local plans and spatial development strategies are examined to assess whether they have been prepared in accordance with legal and procedural requirements, and whether they are 'sound'. There are a number of tests to determine whether a plan is sound, including that it would need to be effective and consistent with national policy (Paragraph 35, NPPF). The following sections discuss how USS considers the soundness of the Submission Draft Local Plan when assessed against the effective and consistent with national policy tests of the NPPF.</p> <p>USS generally supports CBC's commitment to the proposed continued designation of the Site as a Main Employment Area under Draft Policy EC2 'Economic Growth in Main Employment Areas'. However, the Draft Policy identifies that any development which involves a net loss of employment land or floor space will only be permitted where it can be demonstrated that:</p> <p><i>"i. the site is no longer suitable, nor viable, nor appropriate for employment purposes, or that a small loss of employment floorspace will support the wider economic use of the site; and</i></p> <p><i>ii. the loss of any land or floorspace will result in wider social, environmental or economic benefit to the town which clearly outweighs the loss; and</i></p> <p><i>iii. There would be no adverse impact on the economic function of the Main Employment Area, nor the wider economic function of Crawley".</i></p> <p>For the Submission Draft Local Plan to be effective, USS recommends that more flexibility is applied to Draft Policy EC2 'Economic Growth in Main Employment Areas' to allow the potential for mixed use development on such sites to come forward. The draft policy, as it is worded, focusses on the loss of employment land and employment floor space in Main Employment Areas rather than the amount and type of employment itself. Draft policy EC2 should instead recognise that the amount of employment land or floorspace does not necessarily equate to the level of employment on a site. For example, a hotel use could have a smaller footprint, yet employ more people than a B8 use. The wider social and economic impacts could also be greater.</p> <p>Employment areas are susceptible to change in line with economic circumstances and consequently require flexibility to adapt to these changes. This is acknowledged in the NPPF and paragraph 120 states that planning policies and decisions need to reflect changes in the demand for land. Paragraph 11a states that plans should positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change. Paragraph 81d is also of relevance and states that planning policies should <i>"be flexible enough to</i></p> |

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|                            |                         |                 | <p><i>accommodate needs not anticipated in the plan, allow for new and flexible working practices (such as live-work accommodation), and to enable a rapid response to changes in economic circumstances”.</i></p> <p>To ensure Draft Policy EC2 ‘Economic Growth in Main Employment Areas’ is consistent with the aforementioned paragraphs of the NPPF, it is essential that it is sufficiently flexible to accommodate uses which support employment, such as cinemas, gyms and residential. These uses may require a much smaller footprint than the existing uses and therefore lead to the loss of employment land and floorspace, however the economic, social and environmental benefits can be far greater than the loss. A mixture of uses in employment locations can help support the vitality and character of the wider area, and support its economic performance. The potential introduction of well planned residential uses on such sites can support existing uses through potential custom but also in terms of potential recruitment. It would also help boost CBC’s housing delivery.</p> <p>The Submission Draft Local Plan makes provision for the development of a minimum of 5,355 net dwellings in the borough in the period 2020 to 2035. This leaves a remaining unmet housing need of approximately 5,925 dwellings. Paragraph 15 of the NPPF states that plans should provide a framework for addressing housing needs. CBC is proposing to work with neighbouring authorities to explore opportunities for providing for Crawley’s housing need outside of the Borough. However, allowing residential uses to come forward alongside employment uses on suitable sites in Main Employment Areas could provide a significant contribution towards meeting CBC’s housing target within the Borough. It is therefore important that Draft Policy EC2 gives greater flexibility to ensure a mixture of uses, including residential, can come forward alongside employment uses on suitable sites in Main Employment Areas. This would ensure Draft Policy EC2 is consistent with national policy by allowing Main Employment Areas to contribute to CBC meeting its housing target.</p> |
| REP/056                    | Gatwick Airport Limited | EC2             | <p><b>Policy EC2: Economic Growth in the Main Employment Areas</b></p> <p>13.1 GAL specifically objects to the further development of employment areas, (such as Lowfield Heath), on the land currently safeguarded by national policy for a potential future runway at Gatwick Airport. <i>(GAL has made comment on employment land delivery in its objection to Policy SD3 North Crawley Area Action Plan).</i></p> <p>GAL notes the recognition in the draft Plan of the strategic importance of the airport as a Main Employment Area in the development and economic growth of Crawley and the wider sub region. However, GAL believes that the draft Plan has not fully recognised the significant employment opportunities at Gatwick Airport. GAL considers that there is greater potential for the further use of both buildings and land at the airport to widen the employment uses at the airport and potentially assist with meeting the Council’s needs for additional employment space.</p>  |
| REP/060                    | Savills on behalf of    | EC2             | <i>Strategic Policy EC2: Economic Growth in Main Employment Areas</i>   |

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|                                   | Bellway Homes Ltd                                |                         | Within the Regulation 19 document we note that the Three Bridges Corridor Main Employment Area has been amended to exclude the site. This is strongly supported and will ensure that there are no policy conflicts within the new Local Plan and help to facilitate the delivery of housing on the site.   |
| REP/034                           | Vail Williams on behalf of Surrey County Council | EC3                     | <p>Chapter 9: Economic Growth</p> <p>Firstly, further to representations to the Regulation 18 stage, we welcome the restructuring of this chapter and the evolution of the policies as you read through the chapter.</p> <p>Our client wishes to provide support for the recognition in paragraph 9.6 that Manor Royal is the focus for business led economic growth in the Borough and that the Main Employment Areas will be required to make effective use of the land within them. This is consistent with the effective use of land by SCC across Parcels One and Two at Nexus, Gatwick Road.</p> <p>We also note that the importance of employment land is further evidenced by the Lichfield's Economic Growth Assessment (EGA) for the Northern West Sussex Area (January 2020). This document shows that in a constrained land supply scenario, there is a need for 33ha of business land over the plan period, with a 21 ha deficit and 12 ha identified in the Employment Land Trajectory (ELT).</p> <p>We note that our site is contained within the Employment Land Trajectory as being available within years 1-5 and we can confirm that this is the case. Our specific comments on the policies themselves are as follows:</p> <p>Policy EC3: Manor Royal</p> <p>We support this policy which looks to encourage development that is compatible with the economic function of the area and permit any B-uses, or non B uses that are of a scale and function that supports the economic function of Manor Royal.</p> <p>We also acknowledge the continued Public Realm Improvement contributions and commitment to a high quality design and landscaping in line with the adopted Manor Royal Supplementary Planning Document.</p> |
| REP/035                           | Vail Williams behalf of Ardmore Ltd              | EC3                     | <p>Further to representations at the Regulation 18 stage, we welcome the restructure of this Chapter and the evolution of policies as you read the document. As previously mentioned under Policy SD3, we recognise that unmet employment needs are considered to be addressed as part of the AAP process, following the adoption of this Local Plan.</p> <p>We also support the recognition in paragraph 9.6 that states that Manor Royal is the focus for business led economic growth in the Borough and that the Main Employment Areas will be required to make effective use of land within them.</p> <p>The Northern West Sussex Area EGA (January 2020) shows that in a constrained land supply scenario, there is a need for 33ha of business land over the plan period, with an existing deficit of 21ha and 12ha identified in the Employment Land Trajectory (ELT).</p>   |

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|                            |   |                 | <p>We support the text in paragraph 9.10 which states that further growth would exist in an unconstrained land supply position, and that for employment land a Strategic Employment Location (SEL) to the north of Manor Royal and south and/or east of the Airport, would be the most likely location.</p> <p>We also support paragraph 9.12 which states that given the limited land available, business land supply is not undermined. However, this does appear to be at odds with policy ST4 which safeguards further land for the potential delivery of the CWRR. However, we do support the latter text in paragraph 9.12 relating to small extensions to Manor Royal which will be supported where they positively contribute to business-led economic growth.</p> <p>Our client wishes to support the recognition of the Local Plan and the EGA, that in an unconstrained scenario 113 ha of B-class business land would be required. We therefore support paragraphs 9.13 and 9.14 which suggest a SEL in the AAP area would be the most appropriate area, as per the call for sites and the ELT. Whilst we note that in the immediate timeframe Crawley will work with other surrounding LPAs regarding its unmet need we would also consider that the timeframe for the AAP is such that the need can be met locally if safeguarding is lifted. Our specific comments on the policies within Economic Growth Chapter are as follows:<br/> Policy EC3: Manor Royal &amp; Policy EC4: Employment and Skills Development</p> <p>We support these two policies however, we do wish to seek further clarification on how speculative development will be considered.</p> |
| REP/046                    | First Plan on behalf of Aggregate Industries UK Ltd, Cemex UK Operations Ltd, Day Group Ltd and Brett Group | EC3             | <p><b>RESPONSE ON BEHALF OF CRAWLEY GOODS YARD OPERATORS</b><br/> <b>DRAFT CRAWLEY 2035 LOCAL PLAN SUBMISSION CONSULTATION DRAFT</b></p> <p>Firstplan are instructed by Aggregate Industries UK Ltd (AI), Cemex UK Operations Ltd (Cemex), Day Group Ltd (Days) and Brett Group to provide the following response to the submission consultation draft of the Crawley Borough Local Plan 2020 – 2035.</p> <p><b>Relevant Background Information</b></p> <p>As the Borough Council are fully aware, our clients jointly operate Crawley Goods Yard - an established rail fed aggregates depot and safeguarded railhead. The goods yard has the capacity to handle a million tonnes of aggregate a year with the potential for expansion in the future. The site supports additional key minerals infrastructure and related development including two concrete batching plants, an asphalt plant and construction and demolition waste recycling plant.</p> <p>The operators of the Goods Yard were fully involved in the last Local Plan process which led to specific wording in the adopted version of Policy H2 regarding the Tinsley Lane site. This requires that development on this site must be “<i>planned, laid out and designed to minimise potential future conflicts and constraints on the important minerals function of the adjacent safeguarded minerals site</i>”. The operators were subsequently also involved in providing</p>   |

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| Ref. No.                   | Respondent                                | Policy/<br>Para | Comments   |
|                            |   |                 | <p>comments in response to consultation undertaken in the preparation of the Tinsley Lane Development Brief (Adopted April 2017). This now includes at Section 7 guidance on Noise.</p> <p>Crawley Goods Yard is also part of the Manor Royal Employment Area and therefore draft Policies EC1, EC2 and EC3 are relevant. These draft policies seek to protect the employment area for employment uses and encourage intensification of underutilised sites.</p> <p><b>Suggested Modifications:</b></p> <p>The Goods Yard operators are generally supportive of these policies and have no detailed comments on them.</p>  |
| REP/035                    | Vail Williams<br>behalf of<br>Ardmore Ltd | EC4             | <p>Further to representations at the Regulation 18 stage, we welcome the restructure of this Chapter and the evolution of policies as you read the document. As previously mentioned under Policy SD3, we recognise that unmet employment needs are considered to be addressed as part of the AAP process, following the adoption of this Local Plan.</p> <p>We also support the recognition in paragraph 9.6 that states that Manor Royal is the focus for business led economic growth in the Borough and that the Main Employment Areas will be required to make effective use of land within them.</p> <p>The Northern West Sussex Area EGA (January 2020) shows that in a constrained land supply scenario, there is a need for 33ha of business land over the plan period, with an existing deficit of 21ha and 12ha identified in the Employment Land Trajectory (ELT).</p> <p>We support the text in paragraph 9.10 which states that further growth would exist in an unconstrained land supply position, and that for employment land a Strategic Employment Location (SEL) to the north of Manor Royal and south and/or east of the Airport, would be the most likely location.</p> <p>We also support paragraph 9.12 which states that given the limited land available, business land supply is not undermined. However, this does appear to be at odds with policy ST4 which safeguards further land for the potential delivery of the CWRR.</p> <p>However, we do support the latter text in paragraph 9.12 relating to small extensions to Manor Royal which will be supported where they positively contribute to business-led economic growth.</p> <p>Our client wishes to support the recognition of the Local Plan and the EGA, that in an unconstrained scenario 113 ha of B-class business land would be required. We therefore support paragraphs 9.13 and 9.14 which suggest a SEL in the AAP area would be the most appropriate area, as per the call for sites and the ELT. Whilst we note that in the immediate timeframe Crawley will work with other surrounding LPAs regarding its unmet need we would also consider that the timeframe for the AAP is such that the need can be met locally if safeguarding is lifted. Our specific comments on the policies within Economic Growth Chapter are as follows:</p> |

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| <b>Ref. No.</b>                   | <b>Respondent</b>                                     | <b>Policy/<br/>Para</b> | <b>Comments</b>   |
|                                   |   |                         | Policy EC3: Manor Royal & Policy EC4: Employment and Skills Development<br>We support these two policies however, we do wish to seek further clarification on how speculative development will be considered.   |
| REP/044                           | Tim North & Associates Ltd on behalf of HX Properties | EC6                     | <p><b>Draft Crawley Borough Local Plan Review 2020-2035 – Regulation 19 Consultation</b></p> <p>My clients, HX Properties Ltd, object to Policy EC6 of the Regulation 19 version of the Draft Crawley Borough Local Plan 2020-2035 (hereinafter referred to as the DCBLP) including paragraphs 9.72 to 9.74 inclusive, which provide the reasoned justification for the same policy. It is contended that the policy is unsound because it has not had regard to the implications generally for airport related car parking.</p> <p>Policy EC6 is concerned with “<i>Visitor Accommodation</i>”. The policy has remained largely unaltered from that set out in the Regulation 18 version of the same Local Plan, albeit with reorganisation of the same paragraphs. The basis of the policy is to provide a sequential test for hotel and visitor accommodation outside the town centre, whilst at the same time permitting the same uses on the Manor Royal Main Employment Area, where it can be demonstrated that the development caters specifically for the needs of Manor Royal. In addition, it seeks to restrict parking at new hotels and visitor accommodation to that solely for use for staff and guests in residence at the development, and not to be used for any other purpose, including long term off-airport car parking.</p> <p>My clients agree with the underlying purpose of the first paragraph of Policy EC6 which relies upon the sequential test in accordance with paragraph 009 ID:2b-009-20190722 of the NPPG on “<i>Town Centres and Retail</i>”, which guides town centre uses towards town centre locations first, then if no town centre locations are available, to edge of centre locations, and if neither town centre locations nor edge of centre locations are available, to out of centre locations (with preference for accessible sites which are well connected to the town centre). This includes leisure/entertainment uses which support the vitality of town centres.</p> <p>A reading of Policy EC6 of the Regulation 19 version of the DCBLP means that the sequential test should be applied to all hotels and visitor accommodation situated on land at London Gatwick Airport, a consideration which is in accordance with the NPPF and NPPG.</p> <p>Your Council’s response to this company’s representations (REP181/696) raised on behalf of HX Properties Ltd to the predecessor version of Policy EC6, stated: “<i>The approach of this policy (now EC6) is intended for consistency with Policy GAT3 (now GAT2) which ensures that all new airport parking is provided on airport as the most sustainable location.</i>”</p> <p><b>Suggested Modifications:</b></p> |

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|                            |   |                 | <p>My client accepts the need for consistency in decision making as a matter of public policy. In this regard, the need for consistency has been held to be an important tenet of planning law<sup>38</sup>. In the light of the above response from your Council, HX Properties Ltd would respectfully request that in accordance with Policy GAT2 (as it currently stands), your authority give serious consideration to amending Policy EC6, so that in cases where hotels or other visitor accommodation is provided on-airport, not only is the sequential test required to be satisfied, but also a demonstrable needs test should be met.</p> <p>This is necessary because the sequential test is concerned with the location of main town centre uses, and not with having to show a demonstrable need, which is a different test. To the extent that Policy GAT2 requires a demonstrable need test to be met where it relates to on-airport car parking, and given that your Council accepts that the approach to Policy EC6 is required to be consistent with Policy GAT2, must inevitably mean that applications for hotel and visitor accommodation on-airport should only be permitted where a demonstrable need is proven.</p> |
| REP/049                    | Rapleys LLP on behalf of Caravan and Motorhome Club | EC6             | <p>The Plan is not justified or consistent with national policy with regards to its policy regarding visitor accommodation. Please see attached rep for further detail.</p> <p><b>Introduction</b><br/>This letter contains our representation to Crawley Borough Council's Regulation 19 Consultation on the Local Plan 2020 – 2035. This representation relates specifically to Strategic Policy EC6: Visitor Accommodation. The Caravan and Motorhome Club (the 'Club') has a well performing site in the Crawley Borough; Gatwick Caravan Club Site (the 'site'). A brief commentary on the site and its surroundings is below.</p> <p><b>Site and Surroundings</b><br/>Gatwick Caravan Club Site is located to the south of Gatwick Airport, to the north of the town of Crawley. The site is accessed to the north by Charlwood Road. Charlwood Road meets London Road to the east, which provides access into Crawley town. On the Regulation 19 Policies Map, the site is located within the Upper Mole Farmlands Rural Fringe (Policy CL8) and the area covered by the North Crawley Area Action Plan (Policies SD6, CL8, EC1, H1 and ST4).</p>   |

<sup>38</sup> *North Wiltshire District Council v Secretary of State for the Environment (1992) 65 P & CR 137; R (Baber) v Secretary of State for the Environment (1996) JPL 1034; JJ Gallagher Ltd v Secretary of State for Local Government Transport and the Regions (2002) EWHC 1912 (Admin); Dunster Properties Ltd v First Secretary of State (2007) EWCA Civ 236; R (Fox Strategic Land & Property Ltd) v Secretary of State for Communities and Local Government (2012) EWCA Civ 1198; Pertemps Investments Ltd v Secretary of State for Communities and Local Government (2015) EWHC 2308 (Admin); DLA Delivery Ltd v Baroness Cumberlege of Newick and Secretary of State for Communities and Local Government (2018) EWCA Civ 1305.*

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|                                   |                   |                         | <p>The area within the Club's ownership extends to circa 5.7ha and provides a total of 25 pitches, 18 of which are all-weather. The site also includes The Glade Tent Field, a reception block, a warden office, an assistant warden block, a toilet block, servicing points and internal tarmac roads. To the west of the site there are two caravan storage areas. The site is not only well set back from the road to the north, but it is also well screened by vegetation around the boundary of the site.</p> <p><b>Proposed Improvements</b><br/> With regards to this site, the Club would like to extend the site to increase its offering. This extension could include additional touring pitches, lodges or camping pods. These are generally small scale, permanent or semi-permanent structures of varying sizes, typically containing a bedroom as well as some cooking facilities and/or bathroom facilities depending on their size. The provision of this type of accommodation ensures that the Club can continue to meet the evolving needs of its members. On this basis, the below policy changes in the Proposed Submission Local Plan are sought.</p> <p><b>Proposed Submission Crawley Borough Local Plan 2020 – 2035</b><br/> The Club does not support the approach that is being taken through Strategic Policy EC6: Visitor Accommodation – which reads as follows:<br/> Hotel and visitor accommodation will be supported in the Town Centre. Where hotel development is proposed outside of the Town Centre, it will be necessary to demonstrate, through the use of the sequential test, that no sequentially preferable sites are available.<br/> Where hotel and visitor accommodation is proposed in Manor Royal Main Employment Area, this will be permitted where it is demonstrated that the development will cater specifically for the business needs of Manor Royal, including through the provision of business support facilities and staff amenities as per the requirements of Local Plan Policy EC3 (Manor Royal).<br/> Where new hotel and visitor accommodation is located outside of the Gatwick Airport Boundary (in off-airport locations), parking provision shall be solely for the use of staff and guests in residence of the development and shall not be block parked or used by for any other purpose, including as off-airport car parking.<br/> The policy does not provide the support required for the Club to achieve its aims for its site in the borough of Crawley. The policy seeks to restrict the development of new visitor accommodation to town centre locations and where visitor accommodation is proposed outside of the town centre it must satisfy a sequential assessment.<br/> Given the nature of the visitor accommodation offered by the Club, and the needs of its clients, it would be entirely unsuitable for caravan and campsite development to be in a town centre location and in turn fall under the broad brush of this policy.</p> |

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| Ref. No.                   | Respondent              | Policy/<br>Para | Comments   |
|                            |                         |                 | <p>As published, the Local Plan does not contain a specific policy for caravan and campsites. In turn, the Club requests that the Council recognises the economic benefits that the Club helps to provide to the wider area by bringing visitors to the region. Policy should specifically include caravan parks and outline that, in principle, the extension and/or diversification of existing sites would be supported. Moreover, it would be beneficial for such a policy to ensure that tourism offerings are safeguarded and capable of being enhanced.</p> <p>It is important to state that paragraph 83, point c) of the National Planning Policy Framework calls for planning policies to enable sustainable rural tourism and leisure developments which respect the character of the countryside. It is in this spirit that the above-mentioned policy should be drafted.</p> <p><b>Suggested Modifications:</b></p> <p>The Club would welcome the Council developing a policy that is specifically focused to address the protection, extension and diversification of caravan and camp sites within the borough of Crawley. It is essential that the emerging plan recognises the importance of supporting growth in the visitor economy in areas beyond the designated town centres.</p> <p>Emerging policy must be sufficiently flexible to allow for businesses to adapt to changing economic trends, and changes in the demands of their customers. Flexibility is key for the Club to ensure that its site remains economically viable and can continue to support the local economy, local employment and the tourism industry. The Club requires emerging policy to offer reassurance that it will be able to continue to develop and further diversify its offer. The Club wishes to ensure that the diversification and expansion of Gatwick Caravan Club Site will be permitted. We request that the contents of this representation be fully taken into account as the Council takes the emerging Local Plan Forward.</p> |
| REP/056                    | Gatwick Airport Limited | EC6             | <p><b>Policy EC6: Visitor Accommodation</b></p> <p>GAL supports that visitor accommodation outside of the airport boundary will only be permitted where it can be demonstrated that proposals will not be serving visitor needs associated with travelling to and from the airport and or related to off airport car parking.</p> <p>However, GAL objects to the requirements in Policy EC6 for new visitor accommodation within the airport boundary to be required to undertake the sequential test, and accordingly seeks amendments to the wording of the policy and reasoned justification. GAL's representation to Policy EC6 therefore:</p> <ul style="list-style-type: none"> <li>• Presents the evidence that hotels on airport serve a particular airport passenger need, which is supported by an Airport-Related Employment Land Study being carried out on GAL's behalf by Lichfields.</li> <li>• Acknowledges the provisions of the NPPF which defines hotels as a town centre use but identifies that it is clear that hotels serving the Airport are more sustainable by being at the Airport;</li> <li>• Justifies therefore the exclusion of hotels at the Airport from the sequential test.</li> </ul>  |

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| Ref. No.                   | Respondent | Policy/<br>Para | Comments   |
|                            |            |                 | <p><b>GAL Comments on Policy EC6 Visitor Accommodation</b></p> <p>Policy EC6 of the draft local plan provides that hotel and visitor accommodation will be supported in Crawley Town Centre, but where hotel development is proposed outside of the Town Centre, it will be necessary to demonstrate through the use of the sequential test, that no sequentially preferable sites are available. As it stands, this policy test would apply to any hotel proposal that came forward at Gatwick Airport.</p> <p>GAL objects to propose Policy EC6 because there is clear evidence that hotels on-airport serve a particular airport-related passenger need and that this need is best served by being located within the airport boundary. Clearly, the NPPF identifies hotels as a main town centre use. However, local plans should provide a positive vision for each area which for Crawley includes Gatwick Airport.</p> <p>A local policy that requires hotel proposals meeting an on-airport need to be subject to a sequential approach (and thereby make it more difficult and/or less certain to provide airport-related hotel accommodation on or close to Gatwick) is not consistent with the NPPF taken as a whole in that it would not be:</p> <p>Planning positively to meet development needs (para 11) or helping build a strong, responsive and competitive economy by ensuring that sufficient land of</p> <ul style="list-style-type: none"> <li>• The right types is available in the right places to support growth, innovation and productivity and coordinating the provision of infrastructure. (para 8)</li> <li>• Taking account of local business needs and wider opportunities for development (para 80)</li> <li>• Recognising and addressing the specific requirements of different sectors (para 82)</li> <li>• Addressing transport issues, including: <ul style="list-style-type: none"> <li>○ Ensuring patterns of movement are integral (para 102);</li> <li>○ actively managing patterns of growth, by focusing significant development on locations which are or can be made sustainable by limiting the need to travel (para 103);</li> <li>○ supporting an appropriate mix of uses across an area and within larger scale sites to minimise the number and length of journeys needed (para 104 a);</li> <li>○ have policies prepared with the active involvement of other transport infrastructure providers and operators, so that strategies and investments for supporting sustainable transport and development patterns are aligned (para 104 b); and</li> <li>○ provide any large-scale transport facilities that need to be located in the area (including airports) and the infrastructure and wider development required to support their operation, expansion and contribution to the wider economy (para 104 e).</li> </ul> </li> </ul> <p>Although at the time of preparing this representation the study is still to be fully completed the evidence gathered already confirms:</p> |

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| Ref. No.                   | Respondent | Policy/<br>Para | Comments   |
|                            |            |                 | <p><b>Hotels serving the needs of airport users are airport-related</b><br/>Hotels located within the Gatwick Airport Boundary and in close proximity to the airport - are an airport-related employment use. They form an integral part of Gatwick’s operational requirements, serving the needs of a wider range of airport users, from passengers and aircrew using the airport to airport contractors and business users attending business events at the airport. This reflects the APS finding that Airports are “cities in themselves”.</p> <p><b>Airport users prefer an on-airport hotel location</b><br/>The closer a hotel is to the airport, the greater the relationship between the hotel and the airport (that is, the proportion of hotel customers who are airport users), and this demand is at its greatest for hotels within the Gatwick Airport Boundary. Whilst there is also clear take-up of off-airport hotels by airport passengers, this is less than if the hotel is on or in close proximity to the airport, linked by an airport bus service. Demand significantly drops away the further away the hotel is to the airport.</p> <p><b>Accessibility is important for airport related hotels:</b><br/>The shorter the transport connection, being the travel time by car or by public transport to the hotel, the greater the relationship between the hotel and the airport (the proportion of hotel customers that are airport users). There is a growing trend for terminal-linked hotels at other comparable airports. The availability of direct transport links (either public transport or airport shuttle service) is also critical, if an off-airport location is to hold an advantage over an on-airport location. However, on-airport hotels enable customers to walk to check-in facilities within ten minutes, which is unlikely to be possible even with good public transport links.<br/>Airport users typically seek a certain type of airport-related hotel: These hotels are typically bigger (greater average room size, providing availability and choice), are hotels rather than guesthouses, and are often 4 star and above.<br/>Current work is indicating that future growth at Gatwick – with or without the Northern Runway Project – will generate additional demand for hotel accommodation for users of the Airport. This is a development need for which the Local Plan should provide a positive response that recognises the patterns of travel and supports the operation of the Airport.<br/>Gatwick has an ambition to actively provide for its future hotel needs to support its growth. Sites within the Gatwick Airport Boundary are the preferred location for any future hotel provision. An on-airport location will support Gatwick’s role in the local and national economy, its operational requirements, and will also meet the needs of airport users (by way of proximity, accessibility and type of airport-related hotels required) – as demonstrated by the Airport-Related Employment Land Study. As such, GAL strongly objects to a policy that makes meeting this need more difficult, could result in less effective and sustainable outcomes (in the form of extra transport trips). As</p> |

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|                            |            |                 | <p>an alternative, GAL requests that the draft Plan includes a policy that excludes on-airport hotels from the sequential text and makes explicit provision for them.</p> <p>GAL has reviewed the policy approach at other airports and identified a number of examples where new hotel provision on-airport is specifically provided for by local plan policy without requiring proposals to be assessed against application of the sequential approach. These include at Stansted, Luton, Manchester and Southend.</p> <p><b>Suggested Modifications:</b></p> <p><b>Proposed Amendments to Policy EC6 and Reasoned Justifications</b></p> <p>GAL objects to new visitor accommodation within the airport boundary being subject to a sequential test where a planning application is required. Therefore, GAL proposes that the policy text is amended:</p> <p><b>Visitor Accommodation supporting text - Proposed Amendment</b></p> <p>Crawley is home to a number of hotels and other forms of visitor accommodation. These are located throughout the borough but are particularly concentrated in the Town Centre and at Gatwick Airport. Hotels are identified by the NPPF as a main town centre use, and as such should be located in sustainable town centre locations in the first instance.</p> <p><i>A study of Airport-Related Employment Land has confirmed that hotels located within the Gatwick Airport Boundary serve a particular operational airport need (by passengers, aircrew and other airport users) and that this need is best served by being at the airport.</i></p> <p>Hotels can also provide supporting facilities for Manor Royal, but it will also be necessary to demonstrate that the development will support the business function of Manor Royal, particularly given the evidenced business land supply constraints in Crawley and the need to maximise the use of the Main Employment Areas for business-led economic growth.</p> <p>Local Plan Policy GAT2 outlines that the provision of airport-related parking will only be permitted within the Gatwick Airport boundary and must be justified by a demonstrable need in the context of proposals for achieving a sustainable approach to surface transport access to the airport. This applies to the provision of vehicle parking at hotels.</p> <p><b>Policy EC6 - Proposed Amendment</b></p> <p>'Hotel and visitor accommodation will be supported in the Town Centre <i>and within the Gatwick Airport Boundary</i>. Where hotel development is proposed outside of the Town Centre <i>and outside of the Gatwick Airport Boundary</i>, it will be necessary to demonstrate, through the use of the sequential test, that no sequentially preferable sites are available.</p> |

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|                            |   |                 | <p>Where hotel and visitor accommodation is proposed in Manor Royal Main Employment Area, this will be permitted where it is demonstrated that the development will cater specifically for the business needs of Manor Royal, including through the provision of business support facilities and staff amenities as per the requirements of Local Plan Policy EC3 (Manor Royal).</p> <p>Where new hotel and visitor accommodation is located outside of the Gatwick Airport Boundary (in off-airport locations), parking provision shall be solely for the use of staff and guests in residence of the development and shall not be block parked or used by for any other purpose, including as off-airport car parking’.</p> <p><b>Reasoned Justification - Proposed Amendment</b></p> <p>Hotels represent a main town centre use, and support Town Centre vitality and viability. The Town Centre is the preferred location for hotel and visitor accommodation, as it is here where linkages with shops, restaurants and other main town centre uses can best be facilitated. <i>Gatwick Airport is the preferred location for hotels serving an operational airport need.</i> Where hotel and visitor accommodation is proposed in edge-of-centre or out-of-centre locations (<i>with the exception of on-airport locations</i>), it will be necessary for applicants to demonstrate that the requirements of the NPPF sequential test are satisfied.</p> <p>Where hotel and visitor accommodation is proposed in Manor Royal, applicants will be required to demonstrate how the development will provide business facilities and amenities for Manor Royal staff to ensure that the development supports the principal business function of Manor Royal. Given the recognised absence of a dedicated business hub at Manor Royal, there is scope for a hotel development, if carefully planned to incorporate an appropriate range of business-supporting facilities, to provide the business hub function that is currently lacking. To steer the type of business supporting facilities that may help to achieve this, applicants should refer to Local Plan Policy EC3 and its supporting text. The onus will be on the applicant to incorporate the necessary features into their scheme that would clearly demonstrate the complementary nature of the proposal to Manor Royal. Applicants are also encouraged to liaise with the council and Manor Royal BID at an early stage to scope the type of facilities needed to enable any hotel proposal to appropriately support the Manor Royal business function.</p> <p>Airport parking should be located within the airport boundary and, therefore, Policy EC4 contains the appropriate text to ensure consistency with the approach of Local Plan Policy GAT2.</p> |
| REP/046                    | First Plan on behalf of Aggregate Industries UK | EC10            | Our clients jointly operate Crawley Goods Yard - an established rail fed aggregates depot and safeguarded railhead. The goods yard has the capacity to handle a million tonnes of aggregate a year with the potential for expansion in the future. The site supports additional key minerals infrastructure and related development including two concrete batching plants, an asphalt plant and construction and demolition waste recycling plant.   |

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|                                   | Ltd, Cemex UK Operations Ltd, Day Group Ltd and Brett Group |                         | <p>Draft Strategic Policy EC10 concerns 'Employment Development and Residential Amenity'. We note that this has similarities to adopted Policy EC4 but with reworded and additional text referring to the 'agent of change' principle and confirming that residential development within the Main Employment Areas, except the town centre, will not be supported. It also confirms that where residential or amenity sensitive development is proposed adjacent to the employment areas, the proposed uses must be designed to mitigate any impact from the existing or future employment use on the new residents. This approach is supported by the NPPF which establishes the 'agent of change' principle and should be found sound.</p> <p><b>Suggested Modifications:</b><br/>None provided draft wording remains the same</p> |
| REP/068                           | Sussex Wildlife Trust                                       | EC12                    | <p>Our proposed amendments made in our regulation 18 comments have not been incorporated within this policy therefore we maintain that this policy would benefit from the addition of a further bullet point in order to comply with paragraphs 170 and 174 of the NPPF.</p> <p><b>Suggested Modifications:</b><br/>We therefore make the following recommendation:<br/><b>'Developments proposals that would result in the loss of connectivity or function of the green infrastructure network and or sites of biodiversity value will be avoided.'</b></p>  |

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| REP/002                     | Resident 2                     | GAT1            | <p>Dear Sir/Madam <b>Development plans Gatwick Airport for Crawley.</b> We are writing to you to express our concern and dismay about news of the above new plans, and to list in detail our objections to them at this point. We have highlighted just some of the many serious issues that are implied by such plans. Issues which you have a public, moral, ethical and ecological duty to consider. We urgently request that you send us more information about the plans and a response explaining how they will address the concerns listed below.</p> <p><b>Development of Gatwick Airport</b></p> <p>The planned additional use of Gatwick Airport should <u>not be allowed to happen at all</u>. This is because of the very serious environmental issues which we are facing. It is now common knowledge that we are on the edge of a global catastrophe, both in terms of global warming and the destruction of the <i>environment and species</i>. <i>To pollute our air with more emissions from aircraft would be, as far as we are concerned a criminal act, and negligent in the face of the moral imperative we all face to protect our world. There urgently needs to be a reduction in all air travel globally and it is an unprecedented priority to reduce, rather than increase pollution and the use of fossil fuels especially air travel.</i></p>   |
| REP/005                     | Thames Water Utilities Limited | GAT1            | <p>We support the deletion the Gatwick Airport Safeguarded Land policy. The previous safeguarded area includes Thames Water's Crawley Sewage Works and therefore provided uncertainty in relation to future upgrades at the sewage works.</p> <p>There are currently no approved plans for an additional runway at Gatwick Airport and this does not form part of the Government's Aviation Strategy and therefore we agree the safeguarding should be removed.</p> <p>Where any proposed development is within 800m of Crawley Sewage Works, the developer or local authority should liaise with Thames Water to consider whether an odour impact assessment is required as part of the promotion of the site and potential planning application submission. The odour impact assessment would determine whether the proposed development would result in adverse amenity impact for new occupiers, as those new occupiers would be located in closer proximity to a sewage treatment works.</p> <p>Paragraph 170 of the NPPF, February 2019, sets out that: "Planning policies and decisions should contribute to and enhance the natural and local environment by: ....e) preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans..."</p> <p>Paragraph 180 goes on to state: "Planning policies and decisions should also ensure that new development is appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development...."</p> |

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|                             |                      |                 | <p>The odour impact study would establish whether new resident's amenity will be adversely affected by the sewage works and it would set the evidence to establish an appropriate amenity buffer. On this basis, text similar to the following should be incorporated into the Neighbourhood Plan: "When considering sensitive development, such as residential uses, close to the Sewage Treatment Works, a technical assessment should be undertaken by the developer or by the Council. The technical assessment should be undertaken in consultation with Thames Water. The technical assessment should confirm that either: (a) there is no adverse amenity impact on future occupiers of the proposed development or; (b) the development can be conditioned and mitigated to ensure that any potential for adverse amenity impact is avoided."</p> <p><b>Suggested Modifications:</b><br/>Need to take account of potential odour from Crawley Sewage Works in relation to any odour sensitive development proposals within 800m.</p>  |
| REP/007                     | Gatwick's Big Enough | GAT1            | <p>On 12th December 2018, Crawley Borough's Full Council voted, by a significant majority, to oppose Gatwick's masterplan and on 17th July the Council declared a climate emergency. Against this background, we are both surprised and disappointed that the Council's policy in relation to Gatwick Airport appears so out of step with its previously stated position. As currently drafted, not only does the Council's proposed policy fail to accord with these previously stated positions, but in a number of areas falls short of what we believe is required to establish an appropriate long term strategy in relation to Gatwick Airport:</p> <ul style="list-style-type: none"> <li>• The policy does not define, or set out in any other clear way, what is meant by the "sustainable growth" of Gatwick Airport. In our view, there is no such thing as sustainable growth at Gatwick. Given current and foreseeable technology, any growth in flight numbers at Gatwick is very likely to result in increases in CO2 emissions as well as additional noise, congestion and air quality impacts. The proposals set out in Gatwick's masterplan have been estimated to result in an additional 1m tons of CO2 emissions annually. Most of this would come from more intensive use of GAL's main runway, within a single runway two terminal configuration. Consequently, we cannot understand how the Council could overwhelmingly reject that growth in its response to the masterplan, but now appears to be willing to facilitate it through its planning policies.</li> <li>• The policy does not acknowledge or take account of the scale of growth that Gatwick is pursuing within a single runway two terminal structure. The Council currently supports growth in this configuration to a throughput of 45 mppa and will be aware that Gatwick now wishes to increase this to a throughput of 61 mppa, an increase of over 35%. Such an increase would have profound impacts on local people and those under flight paths, on local infrastructure and for the environment more broadly, particularly climate change. Those impacts are not addressed in the draft plan and the proposed policy is unlikely to be capable of dealing with them adequately.</li> </ul> |

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| Ref. No.                    | Respondent | Policy/<br>Para | Comments   |
|                             |            |                 | <ul style="list-style-type: none"> <li>A requirement to “minimise” and “appropriately mitigate” the impacts of the airport’s operations is neither balanced nor consistent with government policy. It gives priority to the airport’s growth aspirations at the expense of the interests of people impacted by its operations and the environment more generally. Current Government policy (as set out in the Aviation Policy Framework) requires that “future growth in aviation should ensure that benefits are shared between the aviation industry and local communities. This means that the industry must continue to reduce and mitigate noise as airport capacity grows”. The Aviation 2050 Green Paper reinforced these goals when it said that its aim was to “balance noise and growth”. The Council’s proposed policy fails to reference any concept of balance between the competing interests or of noise reduction and is therefore unlikely to achieve government policy objectives.</li> </ul> <p><b>Suggested Modifications:</b><br/>In our view, the Council’s plan should instead set out a cap above which it would not support growth in the airport’s passenger and ATM numbers unless it could be clearly demonstrated, through a robust planning process and consultation, that the proposed growth met all relevant local and national policies, including the Paris Agreement, and appropriately balanced community, environmental and industry interests.<br/>Gatwick is the only major UK airport that does not have a planning cap. As we discussed at our recent meeting, the absence of such a cap severely constrains the Council’s ability to control the impacts of the airport’s operations on local people, those under flight paths and the environment, and to achieve a fair balance between competing interests. We would therefore suggest that the Council takes this opportunity to make clear to Gatwick that it wishes to negotiate an appropriate cap, to bring Gatwick into line with other airports, and that it will implement a robust planning policy unless and until one is agreed.</p> |
| REP/020                     | CAGNE      | GAT1            | <p>Clearly there is a need for a robust local plan to provide for the future of the town. However and given the fast changing times in which we now live any plan must be flexible enough to change with developments. Whilst the Plan appears robust and comprehensive it needs to take account of increasing pressures on the town arising from the continued expansion of Gatwick Airport, which appears to be largely beyond the control of Crawley Borough Council (CBC) and pressure on rural areas around the town from housing developments, often again beyond the control of CBC.</p> <p><b>Suggested Modifications:</b><br/>CBC needs to have more control over the areas identified above as being currently beyond its control. Failing this the quality of life for Crawley residents will continue to decline no matter what the content of the Local Plan. It is important that CBC recognise the factors that would lead to a decline in the quality of Crawley residents’ wellbeing and attempts to monitor them. The preservation and expansion of currently protected green sites both within and outside the town is vital. Steps need to be taken to monitor and object to the current apparently uncontrolled</p>   |

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|                             |                                    |                 | expansion of Gatwick Airport by the back door and without any proper central or local government review. Better measures need to be introduced to monitor air quality within and outside of the town as this is a real threat to the health of residents. Given the pressure for new house building in the county CBC must work with other local authorities to ensure that Crawley's currently strained infrastructure is not further tested and over loaded by the demand for additional housing by other local authorities (I refer specifically to Homes England plans for 10,000 plus new homes on land west of Ifield).   |
| REP/031                     | Gatwick Area Conservation Campaign | GAT1            | <p>The Gatwick Area Conservation Campaign (GACC) was formed in 1968 and thus is the longest standing environment and community group in the region. On 12th December 2018, Crawley Borough's Full Council voted, by a significant majority, to oppose Gatwick's masterplan and on 17th July the Council declared a climate emergency. Against this background, GACC are both surprised and disappointed that the Council's policy in relation to Gatwick Airport appears so out of step with its previously stated position. As currently drafted, not only does the Council's proposed policy fail to accord with these previously stated positions, but in a number of areas falls short of what GACC believe is required to establish an appropriate long term strategy in relation to Gatwick Airport:</p> <p><b>Suggested Modifications:</b></p> <p>The policy does not define, or set out in any other clear way, what is meant by the "sustainable growth" of Gatwick Airport. In GACC's view, there is no such thing as sustainable growth at Gatwick. Given current and foreseeable technology, any growth in flight numbers at Gatwick will result in increases in CO2 emissions as well as additional noise, congestion and air quality impacts. The proposals set out in Gatwick's masterplan have been estimated to result in an additional 1m tons of CO2 emissions annually. Most of this would come from more intensive use of GAL's main runway, within a single runway two terminal configuration. Consequently, we cannot understand how the Council could overwhelmingly reject that growth in its response to the masterplan, but now appears to be willing to facilitate it through its planning policies.</p> <p>The policy does not acknowledge or take account of the scale of growth that Gatwick is pursuing within a single runway two terminal structure. The Council currently supports growth in this configuration to a throughput of 45 mppa and will be aware that Gatwick now wishes to increase this to a throughput of 61 mppa, an increase of over 35%. Such an increase would have profound impacts on local people and those under flight paths, on local infrastructure and for the environment more broadly, particularly climate change. Those impacts are not addressed in the draft plan and the proposed policy is unlikely to be capable of dealing with them adequately.</p> <p>A requirement to "minimise" and "appropriately mitigate" the impacts of the airport's operations is neither balanced nor consistent with government policy. It gives priority to the airport's growth aspirations at the expense of the interests of people impacted by its operations and the environment more generally. Current Government policy (as set out in the Aviation Policy Framework) requires that "future growth in aviation should ensure that benefits are</p> |

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|                             |  |                 | <p>shared between the aviation industry and local communities. This means that the industry must continue to reduce and mitigate noise as airport capacity grows". The Aviation 2050 Green Paper reinforced these goals when it said that its aim was to "balance noise and growth". The Council's proposed policy fails to reference any concept of balance between the competing interests or of noise reduction and is therefore unlikely to achieve government policy objectives.</p> <p>In GACC's view, the Council's plan should set out a cap above which it would not support growth in the airport's passenger and ATM numbers unless it could be clearly demonstrated, through a robust planning process and consultation, that the proposed growth met all relevant local and national policies, including the Paris Agreement, and appropriately balanced community, environmental and industry interests.</p> <p>Gatwick is the only major UK airport that does not have a planning cap. As GACC discussed at a recent meeting with senior Members and management, the absence of such a cap severely constrains the Council's ability to control the impacts of the airport's operations on local people, those under flight paths and the environment, and to achieve a fair balance between competing interests. GACC would therefore suggest that the Council takes this opportunity to make clear to Gatwick that it wishes to negotiate an appropriate cap, to bring Gatwick into line with other airports, and that it will implement a robust planning policy unless and until one is agreed.</p> |
| REP/036                     | Vail Williams<br>on behalf of<br>UK<br>Commercial<br>Property<br>Finance<br>Holdings Ltd | GAT1            | <p>Chapter Ten: Gatwick Airport</p> <p>We acknowledge that our client's site is located outside of the Gatwick Airport boundary however, it is within existing airport safeguarding land which is protected against development which would be incompatible with future airport growth.</p> <p>However, paragraph 10.7 states that findings in the government's draft Aviation Strategy (2018) forecast that aviation demand up to 2030 can be met by the expansion of Heathrow Airport. It goes on to states that, whilst there may be further demand beyond 2030, the government is not at a point of deciding on long-term need.</p> <p>We also note in paragraph 10.10 that the Gatwick Airport Master Plan (July 2019) states that they are not currently pursuing plans for an additional runway to the south of airport albeit, there remains a possibility that this could change in the future. On behalf of our client, we support the clarification in policy Gat1: Development of the Airport with a Single Runway which supports sustainable growth of Gatwick Airport within the airport boundary as set out on the Local Plan Map.</p>  |
| REP/058                     | Reigate &<br>Banstead<br>Borough<br>Council  | GAT1            | <p><i>GAT1 "Development of the Airport with a Single Runway"</i></p> <p>We consider that the overarching strategy proposed in Policy GAT1 is sound. It is in line with the strategy in our Core Strategy (Policy CS9 "Gatwick Airport") which the Core Strategy Inspector considered sound.</p> <p><b>Suggested Modifications:</b></p>   |

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|                             |                         |                 | We agree that, as set out in proposed Policy GAT1 and Paragraphs 10.12 and 10.13, it is important that any future growth minimises the impacts of operation of the airport on the local environment and surrounding residents and that any future growth is supported by appropriate infrastructure and maximum benefits across surrounding authorities. In line with our own Core Strategy policy, we would therefore welcome reference in Policy GAT1 to the importance of joint working with neighbouring authorities and partners across the Gatwick Diamond through existing mechanisms such as Gatwick Officers Group to ensure that these shared strategic objectives are achieved for all.   |
| REP/062                     | Environment Agency      | GAT1            | <p><b>Gatwick Airport Development of the Airport Strategic Policy GAT1: Development of the Airport with a Single Runway</b></p> <p><b>We support this policy.</b> We welcome the reference in Policy GAT1 regarding flood risk in relation to the development of Gatwick Airport with a single runway. Areas of the Airport are at risk to fluvial flooding, additional areas with impermeable surfaces could also lead to an increase in the rate and volume of surface water runoff. Future development at the Airport will need to ensure that flooding can be managed on site and not increase the risk to flooding elsewhere.</p>   |
| REP/068                     | Sussex Wildlife Trust   | GAT1            | <p><b>Strategic Policy GAT 1: Development of the airport with a single runway</b></p> <p>SWT does not believe that the sustainable expansion of Gatwick Airport is possible against the backdrop of the legal requirement to reduce carbon emissions and meet net zero targets. SWT proposed amendments to the policy that have been partly incorporated. However we are frustrated that the amendment that seeks to include the term <i>avoided</i> has not been included.</p> <p>We recommend the inclusion of avoidance to ensure the policy is compliant with section 175 of the NPPF. We therefore recommend the following amendments to the policy:</p> <p><i>ii) The impacts of the operation of the airport on the environment, including noise, air quality, flooding, surface access, visual impact, biodiversity and climate change, are minimised <b>avoided</b>, where necessary satisfactory safeguards are in place to ensure they are appropriately mitigated and, as a last resort, fair like for like compensation is secured...</i></p> |
| REP/056                     | Gatwick Airport Limited | GAT1            | <p><b>Introduction</b></p> <p>The response firstly covers ‘Chapter 10: Gatwick Airport’, which is the chapter of most relevance to GAL. Chapter 10 focuses specifically on Gatwick Airport and sets out three local plan policies. GAL’s response relates to each of the 3 policies as follows:</p> <ul style="list-style-type: none"> <li>• GAL generally supports Policy GAT1 subject to some amendments to specific wording in the policy.</li> <li>• GAL supports Policy GAT2 Gatwick Airport Related Car Parking</li> <li>• GAL supports Policy GAT3 Employment Uses at Gatwick.</li> </ul>   |

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|                             |            |                 | <p>(CBC note: GAL representation contains a summary list of policies that GAL has commented on in relation to this and other chapters. This list is not included in this section of the consultation statement)</p> <p><b>Suggested Modifications:</b></p> <p><b>Policy GAT1: Development of the Airport</b><br/> GAL broadly supports GAT1: 'Development of the Airport' subject to suggested changes to specific wording in the policy and the supporting text. GAL considers that Policy GAT1 should include the requirement to ensure incompatible forms of development are not permitted on safeguarded land for an additional runway. We also consider that it should be made clear that the remit of Policy GAT1 is to allow for proposed development which is to be determined by the Local Authority and not for applications which would be subject to a separate DCO process. GAL also seeks amendments to the policy in relation to the need for compensation. Accordingly we have set out the following proposed amendments to the text of Policy GAT1 and the Reasoned Justification.</p> <p><b>Policy GAT 1 - Proposed Amendments</b><br/> The text below sets out how GAL considers the policy wording of GAT1 should be reworded including text to be deleted as strikethrough and new text to be inserted in <i>italics</i>.</p> <p><b>Policy GAT1: Development of the Airport with a Single Runway</b><br/> Within the airport boundary as set out on the Local Plan Map, the council will support the development of facilities which contribute to the sustainable growth of Gatwick Airport as a single runway two terminal airport provided that:</p> <ol style="list-style-type: none"> <li>i. The proposed use is appropriate within the airport boundary and contributes to the safe, secure and efficient operation of the airport; and</li> <li>ii. The impacts of the operation of the airport on the environment, including noise, air quality, flooding, surface access, visual impact, biodiversity and climate change, are minimised, <i>controlled and managed and</i>, where necessary satisfactory safeguards are in place to ensure they are appropriately mitigated, and <del>as a last resort fair compensation is secured</del> <i>where it can be demonstrated that adequate mitigation of impacts is not achievable in relation to biodiversity as a last resort appropriate and fair compensation is secured</i>; and</li> <li>iii. <del>Adequate supporting</del> Infrastructure, particularly for surface access, <i>necessary to support the safe and secure operation of the airport</i>, can be put in place; and</li> <li>iv. <i>Where considered necessary and appropriate, relevant related</i> benefits to Crawley's local economy and community are <del>maximised</del> <i>secured</i>.</li> </ol> <p>The control or mitigation of impacts, <i>proportionate compensation in relation to biodiversity, and any associated infrastructure and benefits, will be secured through appropriate planning conditions and / or S106 obligations.</i></p> |

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| Ref. No.                    | Respondent | Policy/<br>Para | Comments  |
|                             |            |                 | <p>Where development to enable sustainable growth at Gatwick Airport will be a Nationally Significant Infrastructure Project, such as the use of the northern runway, <i>i-iv</i> above will be taken into account by the Council in preparing its Local Impact Report.</p> <p><del>i-iv above will be expected to be met by the airport operator and secured through a s106 Agreement.</del></p> <p><i>Any development on land identified for a new runway should not add costs, complexity or be incompatible with the potential future expansion of the airport to accommodate the construction of an additional wide spaced runway (to the south).</i></p> <p><b>Policy GAT1 Supporting Text - Proposed Amendments</b></p> <p>The text below sets out GAL's suggested changes to Paragraph 10.12 and 10.13 of the draft Plan showing text to be deleted as strikethrough and new text to be inserted in <i>italics</i>.</p> <p><b>Paragraph 10.12.</b> Much of the recent significant growth in passenger numbers at Gatwick Airport, through the use of larger aeroplanes and more flights at "off-peak" times and seasons, has not required new development to support it. The Airport Operator also has permitted development rights for new facilities to support rising passenger numbers. Measures are in place through the S106 Agreement between CBC, WSCC and Gatwick Airport to mitigate some of the adverse impacts of airport growth, and where planning permission is required for new development at the airport, the council will need to ensure that it contributes to the safe and efficient operation of the airport and that <i>where necessary</i> its impacts are minimised or mitigated <del>as appropriate as required</del>, sufficient supporting infrastructure can be put in place, and <i>related</i> local benefits are <del>maximised</del> <i>secured</i>. The council will also consider the cumulative impact of numerous small developments. Planning conditions and a further S106 Agreement will be sought.</p> <p><b>Paragraph 10.13.</b> Sections 14 and 23 of the Planning Act 2008 define Nationally Significant Infrastructure Projects to include the construction, extension or alteration of a runway or building at an airport expected to be capable of increasing by at least 10 million per year the number of passengers for whom the airport is capable of providing air passenger transport services, <i>or of increasing by at least 10,000 per year the number of air transport movements of cargo aircraft for which the airport is capable of providing air cargo transport services</i>. Applications for such developments would therefore be determined by the Secretary of State through the Development Consent Order (DCO) process. The Gatwick Master Plan 2019 proposal to use the standby runway would increase capacity by over 10 mppa and would therefore be determined through a DCO process. Gatwick Airport has formally commenced this process with its Scoping Report in September 2019. Submission of the DCO is anticipated in late 2020 with, should it be approved operational use starting in 2026. Maximum capacity would be reached in 2038. The council would expect the environmental impacts to be <del>controlled minimised</del>, and <i>or mitigated as appropriate, the necessary</i></p> |

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|                             |            |                 | <p>infrastructure to be provided, and <i>related</i> benefits to the local area to be <del>maximised</del> <i>secured</i>, and <del>through</del> is working with neighbouring authorities to ensure that these objectives are achieved across the wider area.</p> <p><b>Policy GAT1 – Justification for Proposed Amendments</b><br/> Policy GAT1 (i): No Change Proposed<br/> Policy GAT1 (ii) as drafted - Proposed Amendments<br/> To ensure that adverse impacts are appropriately considered GAL suggests that Policy GAT1 paragraph ii) should be amended to read, where necessary, such impacts are “<i>controlled and managed</i>” rather than “<i>minimised</i>”. This is because, whilst GAL does seek to minimise impacts of development, there has to be a balance between minimising impacts and securing the benefits of development, such that in some cases minimising rather than mitigating impacts of a development might be incompatible with securing and optimising overall benefits and sustainable growth. GAL considers that the requirement to provide compensation arises <u>only</u> in relation to unavoidable impacts to biodiversity (NPPF 2019 para 175 points (a) &amp; (c)) and where it is agreed that the mitigation of impacts on biodiversity is not achievable or suitably effective. Whilst GAL fully supports the need for appropriate mitigation measures to control adverse environmental impacts, GAL does not support the inclusion in Policy GAT1 paragraph (ii) of the requirement for the airport to ‘compensate’ for the impacts on environmental aspects relating to noise, air quality, flooding, surface access, visual impact and climate change. GAL considers it should be made clear in Policy GAT1 (ii) that the requirement for compensation relates to matters of biodiversity only in line with the requirements of the NPPF.</p> <p><b>GAL objects to GAT1 (iii) as drafted - Proposed Amendment</b><br/> GAL considers the wording ‘<i>adequate infrastructure</i>’ to be ambiguous and should be amended. In line with planning requirements (NPPF para 56), GAL is committed to providing the infrastructure that is <i>necessary</i> to ensure the safe, efficient and secure operation of the airport.</p> <p><b>GAL objects to Policy GAT1 (iv) as drafted - Proposed Amendment</b><br/> GAL considers that in GAT1 (iv) the term ‘<i>maximised</i>’ should be replaced with ‘<i>secured</i>’ as it may not in all instances be reasonable or proportionate for the related benefits to be maximised.</p> <p><b>Nationally Significant Infrastructure Projects - Proposed Policy Text Deletion</b><br/> GAL objects to the last paragraph of the policy as NSIPs are not a matter for Policy GAT1. Policy GAT1 addresses proposed development that is within the remit of the LPA to determine. Applications for NSIP developments would be determined by the Secretary of State through the Development Consent Order (DCO) process. GAL believes the last paragraph of Policy GAT1 should therefore be amended as follows: “<i>Where development to enable sustainable</i></p> |

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|                             |                            |                 | <p><i>growth at Gatwick Airport will be a Nationally Significant Infrastructure Project, such as the use of the northern runway, i-iv above will be taken into account by the Council in preparing its Local Impact Report.”</i></p> <p>Furthermore, GAL’s view is that a positive determination of the proposed Gatwick Northern Runway DCO would be highly likely to trigger a partial review of the Local Plan, and that Policy GAT1 will need to be reviewed taking account of the growth of the airport that would be facilitated by that project. However, until a decision on the DCO is known, any reference in the draft Plan to airport growth via an NSIP should reflect the policy contained in the policy document entitled “Beyond the horizon: The future of UK aviation-Making best use of existing runways” (“MBU”) published alongside the Airports National Policy Statement in 2018.</p> <p><b>The requirement to safeguard land against development incompatible with a potential future additional runway: Proposed insertion to Policy GAT1</b> (<i>GAL has made detailed comment on the national requirement for the safeguarding of land in its objection to Policy SD3 North Crawley Area Action Plan</i>).</p> <p>The Local Plan will have a strategic time horizon to 2035 and therefore the GAT1 policy should be aligned to current national policy which requires land at Gatwick to be safeguarded for the long term potential growth of the airport. GAL has suggested the insertion of new policy wording (as a final paragraph to the policy) in line with the currently adopted local Plan Policy GAT1, in order to reflect the need to safeguard land from development which would be <i>incompatible</i> with the potential future expansion of the airport to accommodate the construction an additional wide spaced runway.</p> |
| REP/027                     | LRM<br>Planning<br>Limited | GAT2            | <p>Our clients strongly object to the policy in its current form as it is based on an out dated approach to infrastructure associated with the airport given the significant recent and likely future growth of the airport. It does not meet the requirements of NPPF para 35 in that it is not justified, effective or positive.</p> <p>This form of policy has been in place for some time however it has not provided adequate controls on unauthorised parking in unsustainable locations. Rather it has actively led to such problems, policies in the current version of the Plan in respect of the airport were prepared at a time when passenger numbers at the airport were around 34 mppa, some 13 mppa fewer than they presently are, infrastructure and parking provision has not kept up with the level of growth which has in turn led to unauthorised parking.</p> <p>The approach within the Local Plan was based on the 2012 Gatwick Master Plan which supported the growth of the Airport from 34 mppa in 2012 to 40 mppa in 2020 and 45 mppa in 2030. However, by the time the plan was adopted passenger numbers had grown by 11 mppa and already exceeded 45 mppa. This massive level of growth to 47 mppa was simply not envisaged or planned for until the 2030’s which was outside the timeframe of the current plan. Given the lack of associated growth in authorised parking provision means that GAT2 can only be considered to be outdated. Indeed, there are numerous adverse impacts and problems as a result of this lack of comprehensive approach to the impacts of airport growth.</p>  |

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|                             |            |                 | <p>There are over 6,600 unauthorised car parking spaces (as of September 2019) within Crawley. This is a significant number of offsite car parking spaces that is dispersed across the Authority in an unsustainable, unplanned and unmitigated way. Indeed, it is highly likely that this reflects an under estimation of parking across the County (and neighbouring authorities). We are strongly of the view that the Local Plan must set out a framework for ensuring impacts are addressed and planned, rather than a blanket restriction in car parking off site that has resulted in adverse impacts. This is likely to be of even greater importance given the likely level of under provision associated with future growth of the airport.</p> <p>Failure to adequately plan for an address the full requirements associated with growth include adverse impacts on a wide range of key indicators of quality of the local environment including in respect of air quality, ecology, landscape, highways, transport, noise. These can all be properly mitigated for and considered through thorough and robust schemes being considered through the planning process.</p> <p>Phil Jones Associates (PJA) have undertaken a modelling exercise (attached to this representation) on behalf of our clients in respect of car parking demand. They note that Gatwick Airport has grown significantly over recent years and there is already a significant shortfall in parking to meet current needs. PJA have updated the projections set out in the Gatwick Airport Car Parking Strategy 2013 (prepared by Arup on behalf of Gatwick Airport Limited) based on more up to date parking information and CAA data. They note:</p> <ul style="list-style-type: none"> <li>• At 52mppa there will be a deficit of 21,134 spaces; and</li> <li>• At 61mppa there will be a deficit of 33,651.</li> </ul> <p>PJA have updated these figures based on Gatwick's own projections on passenger numbers as set out in the master plan. This indicates it could grow to 61mppa with a single runway and 74mppa with the additional use of the standby runway. Whilst we are supportive of maximising public transport to the airport, we believe that it must be planned for proactively and realistically.</p> <p>Clearly with an increase in passenger numbers to 61mppa to 74 mppa there will be further significant associated infrastructure requirements. PJA estimate that for 61mpp there will be a parking deficit of 33,651 spaces and based on 70mppa there will be a shortfall of 46,167 car parking spaces based on a need for 97,353 car parking spaces associated with the airport. Plainly, this would inevitably be greater for 74 mppa.</p> <p>For further comparison, the evidence that Gatwick Airport prepared in order to support their own bid for a 2nd runway (Updated Scheme Design submission - May 2014) indicates that a much higher level of infrastructure ought to be provided. In particular, within Appendix A6 (Surface Access) of the submission documentation, Table 9.3 indicates that for the level of 79 mppa there would be a need for a total of 106,550 car parking spaces (10,300 short term spaces and 96,250 long term).</p> <p>This is an increase of 47,085 parking spaces on the current level. Even on the basis of a modal shift towards 60% using Public Transport, there would be an increased need for 27,735 spaces. However, in the consultation draft</p> |

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|                             |            |                 | <p>master plan (plans 18 and 19), there are only an additional 17,500 spaces proposed for the level of 74 mppa. This approach plainly contradicts the Airports own evidence base from 2014 and we are strongly of the view that this significant under provision can only have a severe and profound adverse impact upon local infrastructure, the environment and local communities without a properly planned approach to managing the additional level of use. Indeed, during the lifetime of this Local Plan it is extremely likely that passenger numbers at Gatwick will increase to up to 74 million passengers per annum. This requires a properly planned and comprehensive approach to infrastructure and managing the growth. This could require a significant number of offsite car parking spaces, it is inevitable that the alternative is an increase in off airport, incremental and unauthorised parking across Crawley and neighbouring authorities. It is noted that PJA are updating their work and will review again when the detailed Airport consultation on growth begins.</p> <p>We are strongly of the view that there should be provision to allow for off airport car parking in sustainable locations close to the airport (within the North Crawley AAP area). A regularised system for allowing off site car parking would:</p> <ul style="list-style-type: none"> <li>- allow infrastructure to be duly mitigated and avoid adverse impacts from growth that has not been properly mitigated or planned for;</li> <li>- manage highways networks;</li> <li>- provide sustainable transport options; and</li> <li>- prevent rogue parking operators running illegal operations.</li> </ul> <p>We believe that it would be more proactive in addressing growth to set out criteria and circumstances that must be complied with in the plan whereby off airport car parking would be acceptable. These circumstances could include:</p> <ul style="list-style-type: none"> <li>- being within close proximity of the airport;</li> <li>- sustainable transfers to and from the airport (for instance electric vehicles); and</li> <li>- providing betterment in terms of transportation, highways, biodiversity etc...</li> </ul> <p>Such an approach would allow a proactive approach to parking rather than waiting for problems to arise and then seek to close unauthorised sites.</p> <p><b>Suggested Modifications:</b></p> <p>We are supportive of the removal of the Gatwick expansion safeguarding area and the preparation of an AAP for North Gatwick, however, we are strongly of the view that a number of associated amendments are required in order to make the plan compliant with the NPPF. These primarily involve ensuring that the Plan robustly responds to the impacts of the future growth of the airport. Suggested changes include:</p> <p>b. Updates to policy GAT2 as set out herein in order to proactively deal with off airport parking in a sustainable and planned manner rather than a blanket restriction which actively encourages rogue operators and unplanned growth. This will become increasingly important as the airport is likely to grow to 74 mppa over the course of the plan period;</p> |

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|                                    |  |                         | (See attached technical note)   |
| REP/036                            | Vail Williams on behalf of UK Commercial Property Finance Holdings Ltd | GAT2                    | <p>Chapter Ten: Gatwick Airport</p> <p>We acknowledge that our client's site is located outside of the Gatwick Airport boundary however, it is within existing airport safeguarding land which is protected against development which would be incompatible with future airport growth.</p> <p>However, paragraph 10.7 states that findings in the government's draft Aviation Strategy (2018) forecast that aviation demand up to 2030 can be met by the expansion of Heathrow Airport. It goes on to states that, whilst there may be further demand beyond 2030, the government is not at a point of deciding on long-term need. We also note in paragraph 10.10 that the Gatwick Airport Master Plan (July 2019) states that they are not currently pursuing plans for an additional runway to the south of airport albeit, there remains a possibility that this could change in the future.</p> <p>Therefore, we support the Councils decision to remove policy GAT2: Safeguarded Land from the Local Plan and include this land within the preparation of the North Crawley AAP. This will provide greater flexibility and opportunity for meeting the Borough's development need in addition to the future development need of Gatwick airport.</p>   |
| REP/044                            | Tim North & Associates Ltd on behalf of HX Properties Ltd              | GAT2                    | <p>Draft Crawley Borough Local Plan Review 2020-2035 – Regulation 19 Consultation</p> <p>My clients, HX Properties Ltd, object to Policy GAT2 of the Regulation 19 version of the Draft Crawley Borough Local Plan 2020-2035 (hereinafter referred to as the DCBLP), including paragraphs 10.16 to 10.19 inclusive, which provide the reasoned justification to the same policy. In this way both the policy and its supporting text are considered unsound.</p> <p>Policy GAT2 is concerned with "Gatwick Airport Related Car Parking" seeking the reintroduction of Policy GAT3 from the statutorily adopted Crawley Borough Local Plan 2015-2030. There has been a minor alteration to the wording of Policy GAT2, in that it now consists of a single paragraph, where previously it formed two paragraphs; the second of which commenced with the words "All new proposals must be justified ...."</p> <p>The reasoned justification behind Policy GAT2 is fundamentally flawed, in that it takes no account of and is inconsistent with, the provisions of Schedule 2 Part 8 Class F of the Town &amp; Country Planning (General Permitted Development) (England) Order 2015 (As Amended). The Airport Owner on "Operational Land" can construct surface car parking or build multi-storey car parks, in accordance with the above mentioned permitted development rights, for which no express planning permission is required, and without having to justify "...a demonstrable need in the context of proposals for achieving a sustainable approach to surface transport access to the airport". This view, accepted by those advising HX Properties Ltd, means that Policy GAT2 set out in the DCBLP is unnecessary and serves no valid purpose, completely nullifying the reasoned justification set out in paragraph 10.16 to 10.19 inclusive.</p> |

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|                                    |                   |                         | <p>The fact that the Airport Operator is under no obligation to produce an assessment of demonstrable need to justify any on-airport surface or multi-storey car park, in accordance with the second limb of Policy GAT2, becomes immediately apparent from the decision taken by your Council to raise no objection to Application No. CR/2017/0523/CON.</p> <p>It is a well-known fact that Crawley Borough Council rely on Gatwick Airport Ltd (hereinafter referred to as GAL) in providing evidence on the central issue of “demonstrable need” to support its case in refusing proposals for long term off-airport car parking in its administrative area. The involvement of GAL means that, by association, it occupies a central position in the decision-making process, particularly in cases where an applicant proceeds to appeal against the Local Planning Authority’s refusal or non-determination of a long term off-airport car parking proposal. GAL as a private company, has a dominant position in surface access facilities provided at London Gatwick Airport, being present in the upstream market (i.e. facilities at an airport, such as bus stations or car parks), as well as the downstream market (i.e. allowing providers to access the facilities at an airport), where they relate to levels of surface access provision. GAL’s presence as an important integral part of the decision-making process, means that land use planning decisions governing airport related car parking proposals cannot be considered transparent. That is, they cannot be divorced from, and are influenced by separate considerations governing issues of competition, i.e. through the Capital Investment Programmes prepared by GAL relating to future levels of on airport car parking expenditure.</p> <p>The contents of supporting paragraph 10.16 to Policy GAT2 refer to the 2019 Section 106 Planning Obligation entered into between Crawley Borough Council, West Sussex County Council and GAL, which sets out an obligation for the Airport Operator to achieve a target of 48% of passengers travelling to the airport by public transport by 2022. The figure of 48% is used as a metric to show that the amount of airport related car parking that needs to be provided for airport passenger throughput, in accordance with the Airport Operators Interim Car Parking Strategy April 2017, is in some way commensurate with public transport modal share. The 48% figure is not considered to be a challenging target, in that in the fourth quarter of 2017, (October to December), CAA’s O &amp; D data reveals that a public transport modal share figure of 48.3% was reached, being in excess of the 48% target figure set down for 2022.</p> <p>No evidence has been produced to demonstrate that long term off-airport car parking has prevented the modal share in favour of public transport from being reached, as set out in the various iterations of the Gatwick Airport Surface Access Strategy (hereinafter referred to as GASAS) and associated Section 106 Planning Obligations. The target figure of 48% is in all probability likely to be met, even in the event that the figure were to be increased, when it is realised that visitors to the UK are always more likely to use public transport than those living and working in the UK. The contents of paragraph 10.17 providing part of the reasoned justification to Policy GAT2 refer to a number of lawful long term off-airport car parking businesses, serving the needs of passengers using London Gatwick Airport. The</p> |

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|                             |            |                 | <p>figure for long term off-airport car parking spaces set out at paragraph 2.3.30 of the Gatwick Airport Masterplan 2019, namely 21,196 authorised spaces is strongly disputed. It will be demonstrated that there has been a consistent and marked reduction in the supply of long term off-airport car parking provision serving the airport, since the Gatwick Airport Interim Master Plan was published in 2006.</p> <p>To the extent that long term off airport car parking provides an important contribution to airport related car parking, means that it has a role to play in the supply of the same product, meeting not only a quantitative, but also a qualitative need. A number of long term off airport car parks have been found to occupy “sustainable locations” whilst at the same time offering “customer choice”. This becomes evident from Inspectors’ appeal decisions in your Council’s administrative area, as well as the contents of Case Officers’ reports granting planning permission for the same use.</p> <p>In this regard no account is taken of i) access arrangements from the particular car park to the terminal buildings; and ii) the advantages of transporting a number of passengers to the Airport’s terminals utilising low emissions/eco-friendly buses. These benefits associated with a traditional park and ride off-airport parking facility have the ability to lead to a reduction in traffic movements, thereby alleviating congestion at strategically located junctions situated in close proximity to London Gatwick Airport, at the same time having the propensity to reduce carbon emissions.</p> <p>It is said in GAL’s representations to the July 2019 version of the DCBLP that the aim is to offer an attractive on airport car parking product as a means of discouraging use of less sustainable car parking options, which create double the amount of car trips compared with “park and fly”, whilst generating extra surface access journeys, which it is argued, add to congestion and CO2 emissions. These comments are wholly predicated on the “kiss and fly” and “meet and greet” car parking mode serving London Gatwick Airport, which are the least sustainable. They take no account of traditional long term park and ride facilities, which are infinitely more sustainable than encouraging passengers to park on-airport. To the extent that GAL refer to a “residual and increasing demand for parking for those passengers who choose to use the car” dictates that the long term off-airport park and ride model has the ability to be the most sustainable option after dependence on public transport.</p> <p>In devising a policy devoted to “Gatwick Airport Related Parking”, requires sustainability issues to extend beyond consideration of whether a site is situated within or outside the boundaries of London Gatwick Airport. A restrictive policy of the kind set out in GAT2 has inverse implications, with associated disadvantages for airport related car parking, with inadequate account taken of other related issues surrounding airport car parking provision.</p> <p>It is a known fact that unless additional resources are provided to the Authority, and a proactive approach is taken to enforcement proceedings in respect of unlawful off-airport car parking uses, the ability to ensure a sustainable approach to airport related car parking will never be realised. Your Authority are on record as stating that unauthorised long term airport related car parking will continue to be a source of capacity (supply) into the future. Given these circumstances, to pursue a strategy which perpetuates, at the same time places reliance on</p> |

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|                             |            |                 | <p>unauthorised long term off-airport car parking, in preference to a properly managed lawful long term off-airport car parking facility, is the very antithesis of “managing” airport related car parking provision into the future. Evidence reveals that adopting the tact outlined in the previous paragraph will encourage long term off-airport car parking facilities of all models, in least sustainable locations seen in terms of distance to the north and south terminals, and is required to be compared with what otherwise may arise from lawful long term off-airport park and ride facilities which from a locational perspective, are sited in close proximity to the same terminals. It is also infinitely more sustainable to have sites granted planning permission, than for long term off-airport car parking facilities to be made lawful through CLEUDs.</p> <p>To impose an embargo on lawful long term off-airport car parking uses based on the park and ride model, would simply play into the hands of those unauthorised long term off-airport car parking businesses operated by rogue traders, with all the ensuing bad publicity for airport related car parking. It simply hands the impetus to those seeking CLEUDs for long term off-airport car parking uses on sites distant from the airport, which along with the “meet and greet” mode, is the least desirable from a sustainability perspective.</p> <p>A restrictive Policy GAT2 has paid no regard to the increasing provision of organisations such as JustPark, a technological platform matching drivers with car parking spaces through its website and app, representing what is referred to as the “sharing economy”, having a profound impact on the ability to reduce the private car mode in favour of public transport, and appearing less sustainable than the provision of a traditional long-term off-airport car parking facility. To these considerations can also be added the increasing focus placed on the use of on-street car parking, sometimes known as transit parking, in residential areas, before walking or taking a cab to the airport’s terminals.</p> <p>In conclusion, Policy GAT2 is passing the responsibility from the Local Planning Authority to a private company, the Operator of London Gatwick Airport, who is then given the remit of meeting the modal split target of passengers, through total reliance placed on on-airport related car parking, without considering alternative forms of access to an international airport.</p> |
|                             |            |                 | <p><b>Suggested Modifications:</b></p> <p>It follows from these representations that if Policy GAT2 is to be retained in the Regulation 19 version of the DCBLP, then consideration should be given to removing permitted development rights where it relates to car parking provision on “Operational Land” within London Gatwick Airport through an Article 4 Direction. The Article 4 process will provide the appropriate reasoned justification and purpose behind the same policy, allowing decisions to be more transparent, if only for reasons of having to justify a demonstrable need.</p> <p>In addition, a methodology should be agreed in which to assess long term demand and capacity issues concerning both on and off airport-related car parking provision, involving your Authority, GAL and representatives of those</p>  |

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|                             |            |                 | <p>involved in lawful long term off-airport car parking facilities. This will reduce issues of dispute, or at least highlight those specific areas where agreement cannot be reached, surrounding existing and future demand for and capacity (supply) of airport related car parking, including the concept that the same two factors are “in balance”. To this end, through collaboration, a sound base for deciding applications will be provided, not dissimilar to the way in which the NPPF requests Local Planning Authorities to use the standard methodology in order to establish a minimum local housing needs figure (LHN) in their administrative areas.</p> <p>A more flexible approach is required in the consideration of airport related car parking provision, given that issues of sustainability, when taken to an extreme as is the case with Policy GAT2, results in locations being defined solely by reference to whether a site lies within or outside the boundary of London Gatwick Airport. That approach produces an anomalous situation, highlighted by the fact that should the Council accept an alteration to the boundaries of London Gatwick Airport, so that it is commensurate with that indicated on Plan 20 in the Gatwick Masterplan 2019, (i.e. leading to an extension to the east beyond the London to Brighton Railway Line towards the M23 Motorway); what is at present considered to be an unsustainable location, automatically becomes sustainable.</p>   |
| REP/053                     | Quod       | GAT2            | <p><b>Gatwick Airport Safeguarding and North Crawley AAP</b></p> <p>The NPPF states that planning policies should “<i>identify and protect, where there is robust evidence, sites and routes which could be critical in developing infrastructure to widen transport choice and realise opportunities for large scale development</i>” (paragraph 101, our emphasis).</p> <p>The Draft Local Plan states that since 2003, Crawley Borough Council (“CBC”) has been required by Government policy to safeguard land from development in order to accommodate the possible construction of an additional wide spaced runway and associated facilities. This has placed significant constraint on the ability of Crawley to meet its development needs. However, in line with our representations to the Regulation 18 Draft Local Plan, it is noted that the Council accept that ‘robust evidence’ does not exist to maintain the safeguarding for a second runway and draft Policy GAT2 (Safeguarded Land) has been deleted. Paragraph 3.20 of the Draft Local Plan states: “<i>The council does not consider there is, at this time, robust evidence to justify the continued safeguarding of land for a further runway at Gatwick, and in light of the other significant needs arising which this land could support, commits to commencing work on an AAP to determine the most appropriate use of this land for future development needs rather than just protecting an extensive area for one use.</i>” (our emphasis)</p> <p>There is no evidenced need or policy case for the safeguarding of a second wide spaced runway at Gatwick Airport. Furthermore, Gatwick Airport has itself confirmed in their 2019 Masterplan that they are no longer pursuing an additional wide-spaced runway (the purpose behind the previous safeguarding) and are instead pursuing a DCO application to make optimum use of the existing runway as well as the standby runway.</p> |

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|                             |            |                 | <p>As a result of the removal of Draft GAT2, Draft Policy SD3 identifies that land to the north of Crawley and south and east of Gatwick Airport (which includes the Site) is to be subject to the preparation of the NCAAP. Paragraphs 3.21 and 3.22 state:</p> <p><i>“The commitment to producing an AAP for this area presents opportunities to support the growth of airport if this can be justified with robust evidence of need, as well as delivering other requirements. The AAP approach, rather than identifying allocations in this Local Plan, is considered to be pragmatic. It allows for the principle of lifting safeguarding to be considered first, through this Local Plan, and then allows greater time for the growth needs of the Airport to be demonstrated by the airport operator and any future protection of some or all of the land for airport purposes to be justified alongside other development needs as part of the work on the AAP.</i></p> <p><i>On this basis, this Local Plan still needs to apply the same protections of the previous safeguarding policy to the area identified in the Gatwick Airport Masterplan 2019 until the AAP is finally adopted. This recognises that, if there is evidenced need for a future southern runway at Gatwick, this is the only location it could be delivered. Therefore, the amended previously safeguarded area identified on the Local Plan Map will be protected against incompatible development which would add constraints, add costs, or increase the complexity of the development of an additional runway. The Airport Operator will continue to be consulted on all applications within this area. Also, as the work on the AAP may still conclude there is a need to safeguard land for a potential southern runway, it is important to ensure that, until the AAP is adopted, noise sensitive development is not located in an area which could become unacceptably noisy in the future due to air traffic movements from a southern runway.”</i> (Our emphasis).</p> <p><b>Conclusions</b></p> <p>We welcome the deletion of Draft Policy GAT 2, however Gatwick Airport should not be offered greater time to demonstrate their growth needs through the NCAAP – the robust evidence needs to be provided as part of the Local Plan review. Draft Policy SD3 needs to be updated according. There is a significant need for employment land in Crawley and as currently drafted the Draft Local Plan is unsound. The Site is the most appropriate location north of Manor Royal to meet the identified need and as such should be included within the Manor Royal allocation rather than the NCAAP. Draft Policy SD3 and Draft Policy EC1 should be updated according. Notwithstanding this if the Council continue to identify the Site as being within the boundary of the NCAAP the amends proposed with regards to Gatwick Airport and small scale extensions north of Manor Royal need to be made. We welcome the amended location of the Indicative Search Corridor Western Relief Road however its location should be dealt with as part of the Local Plan review process.</p> <p><b>Suggested Modifications:</b></p> <p>My client welcomes the deletion of Draft Policy GAT 2.</p> |

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|                             |                    |                 | <p>In line with the NPPF the Council should identify strategic site allocations to meet identified need as part of the Draft Local Plan thereby removing the need to introduce a further planning policy document.</p> <p>Notwithstanding this, the Council have clearly stated that robust evidence does not exist to maintain the safeguarding for a second runway. On this basis there is no evidence or policy rationale to require the NCAAP to consider if further evidence has materialised for safeguarding for a second runway in the future.</p> <p>The NPPF requires all policies to be evidence based and as no evidence exists for safeguarding (as accepted by the Council) the NCAAP should not even contemplate safeguarding for a second runway. The fact that it does means that Draft Policy SD3 as currently drafted is not justified in accordance with Paragraph 35 of the NPPF and is therefore unsound. The only potential safeguarding the NCAAP should consider is additional land associated with the optimum use of the existing runway and the standby runways. The NCAAP and Draft Policy SD3 should focus on assessing the locations for the Borough economic, housing, community and infrastructure needs.</p> <p><b>Previously Non-Safeguarded Land</b></p> <p>The Draft NCAAP boundary covers areas of land which previously fell outside of the safeguarded area. Draft Policy SD3 states that until the AAP is adopted, only minor extensions to existing buildings will be permitted in the previously safeguarded area which has been amended to correspond to the Gatwick Airport Masterplan 2019. Draft Policy SD3 continues to state that minor extensions to Manor Royal will be permitted on the land outside the amended safeguarded area if they do not prejudice future comprehensive development within the NCAAP area.</p> <p>My client objects to the areas of previously non-safeguarded land being included within the Draft NCAAP boundary. The Draft Local Plan is clear that there is no robust evidence to support the safeguarded area and as such Draft Policy GAT 2 has been deleted. Therefore, the Council are being inconsistent as on one hand they are stating there is no evidence for safeguarding for a second runway and on the other utilising the 2019 Masterplan boundary. There is no justification to have a boundary correlating to a wider safeguarded area when the safeguarding has been removed. Furthermore, Gatwick Airport are not actively progressing a second runway as identified in their 2019 Masterplan.</p> <p>As currently drafted, the draft policy is not justified and contrary to the provisions of the NPPF. The draft policy could be updated so that the all land north of Manor Royal is within the NCAAP boundary but specifically state that small scale extensions north of Manor Royal may be considered in advance of the NCAAP if they can be demonstrated not to prejudice the wider NCAAP area. We consider this further in the next section.</p> |
| REP/058                     | Reigate & Banstead | GAT2            | <p><i>GAT2 "Gatwick Airport Related Parking"</i></p> <p>We strongly support the approach set out in this policy and consider that the proposed approach is sound. The proposed policy is aligned with our adopted DMP Policy TAP2 "Airport Car Parking" which our DMP Inspector</p>  |

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|                                    | Borough Council                  |                         | considered sound, and reflects the long-standing, cross-boundary approach to the management of parking associated with the airport.  |
| REP/056                            | Gatwick Airport Limited          | GAT2                    | GAL support draft Plan Policy GAT2 and the reasoned justification set out Paragraphs 10.16 to 10.19 of the draft Plan.<br>GAL support draft Plan Policy GAT3 as it appropriately restricts all future new and replacement airport-related parking to within the airport boundary, demonstrating the continued need for a sustainable approach to surface transport access to the airport.  |
| REP/055                            | Savills on behalf of Wilky Group | GAT 2                   | <p><b>Introduction</b></p> <p>This representation is submitted on behalf of The Wilky Group (TWG or Wilky), which has a long-standing interest in the promotion of strategic employment land within the Crawley Borough Council (CBC) area. It relates to Chapter 10, Gatwick Airport and in particular Policy GAT2 'Gatwick Airport Related Parking' in the draft Crawley Borough Local Plan, 2020 (DCBLP).</p> <p>TWG owns about 63.3 ha (149 acres) of land east of Gatwick Airport and north and south of the M23 spur road between Junctions 9 and 9a. The plan at <b>Appendix 1</b> shows the extent of the opportunity known as Gatwick Green (59 ha). Wilky and Aberdeen Standard Investments are discussing how they can work together in respect of Wilky's strategic landholding adjacent to Gatwick Airport to bring forward an integrated mixed use development and coordinated infrastructure solution. Wilky and Aberdeen Standard Investments are discussing how they can work together in respect of Wilky's strategic landholding adjacent to Gatwick Airport to bring forward an integrated mixed-use development and co-ordinated infrastructure solution.</p> <p><b>Policy GAT2</b></p> <p>Evidence is put forward to demonstrate that the current policy to restrict car parking to on-airport locations is not sound and should be amended to provide for flexibility in future airport car parking provision. Whilst the Council has successfully defended Policy GAT2 at several appeals concerning proposals for airport car parking in off-airport locations, none of those proposals tested the underlying evidential justification for the policy. A review of the evidence and the Council's sustainability assessment of alternatives reveals that the current policy is not justified in the context of future transport sustainability. Consequently, Policy GAT2 is <u>not considered to be sound</u> in accordance with the four tests contained in the NPPF (para 35).</p> <p><b>Gatwick Airport Related Parking – Policy GAT2</b><br/><b>On-airport / off-airport parking balance</b></p> |

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|                             |            |                 | <p>The Gatwick Airport Master Plan 2019<sup>1</sup> identifies the current split between on and off-airport parking. Paragraph 2.3.30 records that there are 39,000 on-airport spaces and 21,196 off-airport spaces; over a third (35%) of all parking spaces are therefore off-airport. There is no evidence in the DCBLP that the off-site airport car parking provision operating legitimately with planning permission is not providing suitable and sustainable long-stay car parking for the airport. Paragraph 10.17 of the DCBLP acknowledges the existence of these car parks.</p> <p>Car parking which lies outside the current boundary of the Airport is therefore a key part of the overall provision for those travelling by car to Gatwick. Whilst it may not all be optimally located, it illustrates that off-airport locations provide a significant amount of spaces and are likely to continue to do so in the future. A prudent policy should therefore provide for off-airport car parking in circumstances where there is a need that cannot be met on airport, or the need can be met in an equally or more sustainable location off-airport, and subject to other criteria (predominantly sustainability).</p> <p><b>Off-airport parking potential</b></p> <p>Plan 22 in the Gatwick Airport Master Plan 2019 (<b>Appendix 2</b>) shows the Wilky land east of Balcombe Road as surface car parking associated with the second (or in light of GAL's recently announced proposals, in effect third) runway. It is assumed that GAL selected this land as it considered it to be suitable and in a sustainable location, (i.e. meeting the sustainability requirements of Policy GAT2). However, the identification of this future possible car parking area reveals an inherent inconsistency within policy. Under current circumstances, this area of car parking would be contrary to Policy GAT2 by being outside the airport boundary and by definition (though no acknowledged measure) having an unsustainable location. If the airport boundary is re-located, the proposed parking in this area would become on-airport and in a sustainable location. By the arbitrary re-location of the airport boundary, an area of car parking shown as a long term proposal in the Airport Master Plan becomes policy-compliant, but is currently contrary to policy. This demonstrates the contradiction within Policy GAT2 and the lack of justification for its continued application – if land is suitable in principle for a particular use, then this should not be obstructed or prevented by an unnecessarily restrictive policy.</p> <p>A more flexible approach to airport car parking, analogous to that in the Luton or Uttlesford Local Plans, would allow proposals to be put forward, where a need is demonstrated and alternative on-airport locations are not available. This might include land currently considered by GAL as suitable for airport car parking. In relation to the land east of Balcombe Road, there is potential for decked car parking within the Airport's runway Public Safety Zone (PSZ), so freeing up land for employment development and thus adopting a more sustainable and positive approach to economic development in the sub-region. This is wholly consistent with the land's identification within the Area of</p> |

<sup>1</sup> Gatwick Airport Master Plan 2019, GAL, July 2019

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| Ref. No.                    | Respondent | Policy/<br>Para | Comments   |
|                             |            |                 | <p>Search for a Strategic Employment Location. It is also in line with the findings of the Inspector at the 2015 Examination into the adopted CBLP who concluded that the surface parking identified on land east of Balcombe Road in the Airport Master Plan may represent a <u>sub-optimal use of the land and that decking the parking could free up land for employment uses.</u></p> <p><b>Sustainability</b></p> <p>The SEA<sup>2</sup> contains an assessment of two policy options for airport car parking, (1) to restrict parking to on-airport locations, and (2) to allow car parking in other areas. The analysis states that allowing parking in other locations would encourage access to the airport by car; would be less sustainable than on-airport parking; would detract from biodiversity and landscape values, and would place pressure on land that could have more beneficial uses. It is considered that none of these adverse impacts need necessarily apply because:</p> <ol style="list-style-type: none"> <li>1. The location of car parking on or off airport has no relationship to the proportion of people traveling to the airport by car. Passengers at long-stay car parks travel to/from the terminals by shuttle bus and this applies whether a site is on or off-airport. Only car parks located immediately adjacent to the terminals would avoid this form of transfer. The impacts of private car travel are proportionate to the distance travelled and the sooner in their journey the occupants transfer to more sustainable modes, the less the impact.</li> <li>2. No evidence is provided on why an off-airport location would be less sustainable than an on-airport location. If it relates to avoiding transfer by bus, then such transfers are likely to be necessary for most of GAL's proposed new on-airport car parks. The adoption of zero carbon buses or other transfer modes with negligible carbon impacts alters the balance of sustainability between on and off-airport locations. A case may easily be made to intercept private cars earlier in their journey to the airport to transfer occupants into zero carbon vehicles. This would reduce net carbon emissions resulting from surface transport. It may also release land for more productive and environmentally beneficial uses on or adjacent to the airport.</li> <li>3. Biodiversity and landscape values can be protected and enhanced by the application of other policies in the DCBLP, to which all proposals for off-airport parking proposals would be subject.</li> <li>4. Other beneficial uses are likely to be employment or housing – CBC is in a position to allocate sites for these purposes so avoiding their loss to airport car parking.</li> </ol> <p>Notwithstanding the findings of the SEA analysis, the two policy options have a nearly identical sustainability profile. In this context, it is noted that in relation to promoting sustainable journeys, the SEA has been updated from the 2019 edition in that on-airport parking now attracts a single negative, whereas in the 2019 version, it attracted a double negative. This appears to be an unjustified adjustment to the sustainability assessment to illustrate that on-airport car</p> |

<sup>2</sup> Sustainability Appraisal / Strategic Environmental Assessment Draft Report For the Submission Local Plan, Crawley BC, January 2020

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|                             |            |                 | <p>parking is marginally more sustainable than off-airport locations. However, this is not the case as an objective assessment would lead to the opposite conclusion for the reasons stated in this representation.</p> <p>Taking account of the above re-evaluation, it is considered that the SEA analysis would not show any sustainability benefits to on-airport locations compared to suitably located off-airport sites. Indeed, it is possible that off-airport sites could offer clear sustainability benefits by intercepting cars destined for the Airport earlier for transfer to low/zero carbon modes of passenger transfer, so reducing carbon and pollutant emissions along approach routes to the Airport and at the Airport itself.</p> <p><b>The need for flexibility</b></p> <p>Policy GAT2 restricts airport car parking to on-airport locations in the context of proposals for achieving a sustainable approach to surface access to the airport. This approach pre-supposes that only locations on-airport represent suitable or sustainable locations for airport car parking. It also implicitly assumes that transfer from car-parks to the terminals will be undertaken with petrol/diesel powered buses. The use of electric or hydrogen propulsion will significantly alter the balance of carbon impacts so supporting more distant airport parking facilities.</p> <p>Aside from the ongoing debate over “sustainable” parking locations, there are many sites near or highly accessible to the Airport’s operational boundary which present the same profile in relation to sustainability as existing on-airport facilities. The key locational criterion should be having ease of access to the airport such that transfer services could access either terminal efficiently and with very minimal environmental impact.</p> <p>The DCBLP Sustainability Appraisal and Strategic Environmental Assessment (SEA) notes at paragraph F15 that “sites within the airport boundary are close to the terminals and can help reduce the number and length of trips”.</p> <p>These outcomes could equally be secured by a site close to the airport boundary with good quality access to the airport via the principal highway network, utilising transfer vehicles with low or zero carbon emissions: in short, such sites are not exclusive to on-airport locations. This illustrates the overly restrictive nature of the policy which may serve to exacerbate rather than mitigate the surface transport impacts of travel to and from the Airport.</p> <p>Policy GAT2 therefore fails to recognise that suitable and sustainable off-airport sites for car parking could make a valuable contribution to the overall supply of long stay parking at Gatwick Airport. A review of Local Plans affecting other major UK airports reveals that there are a number where there are no policies relating to the location of airport car parking. Those that do have policies typically adopt some flexibility in permitting off-airport car parking where a number of criteria can be met. Applying such criteria enables Local Planning Authorities to resist sites that are in unsustainable locations or would cause other adverse transport, planning or environmental effects. Examples of such policies include those in the adopted Luton Local Plan and the Submission Uttlesford Local Plan.</p> <p>Both policies contain a presumption in favour of on-airport locations, but also allow for off-airport locations where it can be demonstrated that there is a need that cannot be met on-airport and that the proposals comply with other</p> |

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|                                    |                   |                         | <p>environmental and transport requirements. Policy GAT2 is far more restrictive by only permitting sites that are on-airport and justified by need in the context of the sustainable approach to surface access transport at Gatwick Airport. Policy GAT2 is therefore inconsistent with planning policy and practice elsewhere, which offers a more balanced and appropriate approach. This recognises that circumstances could arise whereby an off-airport car park could be justified and would serve an important role in providing for the transport needs of passengers in a sustainable way.</p> <p>Based on these examples, a revised Policy GAT2 is proposed, that reflects an objective assessment of the sustainability profile of the alternative policy options. The revised policy is more flexible than the examples cited in the Luton and Uttlesford Local Plans so as to reflect the analysis of sustainability outlined in this representation. The revised policy is contained at <b>Appendix 3</b>.</p> <p><b>Appendices attached to this consultation statement</b></p>  |
|                                    |                   |                         | <p><b>Suggested Modifications:</b></p> <p><b>Conclusions</b></p> <p>It is considered that Policy GAT2 does not pass the tests of soundness contained in the NPPF at paragraph 35. This is because the policy:</p> <ul style="list-style-type: none"> <li>i.) is <b>not positively prepared</b>, as it fails to provide flexibility to allow for some off-airport car parking that may be required to meet legitimate needs and in a suitable location and consistent with the current on / off-airport parking profile;</li> <li>ii.) is <b>not justified</b>, as a re-assessment under the SEA shows that it is not the most appropriate strategy in sustainability terms when compared with the alternative of providing flexibility to allow for off-airport car parking;</li> <li>iii.) is <b>not the most effective strategy</b> in that it could become an unjustified constraint on the provision of sustainable off-airport car parking where on-airport options are not available, as broadly provided for in other Local plans; and</li> <li>iv.) is <b>not consistent with national policy</b> as it would prevent the development of sustainable car parking in off-airport locations, including potentially on land east of Balcombe Road in line with the Gatwick Airport Master Plan 2019.</li> </ul> <p>3.2 A review of the sustainability assessment in the Council's SEA reveals that off-airport car parking has the potential to offer an equally, if not more, sustainable solution. From these findings, an alternative wording of Policy GAT2 is proposed at <b>Appendix 3</b>.</p> |

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| REP/036                     | Vail Williams<br>on behalf of<br>UK<br>Commercial<br>Property<br>Finance<br>Holdings Ltd | GAT3            | <p>Chapter Ten: Gatwick Airport</p> <p>We acknowledge that our client's site is located outside of the Gatwick Airport boundary however, it is within existing airport safeguarding land which is protected against development which would be incompatible with future airport growth.</p> <p>However, paragraph 10.7 states that findings in the government's draft Aviation Strategy (2018) forecast that aviation demand up to 2030 can be met by the expansion of Heathrow Airport. It goes on to states that, whilst there may be further demand beyond 2030, the government is not at a point of deciding on long-term need. We also note in paragraph 10.10 that the Gatwick Airport Master Plan (July 2019) states that they are not currently pursuing plans for an additional runway to the south of airport albeit, there remains a possibility that this could change in the future.</p> <p>We also support policy GAT3: Employment Uses at Gatwick with regard to the prevention of non-airport related commercial floorspace within the airport boundary which would have an unacceptable impact on the role and function of Main Employment Areas.</p> <p>We are grateful for the opportunity to comment on the Regulation 19 Consultation and would seek further to engage directly with the Council in regard to key matters regarding the AAP proposal, Main Employment Areas and wider economic growth and landscape policies.</p>  |
| REP/053                     | Quod   | GAT3            | <p><i>Role of Gatwick</i></p> <p>Gatwick Airport is an integral component of national infrastructure, playing a major role in influencing the character of Crawley and the local area. There are 24,000 on-airport jobs and the airport also supports a substantial number through the wider aviation sector – and indirectly through companies that supply and serve the airport. Crawley does benefit from businesses servicing Gatwick Airport, notably Virgin Atlantic, Gate Gourmet (airline catering) and flight simulator occupiers such as Oxford Aviation Academy and CAE. Some spin-off demand will be generated by Gatwick's continued growth. Expansion of Manor Royal, which is the closest employment hub to the airport is the prime location to ensure this potential is realised.</p> <p>However, the role of Gatwick in driving demand for local business space is less important than it once was. This is acknowledged in the Economic Growth Assessment, as well as reported in local market analysis. Gatwick will continue to grow without an additional runway and Crawley should ensure the maximum benefit of the Gatwick's growth is realised and retained locally. But demand for employment space in Crawley is expected to be driven by growth in the logistics and industrial occupiers requiring modern floorspace, size and design specifications and who want to be in Crawley for its excellent labour market, clusters and road connections, rather than specifically for Gatwick. Market analysis reports that Crawley is not as dependant on the airport for growth and demand as locations</p> |

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|                             |            |                 | <p>such as Heathrow<sup>3</sup>. The Sustainability Appraisal of the Local Plan highlights that, “<i>The economic structure of the town is moving from one dominated by large scale airport related business to one where professional services are becoming increasingly strong</i>”<sup>4</sup>.</p> <p>At the same time, the Airport is no longer actively pursuing plans for an additional runway, although its current Masterplan is proposing significant growth through the use of its existing runway<sup>5</sup>. As such, the council does not consider there is robust evidence to justify the continued safeguarding of land for a further runway<sup>6</sup>. In cases such as these, the NPPF states that planning policies and decisions need to reflect changes in the demand for land. Planning policies:</p> <p>“[...] should be informed by regular reviews of both the land allocated for development in plans, and of land availability.</p> <p>“Where the local planning authority considers there to be no reasonable prospect of an application coming forward for the use allocated in a plan:</p> <p>“a) they should, as part of plan updates, <b>reallocate the land for a more deliverable use that can help to address identified needs</b> (or, if appropriate, deallocate a site which is undeveloped); and</p> <p>b) in the interim, prior to updating the plan, applications for alternative uses on the land should be supported, where the proposed use would contribute to meeting an unmet need for development in the area” [Emphasis added.]<sup>7</sup></p> <p>As such, the delay in allowing growth south of the airport is hitting growth prospects by protecting for longer land that will not come forward for another runway in the foreseeable future and putting a cap on the ability of Manor Royal to respond to any demand than may be generated as a result of either the airport’s planned growth. The failure to commit to the alternative use of this land is against the requirements of the NPPF to reallocate land with no reasonable prospect of use under its current allocation via the revised Local Plan process.</p> <p><i>Role of employment land growth in Local Government Finance</i></p> <p>Local authorities will currently retain 50% of the growth of business rates between 2013/14 and 2020/21<sup>8</sup>. Crawley currently has a net business rates revenue for the financial year 2020-2021 of £5.3m. This makes up 38% of its General Fund Budget over the year.</p> |

<sup>3</sup> DTRE, 2020. Market Report.

<sup>4</sup> Crawley Borough Council, 2020. Sustainability Appraisal / Strategic Environmental Assessment p.5

<sup>5</sup> Crawley Borough Council, 2020. Crawley 2035: Draft Crawley Borough Local Plan 2020 – 2035 para 3.18

<sup>6</sup> Ibid.

<sup>7</sup> MHCLG, 2019. National Planning Policy Framework Paragraph 120.

<sup>8</sup> Less or including top-slicing, tariffs, top-ups, levies, safety nets and tier splits.

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| Ref. No.                    | Respondent | Policy/<br>Para | Comments  |
|                             |            |                 | <p>The Government is currently trialling policies to allow Local Authorities to retain growth in business rates. Business Rates already play a key role in local government funding in Crawley. The wider roll out of business rates retention policies will both incentivise and increase the importance of local business floorspace growth and having a strong and growing business rates revenue – at both a Crawley and West Sussex level. Development will generate a significant amount of business rates – more detail on this set out in Section 4 of this Report.</p> <p><b>Planning for Growth</b></p> <p>The economic vision for Crawley in its Draft Local Plan is to:<br/> <i>“Continue to be an economic leader meeting the needs of significant employers who are important to the overall prosperity of the region. A business environment that supports and encourages new and established businesses to grow and flourish will be developed, and supporting necessary infrastructure, including telecommunications, will be enhanced<sup>9</sup>.”</i><br/> <i>“Crawley will be a modern, vibrant, healthy and sustainable town that stands proud of its achievements and uses its strengths to reach its potential<sup>10</sup>.”</i></p> <p>In policy EC1: The Council has committed to ensuring that all suitable opportunities within the borough are fully explored to allow existing and new businesses to grow and prosper by:</p> <ul style="list-style-type: none"> <li>• Building upon and protecting the established role of Manor Royal as the key business location for Crawley.</li> <li>• Ensuring that the town’s Main Employment Areas are the focus for sustainable economic growth.</li> </ul> <p>This is further reiterated in policy EC3 which states that further development of the Manor Royal estate is prioritised by Crawley.</p> <p>Despite these firm commitments, the Draft Local Plan secures only a third of the employment land needed to meet its “past development rates” growth scenario and only 10% of the land that could be required to meet demand associated with the potential growth of its labour supply<sup>11</sup>. The chart to the right shows the extent of the disparity between what Crawley has committed to in its Draft Local Plan and what requirements have been identified in its Economic Growth Assessment.</p> <p>The Economic Growth Assessment (EGA) identifies three growth scenarios:</p> <ul style="list-style-type: none"> <li>• Baseline Job Growth</li> <li>• Past Development</li> <li>• Baseline Labour Supply.</li> </ul> |

<sup>9</sup> Lichfields, 2020. Northern West Sussex EGA Update : Final Report, p.17

<sup>10</sup> Lichfields, 2020. Northern West Sussex EGA Update : Final Report, p.17

<sup>11</sup> Lichfields, 2020. Northern West Sussex EGA Update : Final Report, Table 10.5

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|                             |            |                 | <p>The lowest of these is the Baseline Job Growth Scenario, which indicated a net loss in employment land requirement over the Plan Period to 2016. The EGA identifies that the baseline job growth scenario “does not appear to provide a robust scenario for positively planning for future employment space <i>needs. It falls significantly below past job growth performance in Crawley and does not align with the more qualitative market intelligence captured in terms of drivers of demand</i><sup>38</sup>.” Therefore this scenario is discounted by Litchfields and CBC.</p> <p>The past development rates scenario identifies the need for a total of 33ha of new B-class employment land in the borough. Past delivery rates have already been constrained by the safeguarding of land for Gatwick – and projecting these delivery rates forward is “baking in” this constraint and falsely limiting both future need and future potential, especially when safeguarded land for Gatwick is released.</p> <p>The EGA presents an alternative scenario which is based on the potential growth of labour supply in the North West Sussex, provided the borough meets its housing needs. Although Crawley is constrained in terms of available housing land too, and cannot meet its housing needs within its own boundaries, the local plan commits to meeting its needs in neighbouring boroughs through the duty to co-operate<sup>12</sup>. Balancing growth in population with growth in jobs is part of a strategy for growth to remain sustainable, to retain the economic benefits of growth in the borough and to reduce the negative impacts of increases in commuting. The Local Plan, its Sustainability Appraisal and the NPPF require consideration of sustainable travel patterns as part of the strategy for growth<sup>13</sup>.</p> <p>The EGA concludes that, “<i>The growth scenarios considered above indicate that projected population growth could be the most significant driver of economic growth in Crawley over the plan period, and that the market has demonstrated that appetite exists to deliver new employment floorspace (if sufficient space is made available). For this reason, it is recommended that the Council consider planning to accommodate the <b>past take-up based requirement as a minimum</b>, to enable historically strong levels of employment development to continue in the Borough over the new plan period. <b>There could also be scope to plan to accommodate the higher level of economic growth associated with the baseline labour supply scenario [...]</b>” [emphasis added]<sup>14</sup></i></p> <p>The Draft Local Plan has identified areas for 12ha of employment land. There is an outstanding requirement of 21ha of additional land for B-Class business uses over the Plan period to 2036. The Draft Local Plan fails to even secure</p> |

<sup>12</sup> Crawley Borough Council, 2020. Crawley 2035: Draft Crawley Borough Local Plan 2020 – 2035 para 1.23-1.29

<sup>13</sup> MHCLG, 2019. National Planning Policy Framework, Para 102-103; CBC, 2020. Draft Local Plan 2020-2035 chapter ST1; CBC, 2020. Sustainability Appraisal / Strategic Environmental Assessment Draft Report For The Submission Local Plan, p116

<sup>14</sup> Ibid.

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|                             |            |                 | <p>the bare minimum employment land requirement set out in its Economic Growth Assessment<sup>15</sup> and demonstrably fails to meet its identified needs.</p> <p>The importance of sustainable economic growth is at the core of the NPPF. Planning policies should help to build a strong and competitive economy by ensuring that the right type of land is readily available in the right areas to support innovation and improved productivity<sup>16</sup>.</p> <p>The NPPF also emphasizes the importance of creating conditions in which businesses can invest and thrive, allowing respective areas to build on strengths and counter weaknesses, stating that any planning policy should present a clear economic vision which encourages growth and takes local industrial strategies, and economic development and regeneration policy into account.</p> <p>Manor Royal is a major contributor to the Crawley and West Sussex Economies, employing more people than on-airport jobs at Gatwick (c 28,000 vs 24,000<sup>17</sup>). It is central to the future economic prosperity of the borough – and this is heavily emphasized in both the Economic Growth Assessment and the Draft Local Plan. The Local Plan states that, “<i>Manor Royal will be seen as a premier business park, attracting sustained business investment that will deliver high value employment and higher levels of productivity and economic growth</i>”<sup>18</sup>. The continuing constraint on its growth and the uncertainty about how and when this constraint will be removed poses a significant threat to the sustainable growth of this employment area and the borough economy.</p> <p>The 2018-2031 Mid Sussex Economic Development Strategy also reiterates the need for the Crawley/Gatwick area to be the main focus for economic development, due to the current concentration of demand and the strength of the area as a business location, which would largely contribute to strategic employment growth<sup>19</sup>.</p> <p>The Council’s commitments in its Draft Local Plan do not live up to the emphasis that has been placed on Manor Royal at a local and strategic level, nor the importance of proactively planning for growth and economic sustainability that the NPPF requires.</p> <p><b>Opportunity at the Site</b></p> |

<sup>15</sup> Lichfields, 2020. Northern West Sussex EGA Update : Final Report, Table 10.5

<sup>16</sup> MHCLG, 2019. National Planning Policy Framework. Section 6.

<sup>17</sup> Lichfields, 2020. Northern West Sussex EGA Update : Final Report, para 3.27

<sup>18</sup> Crawley Borough Council, 2020. Crawley 2035: Draft Crawley Borough Local Plan 2020 – 2035, Crawley Vision page

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<sup>19</sup> Mid Sussex Borough Council 2018. Mid Sussex Economic Development Strategy 2018-2031. p.11

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|                             |            |                 | <p>The Landowner's aspirations for the Site are for between 700,000 sqft and 800,000 sqft of B1a, B1c, B2 and/or B8 uses. Market Analysts DTRE have prepared an assessment of the potential market and demand for development on this scale at this location, especially for large scale, modern properties. They report that Crawley and wider South London/M25 is suffering from a shortage of employment land. The Site provides the opportunity to release a significant single land holding (both in scale and type).</p> <p><b>Potential Scale</b></p> <p>The nearest available sites that could accommodate a single facility in excess of 100,000 sqft are as follows (with distances from Crawley): -</p> <ul style="list-style-type: none"> <li>• Prologis Park Beddington, Croydon - 23 miles</li> <li>• Prologis Park, Weybridge - 32 miles</li> <li>• Panattoni Park, Aylesford - 40 miles</li> <li>• Nowhurst Business Park, Horsham - 10 miles</li> </ul> <p>With the exception of Horsham, these opportunities will serve alternative markets – so there are no other current sites of this scale available in the right location to meet needs in Crawley and its catchment. The location and connectivity of the Horsham site is relatively poor in comparison – almost 10 miles from the M23.</p> <p>The Site's scale sets it apart. It provides the opportunity to attract larger occupiers to the area and to allow existing operators with significant growth potential to stay in the area – in particular the booming growth industries of online retailing logistics. Crawley currently only offers a handful of units larger than 100,000 sqft. The scale of the land holding will provide the town with a viable option to attract a larger Regional Distribution Centre (RDC) that can serve the Southern M25/ Home Counties/ South London area. This would represent a new offer for the borough, one that makes the most of its assets and location.</p> <p>The scale of the Site also allows the opportunity to effectively masterplan and phase development to provide a range of unit sizes and typologies which could then satisfy a range of business needs and be responsive over time. There is the option for a mixture of speculative and built-to-suit solutions that may require bespoke elements. For example, DPD, Amazon and DHL all ideally require low-site density facilities that provide additional yard and car/van parking provisions. Larger facilities (alongside the potential for smaller units as well) will complement the existing Crawley stock.</p> <p><b>Development type</b></p> <p>Crawley has a strong presence of existing warehouse and industrial occupiers that will, over time, generate demand for occupation as they expand or require more modern facilities. DTRE reports that the majority of Crawley accommodation is 20 or 30 years old. Modern day operations have changed, and most businesses require improved,</p> |

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|                             |            |                 | <p>more efficient facilities that are able to accommodate the needs of modern logistics or manufacturing operations. Unit design therefore continues to evolve to accommodate occupiers' requirements and, especially if the market is focussed on logistics (which is experiencing very rapid levels of change and innovation), investment is continually required to keep the property offer up to standard. The improvements in unit design and specification primarily relate to better yard and circulation areas, increased eave height and improved loading doors provisions. Increased height and cubic capacity are particularly pertinent. More occupiers are looking for properties that can accommodate either high level racking systems or mezzanine floors, ensuring the units are as cost effective as possible<sup>20</sup>. Warehouse and logistics operations now often require an innovative mix of office, administrative and customer services space alongside more traditional warehousing space which can have a big impact on design requirements and specification<sup>21</sup>.</p> <p>Demand for warehouse accommodation is strong in Crawley, driven by excellent communication links and businesses need to service the immediate area and wider Southern Home Counties and South London. Demand is being driven by the changes in retail patterns and the continued move towards internet retailing, with the design and scale requirements associated with it. DTRE considers the Site would be very well suited to the warehouse and industrial market and would be of significant interest to business looking to locate in the area as well as existing companies looking to upgrade their accommodation.</p> <p><b>Economic Benefits of the Development</b></p> <p><b>Direct Jobs</b></p> <p>The Site could accommodate between 700,000 to 800,000 sqft of flexible B class floorspace. This could be delivered as office, light industrial or industrial manufacturing floorspace as well as storage &amp; distribution functions, reflecting B1a/B1c/B2/B8 Use Classes. Based on minimum and maximum employment densities as defined by the Homes and Communities Employment Densities Guide (2015), the Site could potentially support 840 jobs to 5,000 jobs. This range is down to the flexibility in the level of floorspace that could come forward and the way the floorspace is occupied. The B class uses that could come forward at the Site vary in how they are occupied by employees based on the activity taking place. Offices are much more densely occupied (an average of 12 sqm NIA per employee) than other B class uses. Storage and distribution uses, however, dedicate a large proportion of space to storing materials with employees taking on more active roles across the site (an average of 77 sqm GEA per employee). Light industrial uses have a wide range that falls between the two.</p> |

<sup>20</sup> DTRE, 2020. Market Report.

<sup>21</sup> Prologis, 2015. Distribution Warehouses Deliver More Jobs

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|                             |  |  | <p>The range of jobs presented reflects a minimum and maximum scenario. The minimum scenario is based on the proposed 700,000 sqft being entirely occupied by B8 uses. The maximum arises from the larger proposed floorspace (800,000 sqft) being entirely occupied by B1a uses. It is most likely that any development delivered here would have a mix of these B class uses and therefore a full B1a or B8 scenario may be unlikely, however the full range is considered here for robustness. A full breakdown of the employment accommodated by each use class for the two floorspaces proposed is outlined in the table below. Bolded figures reflect the minimum and maximum scenarios as outlined above.</p> <table border="1"> <thead> <tr> <th>Use Class</th> <th>Jobs accommodated across<br/>700,000 sqft</th> <th>Jobs accommodated across<br/>800,000 sqft</th> </tr> </thead> <tbody> <tr> <td><b>B1a</b></td> <td>4,375</td> <td><b>5,000 (maximum scenario)</b></td> </tr> <tr> <td><b>B1c</b></td> <td>1,115</td> <td>1,275</td> </tr> <tr> <td><b>B2</b></td> <td>1,715</td> <td>1,960</td> </tr> <tr> <td><b>B8</b></td> <td><b>845 (minimum scenario)</b></td> <td>965</td> </tr> </tbody> </table> <p><b>Making the most of existing infrastructure</b><br/> The Site is already highly accessible by car and by public transport, with a high rate of employees using buses to access Manor Royal. Continued expansion here makes the best use of existing infrastructure and planned investment. In September 2017, Crawley was granted a substantial Local Growth Investment by the Coast to Capital Local Enterprise Partnership. This is to deliver:<br/> <i>“Sustainable transport infrastructure and highway upgrades planned to boost overall transport capacity and enable a significant shift from car usage to bus, rail, cycling and walking alternatives. In addition, connectivity enhancements at the major railway station of Crawley, Three Bridges and Gatwick will greatly facilitate commuter access to Manor Royal and the town centre via sustainable transport connections.</i><br/> <i>“Crawley town centre and Manor Royal will be transformed to upgrade the quality of both the living and business environment to attract higher quality new jobs and homes. It will also be a catalyst for significant new Grade A commercial office space in the town centre’s ‘Eastern Gateway’ and for a new business and jobs growth hub<sup>22</sup>”.</i><br/> Maximising growth potential at Manor Royal will maximise the return on investment of these initiatives – and continued limits on the growth of Manor Royal will mean that the full potential of this investment will be a missed opportunity.</p> <p><b>Gross Value Added</b></p> | Use Class | Jobs accommodated across<br>700,000 sqft | Jobs accommodated across<br>800,000 sqft | <b>B1a</b> | 4,375 | <b>5,000 (maximum scenario)</b> | <b>B1c</b> | 1,115 | 1,275 | <b>B2</b> | 1,715 | 1,960 | <b>B8</b> | <b>845 (minimum scenario)</b> | 965 |
| Use Class                   | Jobs accommodated across<br>700,000 sqft | Jobs accommodated across<br>800,000 sqft |   |           |  |  |            |       |                                 |            |       |       |           |       |       |           |                               |     |
| <b>B1a</b>                  | 4,375                                    | <b>5,000 (maximum scenario)</b>          |   |           |  |  |            |       |                                 |            |       |       |           |       |       |           |                               |     |
| <b>B1c</b>                  | 1,115                                    | 1,275                                    |   |           |  |  |            |       |                                 |            |       |       |           |       |       |           |                               |     |
| <b>B2</b>                   | 1,715                                    | 1,960                                    |   |           |  |  |            |       |                                 |            |       |       |           |       |       |           |                               |     |
| <b>B8</b>                   | <b>845 (minimum scenario)</b>            | 965                                      |   |           |  |  |            |       |                                 |            |       |       |           |       |       |           |                               |     |

<sup>22</sup> Coast to Capital LEP, 2017. <https://www.coast2capital.org.uk/media-centre/press-releases/coast-to-capitalagrees-14-64-million-for-significant-crawley-regeneration-programme.html> accessed 24.02.20

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|                             |            |                 | <p>Employees would also generate economic output or gross value added (GVA). GVA is the value generated in the economy by economic activity – e.g. industrial activity. GVA associated with B class jobs is based on GVA per workforce job estimates by region. The range of employees estimated to be accommodated on-site could make an economic contribution in terms of GVA of £43.5 million to £258.2 million per year (depending on how the floorspace is occupied)<sup>23</sup>.</p> <p><b>Business Rates</b></p> <p>As set out above, payment of business rates provides critical revenue to the Crawley every year. Business rates are a tax on non-domestic properties. Rates are levied on business properties based on their rateable value and the national multiplier. The amount payable may then be subject to several reliefs or exemptions. Crawley retains a proportion of its Business Rates – with the remainder going to West Sussex County Council and central Government. Business rates retention policies will allow this revenue to be used for strategic expenditure, such as 5G and broadband connectivity.</p> <p>Rateable values, which form the basis of Business Rates payable, vary by property use and location. A detailed analysis of the average rateable values for industrial and warehouse floorspace as well as office floorspace has been used to estimate the potential rateable value of the proposed B class floorspace. Business Rates for the Site could be between £25 million and £60 million annually depending on how the floorspace is occupied.</p> <p><b>Construction Activity</b></p> <p>The development of the Site would generate employment within the construction sector. The Construction Industry Training Board (CITB) Labour Forecasting Tool<sup>51</sup> provides an estimate of how many person-days would be generated as a result of the construction cost and projected duration by assessing the output of each occupation and trade within the construction sector. This figure has been used to estimate the quantum of construction employment (Full Time-Equivalent [FTE] jobs) generated by the development of the Site.</p> <p>Given the flexibility of the proposed uses on-site the level of construction workforce appears as a range. This is due to the type of buildings required for the various uses proposed which would require a different workforce and construction programme to deliver. It is estimated that there would be an average of 140 FTE to 570 FTE roles within the sector over the duration of an estimated construction period of 18 months to 24 months.</p> <p><b>Capitalising on economic opportunities</b></p> |

<sup>23</sup> Calculated based on GLA Economics GVA per Workforce by Region 1997-2015 (2017) – GVA per head in relevant occupations in the South East

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| Ref. No.                    | Respondent         | Policy/<br>Para | Comments  |
|                             |                    |                 | <p>As set out above, The Manor Royal Industrial Estate is recognised as one of the South East’s leading mixed activity employment hubs and is the largest business park in the Gatwick Diamond area.</p> <p>DTRE reports that, since 2001, London has reduced its stock of employment land by more than 1,310 hectares of industrial land, mostly for housing redevelopment. A significant proportion of employment land is projected to be redeveloped in Croydon and rental pressures are also pushing demand outwards. Given the direct transport links with Crawley, this is expected to have an impact on the local market with increased demand coming from South London.</p> <p>It is also anticipated that some of the key local tenants (Amazon, DHL) will be seeking to expand locally within the Plan Period. CBC is not currently putting in place the planning policies that will ensure this growth and opportunity is captured locally.</p> <p>Release of this Site will allow Crawley to diversify and modernise its offer, keep rents competitive by expanding supply and maintain its strong performance in current thriving sectors such as retail logistics, manufacturing and aviation.</p> <p><b>Conclusion</b></p> <p>Crawley Borough Council has committed to sustainable economic growth and prosperity for its residents and its businesses but its Draft Local Plan fails to secure the amount of employment land that its evidence base indicates will be required to achieve this. In constraining its employment land commitments and in delaying the release of the Gatwick safeguarded land, the borough is creating uncertainty in the local market for employment which is likely to affect both the prices of existing stock and the investor confidence in planning for new sites. Crawley has a strong economic foundation and its own evidence base as well as market intelligence demonstrates it has substantial potential for continued expansion into key growth sectors such as retailing logistics, as well as to capture continued growth associated with Gatwick. However, its stock is ageing and size ranges (including very large and very small sites) are currently limited compared to demand. Large sites (or more than 100,000 sqft) in particular are not currently available to meet potential needs.</p> <p>Crawley should, in order to meet its own aspirations as well as the requirements of National planning policy, be proactively and positively planning for growth. Releasing land from safeguarding when it has no reasonable prospect of it being delivered as part of Gatwick’s growth is an important step to meeting the borough’s growth needs – and it should not be delayed. The Site has the potential to bring forward employment land at the scale, type and location that should place it as a high priority site for development and this should be reflected in the Local Plan.</p> |
| REP/058                     | Reigate & Banstead | GAT3            | <p><i>GAT3 “Employment Uses at Gatwick”</i></p> <p>We strongly support the approach outlined in proposed Policy GAT3 and welcome the recognition within this policy and the supporting text of the importance of demonstration that new non-airport related commercial floorspace within</p>  |

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| <b>Ref. No.</b>                    | <b>Respondent</b>       | <b>Policy/<br/>Para</b> | <b>Comments</b>   |
|                                    | Borough Council         |                         | the airport boundary will only be permitted where it can be demonstrated that it will not have an unacceptable impact on the role and function of town centres and employment areas beyond Crawley's boundaries. We consider that this approach is sound and in accordance with the sequential test for main town centre uses, seeking to ensure that the role of town centres and employment areas is not impacted by non-essential airport related office provision at Gatwick Airport. |
| REP/056                            | Gatwick Airport Limited | GAT3                    | <b>Policy GAT3: Employment Uses at Gatwick</b><br>GAL support Policy GAT3 and reasoned justifications set out in paragraphs 10.21 and 10.22 as drafted. GAL considers that Policy GAT3 in the draft Plan reflects the position promoted by GAL to include scope for land and buildings within the airport boundary to be used for non-aviation related uses.  |

| Chapter 11. Crawley Town Centre |                          |              |  |
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| Ref. No.                        | Respondent               | Policy/ Para | Comments   |
| REP/068                         | Sussex Wildlife Trust    | TC2          | Strategic Policy TC2 Town Centre Neighbourhood Facilities. SWT notes that changes to this policy have been made, however they do not fully reflect the amendments we proposed.   |
|                                 |                          |              | <p><b>Suggested Modifications:</b><br/>           We encourage CBC to include a reference to high quality green spaces that is accessible to all within the list of neighbourhood facilities. This is needed to be compliant with paragraphs 91 and 96 of the NPPF. We therefore make the following amendment to the policy:<br/>           To facilitate the changing role of Crawley Town Centre, development of facilities and services that meet the needs of its growing residential population will be supported. Such Town Centre Neighbourhood Facilities may include:</p> <ul style="list-style-type: none"> <li>i. Local shopping facilities;</li> <li>ii. Community facilities, including community halls, flexible community space, and space for religious or faith activities;</li> <li>iii. Healthcare</li> <li>iv. Education</li> <li>v. Leisure provision.</li> <li>vi. <del>Accessible</del> High quality green, open or recreational amenity space, accessible to all.</li> </ul> |
| REP/026                         | Rainier Developments LTD | TC3          | Rainier support the identification of MOKA at Strategic Policy TC3 as one of the Key Opportunity Sites within the Town Centre Boundary to enhance the town centre vitality and viability in a sustainable location through mixed-use development that meets the economic and social needs of the borough.  |
|                                 |                          |              | <p><b>Suggested Modifications:</b><br/>           See Regulation 18 response</p>   |
| REP/033                         | Horsham District Council | TC3          | We support this policy in principle, but consider it is not justified as stands and that its effectiveness could be improved. It is considered that there may be further opportunities for mixed-use proposals which enhance the town centre to include a greater element of residential development, which can contribute to reducing the unmet need. This should be reflected in the policy. This view has been formed on the premise that there has not been evidence presented alongside the draft Local Plan to quantify opportunities to provide further residential units, of a higher-density nature, to complement and support the vitality of the town centre.   |
|                                 |                          |              | <p><b>Suggested Modifications:</b><br/>           Change sought: It is considered necessary to prepare a densification study. This should include detailed analysis of redevelopment and regeneration opportunities in the town centre area, in a way that maximises opportunities to address the unmet housing need. This may lead to an increase to the 1,500 net dwellings increase set out in Policy TC3 (iv).</p>   |

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| Ref. No.                        | Respondent                         | Policy/ Para | Comments   |
| REP/058                         | Reigate & Banstead Borough Council | TC5          | <p><b>Retail and Town Centres</b></p> <p>We support and consider that the town centre first approach proposed in Policy TC5 “Town Centre First” is sound. We note that it is consistent with national policy and the approach set out in our DMP (Policy RET5 “Development of Town Centre Uses Outside Town and Local Centres”).</p> <p>We note that for retail and town centre policies to be found sound, Paragraph 85 of the revised NPPF requires planning policies to define a network and hierarchy of town centres. This is defined in Paragraph 11.28 of the Regulation 19 Crawley Borough Local Plan<sup>1</sup>. We would welcome / question whether there is a need for greater clarity with regards to the policy position of neighbourhood centres. Paragraph 11.28 appears to suggest that neighbourhood centres will be treated as out-of-centre sites, however, criterion (b) of Strategic Policy TC5 “Town Centre First” appears to suggest that neighbourhood parades will be given the same policy weight as town centres. We note that the revised NPPF excludes neighbourhood parades from the town centre definition, but question whether in a Crawley context neighbourhood centres are considered as town centres and that the use of the word reflects the historic new town designation.</p> <p>If neighbourhood centres within Crawley are not given the same policy position as town centres, to be in accordance with the revised NPPF “town centre first” approach, we consider that there is a need to amend Strategic Policy TC5 to ensure that centres within other authorities in the retail catchment of proposals (for example town centres in RBBC) are given the same policy position as town centres in CBC.</p> <p><b>Suggested Modifications:</b></p> <p>We also question whether Strategic Policy TC5 criterion (b) should be amended – in accordance with Paragraph 89 of the revised NPPF – to take into consideration the impact on local consumer choice and trade as part of the impact on town centre vitality and viability. Whilst we note that Paragraph 11.35 advises that the retail impact assessment should take into consideration forecast trade draw, given the decision in <i>Cherkley Campaign Ltd, R (on the application of) v Mole Valley District Council and Anor [2014]</i> confirmed that the supporting text to a policy does not have the same weight as policy, we suggest that this requirement would be better included within the policy.</p> <p>Similarly, we note that a retail impact threshold of 500sqm is proposed in Paragraph 11.34. We welcome and support the introduction of a lower retail impact threshold than the national standard to support / protect town centres and note that our adopted DMP includes a retail impact assessment threshold of 150sqm for comparison retail and 250sqm for</p> |

<sup>1</sup> “For the purposes of policy interpretation, for retail uses Town Centre sites are defined as those locations falling within the Primary Shopping Area as identified on the Local Plan Map. Sites falling outside of the Primary Shopping Area, though within the Town Centre Boundary, are defined as edge-of-centre sites and these are the next most sequentially preferable sites. All locations beyond the Town Centre Boundary, in retail terms, represent out-of-centre locations”.

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|          |            |              | convenience retail. Given the above appeal decision we suggest that this requirement would be better included in a policy rather than the supporting text. |

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| Ref. No.                     | Respondent   | Policy/ Para | Comments   |
| REP/002                      | Resident 2   | H1           | <p>Development of between 5355-10,000 new homes. The proposed development of new homes in Crawley should not happen because:</p> <ol style="list-style-type: none"> <li>1. Green field removal. Buildings on green field sites is destroying good agricultural ground that is important for producing food for an increasing population. Brexit will also make this of greater importance.</li> <li>2. Carbon emissions and air quality. Even if the existing green fields are not going to be used for food production, they are a natural resource which could also be used to plant trees, lock up carbon, improve air quality, soil health and biodiversity, and help reduce flooding.</li> </ol> <p>Biodiversity. You talk about using <i>'developers' contributions towards tree planting which can also count towards types of soft landscaping to improved visual amenity and add additional biodiversity value'</i>. How building 10,000 new homes on green field sites will do this quite mystifying. The building of new homes will be wiping out habitat from existing local wildlife forever, wildlife which is already under enormous pressure.</p> <p>In this area, there are a great many species of plants, birds, animals' insects and amphibians just managing to hang on – many of which are nationally or internationally at risk and which add to the biodiversity of the area. To name but a few these species they include: <b>Plants</b> – Ragged Robin, Early Purple and Greater Spotted Orchids, (a large colony already destroyed recently at Pease Pottage by road development), Twayblade Orchid, Pea Grass; <b>Birds</b> – Little Owls, Tawny owls, barn Owls, Kestrels, Yellow Hammers, Nightingales, Cuckoos, Tree Sparrows, Tree creepers, Little Egrets, herons, Kingfishers, (also a wintering feeding ground for Redwings and Field Fares; <b>Insects</b> - Beautiful Demoiselle Damselflies, moths – Brimstone moths, Buff Ermine moth, Spring Usher moth, Poplar Hawkmoth, Butterflies – Holly Blue, Small Blue, Speckled Wood, Comma, Silver Washed fritillary, Yellow Brimstone, Orange Tip, Large and Small Whites, Red Admirals, Peacock, Tortoiseshell, Meadow Brown, Small Skipper, gatekeeper, <b>Mammals</b> – various Bat species, Badgers, Roe and Fallow deer, Weasels and stoats, Water voles, Bank and Field voles, Wood mice, Shrews, Amphibians – Frogs, Toads, Great Crested and Smooth newts (breeding territory), <b>Other</b>- Grass snakes, Slow worms etc.</p> <p>How can the contribution of a few trees and a bit of soft landscaping possible compensate for the destruction and massive loss of this biodiversity?</p> |
| REP/004                      | Neame Sutton Limited on behalf of Danescroft (RLP Crawley) LLP | H1           | <p>Housing Need, Housing Requirement/Target and, Supply<br/>Policy H1, SA, Paragraphs 2.19 – 2.28, Paragraphs 12.1 – 12.31 – OBJECT: Unsound<br/>As a starting point it is important to note that the Plan is being prepared in the context of the current National Planning Policy Framework 2019 ("the Framework").</p> <p><b>Local Housing Need ("LHN"):</b><br/>The basis for the calculation of the LHN is therefore set out in the Framework and corresponding National Planning Practice Guidance ("PPG"), namely, the Government's Standard Method.</p>  |

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|                              |            |              | <p>The Council has correctly identified that it must apply the Standard Method to calculate its LHN as set out at Paragraph 2.19 on Page 21 of the Plan.</p> <p>The LHN figure calculated by the Council equates to 11,280 dwellings or 752 dpa.</p> <p>The PPG advises that the LHN figure should be updated to reflect the latest data and should only be fixed for a period of 2 years from the date the Plan is submitted to the Planning Inspectorate for examination<sup>1</sup>.</p> <p>In this respect the LHN figure for Crawley will need to be updated to reflect the position as at 2020 because the current figure contained in the Plan has been calculated to a base date of 2019.</p> <p>Neame Sutton has undertaken an updated calculation applying the 2020 base date, which generates a Standard Method figure of 753 dpa or 11,295 dwellings over the 15 year Plan period. Whilst this is only marginally different to the LHN contained in the Plan it is important to ensure the Plan, when submitted, is based on the correct figure.</p> <p>Further to our Regulation 18 Representations the Council does now appear to have quantified its affordable housing need, which equates to 739 dpa<sup>2</sup>. That level of affordable housing need is substantially greater than the level identified in the context of the adopted Local Plan (527 dpa at the upper end of the scale identified). In fact the affordable housing need identified equates to some 98% of the total LHN and 148% of the actual number of dwellings planned for as set out in Policy H1 of the Plan.</p> <p>The Plan as currently drafted is therefore set up to fail in terms of meeting the acute affordable housing needs of the Borough. This cannot be a Sound approach.</p> <p><b>Housing Requirement/Target:</b></p> <p>The Council's approach to the identification of a suitable housing requirement or target has been largely to rely on the existing supply sources identified in the adopted Local Plan housing trajectory. Little if any work appears to have been undertaken to identify new sources of supply or indeed to establish if those existing sources have the capability to deliver further housing over and above the numbers previously identified.</p> <p>Given that the LHN has increased and the affordable housing need has grown exponentially it is incumbent upon the Council to explore all avenues for meeting as much of its own needs within the Borough boundaries.</p> <p>Instead the Council has taken the approach that 5,355 dwellings (357 dpa) is the maximum that can be delivered and the remaining 5,940 dwellings will need to be provided by its neighbours. This of course is where the problem lies in the Council's strategy because no agreement has been reached with any of its neighbours for provision to be made.</p> |

<sup>1</sup> Housing and Economic Need Assessment section of PPG - Paragraph: 008 Reference ID: 2a-008-20190220 Revision date: 20 02 2019

<sup>2</sup> Table 67 on Page 156 of the SHMA November 2019

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|                              |            |              | <p>By way of example Horsham District Council is currently consulting on its Regulation 18 draft Plan wherein three growth scenarios are being considered: 1,000 dpa, 1,200 dpa and 1,400 dpa<sup>6</sup>. These options are set against its LHN of 965 dpa, which would indicate an allowance for unmet need ranging from 35 dpa – 435 dpa. Horsham’s position on the extent of unmet need arising from Crawley that it is prepared to accommodate is therefore unclear at the present time.</p> <p>It is not acceptable for the Council to reach such an advanced stage in the preparation of its Plan without having any agreements in place as to the extent of its unmet need that can be addressed by neighbouring authorities.</p> <p>The Council’s approach as set out in the Plan is therefore completely unsound in that it fails to plan positively, it is not effective and certainly does not accord with the Framework. Furthermore, the Council’s cooperation thus far with its neighbours under the DtC must be called into question.</p> <p>The Council’s approach is also not entirely supported by the conclusions of its own Sustainability Appraisal (January 2020) (“SA”). The SA includes an option that meets both the full affordable housing requirement (generating a housing target of 1848 dpa) along with an option that meets the Standard Method calculation of 752 dpa. Both options score considerably better than the chosen option (Option 5) in terms of meeting housing needs<sup>7</sup>. It is however unclear why some of the negative scores in relation to employment growth, health and infrastructure have been attributed to these higher housing growth options. The negative scores are attributed to ‘Anticipated impacts’ rather than being based on any tangible evidence. It must be the case that the Council hasn’t based the assessment on tangible evidence because it has already identified that significant portions of the evidence base in relation to matters such as Transport, Heritage, Flood Risk and Drainage have not yet been completed. In this respect the conclusions of the SA cannot be relied upon and a further SA should be undertaken once the evidence base is complete.</p> <p><b>Housing Supply and Trajectory:</b></p> <p>The Council’s housing requirement/target as set out in Policy H1 of the Plan is entirely based, it says, on the available housing supply. It is however clear to Danescroft that the Council has not properly considered all sources of supply to determine the true extent of available land and its capacity to provide new homes.</p> <p>A prime example of this is Danescroft’s land interest at Steers Lane, which has recently gained Outline Planning Consent for up to 185 no. dwellings. This is a site that the Council currently has allocated within the adopted Local Plan for a minimum of 75 no. dwellings and which it now proposes in the Plan to remove as an allocation. Consequently the Council has reduced its housing supply in the Plan by 75 no. dwellings when in fact consent has been granted for 185 no. dwellings.</p> <p>Further consideration is given to Danescroft’s promotion site in Section 4 below.</p> |

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|                              |                          |              | <p>Turning to the Council's housing trajectory appended to the Plan it is apparent that there are problems with the supply the Council has identified and relies upon to meet its heavily reduced housing target of 5,355 dwellings. The Council proposes a stepped housing trajectory of:</p> <ul style="list-style-type: none"> <li>• 500 dpa – Years 1-5</li> <li>• 450 dpa – Years 6-10</li> <li>• 121 dpa – Years 11-15</li> </ul> <p>The application of the stepped housing trajectory is in order to engineer a rolling 5- year supply of deliverable housing land in accordance with Paragraph 73 of the Framework.</p> <p>When the Council's supply sources are examined and, in the absence of any evidence from the Council to demonstrate compliance with the deliverability test set out at Annex 2 of the Framework, it is apparent that even with a stepped trajectory the Council is unable to demonstrate a rolling 5-year supply of deliverable housing sites. The position is made worse if the Council was to seek to apply Paragraph 74 of the Framework<sup>3</sup> and a 10% buffer is applied to the calculation.</p> <p>The tables attached at Appendix 3 of these representations demonstrate the deficiencies in the Council's housing trajectory when the Annex 2 test is applied to the following supply sources:</p> <ul style="list-style-type: none"> <li>• SHLAA Sites</li> <li>• Windfalls</li> </ul> <p>Neame Sutton considers that a number of the Council's other supply sources may also fail the Annex 2 test, but it is clear from the headline analysis set out in Appendix 3 to these Representations that the trajectory fails even if only windfalls are reduced.</p> <p><b>Suggested Modifications:</b><br/>The Council therefore needs to rectify the deficiencies in its heavily reduced housing trajectory as a bare minimum for the Plan to be found Sound. The simple solution to this is to identify more supply.</p> |
| REP/010                      | Home Builders Federation | H1           | <p>Paragraph 2.19 and 12.8 of the draft local plan states that Crawley's housing needs is 752 dwellings per annum (dpa) which results in an 11,280-home housing requirement over the next 15 years. We would agree that this is the minimum number of homes that should be provided by the Council over the plan period. On the basis that the Council considers it can deliver 5,355 new homes within its own boundary the Council have identified in policy a shortfall of 5,925 homes.</p> <p>We support the clear identification of how many homes will need to deliver elsewhere to ensure its needs are met. However, whilst 3,150 homes have been identified to be delivered in MSDC and HBC to address some of this</p>  |

<sup>3</sup> It is unclear from the evidence whether the Council does intend to fix its 5-year housing land supply via Paragraph 74 of the Framework or not.

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|                              |                  |              | <p>shortfall, we are concerned that needs across the HMA are increasing and as yet there would appear to be no SoCGs between the three authorities as to how they intend to meet needs in full. As we mention earlier in this representation such statements are essential and the Council should have them in place prior to submission. However, even if 3,150 new homes are delivered to meet Crawley's needs this still leaves a 2,775-home shortfall. The Council can't ignore this shortfall and must seek additional support from all its neighbouring authorities. The approach to the stepped housing requirement is interesting and different to others established in that it steps down rather than up. This is clearly a reflection of the fact that more delivery is anticipated in the early part of the plan period rather than later given the constraints faced by the Council. Whilst the HBF is concerned by the use of stepped requirements we can see the logic in the approach taken by CBC in its proposed approach. On the basis of the proposed trajectory we would agree that the Council would have a five-year housing land supply on adoption.</p>  |
| REP/011                      | Highways England | H1           | <p>Highways England has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the strategic road network (SRN). The SRN is a critical national asset and as such Highways England works to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity. We will therefore be concerned with proposals and policies that have the potential to impact the safe and efficient operation of the SRN. With regards to Crawley, the SRN comprises the M23 and A23, with the M25 nearby.</p> <p><b>Crawley's Unmet Housing Need/ Developments in Vicinity of Crawley</b></p> <p>We note that "Even with further development within the borough, Crawley will not be able to meet its housing needs in full and possibly not all of its employment needs", with a need for 11,280 dwellings (with 5,355 planned for delivery 2020-2035) and 20,541 new jobs. As a result, there is a requirement for neighbouring authorities (especially Horsham, Mid Sussex and Reigate &amp; Banstead) to accommodate Crawley's unmet needs (5,925 dwellings). It is Highways England's view that in order for the overall Local plan and individual developments to accord with national planning and transport policy full, timely coordination with neighbouring authorities will need to be undertaken in assessing the transport impacts upon the local and strategic road networks. This will especially be the case with regard to the significant development to be sited in neighbouring authorities just outside Crawley's boundaries. The sites include the prospective West of Ifield development with associated Crawley Western Relief or Link Road (as outlined in policy ST4) and Horley Business Park developments. In this respect, we note that para 1.14 states "Transport Modelling is to be updated taking into account the cumulative impacts of plans, policies and proposals within adjoining authorities".</p> |

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|                              |            |              | <p>We note that in addition to development just outside the borders of Crawley, there is the prospective expansion Gatwick Airport and/or North Crawley Area Action Plan as outlined in SD3 within the borough.</p> <p><b>Transport Evidence Base</b></p> <p>We note that the transport evidence base in support of the Local Plan has yet to be prepared, despite the Council consulting on its Reg 19 plan.</p> <p>We set out our position in June 2019 when consulted on the Infrastructure Plan. It is that because the Local Plan Review involves a change from the current adopted Crawley 2030 Local Plan in terms of the plan years and housing numbers, an updated, robust Transport Assessment will be required.</p> <p>It should include evidence on the location of strategic development within the borough. Associated with this, and in their own right, the evidence base will require assessments for the M23 Junctions 9 to 11 and along the M23 Spur to Gatwick. This because the model used previously is now unlikely to be suitable for further use.</p> <p>In this respect, we note that the need for an updated Transport Assessment is acknowledged in Chapter 17, and we have recently been liaising separately with Crawley Borough Council on our input to the transport modelling brief. We therefore look forward to working with Crawley Borough Council and receiving further information on the transport modelling for review.</p> <p>Until this Transport Assessment is undertaken and agreed, together with any mitigation required (demonstrated to be in accordance with standards, fully funded and deliverable), Highways England will have no option but to object to the development proposals outlined in the revised Crawley Local Plan 2020-2035.</p> <p><b>Assessment of Individual Developments</b></p> <p>It should also be noted that all significant developments (even those allocated in the Local Plan), will need to be supported by a robust Transport Assessment (as outlined in policy ST1). In accordance with NPPF and C2/13 Transport Assessment must consider the impact of the development on the Strategic Road Network for the opening year and a future year equivalent to a) 10 years after the application is submitted or b) the end of Local Plan or c) the date at which the whole development is completed, whichever is latest.</p> <p>Therefore, as things stand at this point in time, we do not consider the Local Plan to be legally compliant, sound or compliant with the duty to co-operate.</p> <p>However, this is not to say that it cannot be made so (for example, we are content with the Council's current transport base tender document that sets out the required work to be completed), and we look forward to working with the Council and the appointed consultants on the above and any other relevant matters.</p> |

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|                              |                          |              | <p><b>Suggested Modifications:</b></p> <p>It should also be noted that all significant developments (even those allocated in the Local Plan), will need to be supported by a robust Transport Assessment (as outlined in policy ST1). In accordance with NPPF and C2/13 Transport Assessment must consider the impact of the development on the Strategic Road Network for the opening year and a future year equivalent to a) 10 years after the application is submitted or b) the end of Local Plan or c) the date at which the whole development is completed, whichever is latest.</p> <p>Therefore, as things stand at this point in time, we do not consider the Local Plan to be legally compliant, sound or compliant with the duty to co-operate.</p> <p>However, this is not to say that it cannot be made so (for example, we are content with the Council's current transport base tender document that sets out the required work to be completed), and we look forward to working with the Council and the appointed consultants on the above and any other relevant matters.</p>  |
| REP/021                      | Gladman Developments LTD | H1           | <p>Policy H1 outlines that the Local Plan makes provision for the development of a minimum of 5,355 net dwellings in the borough in the period 2020 to 2035. The Council are proposing a stepped requirement over the course of the plan period as follows:</p> <p>Policy H1 outlines that there will be a remaining unmet housing need of approximately 5,925 dwellings over the Plan period. The policy then explains how the Council will continue to work closely with its neighbouring authorities, particularly those which form the North West Sussex Housing Market Area.</p> <p>Gladman are supportive of the 5,255 new dwelling requirement being expressed as a minimum figure and the Council setting out what they consider the scale of the unmet needs to be. It will be for the Council to clearly demonstrate the capacity within the borough and therefore provide the evidential justification for the scale of unmet need.</p> <p>Whilst Gladman note that 3,150 homes have been identified to deliver an element of Crawley's unmet needs in the neighbouring authorities of Horsham and Mid Sussex, these unmet needs are changing since the adopted Local Plans and Gladman are unaware of any recent SOCGs between the three authorities regarding how this unmet need will be met. As outlined earlier in this submission these statements are critical for the Local Plan Review and should be in place prior to submission of the Plan.</p> <p>Gladman reserve the right to comment further on the housing needs of Crawley once the SOCGs with Horsham and Mid Sussex have been published. Gladman note that Horsham District Council are currently consulting on their Regulation 18 version of the Local Plan within which three options regarding housing delivery are presented for comments. The first options seeks to only deliver housing to meet the identified needs of Horsham, whereas the second and third options include delivery to meet an element of unmet housing needs arising from Crawley.</p> <ul style="list-style-type: none"> <li>• Years 1-5 (2020-2025): 500 dpa</li> </ul> |

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|                              |                               |              | <ul style="list-style-type: none"> <li>• Years 6-10 (2025-30): 450 dpa</li> <li>• Years 11-15 (2030 – 35): 121 dpa</li> </ul>   |
|                              |                               |              | <p><b>Suggested Modifications:</b><br/>Gladman submit that further certainty is required regarding the delivery of the unmet housing needs across the HMA to ensure that the Local Plan is both effective and positively prepared.</p>  |
| REP/022                      | Sussex Ornithological Society | H1           | <p>The SOS recognises that England needs new houses and we are not challenging the assumptions behind the numbers needed, as that is not our expertise.</p> <p>However, we do feel well qualified to speak out when we can see that proposals are being put forward that would result in houses being built in areas that are of particular importance to birds of conservation importance, as that would harm them.</p> <p>In this respect our issue with the Crawley Local Plan 2020-2035 is not where it is intended to build 5355 houses within the Crawley Borough Council boundary in the plan period (although we do have concerns about one of these proposals, see 20(b) below) but the assumptions that lead to the conclusion that 5925 houses cannot be built in Crawley, but will have to be built by neighbouring Local Authorities under the Duty to Cooperate obligations – and Crawley’s assumptions that these dwellings must be built as an urban extension adjacent to Crawley’s boundaries.</p> <p>Why is there a fundamental assumption that Crawley will not fulfil their housing supply target by building new homes at a high enough density so as to enable all 11,280 to be built within their boundary? Put simply if the average new home in this Local Plan is going to be two and a half stories high so that only 47 % of them can be built in Crawley, then if they were five stories high all 11,280 dwellings could be built in Crawley instead. And the taller you build some dwellings the lower the residual dwellings would need to be.</p> <p>No attempt appears to have been made to consider building at sufficiently high densities to achieve this – <b>instead the assumption appears to be that it is essential that the current character of Crawley is maintained without considering what the implications of that assumption on the proposed overflow areas are.</b> In other words the impact on the characteristics of adjoining local authorities does not appear to have been considered.</p> <p>We strongly object to the assumptions that most of the 5925 overflow dwellings must be built as an urban extension of Crawley Borough – i.e. on land adjacent to Crawley - as that assumption will have a very serious impact on scarce birds of conservation concern, as well as wider adverse biodiversity impacts if any of this overflow is built on the High Weald AONB</p> <p>The inference of the 5925 overflow is that Crawley is full and that there will never be space within its boundaries to ever again build any more dwellings. It would follow from this that future Local Plans will require that all Crawley’s future needs for new dwellings will have to be met by adjoining Local Authorities.</p> |

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|                              |            |              | <p>We simply do not believe that that is a valid scenario. On that basis there would never again be any new development of dwellings in many boroughs and cities across England, yet huge numbers of new dwellings are being built in many boroughs and cities across the UK where the density of population is already far higher than in Crawley.</p> <p>Instead what Crawley appear to envisage is that there will be an ever-increasing expansion of its urban area beyond its current boundaries, absorbing more and more of the West Sussex countryside in Horsham DC, and more and more of the High Weald AONB in Mid Sussex DC.</p> <p>We believe that Crawley must face up now to the need to build new dwellings at a sufficiently high density that it can deliver its future housing needs within its Borough Boundaries, and that it should fundamentally change its planning principles to achieve this. In particular we believe that none of its overflow should be built in the High Weald AONB.</p> <p><b>The High Weald AONB along the east side of the M23/A23, immediately adjacent to the boundary of Crawley Borough, is one of the very best areas for woodland birds in all of Sussex, with significant numbers of Section 41, Schedule 1 and red-listed species of high conservation concern recorded using this area in the last 10 years. For this reason SOS objects to any proposals by Crawley to destroy parts of the AONB by insisting that overflow dwellings are built on it, and that urban Crawley extends into it.</b> Appendix 1 gives details of bird species of conservation concern that are found in this area.</p> <p>Crawley's proposals for urban extensions into Mid Sussex DC suggest that it is acceptable for the character of part of the High Weald AONB to be substantially destroyed in order to accommodate Crawley's overflow. We do not accept that part of the High Weald AONB should be destroyed just because Crawley do not wish to consider building homes at a higher density. What is the justification for this?</p> <p>Moreover the planning system provides high levels of protection from development to Areas of Outstanding Natural Beauty, alongside National Parks. As the High Weald AONB Management Plan 2019 states (P20, Planning and AONB's)</p> <p><i>The National Planning Policy Framework (NPPF), Paragraph 172, requires that:</i></p> <p><i>“Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to these issues. The conservation and enhancement of wildlife and cultural heritage are also important considerations in these areas, and should be given great weight in National Parks and the Broads. The scale and extent of development within these designated areas should be limited. Planning permission should be refused for major developments other than in exceptional circumstances.....”</i></p> <p>The southern part of Crawley, south of the A264, lies within the High Weald AONB. Crawley's Local Plan has not allocated any of this area for development (other than to allocate a reserve site for 10 Gypsy and Traveller pitches, if needed) and (commendably) Crawley appear to be paying particular attention to protecting the part of the AONB that</p> |

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|                              |   |              | <p>lies within their boundary. Yet they assume it will be OK to plan for a substantial urban extension of circa 1000 dwellings in the Mid Sussex portion of the AONB. The logic of this is not apparent! Moreover, since there is no recognition of the need to change planning principles the implication is that more and more of Crawley will extend into the AONB in future Local Plans. Against this background we would make the following specific comments about the Crawley Local Plan 2020-2035.</p> <p><b>Suggested Modifications:</b></p> <p>a) We do not accept the housing numbers shown in this Policy. They need to be higher for the reasons laid out in points 3 to 15 above.</p> <p>b) We also disagree with the inclusion of the statement<br/> <i>“... whilst ensuring against detrimental town-cramming or unacceptable impacts on the planned character of the existing neighbourhoods or on residential amenity.”</i><br/>           Understandable though this wish is, some significant densification of Crawley is needed if the High Weald AONB and the birds in it are not to be significantly harmed through Crawley extending across the M23/A23 into the AONB. Therefore these words should be deleted.</p> <p>c) We also would like to see the last sentence of this policy modified as follows<br/> <i>This will include continued assessment of potential urban extensions to Crawley <b>outside of the AONB.</b></i></p> |
| REP/023                      | Savills on behalf of St Catherine's Hospice | H1           | <p>St Catherine's Hospice recognise the significant land constraints facing Crawley and applaud the Council for increasing their housing supply since the Regulation 18 consultation and their positive approach to meeting housing need in the Borough.</p> <p>However, whilst we support Strategic Policy H1, it is important to reflect on the context of housing need in the South-East. Notably, the significant levels of unmet need across the Gatwick Diamond and the Coastal West Sussex and Greater Brighton LEP. All authorities recognise the need for a sub-regional response to the challenges facing the South-East.</p> <p>In light of this, the onus is on CBC to facilitate as much housing delivery as possible within the District boundary. As such, the implications of Strategic Policy H1 should be considered across the entirety of the Plan, mindful of the cumulative impacts of policy on the viability and deliverability of residential development in the Borough.</p>   |
| REP/033                      | Horsham District Council                    | H1           | <p>We support aspects of this policy, in particular that all reasonable opportunities will be considered to develop on brownfield sites and surplus green space; capitalise on town centre living, and seek out further opportunities on the edge of Crawley.</p> <p>However we consider that the policy is not justified as stands, its effectiveness could be improved, and needs further work to demonstrate that it is positively prepared.</p>  |

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|                                     |                   |                     | <p>Firstly, we do not consider that the remaining unmet need figure of 5,925 dwellings total has been fully justified. Whilst acknowledging that land supply in Crawley is highly constrained, evidence has not been provided that all opportunities for providing further housing within Crawley's boundary have been exhausted. For example, Policy CL5 sets minimum densities for development, and Policy TC3 identifies a number of Key Opportunity Sites in the Town Centre. Paragraph 11.19 states that at least 1,500 dwellings are anticipated across all of these sites (consistent with Policy H1). Currently, we do not consider that there is clear evidence of how this number has been arrived at, or whether a comprehensive study of opportunity sites within the town centre, and appropriate densities within these, has been undertaken.</p> <p>Secondly, it is also not clear how opportunities for estate regeneration (and associated densification) have been looked at. The draft Local Plan in paragraph 12.55 states that there are no estate regeneration projects planned in Crawley. We would welcome discussion as to why this has not been taken forward as an option for increasing housing delivery within Crawley Borough whilst also delivering significant community benefits.</p> <p>Thirdly, we note that the Strategic Housing Land Availability Assessment (SHLAA) supporting the emerging Local Plan makes an assumption that the Gatwick southern runway may still come forward, and incorporates an assumption that maximum permissible noise levels may therefore be exceeded. Whilst we recognise that this situation is complex, this change appears to have had the effect of ruling out large sites of several hectares which had previously been included in the housing trajectory for the 2015 Local Plan. The SHLAA recognises that such sites may be reconsidered as part of the North Crawley Area Action Plan. It is however considered that in advance of such a review, it is not necessarily appropriate to fully rule out sites at this stage, particularly when given the increase in housing need for Crawley and for the housing market area. Again, we would welcome further discussion around these points.</p> <p>It is suggested that further areas of investigation regarding land use efficiency and maximising delivery within Crawley Borough could reasonably include:</p> <ul style="list-style-type: none"> <li>i. Consideration as to whether a more generous assumption relating to windfall development (currently assumed at 55 dwellings per hectare) may be appropriate. It is noted that the draft Local Plan refers on page 223 to a background document 'Windfall Allowance Review 2020-2035.' However we have not been able to find this document on your website.</li> <li>ii. Positive identification at the plan-making stage of any further surplus or under-used green space or industrial land in Crawley Borough. The need to protect and enhance fit-for-purpose green infrastructure is supported, but it is noted that currently published open space studies are some 6 years old and may now be in need of update;</li> <li>iii. Reassess whether sites in the SHLAA should have been found to be unsuitable for development. The airport noise contour issue has already been mentioned above, and</li> </ul> |

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|                              |                          |              | <p>there are further justifications given for rejecting sites that could be better evidenced, e.g. site adjacent (but not within) a flood risk area, or the higher infrastructure costs associated with redeveloping industrial sites.</p> <p>To ensure that a robust unmet need figure can be agreed, and the points above are considered further, it is requested that a comprehensive densification study is undertaken, to consider these points and others as appropriate. This is essential to ensure a robust understanding of how much of the Crawley housing needs will remain unmet, and therefore form the basis of the discussions over the extent to which Horsham District Council can meet this need.</p> <p>We also request an alternative trajectory and target which reflects the likely scenario of some or all of the Gatwick Expansion safeguarding being removed as a result of the forthcoming AAP.</p> <p>This will assist in Duty to Cooperate discussions, and may be critical to the unmet need housing figure should the Gatwick safeguarding policy be removed entirely in the course of the examination.</p> <p><b>Suggested Modifications:</b></p> <p>Change sought:</p> <ul style="list-style-type: none"> <li>• To be effective, and meet the test of positive planning, the policy should additionally refer to opportunities arising from increased densities including increasing building heights and fully exploiting surplus garden land, and estate regeneration.</li> <li>• To ensure that a robust unmet need figure can be agreed, it is requested that a comprehensive densification study is undertaken, to consider points i, ii and iii above, and others as appropriate. This is essential to ensure a robust understanding of how much of the Crawley housing need should in principle be accommodated by neighbouring authorities including Horsham district.</li> <li>• It is requested that an alternative trajectory and target which reflects the likely scenario of some or all of the Gatwick Expansion safeguarding being removed as a result of the forthcoming AAP.</li> </ul> |
| REP/038                      | Waverley Borough Council | H1           | <p>Waverley acknowledges the draft Crawley plan seeks to deliver 5,355 homes per annum from 2020 to 2035. This is 5,925 homes short of the housing need assessed under the government's standard method. Waverley recognises the inclusion in Policy H1 states that this shortfall will be met by working closely with its neighbouring authorities, particularly those in the Northern West Sussex Housing Market Area, primarily Horsham, Mid Sussex and Reigate &amp; Banstead.</p> <p>Waverley welcomes the policy making an explicit reference to meeting their housing shortfall within the Housing Market Area that it lies within. Waverley is unlikely to be able to take any further housing to meet unmet need when we review our Local Plan. Our adopted Local Plan housing requirement already includes unmet need from Woking. Therefore, Waverley considers that Crawley's unmet need must be met within the Housing Market Area that Crawley lies within.</p>   |

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|                              |                                       |              | This is an officer response prepared in liaison with the Council's Head of Planning Policy and Services.   |
|                              |                                       |              | <b>Suggested Modifications:</b><br>None  |
| REP/048                      | Wood PLC with Homes England C/O Agent | H1           | <p>Wood is retained by Homes England to respond to the Crawley Borough Local Plan 2020 – 2035 consultation draft on its behalf, particularly with regard to its land interest at Tinsley Lane, Crawley. The site is allocated in Policy H2 of the adopted Local Plan and draft Policy H2 of the Local Plan review to deliver new homes. An outline planning application for the site was submitted in 2018 seeking permission for up to 150 homes. This application is currently being considered by the Borough Council (reference CR/2018/0544/OUT). The representation below confirms that the site remains available and deliverable. Homes England intends to dispose of the site soon after planning permission is granted and therefore the site will come forward in the short term to deliver homes and boost supply. However, given the current undersupply of homes in the borough, there is a pressing need to ensure that development at Tinsley Lane makes an efficient use of the site in line with guidance in the NPPF. Homes England has robustly tested the capacity of the site through the preparation of the outline planning application and considers that 150 homes rather than 120 homes as stated in the adopted and draft Policy H2 are achievable on the site. Accordingly, in order to make an efficient use of this sustainable site and contribute to boosting supply, it is considered that the Policy should be amended to recognise that 150 homes can be delivered.</p> <p><b>2. Strategic Policy H1: Housing Provision</b></p> <p>To support the Government's objective of significantly boosting the supply of homes, the Local Plan will need to ensure that a sufficient amount of land can come forward to meet housing needs and ensure that land that is allocated and subsequently developed without unnecessary delay.</p> <p>The Council's evidence suggests that there is significant upward pressure on housing need which the Local Plan review will need to address. Paragraph 60 of the NPPF states that in determining the number of homes in strategic plans, the level of housing provision should be based on the standard methodology set out in national planning guidance.</p> <p>The Government's Standard Methodology for calculating housing need identifies a significant requirement of 752dpa which over a new plan period of 2020 to 2035 would be 11,280 dwellings. However, given the constrained nature of Borough of Crawley, the emerging Local Plan only makes provision for the development of a minimum of 5,355 net dwellings in the borough in the period 2020 to 2035. The Plan will deliver an average of 500 dwellings per annum (dpa) until 2024/25. Thereafter an average of 450dpa will be delivered between 2025/30 and 121dpa between 2030/35. This level of provision is significantly below the level required to meet the Local Housing Need (752dpa).</p> |

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|                              |            |              | <p>The Council does not consider this the whole requirement over the plan period can be met within the borough and subsequently they are in discussions with neighbouring authorities about meeting some of this unmet need. Taking into account existing commitments, the Council estimates that the scale of unmet need is approximately 5,925 dwellings over the Plan period.</p> <p>Given the emphasis of the NPPF to significantly boost the supply of housing in addition to guidance at paragraph 122 of the NPPF which states that planning policies and decisions should support development that makes efficient use of land, the emphasis should be on maximising the number of dwellings which could be accommodated on all sites, particularly existing allocations in order to boost supply.</p> <p>As noted above, Homes England's land at Tinsley Lane is allocated in policy H2 of the current adopted Plan. Although Policy H2 identifies the site as being suitable for 120 new homes, the allocation wording notes this is an indicative figure. The housing figures in the Local Plan are expressed as minimum figures. Policy H1 states that "The Local Plan makes provision for the development of a minimum of 5,100 net dwellings in the borough in the period 2015 to 2030".</p> <p>Furthermore, in considering the adopted Local Plan, the Inspector acknowledged that a higher figure (138 dwellings) may be achievable 'if at detailed design stage the northern field is found to have the capacity to deliver the full range of playing pitch facilities.' (Page 13 para 44 Inspector's Report into the Examination of the Crawley Local Plan).</p> <p>Wood has prepared an evidence base of technical reports to demonstrate the suitability of land at Tinsley Lane through the preparation of the outline planning application submitted to Crawley Borough Council (Reference CR/2018/0544/OUT). This included transport, landscape, biodiversity and drainage/flood risk assessments. They demonstrate the suitability of this location, which can deliver a greater quantum of development than is currently identified in Policy H2. The illustrative masterplan submitted with the outline planning application demonstrates that 150 units can be accommodated on the central and southern land parcels with new football facilities being located on the northern parcel.</p> <p><b>Suggested Modifications:</b></p> <p>Summary: we have outlined some suggestions below for the inclusion in Policy H1 in order to support the objective of maintaining a housing supply and assist in delivering a sound plan:</p> <ol style="list-style-type: none"> <li><b>1. Sustainable development proposals will be approved without delay:</b> In line with paragraph 11 of the NPPF, a clear presumption in favour of sustainable development should be applied. Development proposals that accord with the development plan should be approved without delay to enable sites such as Tinsley Lane to come forward quickly and boost supply.</li> <li><b>2. Development proposals should make an efficient use of sites:</b> Guidance in the NPPF (paragraphs</li> </ol> |

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|                              |  |              | <p>122 and 123) is clear that where there is an existing or anticipated shortage of land for meeting identified housing needs, it is especially important that planning policies and decisions avoid homes being built at low densities and ensure that developments make optimal use of the potential of each site. The Council will therefore need to give consideration to policies which achieve the following:</p> <ul style="list-style-type: none"> <li>a. Optimise the use of land to seek a significant uplift in average density of residential development.</li> <li>b. Deliver minimum density standards.</li> <li>c. Refuse applications which would not make an efficient use of land.</li> </ul>  |
| REP/050                      | Montagu Evans on behalf of Homes England       | H1           | <p>Homes England continue to support CBC's commitment to working with neighbouring authorities in the Northern West Sussex housing market area to explore the potential for urban extensions to Crawley as this accords with paragraph 72 of the NPPF in that, <i>'The supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages and towns, provided they are well located and designed, and supported by the necessary infrastructure and facilities. Working with the support of their communities, and with other authorities if appropriate, strategic policy-making authorities should identify suitable locations for such development where this can help to meet identified needs in a sustainable way.'</i></p>   |
| REP/063                      | Pegasus Group on behalf of Persimmon Homes Plc | H1           | <p>Following our representations in relation to the Local Plan Regulation 18 consultation on behalf of our Client Persimmon Homes Plc, Pegasus wish to submit representations to the Crawley Borough Council Local Plan Review 2020-2035 Regulation 19 Public Consultation.</p> <p>On behalf of our client, Pegasus would like to make the following representations on the draft Plan.</p> <p><b>Housing provision across the borough</b></p> <p>Strategic Policy H1: Housing Provision states the Council have a positive approach in considering proposals for residential developments and will take a pro-active approach to identifying suitable sites for housing development and working to overcome constraints wherever possible.</p> <p>The policy rightly acknowledges that the Council will <b>not</b> be able to meet its own needs.</p> <p>The policy estimates the Local Plan will only be able to make a provision for the development of 5,355 dwellings across the plan period (2020-2035). Consequently, it will result in a 5,925 dwelling shortfall over the Plan period.</p> <p>The policy indicates that all reasonable opportunities will be considered for residential developments, including parcels of brownfield land or surplus green spaces as long as consistent with other Local Plan Policies. Pegasus Group welcomes this approach and the attempt to secure more development within the Borough where possible.</p> |
| REP/065                      | Mole Valley District Council                   | H1           | <p>Thank you for consulting Mole Valley District Council (MVDC) on Crawley Borough Council's (CBC) Submission draft Local Plan.</p>  |

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|                              |                       |              | <p>The strategic issues we wish to comment on are:</p> <ul style="list-style-type: none"> <li>• Meeting housing needs</li> <li>• Economic growth</li> <li>• Gatwick Airport</li> </ul> <p><b>Meeting housing needs</b></p> <p>As set out in our earlier response to CBC (dated 30.08.2019) as part of the Regulation 18 consultation, MVDC does recognise the difficulties in delivering sustainable growth and the challenge of balancing competing environmental, social and economic pressures. We also recognise the physically constrained nature of Crawley. Nonetheless, MVDC are concerned that CBC will have an updated unmet need of approximately 5,925 dwellings over the Plan Period (2020-2035), which has reduced from an unmet need of approximately 6, 475 dwellings at the Regulation 18 stage.</p> <p>Three quarters of Mole Valley is within the Metropolitan Green Belt and is therefore heavily constrained. That includes all of the land adjacent to Crawley. In addition, further constraints include the Area of Outstanding Natural Beauty, a Special Area of Conservation, areas prone to flooding and other environmental constraints. MVDC recently commenced a 7 week public consultation on the draft version of the Future Mole Valley Local Plan (Regulation 18) and based on current assessments it is clear that MVDC cannot meet its own housing need on brownfield land and/or within the districts existing built-up areas. At this stage, MVDC has not identified any opportunities for part of Mole Valley's housing need to be met by neighbouring local planning authorities. Therefore, having fully explored all other reasonable options for meeting the district's housing need, exceptional circumstances may exist for MVDC to consider some degree of change to Green Belt boundaries. This is one of the principles which is being considered through MVDC's current Regulation 18 consultation.</p> <p>On a further point, Crawley is a functional component of the Northern West Sussex Housing Market Area (NWS HMA), which includes Horsham, Mid Sussex and a small part of the Reigate and Banstead Council areas. Mole Valley does not form part of the same housing market area.</p> <p>On this basis, we do not consider that MVDC should be expected to meet any of CBC's unmet housing need. A separate letter setting out MVDC's position under the Duty to Cooperate (also dated 2 March 2020) reiterates this position.</p> |
| REP/068                      | Sussex Wildlife Trust | H1           | <p>Strategic Policy H1: Housing Provision</p> <p>SWT is concerned by the capture all approach within this policy which states that: 'All reasonable opportunities will be considered including: brownfield sites; surplus green space; town centre living; and opportunities on the edge of Crawley, where these are consistent with the other policies and proposals in this Local Plan and the principle of sustainable development.'</p>   |

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|                                     |  |                     | We acknowledge the policy wording does state 'consistent with the other policies' however we do suggest that the terminology of 'reasonable opportunities' is unclear. CBC should provide further clarity on how the reasonableness of an opportunity will be assessed.  |
| REP/001                             | Resident 1                                   | H2                  | <p>Copied from IN1</p> <p>Letter to Opinion, The Editor, Crawley Observer</p> <p>Dear Sirs, I was interested to read your articles 24<sup>th</sup> Jan plans for 10,000 new homes at Ifield and say on the future blueprint for Crawley. Infrastructure Covers a Multitude of important headings. A collective term for the fixed installations and facilities such as water?</p> <p>We have had times when the reservoirs have been very low and wishing for rain. Water is a worldwide problem. The Murrumbidgee Irrigation is one of nine New South Wales Irrigation Companies that regulate and trade water. A sad time for dairy farmers and rice growers when you can't get water. The Crops suffer and the dairy farms close.</p> <p>The population of Crawley known was 109,900 in 2014 and if the population growth continues to grow by 2020 could be 115,700</p> <p>I ask the question "are we going to get the Planning Policies Covered by the Strategic Priorities". I doubt it as it all costs money. Our increased Council tax will not pay for it.</p> <p>Crawley hospital was built and completed in 1962 and extensions built 1970 and 1981. Originally a full range of Services, Outpatient Care and Accident and Emergency were given, but by 2008 much was moved to East Surrey Hospital.</p> <p>I understand that Conservative M.P: for Crawley henry Smith has spoken on this subject and think it a good idea to send him a copy of this letter for interest.</p> <p>So is Crawley hospital part of the infrastructure? I think is. This is not mentioned by name in the report. People are at their best if they have good health.</p> <p>Gatwick Airport, I think will have a second runway in the future. Look at all the building going on in the area and should I say anticipated building like the 10,000 homes in Ifield. Maybe this comes under the heading of Infrastructure for transport?</p> <p>Hope is that things will get better, we will see!</p> <p>(Enclosed Letter from Henry Smith MP)</p> |
| REP/004                             | Neame Sutton Limited on behalf of Danescroft | H2                  | <p>Site-Specific Representations in Relation to Land at Steers Lane, Crawley Policy H2, and Paragraphs 12.32 – 12.37, , Policy CL4, Policy EP4, Noise Annex, SA – OBJECT: Unsound</p> <p>At the point of the Regulation 18 consultation stage in September 2019 the Council included Danescroft's promotion site within the Plan as an allocation for a minimum of 75 no. dwellings.</p>   |

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|                                     | (RLP Crawley) LLP |                     | <p>In the context of this Regulation 19 consultation the Council has inexplicably removed the site as an allocation albeit that the land remains within the defined urban area on the draft Plan Proposals Map. The only evidence produced by the Council to support its removal if the site as a housing allocation is contained in Strategic Housing Land Availability Assessment (“SHLAA”)(January 2020) wherein the Council concludes the site is not suitable due to the presence of a noise constraint relating to the potential second runway at Gatwick Airport<sup>4</sup>.</p> <p>The justification set out in the SHLAA for the removal of the site is based on a revision to the Council’s Noise Annex contained at Page 270 of the draft Plan, which lowers the previously accepted predicted noise level for the proposed second runway from 66 dB down to 60dB. No evidence is presented by the Council to support this change in the noise level that it now considers is the threshold for residential development.</p> <p>The change is particularly odd given that the Council remains of the opinion (as set out in the draft Noise Annex) that 66dB is the appropriate noise level in relation to surface transport. In other words it is acceptable for a residential proposal to come forward in an area affected by road transport noise up to 66 dB, but not if aviation noise is at 60 dB. This cannot be right.</p> <p>Setting aside the above points the Council has made the changes to the Plan to remove the promotion site as an allocation in the full knowledge that its Development Management team had been processing a planning application on the site, which has recently gained consent at Appeal for up to 185 no. dwellings. In giving consideration to the matter of noise the Inspector concluded that the living environment for the proposed dwellings would be acceptable having regard to both road and aviation noise.</p> <p>The promotion site should therefore be reinstated as a Commitment for up to 185 no. dwellings to reflect the planning consent that has been achieved.</p> <p>All of the above points relate to Area A of the promotion site, which equates to just over half of the area. The remainder of the land (Area B on the plan attached at Appendix 1) has the capability to deliver up to a further 100 no. dwellings. The only constraint on this land relates to the potential second runway at Gatwick Airport and the consequent impact in terms of noise contours.</p> <p>Danescroft’s acoustic specialists Aecom have undertaken an up-to-date noise assessment of Area B (attached at Appendix 2), which confirms the current noise environment for the land and also deals with the current intentions of GAL in relation to the use of London Gatwick Airport’s standby runway for normal activities. The Approach that GAL is now taking to the expansion of the airport will remove the constraint on Area B in terms of aviation noise and therefore enable the land to be developed for residential purposes.</p> |

<sup>4</sup> Page 146 of SHLAA January 2020

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|                              |   |              | <p>The Council has not considered the potential of Area B within its SHLAA nor has it considered the change in approach by GAL and the implications it has in releasing potential for further residential development. Area B should therefore be included as land suitable for residential development subject to GAL concluding its current Scoping Exercise to release the constraint on the standby runway for normal activities.</p> <p>The inclusion of Area B as a housing allocation would enable the Council to deliver up to another 100 no. dwellings (40 no. of which would be affordable) making a valuable contribution to the significant housing needs in the Borough. Danescroft would welcome the opportunity to work with the Council in relation to the allocation of Area B for housing as part of the emerging Local Plan.</p>   |
| REP/005                      | Thames Water Utilities Limited          | H2           | <p>The information contained within the new Local Plan will be of significant value to Thames Water as we prepare for the provision of future infrastructure.</p> <p>The attached table provides Thames Water's site specific comments from desktop assessments on sewerage/waste water network and waste water treatment infrastructure in relation to the proposed sites. We are also engaged in the Gatwick water cycle study. More detailed comments will follow / supersede these in the Gatwick water cycle study. Early engagement between the developers and Thames Water would be beneficial to understand:</p> <ul style="list-style-type: none"> <li>•What drainage requirements are required on and off site</li> <li>•Clarity on what loading/flow from the development is anticipated</li> </ul> <p>As recognised at Paragraph 8.10 of the draft Local Plan, it should be noted that in the event of an upgrade to our sewerage network assets being required, up to three years lead in time is usual to enable for the planning and delivery of the upgrade. As a developer has the automatic right to connect to our sewer network under the Water Industry Act we may also request a drainage planning condition if a network upgrade is required to ensure the infrastructure is in place ahead of occupation of the development. This will avoid adverse environmental impacts such as sewer flooding and / or water pollution. Waste-water/Sewage Treatment Works upgrades take longer to design and build. Implementing new technologies and the construction of a major treatment works extension or new treatment works could take up to ten years to plan, design, obtain approvals and build.</p> <p>(See attached excel spreadsheet).</p> <p><b>Suggested Modifications:</b><br/>Need to make reference to any site specific sewerage/wastewater infrastructure concerns.</p> |
| REP/006                      | West Sussex County Council Property and | H2           | <p>Developable land adjacent to Desmond Anderson, Tilgate (150 dwellings)</p> <p>WSCC will actively support future proposals to put this land forward for residential development.</p> <p><b>Suggested Modifications:</b><br/>None</p>   |

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| REP/006                      | West Sussex County Council Property and Asset Management | H2           | <p>Town Centre Key Opportunity Sites – County Buildings (deliverable)<br/>WSSC will actively support future proposals to put this land forward as a key opportunity site for residential / mixed use development.</p> <p><b>Suggested Modifications:</b><br/>None</p>  |
| REP/022                      | Sussex Ornithological Society                            | H2           | <p><b>Suggested Modifications:</b></p> <p>a) We do not accept the housing numbers shown in this Policy. They need to be higher for the reasons laid out in points 3 to 15 above.</p> <p>b) The proposal to build the small number of 15 dwellings on land east of Balcombe Road/Street Hill, Pound Hill, would destroy one third of an LWS, as well as impact heritage and conservation zone areas. No justification is put forward for so much damage being caused to a range of significant assets in order to build a mere 15 dwellings. SOS opposes any Local Wildlife Site's being built upon – instead LWS's should be cherished and managed well so that they can deliver their full potential. The Sustainability Assessment notes that there will be a significant negative impact on biodiversity if this site were to be developed.<br/>Deletion of this scheme would have no discernible impact on the delivery of Crawley's overall housing targets.</p> <p>c) We welcome the inclusion in the policy wording of the requirement that “detailed and up-to-date ecological assessments” must be carried out.</p>                                     |
| REP/022                      | Savills on behalf of St Catherine's Hospice              | H2           | <p>Please see accompanying representation (REP/023).</p> <p>St Catherine's supports the allocation of their Malthouse Road site in Strategic Policy H2. However, the allocation for “residential Class C3 use for older people (60 dwellings) and/or residential rooms as Class C2 (Residential Home) use” is too restrictive and may delay delivery on the site. Whilst it is St Catherine's preference to accommodate elderly accommodation, additional flexibility is sought within the policy to enable unrestricted C3 development at the site if a care provider is not forthcoming. This amendment to the policy would ensure the policy is effective and able to adapt where justified at the application stage via evidence of marketing or demonstrated need for general housing needs.</p> <p>The suitability of the Site is recognised in the SA (Appendix 4.0), which highlights the Significant Positive Impacts/Positive Impacts development would have on the site. Significantly, the site has been acknowledged as having a significant positive impact for SA Objectives 1, 2 and 3; including positive impacts for SA objectives 5, 6, 7</p> |

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|                                     |                   |                     | <p>and 8. These positive outcomes will not change if the site is developed for traditional housing over elderly housing, therefore, the redevelopment will still result in positive impacts to the immediate and wider environs. Additionally, the SHLAA (appendix 4.0) assesses the site (ref: 83) as being suitable, available and achievable. This demonstrates that the site is both “suitable and developable for housing, subject to reprovion of the hospice facility and development of an appropriate scheme.”</p> <p>In accordance with the SHLAA assessment, Policy H2 should recognise the reprovion of St Catherine’s Hospice to Pease Pottage, circa. 2.5 miles from Malthouse Road. As such, there will be no net loss of infrastructure to the residents of Crawley.</p> <p>Whilst St Catherine’s have been gifted the land at Pease Pottage, St Catherine’s still requires an adequate land receipt to contribute to building the new facility. As a charity, St Catherine’s is required to achieve best value of the site at Malthouse Road. Creating flexibility in the policy will attract the most market interest and ensure the earliest possible delivery of the site.</p> <p>In light of this, we request that Strategic Policy H2 is reworded to allow higher densities at this location and ensure that if there is a lack of developer interest or demand in the market, the site can be redeveloped for unrestricted C3 use. As part of this, the expectations for Building Regulations Part M, Category 3 should be omitted if the site is not developed for elderly housing. This will recognise the opportunities available at the site, demonstrating the Council’s commitment to facilitating housing delivery in Crawley.</p> <p>This representation is made to the Crawley Borough Council (CBC) Regulation 19 Consultation on the Emerging Local Plan. The consultation is open from 20 January 2020 until 02 March 2020.</p> <p>This representation is submitted on behalf of St Catherine’s Hospice and provides commentary on the key aspects of the consultation and evidence base as applicable to the land and buildings at St Catherine’s Hospice, Malthouse Road (“the site”), which is being actively promoted to the Local Plan for residential development (Use Class C2 or C3).</p> <p>The site currently comprises St Catherine’s Hospice, a facility for palliative health care. St Catherine’s services are to be provided in an alternative enhanced facility, roughly 2.5 miles from the existing site, in neighbouring Mid Sussex (planning permission for the new facility is granted under ref: DM/15/4711). The provisioning of these services has rendered the existing buildings at Malthouse Road unnecessary for St Catherine’s Hospice and provides the opportunity for redevelopment on the site.</p> <p>The emerging plan makes provision for the development of 5,355 net additional dwellings over the Plan Period 2020-2035; which is broken down into a stepped annual requirement of 500 dwelling per annum (dpa) between years 1-5; 450 dpa between years 6-10; and, 121 dpa between years 11-15. This is a significant reduction from the Government’s Standardised Methodology, which sets the housing need of 752 dpa, c. 11,252 dwellings over the plan period.</p> |

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|                              |            |              | <p>Though it is widely accepted that the land constraints faced by CBC severely limits the capacity for housing growth in the Borough, the high levels of unmet need in Crawley merely attests to the need for the Council to ensure the delivery of all appropriate development sites in the Plan. To achieve this, CBC should provide sufficient flexibility within the Plan to facilitate development.</p> <p>Strategic Policy H2 in the emerging Plan allocates Malthouse Road for development, recognising the multiple benefits of redevelopment at this site. Whilst welcomed, it is considered that the proposed restrictions for elderly care (residential Class C3 use for older people and/or residential rooms as Class C2) placed on the site are overtly prescriptive.</p> <p>St. Catherine's is mindful that the trustees have an obligation under the Charities Commission to demonstrate best value within reasonable constraints. In planning terms, the site is ideal for housing of a broad range of types given its setting and proximity to good transport. We would not want to restrict usage at this stage, particularly when initial analysis shows that the site may only deliver marginal capacity to enable effective care home operation.</p> <p>Whilst St Catherine's Hospice would prefer elderly accommodation on this site; additional flexibility should be provided to ensure that if there is demonstrated need, or a lack of demand in the market for elderly care in this location, the site can be redeveloped for unrestricted C3 use.</p> <p>Within this representation comments are provided on CBC's Local Plan review where policies relate to the redevelopment of the Malthouse Road site. The conclusion is drawn that the allocation of the site at St Catherine's Hospice is supported, and should remain in the emerging Local Plan for development for residential Class C3 use for older people and/or residential rooms as Class C2, with flexibility to bring forward unrestricted residential dwellings (use class C3) if it can be demonstrated that there is a lack of developer interest via a marketing period of 3 months or demonstrably evidence of need for unrestricted C3 use at the planning application stage.</p> <p><b>Background to the Site</b><br/> <b>The Site</b><br/> The 0.73 Ha site is situated on the southern side of Malthouse Road Crawley, which is a predominantly residential road, located approximately 0.7 miles south of Crawley town centre and railway station.<br/> The site comprises four existing buildings, including the Main Hospice care building, the Turner Centre, the Awbrook building and the Mynthurst building. The Main Hospice is situated on the northern part of the site fronting onto Malthouse Road. The Turner Centre is located to the rear of the site and adjacent the southern boundary. The Awbrook building is located in the centre of the site, immediately east of the Main Hospice building. The Mynthurst building is located on the northern part of the site and fronts onto Malthouse Road (No. 128 Malthouse Road).<br/> Vehicular and pedestrian access is provided via Malthouse Road, which abuts the northern boundary of the site.</p> |

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|                              |            |              | <p>Immediately south of the main hospice building is a larger building accommodating an extra care residential scheme. This is a reasonably large part 2, 3 and 4-storey building, known as Hogshill Gardens. To the west of the hospice building are No.s 60, 62 and 64 Brighton Road, these are 2-2.5 storeys in height.</p> <p>The eastern boundary of the site (and No. 128) intersects Malthouse Road Conservation Area, with Goffs Park Road Area of Special Local Character located within 200m of the Hospice. Future development will be designed sympathetically to conserve and enhance the setting of the Conservation Area.</p> <p>Malthouse Road predominantly comprises semi-detached, two storey, Edwardian houses which has largely influenced the character of the road. At present, the general scale, massing and design of St Catherine's Hospice does not respond well to the local vernacular.</p> <p>There are a number of mature trees along the boundary of the site, these will to be assessed as part of an arboriculture survey to inform future development schemes. The neighbouring property, Hogshill Gardens on Brighton Road is known to have several trees protected by Tree Preservation Orders (TPO).</p> <p>The site is in Flood Risk Zone 1, and therefore has the lowest chance of fluvial flooding, therefore flooding is not a constraint on the site.</p> <p>A preliminary ecology survey has confirmed that the habitats on the site are "<i>predominately common and widespread throughout the local area.....Buildings, hardstanding, amenity grassland and introduced shrubs were dominant on site, which are of limited value.</i>"</p> <p>Whilst there are some constraints on the site, these are not considered significant enough to negatively affect the opportunities for a comprehensive development to come forward. It is considered that there are numerous opportunities across the site, owing to the existing access points and close proximity to the train station and town centre.</p> <p><b>The Proposals</b></p> <p>As set out above, the aspiration for the site is to provide a comprehensive development, comprising either: a care facility of approximately 60-70 beds, for use as a residential care home or nursing home (use class C2); or, residential development of circa 60-70 dwellings (use class C3). The appended illustrative masterplans comprises 69 beds for the care home (Appendix 2.0) and 63 residential C3 units (Appendix 3.0), demonstrating the capacity of the site to accommodate higher density development than currently identified in Draft Policy H2.</p> <p>Crawley is considerably constrained due to the limited land available in the Borough, as such, it is of paramount importance to maximise the development potential within, and close to, the Town Centre. The redevelopment of the site will increase the density of accommodation provided on the site, whilst enhancing the setting of the neighbouring Conservation Area.</p> |

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|                              |            |              | <p>As the development is still in its infancy, the illustrative masterplans are only an initial study on what can be achieved on the site. These demonstrate that redevelopment can increase the density of residential accommodation without prejudicing the urban grain.</p> <p><b>Relocation of St Catherine’s Hospice Facilities</b><br/> St Catherine’s Hospice is currently in the process of developing an enhanced care facility in Pease Pottage, two miles south of the Malthouse Road site. The relocation of St Catherine’s Hospice will considerably improve the level of care offered at St Catherine’s, providing a modernised and bespoke enhanced palliative care facility. As the hospice will be relocated just outside of the Borough, the hospice will still provide services to Crawley residents and therefore the move will not affect the care provisions available in the area.</p> <p><b>The Local Plan Review</b><br/> These representations address the strategic policies set out in Section 2 (Sustainable Development); Section 4 (Character, Landscape and Development Form); Section 6 (Heritage); Section 12 (Housing Delivery); and, Section 17 (Sustainable Transport). Though some comments relate to the broader interpretation of policy, they are primarily focused on sections relevant to the site.<br/> For clarity, representations were made to the Regulation 18 Consultation on the emerging Local Plan on behalf of St Catherine’s Hospice earlier in the consultation process. This site has been allocated for development at draft Strategic Policy H2, and is referred to in the Strategic Housing Land Availability Assessment as St Catherine’s Hospice, Malthouse Lane (ref: 83).<br/> Draft Strategic Policy H2 allocates the site for “<i>residential Class C3 use for older people (60 dwellings) and/or residential rooms as Class C2 (Residential Home) use</i>”. Though welcomed, St Catherine’s Hospice seeks to increase the quantum of development allocated on the site to c. 60-70 dwellings and additional flexibility in the policy to enable unrestricted C3 uses if a care provider is not forthcoming.<br/> These representations considers the Plan against the tests of soundness, as set out in the National Planning Policy Framework (NPPF); highlighting elements of the Plan which would benefit from alterations to ensure that the Plan is found sound.<br/> Paragraph 35 of the NPPF sets out the four tests to ensure the Plan is sound:<br/> a) “<b>Positively prepared</b> – providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;<br/> b) <b>Justified</b> – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;</p> |

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|                              |            |              | <p>c) <b>Effective</b> – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and</p> <p>d) <b>Consistent with national policy</b> – enabling the delivery of sustainable development in accordance with the policies in this Framework”</p> <p>Whilst the representation follows the section order set out in the Plan, we do not consider this to be the most logical approach to organise the policies. As such, it is suggested that the chapters on Economic Growth and Housing are presented earlier in the Plan as they help to set the context for new development, clearly outlining the opportunities and challenges facing the Borough.</p> <p><b>Conclusion</b></p> <p>This representation is made to the Crawley Borough Council (CBC) Regulation 19 Consultation on the Emerging Local Plan. The consultation is open from 20 January 2020 until 02 March 2020.</p> <p>The representation is submitted on behalf of St Catherine’s Hospice and provides commentary on key aspects of the Emerging Plan as applicable to site at St Catherine’s Hospice, Malthouse Road, which is being promoted to the CBC Local Plan Review for residential development.</p> <p>The relocation of St Catherine’s Hospice to enhanced facilities in Pease Pottage provides the opportunity to provide modern, attractive and sensitively designed new dwellings on the Malthouse Road site. The redevelopment of the site demonstrates the capacity for medium sites to enhance the surrounding area whilst contributing to housing delivery in the District.</p> <p>Strategic Policy H2 in the emerging Plan allocates the St Catherine’s Hospice for development, recognising the multiple benefits of redevelopment at this site. Whilst St Catherine’s preference is for elderly care accommodation, it is considered that this proposed policy is overtly prescriptive and may delay the redevelopment of the site.</p> <p>It is requested that the Strategic Policy H2 is amended to provide additional flexibility to ensure that if there is a lack of developer interest and/or market demand, the site can be redeveloped for unrestricted C3 use.</p> <p>Though it is widely accepted that the land constraints faced by CBC severely limits the capacity for housing growth in the Borough, the high levels of unmet need in Crawley merely attests to the need for the Council to ensure the delivery of all appropriate development sites in the Plan. To achieve an effective Plan, CBC should provide sufficient flexibility within the Plan to facilitate development and ensure density is maximised.</p> <p>The requested amendments to Policy H2 will also help St Catherine’s to achieve adequate land receipts to help contribute to the building of the new facility at Pease Pottage by attracting the most market interest in the land. This will also ensure St Catherine’s are able to demonstrated best value, required by the Charities Act, and ensure the earliest possible delivery of the site.</p> |

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|                              |   |              | <p>As demonstrated by the illustrative masterplans, the Malthouse Road site is able to accommodate 60-70 dwellings and it is requested the housing number in draft Strategic Policy H2 is amended for St Catherine's accordingly. Within this representation comments are provided on CBC's Local Plan review. The conclusion is drawn that the allocation of the site at St Catherine's Hospice is supported, and should remain in the emerging Local Plan for development for residential Class C3 use for older people and/or residential rooms as Class C2, with flexibility to bring forward unrestricted residential dwellings (use class C3) if it can be demonstrated that there is a lack of developer interest via a marketing period of 3 months or demonstrably evidence of need for unrestricted C3 use at the planning application stage.</p> <p>These representations are underlined by the promotion of the site for residential development. As such, Savills and St Catherine's Hospice reserve the right to comment on the emerging Local Plan.</p>   |
|                              |   |              | <p><b>Suggested Modifications:</b><br/>Please refer to appended Representation (REP/023).</p>  |
| REP/023                      | Savills on behalf of St Catherine's Hospice | H2           | <p>Please refer to appended representation (REP/022)</p> <p><b>Suggested Modifications:</b><br/>In light of this, we request that Strategic Policy H2 is reworded to allow higher densities at this location and ensure that if there is a lack of developer interest or demand in the market, the site can be redeveloped for unrestricted C3 use.</p> <p>As part of this, the expectations for Building Regulations Part M, Category 3 should be omitted if the site is not developed for elderly housing. This will recognise the opportunities available at the site, demonstrating the Council's commitment to facilitating housing delivery in Crawley.</p> <p>In addition, it is important that the largest allocations identified in Policy H2 include an allowance for C2/C3 older person accommodation. This will enable a balanced mix of supply and is required in the context of making the best use of land in response to CBC's acknowledged unmet needs.</p> <p><b>Recommended Changes</b><br/>"[St Catherine's Hospice (developable) as residential Class C3 use for older people (60 - 70 dwellings) and/or residential rooms as Class C2 (Residential Home) use.<br/>Development on these sites should specifically meet the needs of older people, either as a care facility in the form of Extra-Care or Residential Care or to provide general housing designed to meet particular needs of older people including being wheelchair adapted dwellings meeting Building Regulations Part M, Category 3 accessibility standards] <b>unless</b> it can be demonstrated that there is a lack of developer interest via a marketing period of 3 months or demonstrably evidence of need for unrestricted C3 use at the planning application stage."</p> |

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| REP/024                      | Tony Fullwood Associates Chartered Town Planners on behalf of The Bucknall Family | H2           | <p><b>Policy H2: Land east of Balcombe Road/Street Hill, Pound Hill</b></p> <p>I act on behalf of the Bucknall family – owners of the Housing, Biodiversity and Heritage Site allocated within Policy H2 (Key Housing Sites) in the Crawley Borough Local Plan 2015 – 2030. It is common ground with the Borough Council that the site remains suitable, available and achievable.</p> <p><i>Site Suitability</i></p> <p>There are no changes in national policy which either diminish the need for housing in the Borough or further constrain development. Up to date evidence in the form of the Standard Method Housing Need Calculation indicates a total need for 752 dwellings per annum during the Local Plan review period compared with the average annual requirement in the adopted Plan of 340 dwellings per annum. The draft Local Plan states that there will be an unmet housing need of approximately 5,925 dwellings within the Borough over the Plan period. It is clear from local evidence that effective use must be made of land already allocated in the adopted Local Plan.</p> <p>The site remains eminently suitable to deliver 15 dwellings as previously confirmed by extensive evidence; the Local Plan Inspector's report and its allocation in the adopted Local Plan. The landowner accepts adopted Local Plan Policy H2.</p> <p><i>Site Availability</i></p> <p>The site remains immediately available and would already have been brought forward for housing development but for a frustration caused by the difficulties encountered by the Borough Council in the production of a satisfactory and lawful Development Brief referred to in Policy H2.</p> <p>A Development Brief was first issued for consultation in July 2017. The lengthy document (62 pages) sought to go beyond the Local Plan in constraining development at the site to the point where Counsel advised the landowner that, in its present form, the Brief was unlawful because it is in conflict with the Local Plan. A second 58 page consultation draft Development Brief was issued in November 2018 with similar flaws to the first version. On both occasions, the landowner has sought to ensure that the requirements set out in the draft Brief do not go beyond those contained within Policy H2 or which may be legitimately imposed from other Local Plan policies. The Local Plan Inspector's Final Report to Crawley Borough Council (2 November 2015) states:</p> <p><i>The fact that the principle of housing development on the site is established through a specific allocation is sufficient to allay concern about conflict with other local plan policies (Para 57).</i></p> <p>There is an absence of any recognition in the draft Briefs that the Inspector accepted that the development would cause some harm, but considered that this was outweighed by the need for housing and the environmental mitigation measures considered, and that an allocation for 15 houses represented an appropriate balance between those two considerations. Instead, the draft Briefs appeared to be seeking to eliminate any harm and to over-constrain development.</p> |

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|                              |            |              | <p>An acceptable and lawful Development Brief has still to be adopted by the Borough Council despite allocation of the site in the adopted Local Plan in December 2015 and consultation on the first draft Development Brief in July 2017. The SHLAA, January 2020, states that the council will continue to engage with the landowner and progress the Development Brief to adoption in order to facilitate the coming forward of a suitable scheme and the Bucknall family look forward to positive engagement in order to ensure an acceptable and lawful Development Brief that facilitates the early delivery of a sensitive and viable housing development.</p> <p><i>Site achievability</i><br/>The site can be, and should already have been, delivered and is considered to be viable and achievable provided the Development Brief does not impose further restrictions and requirements beyond those agreed by the Local Plan Inspector and contained within adopted Local Plan Policy H2. It is for the Local Planning Authority to enable the delivery of this allocated site by ensuring the requirements sought by the Inspector and the adopted Local Plan as necessary and justified mitigation measures are not supplemented in the Development Brief such that the allocation is no longer viable or deliverable.</p> <p><i>Conclusion</i><br/>There is strong justification for retaining Land east of Balcombe Road/Street Hill, Pound Hill as a deliverable Housing, Biodiversity and Heritage Site allocation within Policy H2 (Key Housing Sites) and the Bucknall family wish to strongly support its retention in the emerging Crawley Borough Local Plan 2020 – 2035.</p> <p><b>Objection to Policy H2 Housing, Biodiversity and Heritage Site allocation criterion (v)</b><br/>The Bucknall family wish to object to the proposed amended wording in criterion v. The criterion now seeks to <b>'avoid'</b> rather than <b>'limit'</b> harm to grassland on the site. The inclusion of this wording would result in this part of the Regulation 19 Local Plan not being effective or consistent with national policy – consequently making this part of the Local Plan unsound.</p> <p><i>Effective</i><br/>The restriction to avoid harm to grassland within the housing site could be detrimental to the site being deliverable over the plan period.<br/>In considering the allocated site, the adopted Local Plan Inspector stated:<br/><i>The most important attribute of the SNCI, the species-rich meadow grassland, has diminished appreciably since designation as a result of encroaching bramble scrub. Without intervention all the meadow grassland habitat will in time be replaced by bramble and, ultimately, woodland. Proper management of the two-thirds of the SNCI not affected by development would enable the decline of the remaining species-rich meadow habitat to be arrested.</i></p> |

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|                              |            |              | <p><i>Mitigation of this nature, secured as part of the development, would offset the harm caused by the loss of part of the meadow and (as with the heritage assets) represents a balanced approach to meeting the housing needs of the area.</i></p> <p>It is clear that the Inspector's decision was based on an acceptance that the grassland within the housing area would be lost, and that the objective of securing net gains for biodiversity would be delivered on the other parts of the Site (hence the allocation of the wider Housing, Biodiversity and Heritage Site). The attempt to impose the revised wording to 'avoid harm' would severely undermine the ability of the site to deliver housing development in line with the Inspector's conclusions.</p> <p>The Local Plan Inspector clearly had in mind the wider tests of achieving sustainable development when allocating this site. In particular he referred to the social benefits of achieving a "nonetheless significant contribution towards meeting Crawley's housing need on a site within Crawley". He was also clearly mindful of the environmental benefits which can be achieved as a result of development but was no doubt aware that achieving a certain scale of development would result in some limited and acceptable harm to the grassland. This is reflected in his proposed modification (now included in the Local Plan) which sought to '<b>limit</b>' harm in the adopted Local Plan.</p> <p>This is confirmed in the Sustainability Appraisal which in relation to the Housing, Biodiversity and Heritage Site states:</p> <p><i>...it is essential that appropriate mitigation measures are in place and secured to <b>limit</b> the negative impacts of development (<b>my emphasis</b>).</i></p> <p>It is not acceptable, and should not be necessary, to rely on the phrase at the foot of Policy H2 which states that where impacts cannot be avoided adequate mitigation and compensation measures will be provided to offset any harm caused to the site's important assets. This leaves greater uncertainty over how the Borough Council will apply criterion (v) in their interpretation of NPPF Para 175 (a) in the future. In any event, in the case of the allocated Housing, Biodiversity and Heritage Site the change to criterion (v) represents an unnecessary change to Policy H2 when it has already been accepted by the Local Plan Inspector and in the adopted Local Plan that, as a consequence of this allocation, there will be limited harm to the grasslands. The proposed amendment by the Council is reminiscent of the approach to the draft Development Briefs which in places seek to eliminate any harm rather than accept the Inspector's and the Local Plan approach that there will be limited harm (and compensatory benefits) which are outweighed by the need for housing and the opportunity to achieve this on a suitable site in Crawley.</p> <p>The need for this change is compounded by the revisions to Policy CL8: Development Outside the Built Up Area. Policy H2 Housing, Biodiversity and Heritage allocation sits within the Tilgate/Worth Forest and Fringes. This part of Policy CL8 has been amended to include reference to biodiversity:</p> |

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|                              |  |              | <p><i>Proposals within Tilgate Country Park and Worth Conservation Area/Worth Way LWS should conserve and enhance their high landscape <b>and biodiversity</b> value and potential for improved green infrastructure links to other areas. (my emphasis)</i></p> <p>There is no caveat to this policy to allow for mitigation.</p> <p><b>Suggested Modifications:</b><br/> <b>Modification necessary to resolve the issue identified</b><br/> Amend wording to Policy H2 Housing, Biodiversity and Heritage Site creation (v) to that included in the Adopted Local Plan:<br/> v. <b>limit</b> harm to the species-rich meadow grassland which contributes to the Local Wildlife Sites (LWS);</p>  |
| REP/026                      | Rainier Developments LTD                       | H2           | <p>Rainier support the identification of MOKA at Strategic Policy H2 as a key housing site and allocated on the Local Plan Map. MOKA is identified as a deliverable Town Centre Key Opportunity Site. We confirm that MOKA, which benefits from a resolution to grant planning permission as stated above, is deliverable and new housing will be delivered early in the plan period.</p> <p><b>Suggested Modifications:</b><br/> See Regulation 18 response</p>   |
| REP/033                      | Horsham District Council                       | H2           | <p>We support this policy in principle, but consider it is not justified as stands. As set out in our comments to earlier policies (and in particular Policy H1), there is insufficient evidence to support the overall number of dwellings suggested, given that further sites could be allocated if further investigations through a densification study were made.</p> <p><b>Suggested Modifications:</b><br/> Change sought: It is considered necessary to prepare a densification study. This should include analysis of whether assumptions built into policies as drafted, for example on town centre redevelopment opportunities, surplus green spaces, and estate regeneration should be different and if so, whether this could yield significant further housing capacity in Crawley.<br/> It is also requested that reference is made to the alternative scenario of Langley Green and Forge Wood sites coming forward as a result of Gatwick safeguarding being removed (as stated in 12.28), with associated housing capacities and an alternative trajectory and unmet need figure.</p> |
| REP/046                      | Firstplan on behalf of Aggregate Industries UK | H2           | <p>Our clients jointly operate Crawley Goods Yard - an established rail fed aggregates depot and safeguarded railhead. The goods yard has the capacity to handle a million tonnes of aggregate a year with the potential for expansion in the future. The site supports additional key minerals infrastructure and related development including two concrete batching plants, an asphalt plant and construction and demolition waste recycling plant.</p>   |

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|                              | Ltd, Cemex UK Operations Ltd, Day Group Ltd and Brett Group |              | <p>The operators of the Goods Yard were fully involved in the last Local Plan process which led to specific wording in the adopted version of Policy H2 regarding the Tinsley Lane site. This requires that development on this site must be “planned, laid out and designed to minimise potential future conflicts and constraints on the important minerals function of the adjacent safeguarded minerals site”.</p> <p>The operators were subsequently also involved in providing comments in response to consultation undertaken in the preparation of the Tinsley Lane Development Brief (Adopted April 2017). This now includes at Section 7 guidance on Noise.</p> <p>In respect of Draft Strategic Policy H2, it is noted that the designation of the Tinsley Lane site has the same wording as the current Local Plan except for reference to the adopted development brief. It is also noted that draft Paragraph 12.40 is the same as adopted Paragraph 6.53. The Crawley Goods Yard operators support the previously approved wording in both Policy H2 and draft Paragraph 12.40 which requires that development must be carefully planned, laid out and designed to minimise potential future conflicts and constraints on the important minerals function of the adjacent minerals site. This wording was found sound by the previous Inspector and continues to be supported by National and County level policy.</p> <p><b>Suggested Modifications:</b><br/>None subject to the draft wording remaining the same.</p> |
| REP/048                      | Wood PLC with Homes England C/O Agent                       | H2           | <p>Wood is retained by Homes England to respond to the Crawley Borough Local Plan 2020 – 2035 consultation draft on its behalf, particularly with regard to its land interest at Tinsley Lane, Crawley. The site is allocated in Policy H2 of the adopted Local Plan and draft Policy H2 of the Local Plan review to deliver new homes. An outline planning application for the site was submitted in 2018 seeking permission for up to 150 homes. This application is currently being considered by the Borough Council (reference CR/2018/0544/OUT). The representation below confirms that the site remains available and deliverable. Homes England intends to dispose of the site soon after planning permission is granted and therefore the site will come forward in the short term to deliver homes and boost supply. However, given the current undersupply of homes in the borough, there is a pressing need to ensure that development at Tinsley Lane makes an efficient use of the site in line with guidance in the NPPF. Homes England has robustly tested the capacity of the site through the preparation of the outline planning application and considers that 150 homes rather than 120 homes as stated in the adopted and draft Policy H2 are achievable on the site. Accordingly, in order to make an efficient use of this sustainable site and contribute to boosting supply, it is considered that the Policy should be amended to recognise that 150 homes can be delivered.</p>                            |

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|                              |            |              | <p><b>2.1 Strategic Policy H2: Key Housing Sites Land at Tinsley Lane</b></p> <p>Home England supports the inclusion land at Tinsley Lane being identified as housing site. Policy H2 of the adopted Local Plan and draft Local Plan include the Tinsley Lane as being suitable for 120 dwellings. As noted above, the allocation wording notes this is an indicative figure and Homes England considers the outline planning application demonstrates that the site can deliver 150 dwellings.</p> <p>The submitted outline planning application proposals comply with the criteria in Policy H2 and development will provide a range of community benefits including new sports facilities and public access to Summersever Woods.</p> <p>Homes England considers that this site has significant potential to assist the Council in meeting its development needs, hence the outline planning application. It provides a highly deliverable and developable location in line with guidance in the NPPF. In particular, the site is available now, it offers a suitable location for development and is achievable with a realistic prospect that housing could be delivered within five years. The site:</p> <ul style="list-style-type: none"> <li>• Is not covered by any strategic constraints which would prevent development. It is flood zone 1 and has no other constraints that would preclude development.</li> <li>• Presents a logical and sustainable location for new housing provision. It can deliver a quality development to assist in meeting the significant development needs in the Borough. It is an attractive location for new housing and would be likely to attract further market interest by national developers.</li> <li>• The site is in single ownership of Home England who is willing to bring the land forward. The site can deliver quality development to assist in meeting the Local Plan requirement, including a mix of dwellings. Should the current outline planning application be approved, Homes England would market the site immediately to deliver homes in the short term.</li> </ul> <p><b>Suggested Modifications:</b></p> <p><b>Summary and suggested amendments to Policy H2:</b> As outlined above the Tinsley Lane site is considered suitable and is deliverable. Homes England is progressing the site and there is an expectation that it will deliver homes within the next five years. However, in the above context of boosting supply and making an efficient use of sites (see comments on Policy H1) we suggest the policy wording should be changed to:<br/> <i>Tinsley Lane, Three Bridges (deliverable) 120 150 dwellings, mixed use recreation/residential.</i></p> <p><i>Development of this site must include:</i></p> <ol style="list-style-type: none"> <li><i>the replacement of Oakwood Football Club;</i></li> <li><i>senior football pitch and facilities;</i></li> <li><i>a junior 3G football pitch;</i></li> <li><i>community use arrangements for the sports pitch facilities;</i></li> <li><i>enhancement and management for public access of Summersvere Woods;</i></li> </ol> |

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|                                     |  |                     | <p><i>v. on-site publicly accessible play space and amenity greenspace.</i></p> <p><i>vi. Consideration should also be given to the provision of allotments</i></p>   |
| REP/059                             | Surrey County Council                  | H2                  | <p>We consider that the Crawley Local Plan is legally compliant, sound and compliant with the duty to co-operate, but wish to emphasise the importance of maintaining the policy wording set out below.</p> <p><b>Draft Crawley Borough Local Plan 2020 – 2035 January 2020 Submission Publication Consultation: January – March 2020</b></p> <p>Thank you for consulting Surrey County Council (SCC) on the Crawley Local Plan Review 2020 – 2035 Submission Consultation. We previously responded, by letter, dated 11 September, to the consultation on the Regulation 18 Local Plan Review. Our earlier comments related to highways, heritage and early years. We have no further issues to raise on these matters. Our officer response to the current consultation relates to our role as the Mineral and Waste Authority for Surrey and our comments are set out below.</p> <p>We welcome the requirement, in Policy HS2: Key Housing Sites, for development on the Tinsley Lane site to be designed to minimise potential future conflicts with the function of the adjacent Crawley Goods Yard safeguarded minerals site. The continued operation of this facility will help to ensure that Surrey is supplied with necessary construction aggregates.</p> <p><b>Suggested Modifications:</b></p> <p>We support the requirement, in Policy HS2: Key Housing Sites, for development on the Tinsley Lane site to be designed to minimise potential future conflicts with the function of the adjacent Crawley Goods Yard safeguarded minerals site. The continued operation of this facility will help to ensure that London and the South East is supplied with necessary construction aggregates.</p> |
| REP/060                             | Savills on behalf of Bellway Homes Ltd | H2                  | <p><b>Representations to Crawley’s Local Plan Review Regulation 19 Consultation Former TSB Site, Russell Way, Crawley</b></p> <p>Thank you for providing us with the opportunity to engage with the Regulation 19 consultation on the Council’s Local Plan Review. I write on behalf of our client, Bellway Homes Limited (South London), who has an interest in the above site.</p> <p>Below, I set out a brief summary of the context of the site before turning to specific comments on the consultation document.</p> <p><b>Context</b></p> <p>The site is located off Russell Way within the Three Rivers area of Crawley. The site measures approximately 0.32 hectares in size and is currently a cleared, vacant site. Within the current Local Plan the site is allocated as a key housing site.</p>   |

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|                              |            |              | <p>Bellway has recently submitted a planning application at the site for the following development:<br/> <i>“Erection of L Shaped 4 storey building comprising 59 x flats with associated landscaping, refuse and cycle storage, infrastructure works and parking court at the rear.”</i> (LPA Ref. CR/2020/0037/FUL).</p> <p>This application follows pre-application discussion with planning and design officers at CDC, and highways officers at WSCC. These discussions have informed the layout and design of the scheme which have evolved and developed in response to the comments and feedback provided.</p> <p>It’s also worth noting that on 16th September 2019 Bellway submitted representations to the Crawley Local Plan Review Regulation 18 Consultation. As part of these representations Bellway commented on a number of draft policies, including Policy H2, Policy EC2, Policy H4, Policy H5 and Policy ST2.</p> <p>This letter is drafted in the context of Bellway’s previous representations to the Council on its Local Plan Review, and in the context of its planning application at the site.</p> <p><b>Comments on the Consultation Document</b><br/> <i>Strategic Policy H2: Key Housing Sites</i></p> <p>Within the Regulation 19 document we note that the Council is still proposing to retain the key housing allocation at the site. This is strongly supported. However, we note that the Council has increased the indicative capacity from 40 dwellings within the Regulation 18 document to 90 dwellings within the Regulation 19 document. Whilst this increase is supported in principle, 90 dwellings is considered too high. The proposed development pursuant to planning application CR/2020/037/FUL at the site followed a detailed analysis of the site and the surrounding area. A design-led approach was adopted from an early stage to ensure that the scheme positively responded to the existing and emerging character of the area and was commercially viable.</p> <p>The resulting proposals include a four storey building comprising 59 residential dwellings. Whilst the layout, height and massing of the building, and the resulting residential density, is considered wholly appropriate given the site specific circumstances, a viability appraisal has been submitted with the application as the proposed provision of affordable housing is not policy compliant due to issues with viability arising from the development.</p> <p><b>Suggested Modifications:</b></p> <p>We are concerned that a development of 90 dwellings would completely redefine the configuration of the development from that proposed by the current planning application, for example with regards to the form of construction and how car parking is accommodated. As such, we believe the viability of delivering 90 units on this site would need to be demonstrated.</p> <p>Given the above, it is respectfully requested that the indicative capacity for the Former TSB Site be amended to allow for a range of dwellings to be delivered at this site of between 60-90 units within the next version of the Local</p> |

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|                              |  |              | Plan. This will ensure that the current application remains policy compliant with regards to unit numbers, whilst not precluding the provision of additional units from this site should circumstances facilitate this.  |
| REP/062                      | Environment Agency                             | H2           | <p><b>Meeting Housing Needs</b><br/> <b>Strategic Policy H2: Key Housing Sites</b><br/> Housing, Biodiversity and Heritage Site<br/> <input type="checkbox"/> Land east of Balcombe Road/Street Hill, Pound Hill<br/> <b>This policy needs to be amended for clarification purposes before we can support it.</b></p> <p><b>Suggested Modifications:</b><br/> This allocation of this site must also ensure that biodiversity net gain is achieved, and that sufficient corridor for wildlife is retained along the stream corridor as highlighted in the previous local plan.<br/> The highlighting of the area for housing is not helpful as it includes areas of floodplain along the stream corridor and does not therefore demonstrate full protection of the site's assets. We therefore recommend the way housing area is highlighted is altered or some of the principles of the development change. E.g. reducing the amount of land take by the proposed housing allocation.</p> <p><b>Forge Farm (page 150)</b><br/> It is not clear from the mapping where the additional housing supply land is proposed. Given the amount of semi natural habitat covering remaining areas of this site and the requirement to provide biodiversity net gain the authority may need to think strategically whether on site net gain is realistic and may have to work with neighbouring authorities in order to help provide strategic corridors for wildlife elsewhere.<br/> No significant new sites are proposed within the borough boundaries.<br/> It would be helpful if supplementary guidance looks realistically at how Biodiversity Net Gain can be achieved in collaboration with neighbouring authorities.</p> |
| REP/063                      | Pegasus Group on behalf of Persimmon Homes Plc | H2           | <p><b>Strategic Policy H2: Key Housing Sites</b> lists a number of sites allocated for a residential delivery. The Policy points out that the listed sites are critical to the delivery of housing developments across the Plan period. The policy indicates that Forge Wood Masterplan area is considered to be an area deliverable within the first five years of the plan (2020/21-2024/25) and has an outstanding 1,270 dwellings to be delivered by 2027/28. The importance of the Forge Wood area is emphasised in the introduction section of the plan and Persimmon Homes has ongoing interests in this part of the Borough. The foreword section of the document states the following<br/> <b>“To meet the needs of its growing population and its key economic role at the heart of the Gatwick Diamond, by 2035 Crawley would need to provide over 11,200 more homes, generating up to 20,541 new jobs. &lt;...&gt; Forge Wood is the last full neighbourhood which can be built within the borough boundary as there is simply no space left.”</b></p>   |

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|                                     |                       |                     | <p>The supporting text at paragraphs 12.35-12.37 provides further information on the Forge Wood area. It identifies that the new neighbourhood is currently under construction and will result in a total of 1,900 new dwellings alongside associated infrastructure. It identifies that there may be opportunities within the masterplan area to consider further smaller-scale housing development beyond the 1,900 committed dwellings. The infill proposals would be subject to a number of additional considerations including infrastructure capacity, open space and amenity requirements, biodiversity and ancient woodland, and the requirements of Policy EP4 relating to noise affected areas.</p> <p>As a part of Crawley Borough Council Local Plan regulation 19 Public Consultation held in September 2019, Pegasus Group, on behalf of Persimmon Homes highlighted five parcels of land within the Forge Wood Area that were identified by the Persimmon Homes as available and suitable for development. These are presented on the appended (shown as highlighted against the background context of the approved Forge Wood Masterplan) and remain available for development.</p> <p>The Crawley 2035 Local Plan Map published by the Local Authority as part of the Regulation 18 Consultation identified the entirety of the Forge Wood Area as a site subject to the Policy H2: Housing Sites.</p> <p><b>Suggested Modifications:</b></p> <p>The Policies Map has now changed and this leads to some confusion about where development will be supported. The whole Forge Wood Neighbourhood is shown cross hatched and the key cross refers to Policy H2. However, the Key Housing Sites are shown in red but cover a reduced area whilst still cross-referring cross to Policy H2. The question therefore arises over which area Policy H2 is to be applied to.</p> <p>If it is the red area then the Regulation 19 Consultation appears to reduce the extent of the allocated area.</p> <p>The previous set of representations submitted by Pegasus Group in relation to the infill sites across the Forge Wood Neighbourhood area (as shown on the attached masterplan) provided an indication of the development locations. It did not specify the proposed use types however, the sites put forward in these representations were expected to comprise a mix of uses, including residential and non-residential development options. The overarching objective was to maximize the potential of the land available and suitable for the development in the Forge Wood Neighbourhood.</p> |
| REP/068                             | Sussex Wildlife Trust | H2                  | <p><b>Strategic Policy H2: Key Housing Sites</b></p> <p>We note this policy suggests new housing sites as well as those that are being brought forward from the last plan. We are not aware of any work to show that preliminary ecological appraisals of these sites have been undertaken prior to their inclusion within the submission Local Plan. We strongly encourage CBC to consider the way these potential allocations sit within the green infrastructure strategy for the Borough and to ensure that when allocations are made, they do not act to sever networks vital for climate change resilience and natural capital as per paragraphs 170 and 148 of the NPPF.</p>   |

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| Ref. No.                     | Respondent                                     | Policy/ Para | Comments  |
|                              |  |              | <p><b>Suggested Modifications:</b><br/>           SWT maintains its objection to the allocation of a Local Wildlife Site for housing. Given the requirement in the NPPF for plans to promote the conservation, restoration and enhancement of ecological networks and the fundamental role that locally designated sites play in this network, this is inappropriate.<br/>           The Government's Planning Practice Guidance (ref: 013-20190721) states that LWS are areas of substantive nature conservation value and make an important contribution to ecological networks and nature's recovery. National planning policy expects plans to identify and map these sites, and to include policies that not only secure their protection from harm or loss but also help to enhance them and their connection to wider ecological networks. Therefore we continue to recommend that the Land east of Balcombe Road allocation should be removed from the policy. However if CBC are minded to act contrary to the PPG then we do note that CBC have incorporated the wording we proposed in order to strengthened the policy wording and avoid as many impacts as possible.</p> |
| REP/033                      | Horsham District Council                       | H3b          | We support this policy which is clear in its encouragement of efficient use of land in a number of ways.  |
| REP/063                      | Pegasus Group on behalf of Persimmon Homes Plc | H3b          | <p><b>Strategic Policy H3b: densification, Infill Opportunities and Small Sites</b> states that Densification and development on Infill and small sites in Crawley will be supported, subject to further requirements set out in the Policy. The policy supports the Council's approach in Policy H1: Housing Provision, whereby the Council is seeking to maximise the existing opportunities across the Borough. The policy supports densification and infill or small site developments across the Borough. Pegasus Group welcomes this approach that further reflects the spirit of the Government's approach and is in line with the national policy.<br/>           This policy may overcome the confusion noted above regarding Policy H2 in the Forge Wood area. However it would be preferable to omit reference to small sites and instead allow Policy H3b to apply to all sites within the built up area (subject to normal other development control criteria).</p>  |
| REP/026                      | Rainier Developments LTD                       | H3c          | <p>Rainier support the principle of Strategic Policy H3c: Town Centre Sites however, as currently drafted, we are concerned it could overburden new development which may not be able to meet all of the criteria listed at items i to viii. We suggest that this policy should include flexibility to ensure that it is able to balance the intentions of the policy against the benefits of proposed new town centre development. This could be achieved by requiring proposals to 'generally' meet or meet the 'majority of' the criteria listed.</p> <p><b>Suggested Modifications:</b><br/>           See Regulation 18 response</p>   |
| REP/033                      | Horsham District Council                       | H3c          | We support this policy. It is considered that there may be further opportunities for the town centre area and mixed use developments to provide more housing to help meet the unmet need in Crawley, as set out in our comments to Policies H1 and H2.  |

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| REP/033                             | Horsham District Council    | H3d                 | We support this policy which encourages efficient use of land through building upwards.  |
| REP/059                             | Surrey County Council       | H3d                 | <p>We consider that the Crawley Local Plan is legally compliant, sound and compliant with the duty to co-operate, but wish to emphasise the importance of maintaining the policy wording set out below.</p> <p><b>Suggested Modifications:</b><br/>           As Surrey's landfill capacity is limited, we support the requirement, included within policies DD1, H3d and H3e, for waste and recycling storage to be designed into new housing development schemes. These measures will minimise waste by ensuring that it is managed at the highest practical point on the waste hierarchy. For this reason, we suggest minor modifications to policies DD1, H3d and H3e, to include a requirement for the sustainable management of construction, demolition, and excavation waste. These modifications would be in accordance with West Sussex Waste Local Plan Policy W23: 'Waste Management within New Development'.</p> <p>As Surrey's landfill capacity is limited, we welcome the requirement, included within policies DD1, H3d and H3e, for waste and recycling storage to be designed into new housing development schemes. These measures will minimise waste by ensuring that it is managed at the highest practical point on the waste hierarchy. For this reason, we suggest minor modifications to policies DD1, H3d and H3e, to include a requirement for the sustainable management of construction, demolition, and excavation waste. These modifications would be in accordance with West Sussex Waste Local Plan Policy W23: 'Waste Management within New Development'.</p> |
| REP/066                             | Mid Sussex District Council | H3d                 | <p><b>Crawley Local Plan Review 2020 – 2035 – Submission version</b></p> <p>Mid Sussex welcomes the opportunity to comment on the submission Crawley Local Plan Review (the Plan) and our detailed comments on the Strategic Polices of the Plan build on our earlier response to the Regulation 18 draft of the Local Plan.</p> <p>Mid Sussex welcomes the further work undertaken by Crawley since the publication of the draft Local Plan and the identification of additional sources of housing supply, resulting in another 550 units. In particular, Mid Sussex supports the revisions to policies which will ensure that there is a more effective use of land in meeting housing and other land use needs in line with the National Planning Policy Framework (NPPF).</p> <p>Mid Sussex has reviewed the Plan and accompanying evidence that has been prepared to support the Plan however it is noted that some of the evidence base, including Transport Assessment, Viability and Habitats Regulation Assessment have not yet been completed and therefore these comments are provided in this context. Mid Sussex may wish to make further comments as and when the evidence base is complete.</p> <p><b>Suggested Modifications:</b><br/>           Mid Sussex <b>supports</b> this policy which supports upwards extensions in line with the NPPF and provides clear guidelines on assessment of proposals.</p>   |

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| REP/056                             | Gatwick Airport Limited  | H3d                 | <p><b>Policy H3d: Upward Extensions - Proposed Minor Amendment</b><br/>           GAL support broadly Policy H3d in the requirement for new upwards extensions to have been agreed with Gatwick Airport to ensure that the proposal complies with the safety needs of Aerodrome Safeguarding. However, GAL do consider the policy requires a minor amendment at Policy H3d (i)</p> <p><b>Policy H3d (i) - Proposed Policy Amendment:</b><br/>           GAL request the following amendment<br/>           '..... Gatwick Airport Ltd in relation to aerodrome safeguarding &amp; NATS En Route LTD in relation to technical sites safeguarding'.</p>  |
| REP/059                             | Surrey County Council    | H3e                 | <p>We consider that the Crawley Local Plan is legally compliant, sound and compliant with the duty to co-operate, but wish to emphasise the importance of maintaining the policy wording set out below.</p> <p><b>Suggested Modifications:</b><br/>           As Surrey's landfill capacity is limited, we support the requirement, included within policies DD1, H3d and H3e, for waste and recycling storage to be designed into new housing development schemes. These measures will minimise waste by ensuring that it is managed at the highest practical point on the waste hierarchy. For this reason, we suggest minor modifications to policies DD1, H3d and H3e, to include a requirement for the sustainable management of construction, demolition, and excavation waste. These modifications would be in accordance with West Sussex Waste Local Plan Policy W23: 'Waste Management within New Development'.</p> <p>As Surrey's landfill capacity is limited, we welcome the requirement, included within policies DD1, H3d and H3e, for waste and recycling storage to be designed into new housing development schemes. These measures will minimise waste by ensuring that it is managed at the highest practical point on the waste hierarchy. For this reason, we suggest minor modifications to policies DD1, H3d and H3e, to include a requirement for the sustainable management of construction, demolition, and excavation waste. These modifications would be in accordance with West Sussex Waste Local Plan Policy W23: 'Waste Management within New Development'.</p> |
| REP/033                             | Horsham District Council | H3f                 | We support this policy which strikes an appropriate balance between protecting and enhancing valued open spaced whist taking a pragmatic approach to allowing some housing development in certain circumstances.   |
| REP/009                             | Resident 4               | H3g                 | I'm concerned about the effect on Crawley of development by neighbouring authorities, eg the Homes England proposal for West of Ifield, which could destroy the rural fringe with 10,000 new homes. How can CBC ensure the preservation of the Special Local Character and biodiversity/conservation value of the Ifield Village Conservation Area, and Ifield Brook Meadows and playing fields? I refer to para 14.39 of the Planning document: 'Public consultations have consistently shown that Ifield Brook Meadows and Rusper Road Playing Fields should be protected because of their special value to the local community. The Meadows are an important site of nature conservation with distinctive vegetation and wildlife. The northern part of the Meadows is of historic  |

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|                                     |                               |                     | <p>importance, forming part of the Ifield Village Conservation Area, contributing to the setting of the village and church. These elements make this area unique and local in character.'</p> <p>More generally at a time when biodiversity is being lost at a phenomenal rate, I feel it would be very sad to lose or threaten the rich flora and fauna found in the areas of ancient woodland, Ifield Brook Meadows, and abundant hedgerows of the area. According to detailed ecological surveys carried out by local residents over recent decades, the area supports species of national importance such as longhorn beetles, not to mention those previous residents which are now seen only occasionally, such as the Barn and Little Owls, Kingfisher, Skylark, Nightingale, and Hedgehog. We should be nurturing these ecosystems for future generations.</p> <p><b>Suggested Modifications:</b><br/>Para 12.72 should refer to the need to ensure that development by neighbouring authorities on the Crawley boundary does not jeopardise Crawley's heritage and natural assets.</p>   |
| REP/020                             | CAGNE                         | H3g                 | <p>Clearly there is a need for a robust local plan to provide for the future of the town. However and given the fast changing times in which we now live any plan must be flexible enough to change with developments. Whilst the Plan appears robust and comprehensive it needs to take account of increasing pressures on the town arising from the continued expansion of Gatwick Airport, which appears to be largely beyond the control of Crawley Borough Council (CBC) and pressure on rural areas around the town from housing developments, often again beyond the control of CBC.</p> <p><b>Suggested Modifications:</b><br/>CBC needs to have more control over the areas identified above as being currently beyond its control. Failing this the quality of life for Crawley residents will continue to decline no matter what the content of the Local Plan. It is important that CBC recognise the factors that would lead to a decline in the quality of Crawley residents wellbeing and attempts to monitor them. The preservation and expansion of currently protected green sites both within and outside the town is vital. Steps need to be taken to monitor and object to the current apparently uncontrolled expansion of Gatwick Airport by the back door and without any proper central or local government review. Better measures need to be introduced to monitor air quality within and outside of the town as this is a real threat to the health of residents. Given the pressure for new house building in the county CBC must work with other local authorities to ensure that Crawley's currently strained infrastructure is not further tested and over loaded by the demand for additional housing by other local authorities (I refer specifically to Homes England plans for 10,000 plus new homes on land west of Ifield).</p> |
| REP/022                             | Sussex Ornithological Society | H3g                 | <p><b>Suggested Modifications:</b><br/>Section (v) should be deleted for the reasons spelt out in 3 to 15 above. Crawley cannot continue to maintain these policies and continue to offload all their overflow for ever more onto neighbouring local authorities.</p>   |

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|                              |                          |                    | <p>Instead two new sections should be inserted as follows:</p> <p>(-) <i>Recognising the unique and irreplaceable importance of the High Weald AONB urban extensions into it will not be considered.</i></p> <p>(-) <i>A full Habitat Assessment, which includes the use of up-to-date records from the Sussex Biodiversity Records Centre, shall be carried out for any proposed urban extension to identify what the ecological impact of that extension would be. Any development proposals will be required to include proposals to fully mitigate for the loss of any significant habitat that supports species of high conservation concern, such as Section 41 species or Red Listed Bird Species.</i></p>   |
| REP/030                      | Resident 11              | H3g                | <p>Crawley roads are already crumbling due to sheer volume of traffic as council spending millions on pot holes demonstrates. Rusper Rd is very narrow one parked car creates havoc.</p>  |
|                              |                          |                    | <p><b>Suggested Modifications:</b><br/>Strategic policy H3g urban extension p160 1v Should be changed to Western link road connecting A264 to A23 at county oak policy ST4 should be agreed and provided prior to the completion of (FIRST property.) Reason for this is present infrastructure would not be able to cope with construction traffic.</p>  |
| REP/033                      | Horsham District Council | H3g                | <p>We support this policy in principle, but consider it is not justified as stands and that its effectiveness could be improved.<br/>Given the pressing need for housing in the area and unmet housing need, it is considered imperative that estate regeneration opportunities are explored as this is a potential source of additional housing supply that is, to a great extent, within the control of CBC. This could form part of a densification study, and is necessary to ensure that no stone is left unturned. Such a study may identify further broad areas for development to yield additional housing in the later years of the Plan period.<br/>We welcome paragraph 12.72 and the fact it has now been moved to before the policy (as suggested in our response to your Regulation 18 consultation).</p> |
|                              |                          |                    | <p><b>Suggested Modifications:</b><br/>Change sought: It is considered necessary to prepare a densification study. This should include analysis of whether and estate regeneration could play a part in providing additional housing within Crawley's administrative boundaries.</p>  |
|                              |                          | Policy H3g part ix | <p>Policy H3g part ix is not effective. Including reference to potential nomination rights for affordable housing to potentially be provided outside of Crawley borough is premature and therefore ineffective, given no such agreement in principle has been reached. This bears in mind that Horsham District itself has a high assessed need for affordable housing (503 homes per year) meaning that there may be limited opportunity to meet a significant proportion of Crawley's affordable housing need on top.</p>   |

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| Ref. No.                     | Respondent  | Policy/ Para | Comments  |
|                              |             |              | <p><b>Suggested Modifications:</b><br/>Change sought: Request removal and similarly as a consequential change to the reasoned justification (see further comment on paragraph 12.76).</p>   |
|                              |             | Para. 12.76  | <p>Paragraph 12.76 is not effective as drafted – it currently states:<br/>“Whilst located within Mid Sussex or Horsham Districts, any urban extension on the edge of Crawley should be meeting the unmet housing needs arising from Crawley, and should therefore meet Crawley’s specific needs for affordable housing, housing mix, type, and tenure.”<br/>It is premature to make this statement ahead of any agreement being reached as part of future joint work. HDC wishes to make clear that new development in Horsham district will address the needs of Horsham district in the first instance, as required by NPPF paragraph 35(a) in respect of the minimum requirement for a local plan to pass the ‘positively prepared’ test.</p>  |
|                              |             |              | <p><b>Suggested Modifications:</b><br/>Change sought: Request removal of this sentence.</p>   |
| REP/047                      | Resident 14 | H3g/12.72    | <p>My comments relate to the question of ‘urban extensions’, particularly by neighbouring authorities. I have in mind the potentially enormous Homes England development West of Ifield, and my comments are aimed at both Horsham and Crawley authorities:</p> <ol style="list-style-type: none"> <li>1. I was interested to note from the SHMA that ‘In both authorities, population growth is expected across a range of age groups, but with the strongest growth expected in those aged over 65 linked to changes in the population age structure and improving longevity.’ In fact, the assumption is that 60% of the 24% increase (or 14pp of the 24%) is due to <u>growth in the over 65 population</u>. What does this mean for the types of housing and facilities being proposed by Homes England? <u>The provision of health care, public transport, etc.?</u></li> <li>2. Homes England haven’t considered the question of <u>employment</u> for the working-age residents of West of Ifield. Particularly given Crawley Borough Council’s limited capacity to create jobs by developing land for industrial or business use, due to Gatwick safeguarding.</li> <li>3. Similarly, the problems associated with building and living on a <u>floodplain</u>, on heavy clay, have not yet been addressed.</li> <li>4. How do Homes England propose to respect the fact that Rusper Road is an Area of Special Local Character (ASLC)? This means that proposals should ‘... respect or <u>preserve the character of the area</u> and be designed with regard to the areas existing character and appearance. Proposals should be of an appropriate scale, design and massing, and should not result in significant adverse impact on the locality, its setting and important or valued views. All development within an ASLC should demonstrate, as part of the Heritage Impact Assessment, how the proposals have regard to the area’s designation and the character and appearance of the area.’</li> </ol> |

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|                              |  |              | <p>5. Similarly, Crawley residents and their Borough Council consider West of Ifield is an area of 'locally special <u>rural fringe, its nature conservation and recreation value</u>, its positive relationship with the urban edge and links to the wider countryside will be encouraged.' How does the proposal for 10,000 new homes accord with this?</p> <p>6. Lastly, at a time when <u>biodiversity</u> is being lost at a phenomenal rate, I feel it would be very sad to lose or threaten the rich flora and fauna found in the areas of ancient woodland, Ifield Brook Meadows, and abundant hedgerows of the area. According to detailed ecological surveys carried out by local residents over recent decades, the area supports species of national importance such as longhorn beetles, not to mention those previous residents which are now seen only occasionally, such as the Barn and Little Owls, Kingfisher, Skylark, Nightingale, and Hedgehog. We should be nurturing these ecosystems for future generations.</p> <p><b>Suggested Modifications:</b><br/>           Para 12.72 as currently worded feels a bit blinkered/naive given the scale of some of the developments being considered by neighbouring authorities. I would like to think that 'Crawley and [Horsham] will engage in a process of robust negotiation to ensure that any siting of a significant new-build development is matched by investment in infrastructure and facilities to serve the needs of new and existing residents.'</p>   |
| REP/050                      | Montagu Evans on behalf of Homes England | H3g          | <p><b>Strategic Policy H3g: Urban Extensions</b><br/>           Homes England recognise the purpose of this policy is to allow CBC to articulate the expectations of the Council should development come forward in areas adjoining its administrative boundary. This is particularly important given the ongoing commitment of CBC to work closely with its neighbouring authorities and consider the unmet needs of Crawley over the Plan period and potentially beyond. This includes working with HDC in considering the potential allocation of the land to the West of Crawley through the emerging Horsham Local Plan, as is being promoted by Homes England.<br/>           Policy H3g deals specifically with urban extensions and notes that 'Housing development through urban extensions on or close to Crawley's administrative borough boundaries will be supported by CBC where it can be shown that they meet listed criteria.</p> <p><b>Suggested Modifications:</b><br/>           Whilst Homes England recognise and generally support the intention of this policy; we note that CBC cannot set policy for a neighbouring district. To remove any ambiguity, Homes England recommend that the introductory paragraph is amended as follows:<br/> <i>"Housing development through urban extensions within or close Crawley's administrative borough boundaries will be supported by Crawley Borough Council where it can be shown that <u>they meet the following criteria. Where development may be adjoining the administrative boundary, the criteria below sets out Crawley Borough Council's expectations.</u>"</i></p> |

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|                              |            |              | <p>The following comments relate to criteria listed under H3g where they may impact on proposals relevant to Land West of Ifield and the wider strategic opportunity to the west of Crawley as identified in the HDC Reg 18:</p> <p>ii. <i>The proposals are supported by a comprehensive Masterplan agreed by the relevant authorities (including the county council), in line with the expectations of Policies CL2 and DD1;</i></p> <p>Homes England request that the statement that a masterplan is to be agreed by the relevant authorities (including the county council) is removed from this criteria. Any planning application and associated masterplan can only be agreed through the planning application process, and as such will be determined by the relevant local planning authority receiving and determining the application. It is recommended that this criteria is updated as follows:</p> <p>ii. <i>The proposals are supported by a comprehensive Masterplan agreed by the relevant planning authority. <del>(including the county council)</del>, in line with the expectations of Policies CL2 and DD1;</i></p> <p>This amendment is necessary to fulfil CBC's duty to ensure the plan is consistent with national policy.</p> <p>iv. <i>If development is proposed to the western side of Crawley, the scoping, design and delivery of the comprehensive Western Link Road (connecting from the A264 to the A23, north of County Oak, Policy ST4) should be agreed and provided prior to the completion of properties unless otherwise agreed by the three local authorities: Horsham District, Crawley Borough and West Sussex County Councils;</i></p> <p>Homes England continue to acknowledge that the scoping of the Western Link is a critical aspect of advancing the understanding of any potential major development proposals to the Land West of Ifield.</p> <p>Homes England's objective is to ensure that more detailed masterplanning and modelling of development to the Land West of Ifield , including the work to advance understanding of the wider strategic opportunity, is able to inform the nature and function of any Western Link and that the impact on the existing highway network is therefore beneficial. At this stage, without detailed design / modelling, it is necessary to ensure that the policy does not require an overly prescriptive determinant of the nature of the link and resultant impact on the type of place we are able to create. The precise delivery requirements of this policy are therefore premature.</p> <p>Homes England therefore suggest the wording is amended as follows to recognise that it may be necessary to deliver a Western Link in parts, and subject to design development / modelling it may take on a different form and function as it relates to different parts of the development.</p> <p>All work to progress understanding will be undertaken in consultation with the three local authorities. Any significant housing development to the Land West of Ifield and across the wider strategic opportunity would be completed over a long time period and the justification may not be made for the whole of the Western Link to be completed before any dwelling is occupied. There is currently a lack of available evidence to justify any form or function and therefore conclusions around its delivery must be reserved. It must also be noted that this policy can only relate to that area safeguarded by Policy ST4 and references to any complete link are beyond the CBC administrative area and</p> |

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|                              |            |              | <p>therefore outside the control of the Draft Local Plan policy. These amendments are necessary to fulfil CBC's duty to ensure the plan is justified, effective and based on evidence.</p> <p><i>If development is proposed to the western side of Crawley, the scoping, design and delivery of the comprehensive Western Link Road should enable high quality sustainable transport opportunities for both existing and new communities, therefore reducing the impact on the existing highway network. The appropriate phasing of the link will be prior to the completion agreed by the three local authorities: Horsham District, Crawley Borough and West Sussex County Councils. The identification of the alignment for a Western Link through land within Crawley will form part of the work on the North Crawley Area Action Plan (Policy SD3), which will be determining appropriate land uses across the whole area south of the airport, including possible future expansion of the airport.</i></p> <p>ix. The development helps address unmet development needs arising from Crawley, including in relation to housing mix, type, tenure and affordability (including meeting the 40% affordable housing levels and agreements in relation to the nomination rights for those on the Crawley housing register); complementary employment and economic growth needs; social, education and health needs; and strategic recreation and leisure requirements;</p> <p>Whilst Homes England recognises the important role Land West of Ifield and the potential a wider strategic opportunity could play in meeting Crawley's unmet housing needs, Homes England are concerned about the level of prescription and detail, with potential differing approaches and considerations in relation to affordable housing between CBC and HDC.</p> <p>Firstly, the CBC Draft Local Plan cannot lawfully set the policy requirements in relation to affordable housing on land outside of the CBC administrative area. This will be a matter for HDC, albeit clearly involving close collaboration and working with CBC as part of the preparation of the Horsham Local Plan. Secondly, policy cannot be set in the absence of fully testing the implications on overall viability for any proposals emerging in the Horsham Local Plan. In accordance with the NPPF (para 57), site allocation policies should set out the contributions (including affordable housing) based on viability testing as part of plan led process – this requirement therefore runs contrary to the NPPF.</p> <p>Homes England are fully committed to ensure more homes are built in areas of greatest need and to improve affordability. In order to progress this matter, Homes England recommend that the pre-application discussions are focussed to allow the authorities to discuss this matter early and agree a Statement of Common Ground. This will ensure alignment upon housing delivery expectations (including affordable housing, type and tenure).</p> <p>x. Linkages are maintained from Crawley's neighbourhoods through new development to the countryside beyond (both in terms of active transport and visual links) as well as prioritising sustainable modes of transport links into existing Crawley neighbourhoods and the town centre, making car journeys a longer, more circuitous option; Homes England support the planned level of integration and the commitment to sustainable modes of transport. In order to maintain linkages from existing neighbourhoods through and into new neighbourhoods, the policy will need</p> |

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|                              |                             |                     | to be sufficiently flexibility to enable the provision of links for sustainable modes of travel through Ifield Brook Meadows and Rusper Road Playing Fields such as for some form of pedestrian and cycling connectivity. This is why Homes England continues to comment on Policy GI4 and Policy CL8 which are considered to be too limited and which set an unreasonable test in relation to provision of linkages across this area.  |
| REP/066                      | Mid Sussex District Council | H3g paragraph 12.76 | <p>Mid Sussex <b>objects</b> to this policy. It is neither <b>justified nor effective</b></p> <p>The submission version of the Plan continues to include a policy that seeks to provide policy criteria for the assessment of Urban Extensions outside of the Crawley administrative boundary, in policy H3g: Urban Extensions. Policy H3g provides the framework by which Crawley would assess applications outside the borough boundaries but are adjacent to Crawley. Whilst some amendments have been made to the policy Mid Sussex continues to have concerns and therefore comments on this policy are set out below:</p> <p>The Sustainability Appraisal of the MSDC District Plan (August 2016) sets out the conclusions of the 'Sustainability Assessment of Cross-Boundary Options', which assessed the unmet need of all neighbouring authorities. The evidence shows that there are strong migration and commuting links between the two authorities. These links are not constrained to the areas immediately adjacent to the administrative boundaries of the authorities. Broad locations for growth were assessed based on distance and linkages between areas based on historic commuting patterns. These broad locations cover most of Mid Sussex, which indicate any unmet need from Crawley could be located anywhere in this District. Locations 'At Crawley' has identified locations which may not be the most sustainable location for growth in Mid Sussex, but until work on the District Plan Review is undertaken and all broad locations and sites are assessed, this is not known.</p> <p>It is unclear how this policy can be effective as it relates to land outside the Crawley boundary. An application within Mid Sussex, for example, would not be assessed against the policies within the Crawley Local Plan. As such the criteria within the policy can only be considered to inform Crawley's response during the consultation process on an application within an adjoining authority; and this should be made clear.</p> <p>It is not sufficiently clear what is meant by the term 'Urban Extension', both in terms of scale and location. This is important because some criteria would not apply to all developments. For example, smaller scale sites would not support a neighbourhood centre, or require a masterplan. The preparation of a Joint Area Action Plan may not be necessary in all circumstances. This is acknowledged in the supporting text but not within the policy. Through Duty to Co-Operate discussions, Mid Sussex will continue to liaise with Crawley on any sites within Mid Sussex that would have cross-boundary impacts particularly any that are promoted to the Council as part of the District Plan Review. Part ix of the policy includes a reference to the delivery of affordable housing at 40% and agreements in relation to the nomination rights for those on the Crawley housing register. There are no mechanisms in place to seek a different affordable housing requirement on sites within Mid Sussex as intended by the policy. The adopted Mid</p> |

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| Ref. No.                     | Respondent            | Policy/ Para | Comments  |
|                              |                       |              | <p>Sussex District Plan requires 30% affordable housing and existing evidence does not demonstrate that the provision of 40% affordable housing is viable in Mid Sussex. Mid Sussex's immediate priority is to meet the affordable housing needs of those who live in Mid Sussex.</p> <p>In this context, this Council <b>objects</b> to the wording of paragraph H3g: Urban Extensions and paragraph 12.76 where it refers to any urban extension on the edge of Crawley and within MSDC should be meeting the unmet needs arising from Crawley.</p> <p><b>Change required:</b> The policy needs significantly redrafting.</p>   |
| REP/067                      | Resident 15           | H3g          | <p>To whom it may concern,</p> <p>I am writing to object to the plans to build on the green space on the land to the west of Ifield as detailed within the local plan as detailed within the Strategic Housing and Economic Land Availability Assessment.</p> <p>My Objections are as follows:</p> <p><b>Ifield Golf Course</b> is a fabulous open green space that benefits not only its members but also those who live close by and walk the public footpaths which go through the course. It has plenty of wildlife such as deer, several varieties of geese, butterfly's, buzzards, hawks and many more species of birds and many species of fish in its various ponds. I am a member and I play golf regularly which gives me plenty of exercise keeping me fit and healthy and the social side is good for my wellbeing. Ifield Golf Club has over 500 members both male and female from young teenagers to late 80's or maybe older! We have over 5,000 visitors per year and over 30,000 rounds of golf are played annually. It is the only golf course in the borough of Ruspur. Our clubhouse is used not only by golfers but is also made available to also to the wider population of Crawley and is used for various functions such as weddings, wakes, birthday celebrations, quiz nights, parties, Cabaret nights, Sunday Roasts, charity functions and much more.</p> <p>I hear Boris Johnson say he wants to plant millions of trees to help with climate change and did you know the forest commission planted an additional 8,500 trees on Ifield golf course only 15 years ago now Homes England want to cut them down! We also have many more splendid trees on our course such as magnificent large Oak trees which must be over 100 years old and these surely would not be cut down! Even with all these trees on our course it is still prone to flooding and it would be a disaster to build on this undeveloped land which acts as a water soak and undoubtedly would result in homes being flooded and with the strong possibility of suffering from subsidence.</p> |
| REP/068                      | Sussex Wildlife Trust | H3g          | <p><b>Strategic Policy H3g: Urban Extensions</b></p> <p>Sussex Wildlife Trust note that this policy does include bullet points (xiii, xiv) that reference biodiversity matters. However we are concern about the deliverability of these points and others within the policy when the urban extension could sit outside the administrative boundaries of CBC. Will this policy be effective in delivery biodiversity net gain for a very large urban extension?</p>   |

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| Ref. No.                     | Respondent | Policy/ Para | Comments   |
|                              |            |              | <p><b>Suggested Modifications:</b></p> <p>Therefore partnership working with other local authorities that propose policies which related to any urban extension close to but outside CBC administrative boundary must recognise the importance of irreplaceable/priority habitats, strategic green infrastructure and biodiversity net gain.</p> <p>We also propose the following amendment to bullet point xvi</p> <p>xvi. Up to date ecological information must be used to inform the design of the development. The D development must incorporate Strategic Green Infrastructure throughout, provide ecological linkages, in particular to support pollination, and result in a Net Gain to biodiversity;</p> |

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| <b>Ref. No.</b>                          | <b>Respondent</b>                           | <b>Policy/ Para</b> | <b>Comments</b>  |
| REP/021                                  | Gladman Developments LTD                    | H4                  | <p>Policy H4 provides the proposed policy approach to housing mix. Gladman support the flexibility provided through this policy which, whilst referring to a recommended housing mix set out in the table below the policy, recognises that the appropriate mix will have to be determined on a site by site bases and will be dependent on the size and characteristics of the site as well as the viability of the scheme.</p> <p>Gladman submit that flexibility such as this is necessary within the policy to enable developers to provide a mix of housing on site which reflect local need at that particular time based on up to date evidence. The SHMA only provides evidence from a snapshot in time and therefore will not necessarily be an appropriate indication of housing needs later in the plan period.</p>   |
| REP/022                                  | Savills on behalf of St Catherine's Hospice | H4                  | <p>Strategic Policy H4 sets out the required housing mix for development sites in Crawley. Whilst the policy acknowledges the need for the types of housing to reflect the size and characteristics of the site and viability of the scheme; it then goes on to stipulate that new developments are required to provide a housing mix test in accordance with the recommendations cited at paragraph 13.14.</p> <p>To ensure that future developments in Crawley can respond to local needs and the market, Policy H4 should be made more flexible to increase the efficiency of sustainable sites and ensure the deliverability and viability of these new dwellings.</p> <p>Notably, the new policy wording of the emerging Plan goes significantly beyond that used in Policy H3: Future Housing Mix in the adopted Plan (set out below). As such, it is considered that the previous policy wording should be retained in the emerging Plan, making reference to recent evidence.</p> <p><b>Suggested Modifications:</b><br/>Please refer to appended Representation</p> |
| REP/023                                  | Savills on behalf of St Catherine's Hospice | H4                  | <p>Strategic Policy H4 sets out the required housing mix for development sites in Crawley. Whilst the policy acknowledges the need for the types of housing to reflect the size and characteristics of the site and viability of the scheme; it then goes on to stipulate that new developments are required to provide a housing mix test in accordance with the recommendations cited at paragraph 13.14.</p> <p>To ensure that future developments in Crawley can respond to local needs and the market, Policy H4 should be made more flexible to increase the efficiency of sustainable sites and ensure the deliverability and viability of these new dwellings.</p> <p>Notably, the new policy wording of the emerging Plan goes significantly beyond that used in Policy H3: Future Housing Mix in the adopted Plan (set out below). As such, it is considered that the previous policy wording should be retained in the emerging Plan, making reference to recent evidence.</p> <p><b>Suggested Modifications:</b></p>   |

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| Ref. No.                          | Respondent                             | Policy/<br>Para | Comments   |
|                                   |  |                 | <p>It is therefore suggested the more prescriptive text is removed and the emerging Plan retains the previous policy wording.</p> <p><b>Recommended Changes</b><br/> “[All housing development should provide a mix of dwelling types and sizes to address the nature of local housing needs and market demand. The appropriate mix of house types and sizes for each site will depend upon the size and characteristics of the site and the viability of the scheme. However, consideration should be given to the evidence established in the Strategic Housing Market Assessment and its updates for market housing needs and demand in Crawley.</p> <p><b>Affordable Housing</b><br/> In delivering the affordable housing element of residential schemes, in line with Policy H5, the need for one, two and three bedroom affordable dwellings in Crawley, as identified in the council’s Strategic Housing Market Assessment and its updates, should be addressed in meeting the housing needs of those considered to be in greatest need.]”</p> |
| REP/026                           | Rainier Developments LTD               | H4              | <p>Rainier welcome the flexibility included in Strategic Policy H4 which recognises the flexibility required when assessing an appropriate housing mix for a development, providing the ability to deviate from the ‘starting point’ mix provided in the table at paragraph 13.14. In considering an appropriate housing mix it is important that a development scheme is able to respond to its location and market demand.</p> <p>The MOKA site, which is in a town centre location, immediately adjacent to Crawley Train Station and Bus Station will have a much different mix to a low-rise housing development on the edge of the town centre. The imposition of a rigid housing mix could impact on the viability and deliverability of residential development.</p> <p><b>Suggested Modifications:</b><br/> See Regulation 18 response</p>  |
| REP/060                           | Savills on behalf of Bellway Homes Ltd | H4              | <p><i>Strategic Policy H4: Future Housing Mix</i></p> <p>Within the Regulation 19 document we note that the Council has amended Policy H4 to say that the starting point for market housing mix is the recommended mix. The Council has also introduced a new Housing Mix Test to the policy to try and avoid an excessive distorted dwelling mix. However, we note that the recommend mix remains unchanged and separates out market (owner occupier and private rent) and affordable dwellings. We think that the supporting text needs to be made clearer in setting out that this is a strategic recommended mix for the whole borough and should not be applied rigidly to individual development proposals. Such a rigid approach could potentially hamper the delivery of much needed housing within the Borough.</p>   |
| REP/063                           | Pegasus Group on                       | Policy H4       | <p><b>Strategic Policy H4: Future Housing Mix</b> provides a detailed mix of dwelling types and sizes to address the nature of local housing needs and market demand that is sought by the Borough Council. The policy relates to the evidence</p>   |

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|  | behalf of Persimmon Homes Ltd |                         | <p>established in the Strategic Housing Market Assessment and its updates for market housing needs and demand in Crawley. Paragraph 13.14 sets out the recommended mix across all priority bandings and affordable tenures. Pegasus does not dispute the affordable housing mix where this is based on need assessments. Nevertheless, Pegasus Group does not oppose the following approach in determining the mix for the private sale of private rent units. The 60% market housing element breaks down the recommended mix between Town Centre location and Borough wide locations.</p> <p>Pegasus Group considers that the LPA does not need to interfere with the market housing mix and that this should be left to developers who have a better understanding of changing trends.</p>   |
| REP/010                                  | Home Builders Federation      | H5                      | <p>Policy is unsound as it is neither consistent with national policy nor justified</p> <p>We will need to reserve judgement on the justification for 40% requirement for affordable housing as this policy as the Council has not published its viability assessment. However, we can comment on the Council's decision to require all residential developments to make a contribution towards affordable housing delivery. This is not consistent with national policy, a fact the Council do not acknowledge or seek to justify in the local plan. Paragraph 63 of the 2019 NPPF establishes the approach set out in the 2015 Written Ministerial Statement with regard contributions for affordable housing not considered to be major development. The Council have decided to ignore this policy and will require small sites of 10 units or less to make a financial contribution toward affordable housing provision.</p> <p>When considering the appropriateness of including such a policy it is worth reiterating why the Government introduced this particular policy. The Ministerial Statement is clear that the reason for introducing this policy was to "ease the disproportionate burden of developer contributions on small scale developers". This is distinct from whether or not such development is viable in general but whether they are a disproportionate burden on a specific sector that faces differential costs that are not reflected in general viability assessments. These costs have led to a reduction in the number of small and medium (SME) sized house builders. Analysis by the HBF<sup>1</sup> shows that over the last 30 years changes to the planning system and other regulatory requirements, coupled with the lack of attractive terms for project finance, have led to a long-term reduction of total SME house builder numbers by about 70% since 1988. The Government is very anxious to reverse this trend and increase the number of small businesses starting up and sustaining this activity. Improving business conditions for SME home builders is the key to long-term supply responsiveness.</p> <p>It is also worth considering the Government's broader aims for the housing market. This is most clearly set out in the Housing White Paper (HWP). Their aims are not just to support existing SME house builders but to grow this sector</p> |

<sup>1</sup> [http://www.hbf.co.uk/?eID=dam\\_frontend\\_push&docID=25453&filename=HBF\\_SME\\_Report\\_2017\\_Web.pdf](http://www.hbf.co.uk/?eID=dam_frontend_push&docID=25453&filename=HBF_SME_Report_2017_Web.pdf)

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|                                   |                          |              | <p>again which was hit hard by the recession with the number of registered small builders falling from 44,000 in 2007 to 18,000 in 2015<sup>2</sup>. To grow the sector one key element has been to simplify the planning system in order to reduce the burden to new entrants into this market. Therefore, the focus of the Council should be on freeing up this sector of the house building industry rather than seeking to place financial burdens that the Government have said should not be implemented.</p> <p>As such we do not consider this departure from national policy to be justified. The policy will continue to be a burden to SME house builders and in particular to new entrants into the market.</p>  |
| REP/021                           | Gladman Developments LTD | H5           | <p>Policy H5 outlines that 40% affordable housing will be required from all residential developments. Gladman reserve the right to comment on the affordable housing percentage requirement once the viability work has been published as this should test the appropriateness of this percentage requirement in Crawley.</p> <p>Gladman note that the affordable housing requirement is in relation to all residential development. Gladman do not consider this approach to be justified or consistent with national policy. In this regard, Gladman refer to paragraph 63 of the NPPF(2019) which states: "Provision of affordable housing should not be sought for residential developments that are not major developments, other than in designated rural area (where policies may set out a lower threshold of 5 units or fewer)..."</p> <p>The approach set out in Policy H5 requires small sites of less than 10 units to make a financial contribution towards affordable housing.</p> <p><b>Suggested Modifications:</b></p> <p>The Council expects a minimum of 75% of the affordable housing to be Affordable Rent or Social Rent, and up to 25% Intermediate and/or Affordable Home Ownership tenure. Gladman recommend that this proposed tenure split should be provided as guidance rather than a rigid requirement. Flexibility is needed to ensure that if necessary, the developer and Council can negotiate over the appropriate mix for a scheme, due to site specifics and local need.</p> <p>It is important to remember that the evidence provided through the SHMA only provides a snapshot in time and therefore flexibility in the approach provided regarding the affordable housing tenure is required. It is also important that the affordable housing requirement, including the proposed tenure split, is tested through the viability study and found to be viable.</p> |
| REP/026                           | Rainier Developments LTD | H5           | <p>Rainier welcome the exceptions at Strategic Policy H5 which allow the council to consider relaxing the affordable housing requirement, in part or in full, subject to viability.</p> <p>We query the interpretation of paragraph 64 of the Framework at paragraph 13.31 of the Draft Local Plan and, for avoidance of doubt, we suggest that clarification is provided regarding this matter. We do not consider that</p>   |

<sup>2</sup> Fixing our Broken Housing Market, Department for Communities and Local Government, February 2017

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| <b>Ref. No.</b>                          | <b>Respondent</b>                                 | <b>Policy/ Para</b> | <b>Comments</b>  |
|  |   |                     | <p>paragraph 64 of the Framework means that every residential development must include 10% of its units as affordable home ownership units. This would be a misunderstanding. This would fail to take into account of the footnote accompanying paragraph 64, which confirms that the 10% figure is to be seen “as part of the overall affordable housing contribution from a site”; and the fact that affordable housing policy has to have regard to the viability of a scheme.</p> <p><b>Suggested Modifications:</b><br/>See Regulation 18 response</p>  |
| REP/043                                  | Tetlow King Planning                              | H5                  | <p>No on first two points because of lack of precision in wording of policy H5<br/>No interest in duty cooperate but would have answered don't know as can't have that as option. Question has bias and forcing an answer on something that has nothing to do with this rep.<br/>See below for rep.</p> <p><b>Suggested Modifications:</b><br/>Policy H5 says "...40% affordable housing will be required from all residential developments". But there is a lack of precision and certainty on what this means. While the policy goes onto explain it applies to sites of 10 dwellings or less (oddly there is no site size restriction) there is no definition in the glossary of what a "dwelling" is and that restriction on numbers conflicts with "all residential developments" which could include C2 and C1 use class developments including prisons, care homes, boarding schools, C2 extra care and so on.<br/>The policy should precisely say what type of residential development it applies to differentiate it from "all residential developments" preferably by use class and a description. It should do this in the policy and the accompanying text.<br/>Not doing this will cause confusion and harm to development proposal due to a lack of clarity due to arguments over what it means.</p> |
| REP/051                                  | Tetlow King on Planning behalf of Rentplus UK Ltd | H5                  | <p><b>RE: CRAWLEY LOCAL PLAN: REGULATION 19 SUBMISSION DRAFT</b></p> <p>Thank you for the opportunity to comment on the Regulation 19 consultation for the Crawley Local Plan. We represent <b>Rentplus UK Ltd</b>, an innovative company providing <b>affordable rent-to-buy housing</b> for hard-working people aspiring to home ownership. Working in partnership with Councils and Registered Provider (RPs), Rentplus provides an accessible route to achieve their dream through the rent - save - own model. Households rent the property for a defined period at an affordable rent and then receive a gifted 10% deposit upon purchase. Rentplus has recently been recognised by the National Housing Awards as the Most Innovative Home Ownership Solution for 2019. As requested, completed representation forms are supplied alongside this letter.</p> <p><b>Introducing Rentplus</b><br/>Rentplus offers an <b>affordable Rent to Buy</b> product which can be delivered without requiring any public subsidy. Households rent the property from Rentplus' partner RPs at an affordable rent for a defined period of five, ten, fifteen</p>  |

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|                                   |            |                 | <p>or twenty years. During this time, households will benefit from security of tenure; management and maintenance from the partner RP; the ability to establish a good credit history (to assist with mortgage applications); and the opportunity to raise their own savings. At the end of the period of rent, households will have the option to purchase; Rentplus is unique in that they receive a gifted deposit equivalent to 10% of the market value of the property at that time. Rentplus tenants include those previously in both the private rented sector and social rented sector and are typically drawn from the Council's housing register; it therefore helps to free up existing social and affordable housing for those in high priority need.</p> <p>Annex 2 of the NPPF defines 'affordable housing' as homes for affordable rent or sale, within four categories. Rentplus meets the definition of category d) 'Other affordable routes to home ownership' and in 2019 the Minister for Housing, Communities and Local Government confirmed in a letter that Rentplus meets this definition (see <b>Appendix</b>). It is also important to note that the Rentplus model also meets the conditions set out in category a) 'Affordable homes for rent' and this has been agreed by several Local Planning Authorities.</p> <p><b>The need for Rentplus</b></p> <p>The national housing crisis is well-documented. Many households find themselves 'priced out' of homeownership, not necessarily by the cost of mortgage repayments, but by the onerous task of raising a deposit. Many are in the private rented sector and face high rents, lack of security, and poor quality accommodation, although some are in the social rented sector and could release existing housing stock to meet priority needs.</p> <p>The independent <b>Affordable Housing Commission</b>, chaired by one of the pre-eminent voices on affordable housing, Lord Best, published its interim report <i>Defining and Measuring housing affordability – an alternative approach</i> in June 2019. The report proposes that affordable housing definitions should relate to specific groups of people experiencing housing stress. This includes 'frustrated first time buyers', of which 1.6 million households 'might' be able to buy (1.3m in the private rental sector, 0.3m in the social housing sector). However, it explains that even where mortgage payments can be afforded "<i>large numbers are likely to have affordability issues when seeking to buy because of the deposit</i>" and that "<i>those just able to buy are likely to have to save for an unrealistic period or unlikely ever to be able to raise an adequate deposit</i>".</p> <p>In this context, it is clear that the difficulty in saving for a deposit is one of the most critical barriers to home ownership, particularly without access to 'the bank of Mum and Dad' or inherited wealth. It is this problem that Rentplus seeks to address, by placing households on a clear pathway to homeownership with the benefit of a 10% gifted deposit at the point of purchase (supplemented by households' own savings). This is in contrast with other home-ownership initiatives which require an up-front deposit to be raised before purchase.</p> |

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|                                   |            |                 | <p>Government has recognised the role that affordable rent to buy can play in meeting housing need. This is exemplified by its inclusion within the Framework’s definition of affordable housing as updated in 2018. More recently, the then-Housing Minister, Esther McVey highlighted the importance of Rent to Buy in her speech to the RESI Convention (12th September 2019). In talking about the Government’s drive to increase home ownership she stated that it includes <i>“Rent to Buy, so people can rent knowing that they are going to buy, knowing that they’ve got a bit of breathing space, maybe it’s in 5 years, maybe it’s in 10 years, but they will get to own that property - so they can plan, knowing they have the certainty of getting a deposit and getting that house.”</i></p> <p><b>Comments on the Regulation 19 consultation</b></p> <p>In general terms, we welcome Policy H5 as drafted. It enables 10% of the total number of homes on qualifying sites to come forward for affordable home ownership. This is consistent with paragraph 64 of the National Planning Policy Framework (the Framework). It also allows flexibility for the delivery of affordable routes to home ownership; it is not unduly prescriptive in this regard. The 2019 Strategic Housing Market Assessment identified an overall annually-arising need of 173 dwellings per annum for affordable routes to home ownership, so there is a clear need for this kind of housing and to meet the needs of those who fall in the gap between needing affordable rented housing and being able to access home ownership at the entry level of the open market.</p> <p>Paragraph 13.23 specifically references rent to buy as an affordable route to home ownership. This is welcome; it is consistent with the Government’s intention to support delivery of rent to buy (as highlighted in the appended letter). However, <b>there are details of the policy and the supporting text which are unsound in their present form</b> but are capable of being remedied.</p> <p>Throughout the discussion of affordable housing from paragraph 13.19 to 13.31, references can be found to ‘intermediate’ housing tenures. The term ‘intermediate’ formed part of the definition of affordable housing in the 2012 Framework, but the 2019 Framework has replaced this with the four categories of affordable housing listed in the definition at Annex 2. As such, to be consistent with national policy, references to ‘intermediate’ housing should be replaced with reference to ‘affordable home ownership’ products.</p> <p>In a similar vein, paragraph 13.21 of the reasoned justification states that <i>“The council will always pursue perpetuity in affordable housing provision to ensure the ability to serve future households over the longterm”</i>. Similarly, paragraph 13.26 states that <i>“Where affordable home ownership is agreed, securing perpetuity to ensure housing remains at a discount for future eligible households will be the council’s priority”</i>. Requiring affordable housing to be provided in perpetuity prevents solutions for affordable home ownership from coming forward, since the objective of such housing is that it will eventually be owned by the occupier. The Framework does not require affordable housing to be provided in perpetuity except in specific circumstances (typically rural exception sites). Instead, it sets out conditions for the ongoing provision, or recycling of receipts/subsidy, within the definitions of affordable housing</p> |

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|                                   |            |                 | <p>contained at Annex 2. To be consistent with national policy, the final paragraph of 13.21 should be deleted and the preceding sentence to include “<i>or for the subsidy to be recycled for alternative affordable housing provision</i>”.</p> <p>Paragraph 13.26 should be reworded to read “<i>Where affordable home ownership is agreed, the Council shall seek its ongoing provision, or for the recycling of receipts as set out within the National Planning Policy Framework</i>”.</p> <p>Paragraph 13.30 explains that the Council will negotiate the proportion of affordable housing in instances where viability indicates that the full 40% cannot be provided. It states that “<i>Where this is agreed it will also be necessary for the viability assessment to undertake modelling of various affordable housing options rather than relying on an assumption that no affordable housing can be provided</i>”. This approach is welcomed. However, to be effective, to assist applicants and to maximise the amount of affordable housing that can be secured, additional text should be added after this sentence to state that “<i>The Council will carefully consider adjustments to the tenure mix of development proposals having regard to viability and evidenced housing need, to secure the maximum overall proportion of affordable housing</i>”. In this context it is important to note that the Rentplus model meets the requirements of “affordable housing to rent” as defined at Annex 2 of the Framework and has indeed been accepted by other Local Planning Authorities in place of traditional affordable rented housing. Therefore, Rentplus can help to achieve a wider mix of tenures whilst also supporting the delivery of higher overall proportions of affordable housing.</p> <p><b>Summary</b></p> <p>We trust the above comments are of assistance to the Council. Should the Council wish to discuss how affordable housing delivery and rent-to-buy can best meet local needs in Crawley, please get in touch.</p> <p>We would like to be notified of the progress of the Local Plan as it proceeds to Examination; please notify <b>Tetlow King Planning</b> as agents of Rentplus by email only to <a href="mailto:consultation@tetlow-king.co.uk">consultation@tetlow-king.co.uk</a>.</p> <p>In general terms, we welcome Policy H5 as drafted. It enables 10% of the total number of homes on qualifying sites to come forward for affordable home ownership. This is consistent with paragraph 64 of the National Planning Policy Framework (the Framework). It also allows flexibility for the delivery of affordable routes to home ownership; it is not unduly prescriptive in this regard. The 2019 Strategic Housing Market Assessment identified an overall annually-arising need of 173 dwellings per annum for affordable routes to home ownership, so there is a clear need for this kind of housing and to meet the needs of those who fall in the gap between needing affordable rented housing and being able to access home ownership at the entry level of the open market.</p> <p>Paragraph 13.23 specifically references rent to buy as an affordable route to home ownership. This is welcome; it is consistent with the Government's intention to support delivery of rent to buy (as highlighted in the appended letter). Throughout the discussion of affordable housing from paragraph 13.19 to 13.31, references can be found to ‘intermediate’ housing tenures. The term ‘intermediate’ formed part of the definition of affordable housing in the</p> |

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|                                   |            |                 | <p>2012 Framework, but the 2019 Framework has replaced this with the four categories of affordable housing listed in the definition at Annex 2.</p> <p>Paragraph 13.21 of the reasoned justification states that “<i>The council will always pursue perpetuity in affordable housing provision to ensure the ability to serve future households over the long-term</i>”. Similarly, paragraph 13.26 states that “<i>Where affordable home ownership is agreed, securing perpetuity to ensure housing remains at a discount for future eligible households will be the council’s priority</i>”. Requiring affordable housing to be provided in perpetuity prevents solutions for affordable home ownership from coming forward, since the objective of such housing is that it will eventually be owned by the occupier. The Framework does not require affordable housing to be provided in perpetuity except in specific circumstances (typically rural exception sites). Instead, it sets out conditions for the ongoing provision, or recycling of receipts/subsidy, within the definitions of affordable housing contained at Annex 2.</p> <p>Paragraph 13.30 explains that the Council will negotiate the proportion of affordable housing in instances where viability indicates that the full 40% cannot be provided. It states that “<i>Where this is agreed it will also be necessary for the viability assessment to undertake modelling of various affordable housing options rather than relying on an assumption that no affordable housing can be provided</i>”. This approach is welcomed. However, to be effective, to assist applicants and to maximise the amount of affordable housing that can be secured, additional text should be added after this sentence.</p> <p><b>Suggested Modifications:</b></p> <p>To be consistent with national policy, references to ‘intermediate’ housing should be replaced with reference to ‘affordable home ownership’ products.</p> <p>To be consistent with national policy, the final paragraph of 13.21 should be deleted and the preceding sentence to include “<i>or for the subsidy to be recycled for alternative affordable housing provision</i>”. Paragraph 13.26 should be reworded to read “<i>Where affordable home ownership is agreed, the Council shall seek its ongoing provision, or for the recycling of receipts as set out within the National Planning Policy Framework</i>”.</p> <p>To be effective, to assist applicants and to maximise the amount of affordable housing that can be secured, additional text should be added after this sentence to state that “<i>The Council will carefully consider adjustments to the tenure mix of development proposals having regard to viability and evidenced housing need, to secure the maximum overall proportion of affordable housing</i>”. In this context it is important to note that the Rentplus model meets the requirements of “affordable housing to rent” as defined at Annex 2 of the Framework and has indeed been accepted by other Local Planning Authorities in place of traditional affordable rented housing. Therefore, Rentplus can help to achieve a wider mix of tenures whilst also supporting the delivery of higher overall proportions of affordable housing.</p> |

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| REP/060                           | Savills on behalf of Bellway Homes Ltd | H5           | <p><i>Strategic Policy H5: Affordable Housing</i></p> <p>Within the Regulation 19 document we note that the Council has not carried forward the policy requirement for 10% low cost housing in addition to the requirement for 40% affordable housing (subject to viability). This is still supported. The provision of such housing is largely governed by national initiatives which are inherently open to change. A specific policy requirement for low cost housing risks jeopardising the provision of affordable housing if such initiatives change.</p> <p>We also note that within the Regulation 19 document Policy H5 now states that:<br/> <i>“The council will only consider relaxing this affordable housing requirement, in part or in full, in exceptional circumstances, where a scheme is clearly subject to abnormal costs, not including costs paid for the land, and not otherwise envisaged by the Local Plan Viability Assessment, and where this is evidenced by robustly assessed viability. The scheme must also evidence that it addresses a demonstrative immediate need. In such situations, the scheme is expected to appraise various permutations of affordable housing provisions, and where concessions are agreed by the council then claw-back mechanisms will be expected to be put in place and the scheme independently assessed on an open-book basis.”</i></p> <p>Based on the above it would seem that ‘exceptional circumstances’ only includes abnormal costs. However, there are a number of other factors which can impact the viability of a scheme and the provision of affordable housing. These included (but are not limited to) land value, developer return, sale values and rental values. It is respectfully requires that allowance for other factors is included within the next version of the Local Plan Review.</p> |
| REP/010                           | Home Builders Federation               | H7           | <p>Whilst the HBF support the encouragement of self-build housing through the local plan, we do not consider the requirement for sites of over 50 to set aside 6% of the total area of the site to provide serviced plots for self and custom house building to be justified or consistent with national policy. Whilst we recognise that Local Planning Authorities now have a duty to promote self-build housing, we have three concerns with the Councils approach in H7.</p> <p>Firstly, we consider the policy to be inconsistent with the third bullet point of paragraph 57-025 of PPG. This outlines that the Council should engage with landowners and encourage them to consider self-build and custom housebuilding. The approach taken by the Council moves beyond encouragement and requires landowners to bring forward plots.</p> <p>Secondly, we do not consider the Council to have looked at sufficient options with regard to how it can provide plots to support self-builders. Paragraph 57-024 of the PPG sets out a variety of approaches that need to be considered – including the use of their own land. This is reiterated in para 57-14 of the PPG which sets out the need for Council’s to consider how they can support the delivery of self-build plots through their housing strategy, land disposal and regeneration functions. However, it would appear that the Council is seeking to place the burden for delivery of self-</p>   |

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|                                   |                           |              | <p>build plots on larger sites without any evidence that an investigation into alternative approaches have taken place. We would suggest that it should conclude such an investigation before requiring the provision of service plots on larger sites.</p> <p>Finally, we do not consider the evidence to be sufficiently robust. There have always been concerns that self and custom build registers alone do not provide a sufficiently robust evidence base against which to assess needs. There is no requirement to review this evidence to ensure those on the database are still interested in self-build, whether there was any double counting with other areas or whether the individuals on a list had the financial ability to build their own home. However, this situation has been recognised with paragraph 57-011 of PPG requiring additional data from secondary sources to be considered to better understand the demand for self-build plots. In particular we are concerned that planning policies, such as the ones proposed in the draft local plan, will deliver plots on major house building sites whereas the demand for self-build plots may be for individual plots in more rural locations. Without the necessary evidence to show that there is demand for self-build plots on such sites the policy cannot be either justified or effective.</p> <p><b>Suggested Modifications:</b><br/>We do not consider the policy to be justified or consistent with national policy and should be deleted.</p> |
| REP/021                           | Gladmans Developments LTD | H7           | <p>Policy H7 provides the proposed approach to the delivery of self-build and custom build housing in Crawley. This outlines a requirement for sites over 50 to set aside 6% of the total area of the site to provide serviced plots for self-build and custom build housing. Gladman are unclear of the justification for this specific level of requirement and also query the appropriateness of requiring self-build provision as part of large-scale development sites. The demand for self-build plots may be for individual plots in more rural locations.</p> <p><b>Suggested Modifications:</b><br/>Whilst Gladman are supportive of the Local Plan including a policy encouraging the provision of self-build, when setting a specific requirement for strategic sites to meet, there does still need to be evidence of local demand for this type of housing, therefore it is important that the policy contains a reference to the need for appropriate demand being identified in relation to these large sites.</p> <p>Gladman note and support the inclusion a mechanism whereby if the self-build and custom-build plots are not brought forward within a given timeframe (in this case marketed for 12 months) that the plots revert back to market housing as part of the wider scheme so that it does not unnecessarily restrict the delivery of much needed housing.</p>  |
| REP/056                           | Gatwick Airport Limited   | H8           | <p><b>Policy H8: Gypsy, Travellers and Travelling Showpeople Sites</b><br/>GAL object to Policy H8 as drafted.<br/>Gatwick supports the need for the inclusion of a policy in the draft Plan which makes provisions for the allocation of a Gypsy, Traveller and Travelling Show People Sites.</p>  |

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|  |   |              | <p>However, Policy H8 as drafted is considered by GAL to be in conflict with both the national policy requirement to safeguard land around the airport, the Noise Policy Statement for England and the proposed Policy EP4 Noise of the draft Plan.</p> <p><b>GAL Comment:</b><br/>           GAL submit that any form of new residential accommodation and housing including Gypsy, Traveller and Traveller Showpeople sites should not be permitted (this objection extends to include granting of temporary permissions) on the land currently safeguarded by national policy for future airport expansion as this could compromise the expedient delivery of a nationally significant infrastructure scheme in the national interest. (<i>GAL provides significant details of the need for land to be safeguarded from incompatible forms of development such as housing in its representation objecting to Policy SD3</i>).</p> <p>In addition and central to GAL's objection to Policy H8 is that the noise thresholds for permanent and temporary Gypsy, Traveller and Traveller Showpeople sites, as proposed in Policy H8 point (a) are set at thresholds that are too high and as such will fail to ensure that the future sites will offer suitable living environments for the travelling community.</p> <p>The following noise criteria are identified in Policy H8 criterion (a):</p> <p><b>Gypsy, Traveller and Travelling Showpeople Sites</b></p> <table border="1"> <tbody> <tr> <td><b>Permanent Sites</b></td> <td>Not permitted in locations exposed to existing or predicted noise levels &gt;57dBA</td> </tr> <tr> <td><b>Long Term Temporary Sites (up to one month)</b></td> <td>Not permitted in locations exposed to existing or predicted noise levels &gt;60dBA</td> </tr> <tr> <td><b>Temporary Sites</b></td> <td>Not permitted in locations exposed to existing or predicted noise levels &gt;66dBA</td> </tr> </tbody> </table> <p>GAL is unclear about the distinction between 'long term temporary sites of up to one month' and 'temporary sites' but considers that the noise thresholds for any temporary site as is proposed in Policy H8 will lead to unacceptable impacts on occupants of any such sites. GAL's view is that the effects of noise on health and quality of life (for example sleep disturbance) occur from short term exposure as well as long term exposure.</p> <p>Policy EP4 of the draft Plan states new housing above the unacceptable noise level of Leq 60dB for aircraft noise should not be permitted. It goes on to say that new housing can be developed in noise levels above the Lowest Observable Adverse Effect Level (LOAEL) or Significant Observable Adverse Effect Level (SOAEL) 'where it can be demonstrated that a good acoustic design has been considered early in the planning process, and that all appropriate mitigation, through careful planning, layout and design, will be undertaken to ensure that the noise</p> | <b>Permanent Sites</b> | Not permitted in locations exposed to existing or predicted noise levels >57dBA | <b>Long Term Temporary Sites (up to one month)</b> | Not permitted in locations exposed to existing or predicted noise levels >60dBA | <b>Temporary Sites</b> | Not permitted in locations exposed to existing or predicted noise levels >66dBA |
| <b>Permanent Sites</b>                             | Not permitted in locations exposed to existing or predicted noise levels >57dBA |              |   |                        |   |  |   |                        |   |
| <b>Long Term Temporary Sites (up to one month)</b> | Not permitted in locations exposed to existing or predicted noise levels >60dBA |              |   |                        |   |  |   |                        |   |
| <b>Temporary Sites</b>                             | Not permitted in locations exposed to existing or predicted noise levels >66dBA |              |   |                        |   |  |   |                        |   |

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|                                   |                                    |              | <p>impact for future users will be made acceptable'. Design measures to mitigate aircraft noise are available for new build housing, such as property sound insulation however, unlike 'bricks and mortar' housing, it is not possible to attenuate the noise in caravans, mobile homes and prefabricated accommodation to the same degree. This means that the noise thresholds need to be lower for such accommodation.</p> <p>The national policy position is to avoid significant adverse impacts from noise. It also explains that at noise levels from air traffic sources should be mitigated and reduced to a minimum to avoid such significant adverse effects. GAL therefore considers that Policy H8 should reflect this position and that new traveller sites should not be permitted above the LOAEL, which in government policy is Leq 16hr 51dB for daytime and Leq 8 hr 45dB for night-time for aircraft noise in order to ensure residents do not experience adverse effects from noise.</p> <p><b>Suggested Modifications:</b><br/> <b>Criteria for Assessing other Proposals</b><br/> Proposals for a new permanent or transit Gypsy, Traveller and Travelling Showpeople site will only be considered suitable if the proposed site:<br/> a) is not subject to existing or predicted air, road and/or rail noise in excess of Leq 16hr 51dB for daytime and Leq 8 hr 45dB for night-time for aircraft noise. <del>57 decibels for permanent sites, 60 decibels for long term temporary sites up to one month, and 66decibels for temporary sites</del><br/> ... [continue with other criteria ((b) to (f))]</p> <p><b>Reasoned Justification – Proposed Amendment</b><br/> <b>Paragraph 13.46</b><br/> 16.9 The supporting text at paragraph 13.46 would need to be updated in line with GAL's comments on the appropriate noise thresholds to be applied for traveller sites as follows:<br/> However, caravans offer a much lower level of acoustic attenuation than bricks and mortar accommodation and exposure, even for short periods, can affect health. Therefore, in the interests of the health of inhabitants, sites will not be permitted if noise exposure would, during the lifetime of any permission, be in excess of 51 dBA Leq.</p> |
| REP/058                           | Reigate & Banstead Borough Council | H8           | <p>Gypsies, Travellers and Travelling Showpeople<br/> RBBC note that CBC is currently in the process of updating its 2014 Gypsy &amp; Traveller Needs Assessment. We note that the current, 2014, Gypsy, Traveller and Travelling Showpeople Assessment identifies a potential need for up to 10 pitches and that this is the need that is currently being planned for in the Regulation 19 Crawley Borough Local Plan. We suggest that you may wish to consider the soundness of a proposed submission Local Plan policy "reserve" allocation, based on outdated evidence.</p> <p>We note that the 2014 study sought to meet the needs of the Gypsies, Travellers and Travelling Showpeople as defined in the National Planning Policy for Traveller Sites. The current National policy is from August 2015,</p>   |

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|  |                   |                         | <p>postdating CBC's current evidence on G&amp;T housing needs. Our DMP makes provision to meet the needs of households who meet the National Planning Policy definition of "Traveller", and also those who meet the wider equalities definition, and those for whom it was unclear. We would therefore urge CBC to also seek to meet the needs of both definitions in order to ensure that the needs of this wider group are properly planned for in accordance with the public sector equalities responsibility.</p> <p>Should the updated G&amp;T needs assessment study identify a greater need for Gypsy, Traveller and Travelling Showpeople than that currently being planned for, in order for the plan to be "justified" based on an appropriate strategy, and therefore sound, further sites may need to be identified to meet this updated need, a process which would require Main Modifications to be made to the proposed submission plan.</p> <p>Whilst we note that proposed Policy H8 "Gypsy, Traveller and Travelling Showpeople Sites" allows windfall sites to come forward, subject to a criteria based approach, opportunities in the borough may be few given the land constraints and high land values.</p> <p>We appreciate the land constraints within CBC, however, we would like to reiterate that whilst our DMP has sought to meet our pitch and plot needs through site-specific allocations and as part of wider housing/ employment/ community development on our Sustainable Urban Extensions, there is no surplus available to accommodate any potential unmet needs from CBC.</p> |

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| REP/022   | Sussex Ornithological Society | GI1          | <p>The SOS recognises that England needs new houses and we are not challenging the assumptions behind the numbers needed, as that is not our expertise.</p> <p>However, we do feel well qualified to speak out when we can see that proposals are being put forward that would result in houses being built in areas that are of particular importance to birds of conservation importance, as that would harm them.</p> <p>In this respect our issue with the Crawley Local Plan 2020-2035 is not where it is intended to build 5355 houses within the Crawley Borough Council boundary in the plan period (although we do have concerns about one of these proposals, see 20(b) below) but the assumptions that lead to the conclusion that 5925 houses cannot be built in Crawley, but will have to be built by neighbouring Local Authorities under the Duty to Cooperate obligations – and Crawley’s assumptions that these dwellings must be built as an urban extension adjacent to Crawley’s boundaries.</p> <p>Why is there a fundamental assumption that Crawley will not fulfil their housing supply target by building new homes at a high enough density so as to enable all 11,280 to be built within their boundary? Put simply if the average new home in this Local Plan is going to be two and a half stories high so that only 47 % of them can be built in Crawley, then if they were five stories high all 11,280 dwellings could be built in Crawley instead. And the taller you build some dwellings the lower the residual dwellings would need to be.</p> <p>No attempt appears to have been made to consider building at sufficiently high densities to achieve this – <b>instead the assumption appears to be that it is essential that the current character of Crawley is maintained without considering what the implications of that assumption on the proposed overflow areas are.</b> In other words the impact on the characteristics of adjoining local authorities does not appear to have been considered.</p> <p>We strongly object to the assumptions that most of the 5925 overflow dwellings must be built as an urban extension of Crawley Borough – i.e. on land adjacent to Crawley - as that assumption will have a very serious impact on scarce birds of conservation concern, as well as wider adverse biodiversity impacts if any of this overflow is built on the High Weald AONB</p> <p>The inference of the 5925 overflow is that Crawley is full and that there will never be space within its boundaries to ever again build any more dwellings. It would follow from this that future Local Plans will require that all Crawley’s future needs for new dwellings will have to be met by adjoining Local Authorities.</p> <p>We simply do not believe that that is a valid scenario. On that basis there would never again be any new development of dwellings in many boroughs and cities across England, yet huge numbers of new dwellings are being built in many boroughs and cities across the UK where the density of population is already far higher than in Crawley.</p> <p>Instead what Crawley appear to envisage is that there will be an ever-increasing expansion of its urban area beyond its current boundaries, absorbing more and more of the West Sussex countryside in Horsham DC, and more and more of the High Weald AONB in Mid Sussex DC.</p> |

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|   |            |              | <p>We believe that Crawley must face up now to the need to build new dwellings at a sufficiently high density that it can deliver its future housing needs within its Borough Boundaries, and that it should fundamentally change its planning principles to achieve this. In particular we believe that none of its overflow should be built in the High Weald AONB.</p> <p><b>The High Weald AONB along the east side of the M23/A23, immediately adjacent to the boundary of Crawley Borough, is one of the very best areas for woodland birds in all of Sussex, with significant numbers of Section 41, Schedule 1 and red-listed species of high conservation concern recorded using this area in the last 10 years. For this reason SOS objects to any proposals by Crawley to destroy parts of the AONB by insisting that overflow dwellings are built on it, and that urban Crawley extends into it.</b> Appendix 1 gives details of bird species of conservation concern that are found in this area.</p> <p>Crawley's proposals for urban extensions into Mid Sussex DC suggest that it is acceptable for the character of part of the High Weald AONB to be substantially destroyed in order to accommodate Crawley's overflow. We do not accept that part of the High Weald AONB should be destroyed just because Crawley do not wish to consider building homes at a higher density. What is the justification for this?</p> <p>Moreover the planning system provides high levels of protection from development to Areas of Outstanding Natural Beauty, alongside National Parks. As the High Weald AONB Management Plan 2019 states (P20, Planning and AONB's) <i>The National Planning Policy Framework (NPPF), Paragraph 172, requires that:</i></p> <p><i>"Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to these issues. The conservation and enhancement of wildlife and cultural heritage are also important considerations in these areas, and should be given great weight in National Parks and the Broads. The scale and extent of development within these designated areas should be limited. Planning permission should be refused for major developments other than in exceptional circumstances....."</i></p> <p>The southern part of Crawley, south of the A264, lies within the High Weald AONB. Crawley's Local Plan has not allocated any of this area for development (other than to allocate a reserve site for 10 Gypsy and Traveller pitches, if needed) and (commendably) Crawley appear to be paying particular attention to protecting the part of the AONB that lies within their boundary. Yet they assume it will be OK to plan for a substantial urban extension of circa 1000 dwellings in the Mid Sussex portion of the AONB. The logic of this is not apparent!</p> <p>Moreover, since there is no recognition of the need to change planning principles the implication is that more and more of Crawley will extend into the AONB in future Local Plans.</p> <p>Against this background we would make the following specific comments about the Crawley Local Plan 2020-2035.</p> <p><b>Suggested Modifications:</b></p> <p>We welcome the changes made to this Policy since the regulation 18 consultation.</p> |

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|  |                          |                     | b) We understand that Crawley have mapped their Green Infrastructure. However, we would now like to see Crawley starting to address what planning steps will be taken to improve linkages, but we cannot find within the Local Plan any proposals to do this. It is a well-known fact that the wildlife in isolated Green Assets that are not linked to other Green Assets are much more vulnerable to degradation, and that such isolated Green Assets cannot thrive long term as biodiversity hotspots unless they are very large in area and biodiversity.  |
| REP/062  | Environment Agency       | G11                 | <b>Green Infrastructure &amp; Biodiversity</b><br><b>Strategic Policy G11: Green Infrastructure; Strategic Policy G12: Biodiversity and Net gain; Strategic Policy G13: Biodiversity Sites</b><br><b>We support these policies</b>   |
| REP/068  | Sussex Wildlife Trust    | G11                 | Strategic Policy G11: Green Infrastructure<br>We are supportive of the inclusion of a distinct green infrastructure policy. SWT feels that it demonstrates recognition of the value this infrastructure plays in a multitude of delivery areas, within and across the boundaries of the borough. We are encouraged to see that the policy has incorporated SWTs suggested wording from the regulation 18 consultation and that other aspects of the policy are strengthened in particular bullet point (iii).  |
| REP/010  | Home Builders Federation | G12                 | This policy is unsound as it is not justified<br>The Council have looked to update this policy to take account of the Government's suggestion that new development should improve the biodiversity on their site to show a 10% net gain over the pre-development base line. Whilst this is the Government's current position the implementation of this particular policy is still some distance into the future and there is no certainty as to the final level of net gain that will be required nor the method by which the baseline and any net gains will be calculated. Until these have been finalised the Council should not be seeking to implement such a policy. At present national policy states that local plans as a whole should ensure net gains for biodiversity.<br><b>Suggested Modifications:</b><br>References to sites being required to deliver 10% net gain in biodiversity should be removed as below:<br>All development proposals will be expected to incorporate features to encourage biodiversity and enhance existing features of nature conservation value within and around the development.<br><del>Development will be required to demonstrate how it will meet the government's requirement for securing a 'net gain' in biodiversity. As a minimum, all development proposals will need to achieve a net gain for biodiversity in accordance with government expectations currently a 10% increase in habitat value for wildlife compared with the pre-development baseline.</del><br><del>In the first instance, net gain for biodiversity will be expected to achieve a minimum 10% net increase on site. Only where it is clearly justified his is not practicable to achieve, and where it is shown to have been considered and sought</del> |

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|   |   |              | <del>from the early stages of the design and layout of the development, will off-site provision, in the form of equivalent financial contributions, be agreed</del>   |
| REP/013   | Resident 5<br>On behalf of<br>The Ifield<br>Society | GI2          | <p>I do not consider the Local Plan document to be 'Sound' regarding Policies GI2 &amp; GI3 [Biodiversity Opportunity Areas and Local Nature Reserves] Willoughby Fields Local Nature Reserve [GI3] will disappear under tarmac according to Policy ST4 ['Indicative Search Corridor for a Western Link Road'].<br/>Kilnwood Vale [Joint Area Action Plan]</p> <p>I do not consider the Local Plan document to be 'Sound' regarding Policies GI2 &amp; GI3 [Ancient Woodland, Local Wildlife Site &amp; Biodiversity Opportunity Areas] 'Proposed amendment to build up area boundary – Kilnwood Vale {Joint Area Action Plan} – north of the railway line and south of Kilnwood Lane – threatens Ancient Woodland, Local Wildlife and Biodiversity (Policies GI2 7 GI3). In the 'Proposed amendment to Kilnwood Vale's built up area boundary) i.e. north of railway line) was given planning permission, this would speed up the environmental catastrophe which already threatens this beautiful area (for example, the Environment Agency and CBC have already identified a contamination/pollution problem in Kilnwood Value which threatens Bewbush Brook, Ifield Mill Pond, Ifield Brook &amp; River Mole).</p> <p><b>Suggested Modifications:</b><br/>The modifications I consider necessary to resolve 'Willoughby Fields/Western Relief Link Road would be:<br/>a) Move the Search Corridor to a Western Relief/Link Road (Policy ST4) North e.g. Parallel to the runway along Charlwood Road. The Local Plan has already hinted at that in Para 17.28: "Therefore, the current Search Corridor is located at the Southern edge of land historically safeguarded for a potential future runway at Gatwick Airport. But it could move north should the AAP (North Crawley Area Action Plan Policy SD3) work determine".<br/>b) Extend Willoughby Fields Local Nature Reserve (LNR) to include its neighbouring Ifield Brook Meadows Local Green Space [LGS] to prevent an environmental catastrophe in Ifield and beyond.<br/>The modifications I consider necessary to resolve the Kilnwood Vale issue would be to REJECT the "proposed amendment to built-up boundary (ie north of the railway line and south of Kilnwood Lane. These modifications might well avert an environmental catastrophe which threatens both Horsham and Crawley especially at Ifield.</p> |
| REP/015   | Resident 6  | GI2          | <p>A general concern to ensure good environmental and stable community development.<br/>A specific concern on any large scale development "West of Ifield" that damages environmental and community Stability. <b>Paragraph 4.43</b></p> <p><b>Suggested Modifications:</b><br/>The general concern – Please register my objection to the 10,000 new homes proposal in close proximity to Crawley as being impractical and unreasonable.<br/>The specific concern – <b>paragraph 4.43</b> consider an extra bullet point IX. A green belt is maintained bordering the</p>   |

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|   |                               |              | <p>perimeter of Crawley's Administrative and any neighbouring authority's boundary(s)<br/>           Consider revision of wording from <b>West of Ifield Rural Fringe</b> Proposals which respect this area of locally special rural fringe, its nature conservation and recreation value, its positive relationship with the urban edge and links to the wider countryside will be encouraged.<br/>           To: <b>West of Ifield Rural Fringe</b> Proposals which respect this area of locally special rural fringe, its nature conservation and recreation value, its positive relationship with the urban edge and links to the wider countryside will be safeguarded. A new nature reserve will be created to safeguard open countryside and for the benefit of existing and future residents.<br/>           The new nature reserve will incorporate a lake to environmentally manage and capitalise on the current flood plains.<br/>           The new nature reserve will be the size of Tilgate forest. Any Western relief road is built to the West of the new nature reserve. Any additional housing is built to the West of the new nature reserve, Neighbouring authorities will collaborate to achieve the above.</p>   |
| REP/021   | Gladman Developments LTD      | GI2          | <p><b>Policy GI2</b> outlines that "Development will be required to demonstrate how it will meet the government's requirement for securing a 'net gain' in biodiversity. As a minimum, all development proposals will need to achieve a net gain for biodiversity in accordance with government expectations currently a 10% increase in habitat value for wildlife compared with the pre-development baseline."<br/> <b>Suggested Modifications:</b><br/>           Gladman note that whilst this is the Government's current position there is no certainty as yet as to the final level of net gain that will be required nor the basis for calculating this. Gladman recommend that this policy should be amended to refer to 'should ensure net gains for biodiversity', with the exclusion of any specific percentage increase.<br/>           With regards to achieving net gains in biodiversity, Gladman submit that it is important to consider the long term impacts when reviewing proposals for biodiversity net gain taking into account that many of the measures provided as part of the development will need to mature beyond the build period.<br/>           Gladman also submit that if off-site mitigation provides the best opportunity for biodiversity gain, then the Local Plan policy should be flexible enough to allow for this and it should not be ruled out from the planning application process.</p> |
| REP/022   | Sussex Ornithological Society | GI2          | <p>The SOS recognises that England needs new houses and we are not challenging the assumptions behind the numbers needed, as that is not our expertise.<br/>           However, we do feel well qualified to speak out when we can see that proposals are being put forward that would result in houses being built in areas that are of particular importance to birds of conservation importance, as that would harm them.<br/>           In this respect our issue with the Crawley Local Plan 2020-2035 is not where it is intended to build 5355 houses within the Crawley Borough Council boundary in the plan period (although we do have concerns about one of these proposals,</p>  |

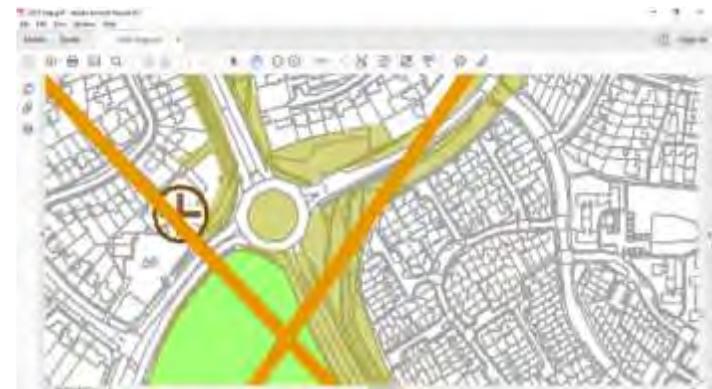
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| Ref. No.  | Respondent | Policy/ Para | Comments   |
|   |            |              | <p>see 20(b) below) but the assumptions that lead to the conclusion that 5925 houses cannot be built in Crawley, but will have to be built by neighbouring Local Authorities under the Duty to Cooperate obligations – and Crawley’s assumptions that these dwellings must be built as an urban extension adjacent to Crawley’s boundaries.</p> <p>Why is there a fundamental assumption that Crawley will not fulfil their housing supply target by building new homes at a high enough density so as to enable all 11,280 to be built within their boundary? Put simply if the average new home in this Local Plan is going to be two and a half stories high so that only 47 % of them can be built in Crawley, then if they were five stories high all 11,280 dwellings could be built in Crawley instead. And the taller you build some dwellings the lower the residual dwellings would need to be.</p> <p>No attempt appears to have been made to consider building at sufficiently high densities to achieve this – <b>instead the assumption appears to be that it is essential that the current character of Crawley is maintained without considering what the implications of that assumption on the proposed overflow areas are.</b> In other words the impact on the characteristics of adjoining local authorities does not appear to have been considered.</p> <p>We strongly object to the assumptions that most of the 5925 overflow dwellings must be built as an urban extension of Crawley Borough – i.e. on land adjacent to Crawley - as that assumption will have a very serious impact on scarce birds of conservation concern, as well as wider adverse biodiversity impacts if any of this overflow is built on the High Weald AONB</p> <p>The inference of the 5925 overflow is that Crawley is full and that there will never be space within its boundaries to ever again build any more dwellings. It would follow from this that future Local Plans will require that all Crawley’s future needs for new dwellings will have to be met by adjoining Local Authorities.</p> <p>We simply do not believe that that is a valid scenario. On that basis there would never again be any new development of dwellings in many boroughs and cities across England, yet huge numbers of new dwellings are being built in many boroughs and cities across the UK where the density of population is already far higher than in Crawley.</p> <p>Instead what Crawley appear to envisage is that there will be an ever-increasing expansion of its urban area beyond its current boundaries, absorbing more and more of the West Sussex countryside in Horsham DC, and more and more of the High Weald AONB in Mid Sussex DC.</p> <p>We believe that Crawley must face up now to the need to build new dwellings at a sufficiently high density that it can deliver its future housing needs within its Borough Boundaries, and that it should fundamentally change its planning principles to achieve this. In particular we believe that none of its overflow should be built in the High Weald AONB.</p> <p><b>The High Weald AONB along the east side of the M23/A23, immediately adjacent to the boundary of Crawley Borough, is one of the very best areas for woodland birds in all of Sussex, with significant numbers of Section 41, Schedule 1 and red-listed species of high conservation concern recorded using this area in the last 10 years. For this reason SOS objects to any proposals by Crawley to destroy parts of the AONB by insisting that overflow</b></p> |

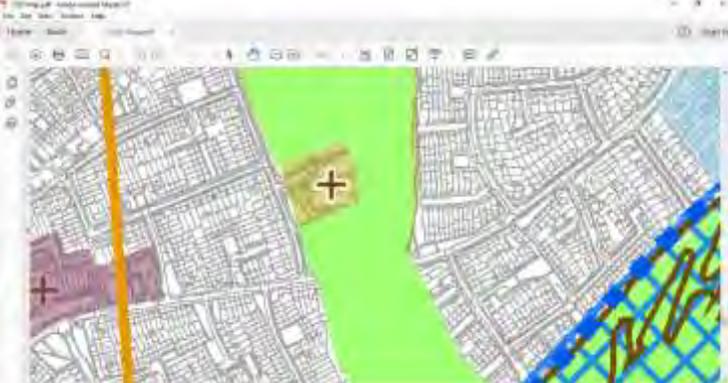
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| Ref. No.  | Respondent | Policy/ Para | Comments   |
|   |            |              | <p><b> dwellings are built on it, and that urban Crawley extends into it.</b> Appendix 1 gives details of bird species of conservation concern that are found in this area.</p> <p>Crawley's proposals for urban extensions into Mid Sussex DC suggest that it is acceptable for the character of part of the High Weald AONB to be substantially destroyed in order to accommodate Crawley's overflow. We do not accept that part of the High Weald AONB should be destroyed just because Crawley do not wish to consider building homes at a higher density. What is the justification for this?</p> <p>Moreover the planning system provides high levels of protection from development to Areas of Outstanding Natural Beauty, alongside National Parks. As the High Weald AONB Management Plan 2019 states (P20, Planning and AONB's) <i>The National Planning Policy Framework (NPPF), Paragraph 172, requires that:</i></p> <p><i>“Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to these issues. The conservation and enhancement of wildlife and cultural heritage are also important considerations in these areas, and should be given great weight in National Parks and the Broads. The scale and extent of development within these designated areas should be limited. Planning permission should be refused for major developments other than in exceptional circumstances.....”</i></p> <p>The southern part of Crawley, south of the A264, lies within the High Weald AONB. Crawley's Local Plan has not allocated any of this area for development (other than to allocate a reserve site for 10 Gypsy and Traveller pitches, if needed) and (commendably) Crawley appear to be paying particular attention to protecting the part of the AONB that lies within their boundary. Yet they assume it will be OK to plan for a substantial urban extension of circa 1000 dwellings in the Mid Sussex portion of the AONB. The logic of this is not apparent!</p> <p>Moreover, since there is no recognition of the need to change planning principles the implication is that more and more of Crawley will extend into the AONB in future Local Plans.</p> <p>Against this background we would make the following specific comments about the Crawley Local Plan 2020-2035.</p> <p><b>Suggested Modifications:</b></p> <p>a) We would like to see the following sentence added to the start of the first paragraph of this policy so that it reads:<br/> <b><i>“All development proposals will be supported by ecological information to ensure that the current biodiversity value of the site is calculated. Development proposals that do not do this will not be considered.</i></b><br/> All development proposals will be expected to incorporate features to encourage biodiversity.....”</p> <p>b) In the second paragraph of the policy it is stated that the offsite provision of net gain can be through financial contributions. In order for this approach to have any success, we would suggest that CBC ensure that they have a strategic plan in place for the delivery of net gain – which includes the identification of off-site locations where already planned improvements to provide biodiversity gain are defined. Unless sites identified for improvement to deliver</p> |

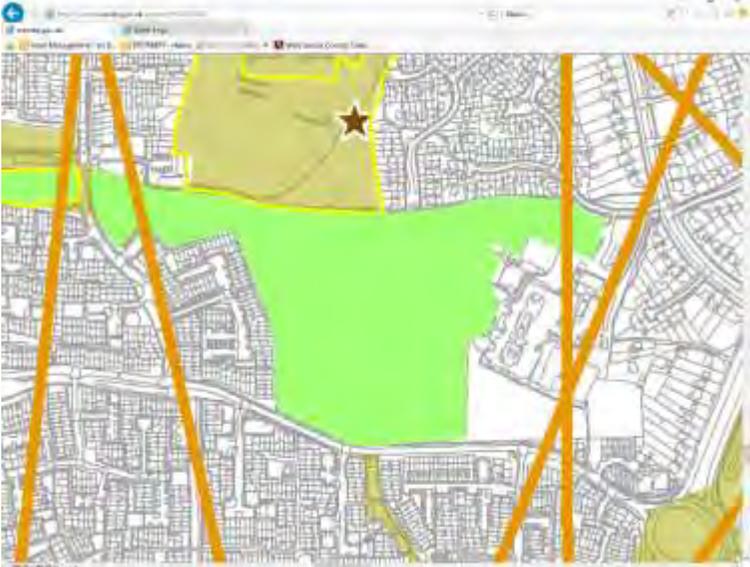
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| Ref. No.  | Respondent                               | Policy/ Para | Comments   |
|   |  |              | <p>biodiversity gains are in place there can be no confidence that financial contributions will deliver any real biodiversity benefit. We would like to see this incorporated within this policy through the following sentence being added at the end of the second paragraph:</p> <p><i>“.....equivalent financial contributions, be agreed. <b>This off site financial provision will be delivered via an identified strategic mechanism for net gain within the Borough</b>”.</i></p>  |
| REP/ 050  | Montagu Evans on behalf of Homes England | GI2          | <p>Homes England are pleased to see the updates made to this policy and the insertion of reference to a 10% net gain for biodiversity.</p> <p><b>Suggested Modifications:</b></p> <p>Paragraph two of the policy refers to the condition under which offsite provision will be acceptable and states that this will be in the form of “<i>equivalent financial contributions</i>”. Homes England asks in the interests of retaining a flexible approach, “<i>...or agreed alternative</i>” is added to this text, to enable developers to secure offsite ecological compensation using land they own or lease for this purpose or through an alternative arrangement with a third party, in agreement with CBC. The requested amendment would read as follows:</p> <p><i>In the first instance, net gain for biodiversity will be expected to achieve a minimum 10% net increase on site. Only where it is clearly justified this is not practicable to achieve, and where it is shown to have been considered and sought from the early stages of the design and layout of the development, will off-site provision, in the form of equivalent financial contributions or agreed alternative, be agreed.</i></p> <p>In terms of the reference to early discussions taking place with GAL to minimise the risk of bird strikes, Homes England welcome the inclusion of proposed amendments with the insertion of ‘as far as possible’ and consider this will support discussions to ensure a 10% net gain on-site.</p> |
| REP/ 062  | Environment Agency                       | GI2          | <p><b>Green Infrastructure &amp; Biodiversity</b><br/> <b>Strategic Policy GI1: Green Infrastructure; Strategic Policy GI2: Biodiversity and Net gain; Strategic Policy GI3: Biodiversity Sites</b><br/> <b>We support these policies</b></p>  |
| REP/ 068  | Sussex Wildlife Trust                    | GI2          | <p>It is imperative that the policy and guidance is clear that net gain is required in addition to any mitigation and compensation that is required through the mitigation hierarchy.</p> <p>We are supportive of the inclusion of a biodiversity Net Gain policy as it reflects the aspirations of the NPPF (particularly paragraph 170). The clear aim of this policy should be to set out the council’s commitment to ensuring that over the lifetime of the plan there is a measurable net gain to biodiversity through all development. As a result, CBC will need to ensure they are clear on their biodiversity assets at the start of the plan period. Otherwise the monitoring proposed in the sustainability appraisal will not be able demonstrated biodiversity net gain has been achieved. Do CBC feel that their current evidence base will enable this?</p>   |

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|   |            |              | <p>It is also important to recognise there will be changes to biodiversity over the plan period as ecosystems shift and change over time. To achieve net gains to biodiversity, the council will need to have clear understanding from the outset of the biodiversity value of the sites proposed for development, the ecosystem services they are delivering and their context in the wider network (to understand function). Therefore, in order to make the policy deliverable, it needs to recognise the necessity of providing the baseline for biodiversity on a proposed site and its surroundings. If measurable net gains are to be achieved as per 174 of the NPPF, then the Defra metric must be successfully applied. We made recommendations in relation to this point during the regulation 18 consultation, but are concerned that the policy still fails to acknowledge the clear need for up to date ecological information to be the foundation of the approach to net gain.</p> <p>We note that the council has now included a minimum percentage for the net gain in the policy wording, we support this. However, it maybe that some of the additional wording could be within the supporting text to make the policy more straightforward to apply.</p> <p>Within the second paragraph of the policy it is stated that the offsite provision of net gain can be through financial contributions. In order for this approach to have any success, we would suggest that CBC ensure that they have a strategic plan in place for the delivery of net gain. We make this suggestion as we are aware of other local authorities within Sussex that have failed to take a strategic approach to biodiversity delivery, simply in terms of compensation for development, without the added need for net gain. This has result in developments that not currently delivering the conditions of the approval.</p> <p><b>Suggested Modifications:</b></p> <p>We propose the following amendments to the policy:</p> <p><b>All development proposals will be support by ecological information to ensure that the current biodiversity value of the site is calculated.</b> All development proposals will be expected to incorporate features to encourage biodiversity and enhance existing features of nature conservation value within and around the development. Development will be required to demonstrate how it will meet the government's requirement for securing a 'net gain' in biodiversity. As a minimum, all development proposals will need to achieve a net gain for biodiversity in accordance with government expectations<sup>118</sup> currently a 10% increase in habitat value for wildlife compared with the pre-development baseline.</p> <p>In the first instance, net gain for biodiversity will be expected to achieve a minimum 10% net increase on site. Only where it is clearly justified this is not practicable to achieve, and where it is shown to have been considered and sought from the early stages of the design and layout of the development, will off-site provision, in the form of equivalent financial contributions, be agreed. <b>This off site financial provision will be delivered via an identified strategic mechanism for net gain within the Borough.</b></p> |

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| Ref. No.  | Respondent                                     | Policy/ Para | Comments   |
|   |  |              | <p>Applications should include consideration to securing benefits for the purposes of pollination and biodiversity as part of their on-site landscaping schemes. This can include consideration for green roofs and green walls, where soft landscaping at ground level is limited. Discussions with Gatwick Airport Limited in relation to planting and management to minimise, as far as possible, the risk of bird strike should be held at an early stage of landscape design, in accordance with Policy DD6.</p> <p>Proposals which would result in significant harm to biodiversity will be refused unless:</p> <ul style="list-style-type: none"> <li>i. this can be avoided by locating on an alternative site with less harmful impact; or</li> <li>ii. the harm can be adequately mitigated, or, as a last resort, compensated for.</li> </ul> <p>Compensation should consider losses of all the benefits provided by the natural environment.</p> <p>Development whose primary objective is to conserve or enhance biodiversity will be supported; while opportunities to incorporate biodiversity improvements in and around developments will be encouraged, especially where this can secure measurable net gains for biodiversity.</p> <p>Developers may be required to commit to providing an Ecological Management Plan/Biodiversity Offset Management Plan for the development site. This will usually apply to larger developments or where a development site is close to an LWS. The developer and/or site manager must ensure the relevant management plan is handed over and explained to any maintenance company or staff responsible for maintaining landscaping and/or gardens and buildings. A simplified version should also be provided for householders and other occupiers, explaining how biodiversity is being protected and encouraged on the site. This commitment will form part of the obligations on a planning permission and will be secured by way of a S106 legal agreement and/or planning condition.</p> |
| REP/006   | West Sussex County Council Property and Assets | GI3          | <p>The land at Cheals Roundabout is held for strategic infrastructure purposes, and to ensure that the road remains safe and can be well maintained. This representation was raised in our earlier response of 22 August 2019 in response to the Local Plan Review, and we would request reassurance that our objection has been considered and is reflected in this latest version in order to demonstrate that the plan is Positively Prepared. A copy of the Local Plan Map with areas affected is attached below.</p> <p>As a consequence we would request:</p>  |



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|   |  |              | <ul style="list-style-type: none"> <li>Removal of the designations of 'Structural landscaping' to the areas to the north and east of the roundabout shaded olive green, and also</li> </ul> Removal of the designation as 'Biodiversity Opportunity Areas' of the area to the south of the roundabout shaded bright green.   |
|   |  |              | <p><b>Suggested Modifications:</b></p> In order to demonstrate that the Plan is positively prepared and is informed by agreement with WSCC we would request: <ul style="list-style-type: none"> <li>Removal of the designations of 'Structural landscaping' to the areas to the north and east of the roundabout shaded olive green, and also</li> <li>Removal of the designation as 'Biodiversity Opportunity Areas' of the area to the south of the roundabout shaded bright green.</li> </ul>   |
| REP/006   | West Sussex County Council Property and Assets | GI3          | <p><b>The Oaks Primary School</b> is proposed to be designated as a 'Biodiversity Opportunity Area' (bright green) and an area of 'Structural landscaping' (olive green). An extract of the Local Plan Map with areas affected is attached below. These designations may serve to compromise or constrain (see para 3.4) the statutory obligation placed upon the Council to meet any future need to create additional spaces at the school, particularly in view of the proposed new housing allocations in Tilgate.</p>  <p>We therefore wish to object to the proposed designations for the reasons set out above and in order to demonstrate that the Plan is positively prepared and is informed by agreement with WSCC, namely that the areas are already</p> |

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|   |  |              | protected due to their status, and that there may be a future requirement to increase the capacity of the schools to accommodate additional children.  |
|   |  |              | <p><b>Suggested Modifications:</b><br/>           To remove the school fields and buildings at The Oaks Primary School from the list of proposed designated areas of 'Biodiversity Opportunity Area' (bright green) and an area of 'Structural landscaping' (olive green) within the proposed Local Plan in order to demonstrate that the Plan is positively prepared and is informed by agreement with WSCC.</p>  |
| REP/006   | West Sussex County Council Property and Assets | GI3          | <p><b>Holy Trinity CE School</b> is proposed to be designated as a 'Biodiversity Opportunity Area' (bright green). An extract of the Local Plan Map with areas affected is attached below. This designation may serve to compromise or constrain (see para 3.4) the statutory obligation placed upon the Council to meet any future need to create additional spaces at the school.</p>  <p>We therefore wish to object to the proposed designations for the reasons set out above, and in order to demonstrate that the Plan is positively prepared and is informed by agreement with WSCC namely that the areas are already protected due to their status, and that there may be a future requirement to increase the capacity of the schools to accommodate additional children.</p> |

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| Ref. No.  | Respondent                                 | Policy/ Para | Comments   |
|   |  |              | <p><b>Suggested Modifications:</b><br/>To remove the school fields at Holy Trinity CE School from the list of proposed designated areas of Biodiversity Opportunity Areas within the proposed Local Plan in order to demonstrate that the Plan is positively prepared and is informed by agreement with WSCC.</p>  |
| REP/013   | Resident 5 On behalf of The Ifield Society | GI3          | <p>I do not consider the Local Plan document to be 'Sound' regarding Policies GI2 7 GI3 [Biodiversity Opportunity Areas and Local Nature Reserves] Willoughby Fields Local Nature Reserve [GI3] will disappear under tarmac according to Policy ST4 ['Indicative Search Corridor for a Western Link Road'].<br/>Kilnwood Vale [Joint Area Action Plan]</p> <p>I do not consider the Local Plan document to be 'Sound' regarding Policies GI2 &amp; GI3 [Ancient Woodland, Local Wildlife Site &amp; Biodiversity Opportunity Areas] 'Proposed amendment to build up area boundary – Kilnwood Vale {Joint Area Action Plan} – north of the railway line and south of Kilnwood Lane – threatens Ancient Woodland, Local Wildlife and Biodiversity (Policies GI2 7 GI3). In the 'Proposed amendment to Kilnwood Vale's built up area boundary) i.e. north of railway line) was given planning permission, this would speed up the environmental catastrophe which already threatens this beautiful area (for example, the Environment Agency and CBC have already identified a contamination/pollution problem in Kilnwood Value which threatens Bewbush Brook, Ifield Mill Pond, Ifield Brook &amp; River Mole).</p> <p><b>Suggested Modifications:</b><br/>The modifications I consider necessary to resolve 'Willoughby Fields/Western Relief Link Road would be:<br/>a) Move the Search Corridor to a Western Relief/Link Road (Policy ST4) North e.g. Parallel to the runway along Charlwood Road. The Local Plan has already hinted at that in Para 17.28: "Therefore, the current Search Corridor is located at the Southern edge of land historically safeguarded for a potential future runway at Gatwick Airport But it could move north should the AAP (North Crawley Area Action Plan Policy SD3) work determine".<br/>b) Extend Willoughby Fields Local Nature Reserve (LNR) to include its neighbouring Ifield Brook Meadows Local Green Space [LGS] to prevent an environmental catastrophe in Ifield and beyond.<br/>The modifications I consider necessary to resolve the Kilnwood Vale issue would be to REJECT the "proposed amendment to built-up boundary (ie north of the railway line and south of Kilnwood Lane. These modifications might well avert an environmental catastrophe which threatens both Horsham and Crawley especially at Ifield.</p> |
| REP/014   | Crawley Green Party                        | GI3          | <p><b>5.1 Legally compliant?</b><br/>The Council have committed themselves to a Green structure, biodiversity concerning Nature Reserves (Policy GI3) but are proposing to build the Western Relief road through the Willoughby Fields Nature Reserve. (Policy ST4). The road (and the Homes England housing scheme) will also impact on the designated conservation area of Ifield Village and areas of outstanding beauty of Ifield Wood + Ifield Brook Meadows.</p>   |

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|   |                               |              | <p><b>5.2 Sound?</b><br/>The building of the Relief road (= housing scheme of 10,000 + homes) will impact on the Councils pledge of Climate Change Emergency declaration and its targets to reduce carbon emissions of 45% by 2030 and Zero emissions by 2050, as well as increase the air pollution (Nd2 – Nitrogen Dioxide) problems around + in Crawley.</p> <p><b>5.3 Compliant with the duty to co-operate?</b><br/>Will Environmental concerns about the Relief Road (and housing scheme) be given partly to the Economic + Financial concerns _ arguments presented by Homes England and other interested parties in the decision making process?<br/>Will people considering buying houses in the West of Ifield housing estates be made aware of potential flooding and contamination risks from the landfill area of Kiln vale estate?<br/>If the West of Ifield housing estate goes ahead on the or close of the Ifield flood plain this could cause the Relief road + areas close by to be flooded. Is this acceptable or desirable?</p> <p><b>Suggested Modifications:</b><br/>To meet Crawley Councils commitment to Green structure and biodiversity policy, in addition to its Climate Emergency declaration and pledge to reduce carbon emissions to 45% by 2030 and zero by 2050, council policy 0<br/>The Council in order to meet and comply with these policy commitments must incorporate them in the Local Plan.<br/>This commitment, maybe best served by the creation of a Local Nature Reserve, encompassing Willoughby Fields Nature Reserve, Ifield Woods (ancient woodlands), Ifield Brook Meadows (flood plain) and Ifield Village and any other natural areas close by. To maintain and preserve the ancient woodlands, floodplain, natural habitats and wildlife within the area.<br/>This would show a meaningful commitment by the Council to its policies and pledges to the Environment and improve upon its desire to create a cleaner, healthier, less polluted environment for the people of Crawley.</p> |
| REP/ 022  | Sussex Ornithological Society | GI3          | <p>The SOS recognises that England needs new houses and we are not challenging the assumptions behind the numbers needed, as that is not our expertise.<br/>However, we do feel well qualified to speak out when we can see that proposals are being put forward that would result in houses being built in areas that are of particular importance to birds of conservation importance, as that would harm them.<br/>In this respect our issue with the Crawley Local Plan 2020-2035 is not where it is intended to build 5355 houses within the Crawley Borough Council boundary in the plan period (although we do have concerns about one of these proposals, see 20(b) below) but the assumptions that lead to the conclusion that 5925 houses cannot be built in Crawley, but will have to be built by neighbouring Local Authorities under the Duty to Cooperate obligations – and Crawley’s assumptions that these dwellings must be built as an urban extension adjacent to Crawley’s boundaries.</p>   |

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| Ref. No.  | Respondent | Policy/ Para | Comments   |
|   |            |              | <p>Why is there a fundamental assumption that Crawley will not fulfil their housing supply target by building new homes at a high enough density so as to enable all 11,280 to be built within their boundary? Put simply if the average new home in this Local Plan is going to be two and a half stories high so that only 47 % of them can be built in Crawley, then if they were five stories high all 11,280 dwellings could be built in Crawley instead. And the taller you build some dwellings the lower the residual dwellings would need to be.</p> <p>No attempt appears to have been made to consider building at sufficiently high densities to achieve this – <b>instead the assumption appears to be that it is essential that the current character of Crawley is maintained without considering what the implications of that assumption on the proposed overflow areas are.</b> In other words the impact on the characteristics of adjoining local authorities does not appear to have been considered.</p> <p>We strongly object to the assumptions that most of the 5925 overflow dwellings must be built as an urban extension of Crawley Borough – i.e. on land adjacent to Crawley - as that assumption will have a very serious impact on scarce birds of conservation concern, as well as wider adverse biodiversity impacts if any of this overflow is built on the High Weald AONB</p> <p>The inference of the 5925 overflow is that Crawley is full and that there will never be space within its boundaries to ever again build any more dwellings. It would follow from this that future Local Plans will require that all Crawley's future needs for new dwellings will have to be met by adjoining Local Authorities.</p> <p>We simply do not believe that that is a valid scenario. On that basis there would never again be any new development of dwellings in many boroughs and cities across England, yet huge numbers of new dwellings are being built in many boroughs and cities across the UK where the density of population is already far higher than in Crawley.</p> <p>Instead what Crawley appear to envisage is that there will be an ever-increasing expansion of its urban area beyond its current boundaries, absorbing more and more of the West Sussex countryside in Horsham DC, and more and more of the High Weald AONB in Mid Sussex DC.</p> <p>We believe that Crawley must face up now to the need to build new dwellings at a sufficiently high density that it can deliver its future housing needs within its Borough Boundaries, and that it should fundamentally change its planning principles to achieve this. In particular we believe that none of its overflow should be built in the High Weald AONB.</p> <p><b>The High Weald AONB along the east side of the M23/A23, immediately adjacent to the boundary of Crawley Borough, is one of the very best areas for woodland birds in all of Sussex, with significant numbers of Section 41, Schedule 1 and red-listed species of high conservation concern recorded using this area in the last 10 years. For this reason SOS objects to any proposals by Crawley to destroy parts of the AONB by insisting that overflow dwellings are built on it, and that urban Crawley extends into it.</b> Appendix 1 gives details of bird species of conservation concern that are found in this area.</p> <p>Crawley's proposals for urban extensions into Mid Sussex DC suggest that it is acceptable for the character of part of the High Weald AONB to be substantially destroyed in order to accommodate Crawley's overflow. We do not accept</p> |

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| Ref. No.  | Respondent            | Policy/ Para | Comments  |
|   |                       |              | <p>that part of the High Weald AONB should be destroyed just because Crawley do not wish to consider building homes at a higher density. What is the justification for this?</p> <p>Moreover the planning system provides high levels of protection from development to Areas of Outstanding Natural Beauty, alongside National Parks. As the High Weald AONB Management Plan 2019 states (P20, Planning and AONB's) <i>The National Planning Policy Framework (NPPF), Paragraph 172, requires that:</i></p> <p><i>"Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to these issues. The conservation and enhancement of wildlife and cultural heritage are also important considerations in these areas, and should be given great weight in National Parks and the Broads. The scale and extent of development within these designated areas should be limited. Planning permission should be refused for major developments other than in exceptional circumstances....."</i></p> <p>The southern part of Crawley, south of the A264, lies within the High Weald AONB. Crawley's Local Plan has not allocated any of this area for development (other than to allocate a reserve site for 10 Gypsy and Traveller pitches, if needed) and (commendably) Crawley appear to be paying particular attention to protecting the part of the AONB that lies within their boundary. Yet they assume it will be OK to plan for a substantial urban extension of circa 1000 dwellings in the Mid Sussex portion of the AONB. The logic of this is not apparent!</p> <p>Moreover, since there is no recognition of the need to change planning principles the implication is that more and more of Crawley will extend into the AONB in future Local Plans.</p> <p>Against this background we would make the following specific comments about the Crawley Local Plan 2020-2035.</p> <p><b>Suggested Modifications:</b></p> <p>We welcome the changes made to this Policy since the regulation 18 consultation.</p> |
| REP/062   | Environment Agency    | GI3          | <p><b>Green Infrastructure &amp; Biodiversity</b></p> <p><b>Strategic Policy GI1: Green Infrastructure; Strategic Policy GI2: Biodiversity and Net gain; Strategic Policy GI3: Biodiversity Sites</b></p> <p><b>We support these policies</b></p>   |
| REP/068   | Sussex Wildlife Trust | GI3          | <p>Strategic Policy GI3: Biodiversity Sites</p> <p>We welcome the amendments made to this policy in light of our recommendations. SWT welcomes the acknowledgement that sites designated for their biodiversity value are recognised and protected in line with NPPF paragraphs 171 and 174. Further to this we can see that CBC have taken on board some of our amendments to the policy so that the second paragraph now recognises the importance of function, connectivity and subsequent climate resilience.</p> <p><b>Suggested Modifications:</b></p>  |

| Chapter 14. Green Infrastructure & Biodiversity |  |              |   |
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| Ref. No.  | Respondent                               | Policy/ Para | Comments  |
|   |  |              | <p>We would however ask CBC to consider an amendment to the policy that removes the final part of the sentence relating to past ecological surveys. This is because it may be the case that the site has not been previously surveyed, but it has features that are recognised as valuable for wildlife, for example veteran trees and species rich grassland. We also suggest that the policy incorporates the clear requirement to follow the mitigation hierarchy as per 175(a) of the NPPF.</p> <p>We therefore recommend the following amendment to the first paragraph of the policy and additional wording between the current first and second paragraph. Without this we do not believe the policy is compliant with national policy:<br/> <i>Up-to-date habitat and species surveys and associated reports will be required to accompany planning applications which may affect the areas listed below or sites showing likely ecological value. <del>based on past ecological surveys.</del></i><br/> <b>If significant harm to biodiversity resulting from development cannot be avoided, adequately mitigated or as last resort compensated then planning permission should be refused.</b><br/> <i>Hierarchy of Biodiversity Sites</i><br/> <i>To ensure a net gain to biodiversity...'</i></p>   |
| REP/050   | Montagu Evans on behalf of Homes England | GI4          | <p>Homes England agrees with the Council's evaluation of the value and role of Ifield Brook Meadows and Rusper Road Playing Fields. However, Homes England does not agree with the approach suggested in the policy that any development in this area should satisfy a test of "very special circumstances" as this approach is not consistent with the wording in the NPPF at paragraph 101 where it states that the 'policies for managing development within a Local Green Space should be consistent with those for Green Belts'. The policy, as written, focuses on solely the very special circumstances element of national Green Belt policy and makes no reference to their being certain forms of development which are not inappropriate development provided they preserve its openness and do not conflict with the purposes of including land within it including '<i>local transport infrastructure which can demonstrate a requirement for a Green Belt location</i>' (paragraph 146). The tests therefore need to be consistent with the protection of the Green Belt as a whole and not simply stating a need to pass the very special circumstances test.</p> <p>This change would be consistent with the Reasoned Justification which specifically references "national Green Belt Policy".</p> <p><b>Suggested Modifications:</b></p> <p>Homes England do, however, support the amendments made to Policy H3g x1, xii and xiii which more clearly demonstrate the process of assessment needed to justify the appropriateness of development in this area. Therefore, Policy GI4 should be amended for consistency with those Policies.</p> <p>Homes England also note Policy OS3 Rights of Way and Access to the Countryside which is pertinent here and recognises upgrading of routes across Ifield Meadows could be supported to enable improved access both for existing and new residents.</p> |

| Chapter 14. Green Infrastructure & Biodiversity |                       |              |   |
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| Ref. No.  | Respondent            | Policy/ Para | Comments  |
|   |                       |              | <p>Homes England would also recommend an amendment to policy wording that removes any subjective terminology. The proposed amendment is as follows and necessary to fulfil CBC's duty to ensure the plan is justified and consistent with National Planning Policy.</p> <p>This area is designated due to its value to the local community and local significance in its function as an area for enjoyment of recreation, visual amenity, tranquillity, wildlife, heritage, and highly accessible countryside close to the urban area.</p> <p>The above area will be safeguarded from development other than in <del>very special circumstances or where the development</del> instances that can be proven consistent with criteria listed at paragraphs 145 and 146 of the NPPF. <del>and will be to enhance Local Green Space functions, for example, through improvements to access, recreation and wildlife.</del></p> |
| REP/068   | Sussex Wildlife Trust | GI4          | <p>Strategic Policy G14: Local Green Space</p> <p>We welcome the inclusion of this policy as Local Green Spaces can serve many functions for local communities, as well as acting as a valuable area of Natural Capital for the Borough. While we are not in a position to currently identify further local green spaces, we do encourage the council to ensure that the local community is consulted with to ensure these valuable spaces are identified and protected.</p>  |
| REP/069   | Natural England       |              | <p>We are pleased to see the inclusion of many of our previous comments included within the draft submission. In particular comments relating to Green Infrastructure, Biodiversity and Net Gain.</p>   |

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| <b>Ref. No.</b>  | <b>Respondent</b>                                | <b>Policy/ Para</b> | <b>Comments</b>   |
| REP/026  | Rainier Developments LTD                         | SDC1                | <p>Rainier are concerned that the intentions of Strategic Policy SDC1 are unnecessary and a duplication of building regulations. It is considered that this policy should be refocused and seek to achieve carbon reductions and sustainable design in a more flexible way without adding onerous requirements to new development.</p> <p><b>Suggested Modifications:</b><br/>See Regulation 18 response</p>  |
| REP/034  | Vail Williams on behalf of Surrey County Council | SDC1                | <p>Firstly, further to representations to the Regulation 18 stage, we welcome the restructuring of this chapter and the evolution of the policies as you read through the chapter.</p> <p>Our client wishes to provide support for the recognition in paragraph 9.6 that Manor Royal is the focus for business led economic growth in the Borough and that the Main Employment Areas will be required to make effective use of the land within them. This is consistent with the effective use of land by SCC across Parcels One and Two at Nexus, Gatwick Road.</p> <p>We also note that the importance of employment land is further evidenced by the Lichfield's Economic Growth Assessment (EGA) for the Northern West Sussex Area (January 2020). This document shows that in a constrained land supply scenario, there is a need for 33ha of business land over the plan period, with a 21 ha deficit and 12 ha identified in the Employment Land Trajectory (ELT).</p> <p>We note that our site is contained within the Employment Land Trajectory as being available within years 1-5 and we can confirm that this is the case.</p> <p>Our specific comments on the policies themselves are as follows:</p> <p>We note the continued commitment for non-domestic buildings as BREAAAM excellent for water and energy categories as per our adjacent developments on Parcel One and Two.</p> <p>We also acknowledge that development will need to take the appropriate measures to meet objectives set out in the Energy Hierarchy and Cooling Hierarchy in order to mitigate against and adapt to, the impacts of climate change.</p> |
| REP/035  | Vail Williams on behalf of Ardmore Ltd           | SDC1                | <p>We acknowledge and support the requirements for new non-domestic development as set out in the policy, to ensure that development meets the 'minimum standard' of BREEAM Excellent for Energy and Water categories.</p> <p>We acknowledge that development will need to actively seek to minimise energy consumption, in line with National planning policy requirements for tackling climate change. We note that within the policy, an Energy Hierarchy is provided which all development is required to follow in order to mitigate against climate change. This now includes specific reference to use of available roof-space for solar PV, where possible. Given the constrained land availability, we consider this to be appropriate, subject to detailed guidance in regard to proximity to the airport.</p> <p>We also note that the policy has been amended to include more detail with regard to the cooling hierarchy, for adapting to the impact of climate change. This now sets out a requirement for energy efficient design and includes specific detail on how development can reduce heat entering a building during spells of hot weather.</p>  |

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| <b>Ref. No.</b>  | <b>Respondent</b>                                | <b>Policy/ Para</b> | <b>Comments</b>   |
| REP/062  | Environment Agency                               | SDC1                | <p><b>Sustainable Design and Construction</b><br/> <b>Strategic Policy SDC1: Sustainable Design and Construction; Policy SDC3 Tackling Water Stress</b><br/> <b>We support these policies.</b></p> <p>There is one instance of the phrase "extreme water stress" in Paragraph 15.5. Elsewhere (and in the Sustainability Appraisal) your terminology is consistent with our own, as we pointed out in the Regulation 18 consultation. We use "serious water stress". We support the need to tackle the serious water stress in the borough, and welcome the amount of attention this is given in the Plan.</p> <p>In particular, we are pleased to see Strategic Policy SDC3 specifically devoted to tackling water stress. We support the requirement for domestic developments to meet the 110 litres per person per day standard. The more stringent 100 litres target is supported by the ambition of Southern Water in its Water Resources Management Plan for average consumption across all homes by 2040. The target of 80 litres proposed for significant, strategic scale developments will be challenging, but will help in reducing the overall average to nearer 100. The mention of greywater reuse and rainwater harvesting in para 15.39 is appropriate in the context of achieving 80 litres.</p> <p>We welcome the requirement in both Strategic Policies SDC1 and SDC3 for new non-domestic buildings to achieve the BREEAM Excellent standard except where not technically feasible.</p> <p>We note that the Water Cycle Study has yet to be updated, and the justification for these high standards rests partly on the conclusions of the previous one. We hope the new document will also support the policies presented.</p> <p>In section 15.42, the requirement for non-domestic (and domestic) developments to install meters is not confined to water stressed areas. This is the norm, unless it concerns extensions, and nearly all non-domestic properties are already metered anyway.</p> |
| REP/034  | Vail Williams on behalf of Surrey County Council | SDC2                | <p>Firstly, further to representations to the Regulation 18 stage, we welcome the restructuring of this chapter and the evolution of the policies as you read through the chapter.</p> <p>Our client wishes to provide support for the recognition in paragraph 9.6 that Manor Royal is the focus for business led economic growth in the Borough and that the Main Employment Areas will be required to make effective use of the land within them. This is consistent with the effective use of land by SCC across Parcels One and Two at Nexus, Gatwick Road.</p> <p>We also note that the importance of employment land is further evidenced by the Lichfield's Economic Growth Assessment (EGA) for the Northern West Sussex Area (January 2020). This document shows that in a constrained land supply scenario, there is a need for 33ha of business land over the plan period, with a 21 ha deficit and 12 ha identified in the Employment Land Trajectory (ELT).</p> <p>We note that our site is contained within the Employment Land Trajectory as being available within years 1-5 and we can confirm that this is the case.</p>   |

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| Ref. No.                                      | Respondent                                       | Policy/ Para | Comments  |
|   |  |              | <p>Our specific comments on the policies themselves are as follows:<br/>           We note the continued commitment for development proposals within a priority area for District Energy Networks that involve the creation of over 1000sqm of internal floor space, to include an Energy Strategy that is in accordance with the hierarchy set out in this policy.</p> <p>We also note that in paragraph 15.33 that Manor Royal is identified as an area where development of District Heating schemes should be actively encouraged, to meet high demand for heating / cooling process and space heating. Again, this is consistent with our approach across Parcels One and Two. We also support the opportunity to explore potential for the generation and supply of local low/zero carbon energy technologies, as part of the Re-Energise Manor Royal project milestone for 2020.</p>   |
| REP/035                                       | Vail Williams on behalf of Admore Ltd            | SDC2         | <p>We support a requirement for major development proposals to incorporate an energy development strategy, in accordance with the hierarchy set out in the policy. This has already been integrated into our current proposals. We also recognise that paragraph 15.33 identifies Manor Royal and Forge Wood as areas where district heating schemes development should be actively encouraged to meet demand and support proposals for “<i>additional large-scale development and possible linkages with Manor Royal</i>”</p> <p>However, no reference is made to the proposal for SEL to the north of Manor Royal and south and/or east of the Gatwick Airport, as set out in Chapter 9. Whilst this is likely to be addressed in the AAP process, we would seek assurance that any future development opportunity within the AAP would be considered.</p>  |
| REP/034                                       | Vail Williams on behalf of Surrey County Council | SDC3         | <p>Firstly, further to representations to the Regulation 18 stage, we welcome the restructuring of this chapter and the evolution of the policies as you read through the chapter.</p> <p>Our client wishes to provide support for the recognition in paragraph 9.6 that Manor Royal is the focus for business led economic growth in the Borough and that the Main Employment Areas will be required to make effective use of the land within them. This is consistent with the effective use of land by SCC across Parcels One and Two at Nexus, Gatwick Road.</p> <p>We also note that the importance of employment land is further evidenced by the Lichfield’s Economic Growth Assessment (EGA) for the Northern West Sussex Area (January 2020). This document shows that in a constrained land supply scenario, there is a need for 33ha of business land over the plan period, with a 21 ha deficit and 12 ha identified in the Employment Land Trajectory (ELT).</p> <p>We note that our site is contained within the Employment Land Trajectory as being available within years 1-5 and we can confirm that this is the case.</p> <p>Our specific comments on the policies themselves are as follows:<br/>           We acknowledge that the South East of England is an area of serious water stress and that Crawley must ensure that development in the Borough requires stringent water conservation measures, as a result of this. We note the</p> |

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| Ref. No.                                      | Respondent                             | Policy/ Para | Comments   |
|   |  |              | <p>continued commitment for non-residential buildings to meet the 'minimum standards' for BREEAM Excellent for the Water Category, as delivered across Parcels One and Two.</p> <p>We also acknowledge that the policy will support any tighter national standards which supersede the existing Building Regulations 'optional' requirement for 110 litre/person/day, if these come forward during the Local Plan period.</p> <p>As with our representations for Regulation 18, on behalf of Surrey County Council, we are grateful for the opportunity to comment on the Regulation 19 Submission Draft Local Plan and will seek further to engage directly with the Council in regard to the key matters effecting general economic policies and our site Nexus Parcel Three.</p>  |
| REP/035                                       | Vail Williams on behalf of Ardmore Ltd | SDC3         | <p>We recognise that Crawley sits within an area of serious water stress and that this is expected to worsen in the future as a result of climate change. Given this, we support the Council's decision to retain the existing Building Regulations 'optional' requirement of 110 litres/person/day, and if necessary, raise this in line with any tighter national standards introduced over the Plan period.</p> <p>We also note that the policy text has been amended and now reads that <i>"development should plan positively to minimise its impact on water resources, including protecting against deteriorating water quality, and promote water efficiently"</i>.</p> <p>We also acknowledge that this policy requires new non-residential buildings to meet the minimum stands for BREEAM 'Excellent' within the Water category. Again, this has been achieved in our current application.</p>  |
| REP/062                                       | Environment Agency                     | SCD3         | <p><b>Sustainable Design and Construction</b><br/> <b>Strategic Policy SDC1: Sustainable Design and Construction; Policy SDC3 Tackling Water Stress</b><br/> <b>We support these policies.</b></p> <p>There is one instance of the phrase "extreme water stress" in Paragraph 15.5. Elsewhere (and in the Sustainability Appraisal) your terminology is consistent with our own, as we pointed out in the Regulation 18 consultation. We use "serious water stress". We support the need to tackle the serious water stress in the borough, and welcome the amount of attention this is given in the Plan.</p> <p>In particular, we are pleased to see Strategic Policy SDC3 specifically devoted to tackling water stress. We support the requirement for domestic developments to meet the 110 litres per person per day standard. The more stringent 100 litres target is supported by the ambition of Southern Water in its Water Resources Management Plan for average consumption across all homes by 2040. The target of 80 litres proposed for significant, strategic scale developments will be challenging, but will help in reducing the overall average to nearer 100. The mention of greywater reuse and rainwater harvesting in para 15.39 is appropriate in the context of achieving 80 litres.</p> <p>We welcome the requirement in both Strategic Policies SDC1 and SDC3 for new non-domestic buildings to achieve the BREEAM Excellent standard except where not technically feasible.</p> |

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| Ref. No.                                      | Respondent      | Policy/ Para | Comments   |
|   |                 |              | <p>We note that the Water Cycle Study has yet to be updated, and the justification for these high standards rests partly on the conclusions of the previous one. We hope the new document will also support the policies presented.</p> <p>In section 15.42, the requirement for non-domestic (and domestic) developments to install meters is not confined to water stressed areas. This is the norm, unless it concerns extensions, and nearly all non-domestic properties are already metered anyway.</p>   |
| REP/037                                       | Southern Water  | SDC3         | <p>As the statutory water undertaker for a large proportion of Crawley Borough, Southern Water supports the Council's higher water efficiency target of 100 litres/person/day and 80 litres/person/day for significant strategic development. Southern Water also supports the requirement for non-residential buildings to meet the minimum standards for BREEAM 'Excellent' within the Water category, since a comprehensive approach to water efficiency standards in all new development should be adopted in order to achieve meaningful savings.</p> <p>Whilst knowledge and research around climate change and its predicted impacts is constantly evolving, in tandem with this is an ongoing requirement to increase water supplies to meet the needs of a growing population. Higher standards of water efficiency in new development can support greater long term sustainability – with the potential to delay or reduce the need to increase abstraction or find new sources of water supply, which in turn will help to minimise impacts on the environment. This approach is endorsed through Southern Water's Water Resource Management Plan 2020-2070.</p> <p><b>Suggested Modifications:</b></p> <p>This policy is sound as it meets the requirement of the NPPF paragraph 149 for local plans to seek to mitigate and adapt to climate change and its long term implications for water supply, therefore no modifications are sought.</p> |
| REP/069                                       | Natural England | SDC3         | <p>We support the inclusion of the inclusion of a <i>“Proposals involving the creation of dwellings will be required to at least meet the Building Regulations optional requirement for tighter water efficiency, and should, where feasible, achieve a more advanced target of 100 litres/person/day. A tighter target of 80 litres/person/day should be met for significant, strategic scale developments.”</i> within Policy SDC3 Tackling Water Stress.</p>  |

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| Ref. No.                             | Respondent                     | Policy/ Para | Comments  |
| REP/002                              | Resident 2                     | EP1          | <p>Flood Management. The proposed housing and road development would be building on a natural flood plain, putting a lot of surface water into the rivers which would naturally be absorbed by the land. The fields and woods slow down the progress of water going into the river and reduce the risk of it bursting its banks. When Apple Tree Farm Housing Estate and Hindu Temple were built, all of the surface water was put into a huge pipe (we are happy to show you the pipe), that empties into the River Mole. So, there was no effective flood management measures put in place. One of us has lived in Burlands for over 62 years and on many occasions the River Mole has come right up to the back fence of our garden. So, the additional surface water that would be put into the river from a housing development of this scale could potentially flood all the houses in Burlands and other houses along the river Mole.</p>  |
| REP/005                              | Thames Water Utilities Limited | EP1          | <p>We support Policy EP1 part iv) in particular as this is in line with our previous representations.</p> <p>With regard to surface water drainage it is the responsibility of the developer to make proper provision for drainage to ground, watercourses or surface water sewer. It is important to reduce the quantity of surface water entering the sewerage system in order to maximise the capacity for foul sewage to reduce the risk of sewer flooding.</p> <p>Limiting the opportunity for surface water entering the foul and combined sewer networks is of critical importance to Thames Water. Thames Water have advocated an approach to SuDS that limits as far as possible the volume of and rate at which surface water enters the public sewer system. By doing this, SuDS have the potential to play an important role in helping to ensure the sewerage network has the capacity to cater for population growth and the effects of climate change. SuDS not only help to mitigate flooding, they can also help to: improve water quality; provide opportunities for water efficiency; provide enhanced landscape and visual features; support wildlife; and provide amenity and recreational benefits. We therefore also support Policy EP1 part iii) in particular.</p> <p>In relation to flood risk, the National Planning Practice Guidance (NPPG) states that a sequential approach should be used by local planning authorities in areas known to be at risk from forms of flooding other than from river and sea, which includes "Flooding from Sewers".</p> <p>When reviewing development and flood risk it is important to recognise that water and/or sewerage infrastructure may be required to be developed in flood risk areas. By their very nature water and sewage treatment works are located close or adjacent to rivers (to abstract water for treatment and supply or to discharge treated effluent). It is likely that these existing works will need to be upgraded or extended to provide the increase in treatment capacity required to service new development. Flood risk sustainability objectives should therefore accept that water and sewerage infrastructure development may be necessary in flood risk areas.</p> <p>Flood risk policies should also make reference to 'sewer flooding' and an acceptance that flooding can occur away from the flood plain as a result of development where off site sewerage infrastructure and capacity is not in place ahead of development.</p> |

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| <b>Ref. No.</b>                             | <b>Respondent</b>  | <b>Policy/ Para</b> | <b>Comments</b>   |
| REP/062                                     | Environment Agency | EP1                 | <p><b>Environment Protection</b><br/> <b>Flood Risk (page 196) -Paragraphs 16.7</b><br/> <b>Development and Flooding - 16.13</b></p> <p>The draft Local Plan recognises the need to ensure that the risk to flooding is an essential factor to take into account as part of the ongoing development of Crawley Borough, this is highlighted by sections 16.7 and 16.13. Importantly, these paragraphs state that development must be planned with flood risk in mind, both in terms of protecting Crawley residents, and ensuring that flood risk is not increased elsewhere. In addition, the Local Plan recognises that climate change should form part of the assessment process when considering development in relation to flood risk. These are essential factors in ensuring that any future development could be considered as sustainable.</p> <p>The Strategic Flood Risk Assessment (SFRA) and updated flood risk modelling for the Upper Mole Catchment are referenced within the draft Local Plan, Sustainability Appraisal, and also within the draft infrastructure plan. The updated flood risk modelling is likely to, in some areas, change the extent of the areas that are considered to be at risk to fluvial flooding from main rivers. We note that comment is made by Crawley in the draft plan that the SFRA and the Upper Mole modelling are currently being updated. Once these two items have been updated, this should be reflected with the draft Local Plan and its supporting evidence base.</p> <p><b>Suggested Modifications:</b><br/> <b>Strategic Policy EP1: Development and Flood Risk</b><br/> <b>We support this policy</b></p> <p>The requirements of the NPPF and associated PPG Flood Risk and Coastal Change are interpreted within and incorporated into Strategic Policy EP1. The manner in which the draft Local Plan sets out the requirements of the NPPF and its associated Flood Risk and Coastal change PPG within EP1 appear to be reasonable. Section 16.20 sets out the definition of Flood Zone 3b, this definition has been previously agreed with the Environment Agency.</p> |
| REP/062                                     | Environment Agency | EP2                 | <p><b>Environment Protection</b><br/> <b>Flood Risk (page 196) -Paragraphs 16.7</b><br/> <b>Development and Flooding - 16.13</b></p> <p>The draft Local Plan recognises the need to ensure that the risk to flooding is an essential factor to take into account as part of the ongoing development of Crawley Borough, this is highlighted by sections 16.7 and 16.13. Importantly, these paragraphs state that development must be planned with flood risk in mind, both in terms of protecting Crawley residents, and ensuring that flood risk is not increased elsewhere. In addition, the Local Plan recognises that climate change should form part of the assessment process when considering development in relation to flood risk. These are essential factors in ensuring that any future development could be considered as sustainable.</p>   |

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| Ref. No.                             | Respondent         | Policy/ Para | Comments   |
|                                      |                    |              | <p>The Strategic Flood Risk Assessment (SFRA) and updated flood risk modelling for the Upper Mole Catchment are referenced within the draft Local Plan, Sustainability Appraisal, and also within the draft infrastructure plan. The updated flood risk modelling is likely to, in some areas, change the extent of the areas that are considered to be at risk to fluvial flooding from main rivers. We note that comment is made by Crawley in the draft plan that the SFRA and the Upper Mole modelling are currently being updated. Once these two items have been updated, this should be reflected with the draft Local Plan and its supporting evidence base.</p> <p><b>Suggested Modifications:</b><br/> <b>Non-strategic Policy EP2: Flood Risk Guidance for Householder Development and Small Non-Residential Extensions</b><br/> <b>We support this policy</b><br/> This sets out guidance for householder development and small non-residential extensions. The inclusion of this policy is welcomed, small scale development can have a negative cumulative impact on flood risk, as well as being at risk to damage that flooding causes. The requirement to provide a Flood Risk and Resilience Statement for these types of development offers clear guidance on how to approach smaller scale development at risk to flooding, whilst ensuring the information that needs to be provide is appropriate to the nature and scale of these types of development. It is noted that EP2 contains descriptions of the types of development that fall under this Policy, which should assist in determining when a full Flood Risk Assessment is needed, and when a Flood Risk and Resilience Statement is appropriate. We welcome the reference in Policy GAT1 regarding flood risk in relation to the development of Gatwick Airport with a single runway. Areas of the Airport are at risk to fluvial flooding, additional areas with impermeable surfaces could also lead to an increase in the rate and volume of surface water runoff. Future development at the Airport will need to ensure that flooding can be managed on site and not increase the risk to flooding elsewhere.</p> |
| REP/062                              | Environment Agency | EP3          | <p><b>Environment Protection</b><br/> <b>Flood Risk (page 196) -Paragraphs 16.7</b><br/> <b>Development and Flooding - 16.13</b><br/> The draft Local Plan recognises the need to ensure that the risk to flooding is an essential factor to take into account as part of the ongoing development of Crawley Borough, this is highlighted by sections 16.7 and 16.13. Importantly, these paragraphs state that development must be planned with flood risk in mind, both in terms of protecting Crawley residents, and ensuring that flood risk is not increased elsewhere. In addition, the Local Plan recognises that climate change should form part of the assessment process when considering development in relation to flood risk. These are essential factors in ensuring that any future development could be considered as sustainable.<br/> The Strategic Flood Risk Assessment (SFRA) and updated flood risk modelling for the Upper Mole Catchment are referenced within the draft Local Plan, Sustainability Appraisal, and also within the draft infrastructure plan. The</p>   |

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| Ref. No.                             | Respondent                                     | Policy/ Para | Comments  |
|                                      |  |              | <p>updated flood risk modelling is likely to, in some areas, change the extent of the areas that are considered to be at risk to fluvial flooding from main rivers. We note that comment is made by Crawley in the draft plan that the SFRA and the Upper Mole modelling are currently being updated. Once these two items have been updated, this should be reflected with the draft Local Plan and its supporting evidence base.</p> <p><b>Suggested Modifications:</b><br/>Strategic Policy EP3 Land Quality<br/>We support this policy. We are pleased to note the inclusion of requirements to investigate, and if necessary, remediate potentially contaminated land, and to only permit development that has the potential to cause land or water contamination, with appropriate mitigation measures.</p>   |
| REP/050                              | Montagu Evans on behalf of Homes England       | EP4          | <p>The Annex provides policy context and establish locally specific guidance through which the approach of Local Plan Policy EP4: Development and Noise should be applied. Homes England request confirmation that the noise contours referenced in draft policy (Air Noise Map – Additional Runway – Summer Day – 2040 as shown at Plan 31 of the Gatwick Airport Master Plan 2019) are the latest and most appropriate noise contours to be used as a basis for ‘Planning applications for noise sensitive development’? The 2019 Gatwick Airport Master Plan refers to 2017 actual noise contour data, whereas 2018 data is available. Furthermore, the 2019 Gatwick Airport Master Plan doesn’t provide a date when the modelling was undertaken, but potentially suggests it is associated with a 2014 assessment. It is understood in general that these noise maps are regularly updated and take account of improvements in noise modelling software. Furthermore, it is recognised that 2050 noise contours have been prepared previously and therefore it is questioned why the 2040 contours are used specifically. If the referenced noise contours are to be used for planning applications unless otherwise confirmed through the AAP once it is adopted, then it is suggested that the noise contours should be the very latest available based on the most recent actual noise mapping and noise modelling.</p> |
| REP/063                              | Pegasus Group on behalf of Persimmon Homes Ltd | EP4          | <p>Strategic Policy EP4: Development and Noise states that People’s quality of life will be protected from unacceptable noise impacts by managing the relationship between noise sensitive development and noise sources. The policy indicates that residential and other noise sensitive development will be permitted where it can be demonstrated that users of the development will not be exposed to unacceptable noise impact from existing, temporary or future uses. The policy allows noise sensitive used in areas that are exposed to Lowest Observed Adverse Effect Level (LOAEL) or the Significant Observed Adverse Effect Level (SOAEL) to be permitted subject to a good acoustic design consideration in the early planning process, sufficient mitigation, careful planning and appropriate layout and design implemented. The policy further identifies that <b>“For aviation transport sources the Unacceptable Adverse Effect is considered to occur where noise exposure is about 60dB LAeq, 16hr.”</b></p>   |

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|                                      |                         |              | <p>The proposed sites put forward by Pegasus on behalf of Persimmon Homes identify a number of land parcels in the northern areas of the Forge Wood Neighbourhood and an infill site to the south of the area. Noise annex figure 1: the proposed wide spaced runway contours from Gatwick Airport's 2019 master plan indicates a Gatwick airport noise contour 2 runway scenario. It identifies that the entirety of the Forge Wood area is subject to 54- 66dB noise exposure. The southern part of the Forge Wood Neighbourhood is subject to the lower levels of noise (54-60db) and therefore the principle of the development is not precluded in such locations.</p> <p>Therefore, the area is broadly compliant with the Policy EP4 and hence does not preclude development occurring in the above locations. In some areas beyond the current consented scheme they could however be affected more by noise and this will influence what land uses they are best suited to, and non-residential options should be considered. The four land parcels to the north of Forge Wood are more likely to be affected by existing and potential future noise arising from Gatwick Airport. Nevertheless, it is expected that the Council will be willing to work towards securing a suitable solution and maximise the potential of Forge Wood neighbourhood area in maximising the development opportunities. Contours set out in the Policy map submitted as part of the Regulation 19 consultation does not allocate the land for development. It was previously highlighted that, in the locations where noise levels exceeded the levels that the LPA considered to be appropriate for housing, Persimmon are open to bringing that land forward for employment or other less noise sensitive uses. Pegasus Group would therefore like to highlight the appended parcels of land are suitable and available for a development.</p> |
| REP/ 056                             | Gatwick Airport Limited | EP4          | <p><b>Policy EP4: Noise and Development</b></p> <p>GAL broadly supports Policy EP4 but considers the policy requires minor amendments.</p> <p>Policy EP4 as drafted does broadly promote the achievement of the objective of preventing new noise sensitive development in areas with an unacceptable noise impact. We therefore broadly support the position the draft Plan adopts in relation to noise when considering an application or an allocation of a site for a noise sensitive development, subject to our further comments below regarding the need for noise mitigation to be met by the developer and for the correct technical noise thresholds to be applied in Policy EP4.</p> <p><b>GAL Comments:</b></p> <p>Whilst GAL supports the inclusion of a policy in the draft Plan that specifically considers noise generating and noise sensitive development and the inclusion of a technical 'Noise Annex' that explains how the policy will be applied in relation to sound levels from transport sources, we do consider that the specific values applied relating to aircraft noise are not consistent with the evidence from research.</p> <p>GAL suggest that the noise threshold levels align with recent government policy for LOAEL and significant community annoyance specifically for aircraft noise. Government guidance is clear that LOAEL for aircraft noise is Leq 16-hour day 51dB and Leq 8 hour summer night 45dB (Consultation Response on UK Aviation Policy: A framework for</p>   |

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|                                      |            |              | <p>balanced decisions on the design and use of airspace, October 2017, Section 2 paragraph 2.72). It is GAL's view that these values should be accurately reflected in the draft Plan.</p> <p>Since 2014 noise policy has been interpreted by various local planning authorities, a public inquiry inspector, the Mayor of London and the Secretary of State for Transport, in the following applications for new airport infrastructure:</p> <ul style="list-style-type: none"> <li>▪ Birmingham International Airport Runway Extension, 2014;</li> <li>▪ London City Airport Development Plan, 2015-2016; and</li> <li>▪ Cranford Agreement Secretary of State's Decision, February 2017.</li> </ul> <p>In the Cranford case the inspector noted <i>'the parties do not differ about the SOAEL for aircraft noise: it is 63dB LAeq, 16 hours (or its equivalent if other metrics are considered). Noise impacts at that level require to be avoided.'</i></p> <p>However, the draft Plan Policy EP4 part 'A. Noise Sensitive Development' (para 4) states:<br/><i>'For aviation transport sources the Unacceptable Adverse Effect is considered to occur where noise exposure is above 60dB LAeq 16hr.'</i></p> <p>GAL note this policy wording is under the heading 'Noise Sensitive Development', and whilst we would support planning policies to ensure that new housing is not permitted above this level of aircraft noise, we do not agree that such levels are unacceptable in a broader sense. GAL considers that, in line with best planning practice, the draft Plan should continue to promote policies which seek to locate new noise sensitive development in locations removed from existing noise generating sources, such as the airport.</p> <p>The draft Policy EP4, under the heading 'A. Noise Sensitive Development' (para 2), states:<br/><i>'Noise sensitive uses proposed in areas that are exposed to significant noise at the Lowest Observable Adverse Effect (LOAEL), or the Significant Observable Adverse Effect (SOAEL) from existing or future industrial, commercial or transport (air, road, rail and mixed) sources will be permitted where it can be demonstrated that good acoustic design has been considered early in the planning process, and that all appropriate mitigation, through careful planning, layout and design, will be undertaken to ensure that the noise impact for future users will be made acceptable....'</i></p> <p>The Noise Policy Statement for England (NPSE), at paragraph 2.24, suggests that reasonable steps to mitigate noise impacts should be considered above LOAEL, not above SOAEL. GAL therefore propose the following amendment to the wording of Policy EP4;</p> <p><b>Suggested Modifications:</b><br/><b>Policy EP4 - Proposed Amendment</b><br/><i>'Noise sensitive uses proposed in areas that are exposed to significant noise <del>at</del> above the Lowest Observable Adverse Effect (LOAEL), or <del>at</del> the Significant Observable Adverse Effect (SOAEL) from existing or future industrial, commercial or transport (air, road, rail and mixed) sources will be permitted where it can be demonstrated that good acoustic</i></p> |

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|                                      |            |              | <p><i>design has been considered early in the planning process, and that all appropriate mitigation, through careful planning, layout and design, will be undertaken to ensure that the noise impact for future users will be made acceptable...'. GAL supports the principle to avoid new housing in areas of excessive aircraft noise, and to ensure that if new housing must be permitted within the airport's LOAEL zones it should only be permitted if appropriate mitigation is included within the design, as indicated in the ProPG: Planning &amp; Noise – New Residential Development (May 2017). GAL considers that Policy EP4 should make it explicitly clear that the costs associated with the noise mitigation measures required for making a proposed noise sensitive development acceptable for future users in terms of the existing noise levels or known potential future noise contours are a cost to be fully met by the developer. GAL therefore requires the insertion of the following policy wording to Policy EP4 to form the final paragraph under part D. Mitigating Noise Impact</i></p> <p><i>'All responsibility for undertaking appropriate mitigation lies with the planning applicant to ensure that the impacts of existing noise or known potential future noise sources are acceptable on the use being applied for by the applicant'.</i></p> |

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| Ref. No.                          | Respondent                       | Policy/ Para | Comments   |
| REP/055                           | Savills on behalf of Wilky Group | ST1          | <p>Introduction<br/>Background</p> <p>This representation is submitted on behalf of The Wilky Group (TWG), which has a long-standing interest in the promotion of strategic employment land within the Crawley Borough Council (CBC) area. It relates to Chapter 17 Sustainable Transport in the Draft Crawley Borough Local Plan, 2020 (DCBLP) and specifically Policy ST1 Development and Requirements for Sustainable Transport.</p> <p>TWG owns about 63.3 ha (149 acres) of land east of Gatwick Airport and north and south of the M23 spur road between Junctions 9 and 9a. The land south of the M23 spur road is being promoted by TWG as a strategic employment opportunity known as Gatwick Green (the Site). The Site is identified on the plan at Appendix 1, which shows the extent of the Gatwick Green opportunity, comprising about 59 ha (146 acres).</p> <p>Wilky and Aberdeen Standard Investments are discussing how they can work together in respect of Wilky's strategic landholding adjacent to Gatwick Airport to bring forward an integrated mixed use development and co-ordinated infrastructure solution.</p> <p><b>Executive Summary</b></p> <p>TWG has submitted substantive representations on the DCBLP in relation to its land interests east of Gatwick Airport and Balcombe Road to the north of Crawley (59 ha). Its case is primarily concerned with the approach in the DCBLP to safeguarding land for future growth of the airport, the proposal to designate the formerly safeguarded land for the North Crawley AAP and the short and long term approach to identifying land for strategic employment contained in Policies EC1 (Sustainable Economic Growth) and SD3 (North Crawley AAP).</p> <p>TWG considers that there is no legal or national policy basis to safeguard land for a second runway at Gatwick and consequently the unmet planning and socio-economic needs of the Borough can be accommodated through the identification of land. Runway capacity has been provided for at Heathrow to meet forecast demand, alongside the expansion of other airports based on their existing runway infrastructure. National policy on aviation and airports therefore no longer requires any safeguarding at Gatwick, so TWG fully supports the removal of blanket safeguarding in the DCBLP.</p> <p>The NPPF requires Local planning Authorities to place significant weight on supporting sustainable economic growth by, inter alia, identifying strategic sites for inward investment to accommodate business needs and wider opportunities. Regional and sub-regional economic policy support focusing growth at Crawley/Gatwick in recognition of the area's current role and future potential. Importantly, the evidence base for the Local Industrial Strategy, which planning policy should reflect, supports the identification of major economic development adjacent to Gatwick, identifying land east of the Airport in this regard.</p> |

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|                                   |            |              | <p>TWG supports the policy to identify land for strategic employment and other needs via an AAP for north Crawley, but has put forward evidence that the unmet economic needs of the Borough are higher than noted in policy. In recognition of this and having regard to the removal of blanket safeguarding, evidence has been put forward to support the identification of Gatwick Green for strategic employment to meet the long-standing and urgent unmet needs of the area. Gatwick Green is immediately available to address the short term shortfall of employment land.</p> <p><b>Sustainable Transport and Infrastructure</b></p> <p>Policy ST1 sets out the requirements for development in relation to sustainable transport. TWG welcomes the transport Sustainability Objectives together with the policies set out in the Sustainable Transport chapter of the DCBLP. It is recognised that the policies attempt to balance the aspirations for growth and new development with the need to minimise carbon emissions and the impact of travel on climate change and air quality. Crawley has a record of delivering genuine improvements in public transport through Fastway, which has helped achieve a shift from car to bus travel. It is also clear that recent sustainable transport measures proposed and under development as part of the Coast to Capital Growth Fund are an extension of a local commitment to innovation in transport. This includes significant investment in hydrogen powered buses with zero emissions.</p> <p>The response to the questions posed in the Sustainable Transport chapter, submitted on behalf of TWG are therefore directed at clarifying the means of delivering the policies and facilitating growth whilst minimising its impact on the environment. Policy ST1 and the Key Issues identified in para 17.5 cover the aspirations of CBC to deliver a vibrant economy, at the same time recognising the urgent need to improve transport networks and address climate change. TWG believes that the Government's Industrial Strategy, including its focus on reducing Greenhouse Emissions alongside improving productivity, and the publication of the Future of Mobility: Urban Strategy (March 2019), provides a useful and constructive context for Crawley's Sustainable Transport policies.</p> <p>In committing to new development east of Gatwick Airport, TWG has considered the part that new employment will play in reducing the level of car-borne journeys and the means by which residents and those working in Crawley, travel around the area. This has generated a set of principles and infrastructure concepts which partially address the consultation questions and promotes a vision for Crawley, linking growth with improvements to sustainable transport which, so far as possible, achieve carbon neutral travel. These principles are:</p> <ul style="list-style-type: none"> <li>• To provide a range of high-quality employment opportunities that widen and deepen the skill base of residents in Crawley and its immediate neighbours. This will reduce levels of "out-commuting" and therefore the length of trips. Shorter journeys are made more easily by active modes, walking and cycling and potentially, personal electric transport.</li> </ul> |

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|                                   |            |              | <ul style="list-style-type: none"> <li>• To link new and existing residential development with employment opportunities through infrastructure and transport services that cater for carbon neutral modes of travel, potentially reducing reliance on the private car and in line with the concept of Mobility as a Service, (MAAS).</li> <li>• To ensure a consistent approach to the delivery of new transport services and infrastructure across borough/county boundaries and to work in partnership with relevant agencies such as the Coast to Capital LEP and Transport for the South East (TfSE).</li> <li>• To achieve a high level of integration between carbon-neutral modes by providing strategically located and high quality interchange facilities (the concept of super-hubs is already established in Crawley).</li> <li>• To plan development and sustainable transport comprehensively with new employment and residential locations linked, to avoid “piecemeal” growth which focusses on the exclusive needs of individual sites and occupiers.</li> <li>• To encourage new development that has the scale and value necessary to deliver investment in innovative and carbon neutral transport services and infrastructure.</li> <li>• To establish a multi-modal, comprehensive and flexible Sustainable Transport Strategy which is phased in line with new development. It is recognised that this will include some limited new road links to address gaps in the highway network and provide alternative route choices. These should not be primarily aimed at expanding capacity for private car use, but would assist in providing flexible transport corridors, including priority for low emission vehicles, e.g. hydrogen buses operating on the Fastway network and high occupancy electric transit. Critical to delivering the transport infrastructure will be a clear funding strategy based on a borough-wide model that pools available public funding with developer contributions through the CIL or a comprehensive approach to securing planning obligations. TWG has sought, in discussion with existing transport and network providers, to “operationalise” the principles set out above and thereby to demonstrate that new employment at Gatwick Green would significantly contribute to the simultaneous delivery of growth and a reduction in carbon emissions. The following are examples of measures to address the ways in which transport in Crawley could be different in 2035:               <ol style="list-style-type: none"> <li>1. A transit service which is consistent and complementary with existing bus routes operated by zero emission vehicles and capable of conversion to a more sophisticated Guideway system and/or light tramway.</li> <li>2. Dedicated infrastructure along newly identified routes which would function as a Flexible Transport Corridor, (FTC) linking development sites with existing interchanges and destinations. These routes would encompass the latest thinking in terms of flexible movement using e-bikes, e-scooters (subject to legislation), and “personal transport” solutions, which will form the basis of movement. Such carbon neutral / low-carbon solutions would help to mitigate the causes of climate change and improve urban air quality, currently a key national objective.</li> <li>3. High quality and strategically located transport interchanges with a focus on sustainable modes. The concept of “super-hubs” is consistent with this aspiration.</li> </ol> </li> </ul> |

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|  |                   |                     | <p>4. New road infrastructure to accommodate all travel modes and to bypass existing congestion hotspots. The principle is to plug gaps rather than significantly expand capacity.</p> <p>5. New pedestrian and cycle links utilising existing routes where possible with an emphasis on safety and the protection of vulnerable road users. These may form part of 2 above.</p> <p>2.5 It is important to stress that TWG believes these measures form part of an integrated “whole” with new development contributing to the delivery of the linked network of sustainable travel opportunities. In this regard and in the context of Policy ST1, the DCBLP is broadly consistent with national planning policy requirements, is justified and appropriate. However, in its current form, the policy would benefit from a clearer statement that sustainable growth means growth that delivers a significant shift towards efficient carbon neutral transport arrangements. The policy could therefore more clearly state that growth (residential, retail and employment) must be accompanied by major investment in alternative transport networks and methods.</p> <p>2.6 A comprehensive, employment and residential development strategy, aligned with an integrated approach to travel will play an important part in delivering Local Plan policies. An explicit policy which sets out to encourage development which addresses the challenge of climate change, through contribution to a clear and defined sustainable transport strategy, will serve to strengthen the Plan. This could build on both committed and proposed investment in Crawley, but crucially should see new development as an opportunity to deliver innovative transport solutions and exploit the emerging technologies designed to minimise greenhouse gasses. The environmental impacts of traditional modes of transport is likely to mean major changes on how people travel in the near future. In the context of the UK policy to end its contribution to global warming by 2050, major shifts in transport modes and networks will be needed to comply with this commitment.</p> <p>2.7 In meeting the aspirations of the DCBLP, TWG believes that Gatwick Green is a good example of new development that would achieve economic growth and help to shape a transport system fit for purpose and designed for future generations. Gatwick Green is strategically located at the confluence of several major transport networks, so is uniquely placed in view of its scale and location to deliver modal shift and significant components of the wider sustainable Transport Strategy.</p> <p>2.8 The absence in the DCBLP of a Strategic Employment Location (SEL) and identified housing allocations within/outwith Crawley Borough means there is a risk that the opportunity to achieve highly sustainable transport and travel will not be fully realised. It is crucial the DCBLP contains a key policy on sustainable transport that reflects the need to shift transport towards a net zero carbon outcome over the Plan period. This will include measure to achieve a significant shift from travel by private car, especially for trips of less than 5 miles. Such measures need to be aligned with the proposed development sites in the Local Plan.</p> <p><b>Conclusions</b></p> |

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|          |            |              | <p>This representation sets out a clear manifesto for the range of sustainable transport initiatives and infrastructure that should be part of Crawley’s future transport vision, enabled and delivered through well planned growth and development, integrated and aligned with public funding. This vision can only be fully achieved through planning effectively for employment growth east of Gatwick – a strategic opportunity known as Gatwick Green – and residential development within and sustainably located adjacent to the Borough. To achieve these objectives, TWG has put forward the need for a multi-modal, comprehensive and flexible Sustainable Transport Strategy, which is phased in line with new development. The soundness of the DCBLP will depend on such a Strategy coming forward alongside any growth proposed. It will, of its nature, need to be a joint strategy with the authorities neighbouring Crawley to ensure funding is secured, apportioned and directed in line with mutually agreed priorities.</p>  |
|          |            |              | <p><b>Suggested Modifications:</b><br/>           In order to address the above points, it is considered that Policy ST1 would benefit from some minor changes to clarify its purpose and objectives:</p> <ul style="list-style-type: none"> <li>• A clearer statement that sustainable growth means growth that delivers a significant shift towards efficient carbon neutral transport arrangements.</li> <li>• More clearly state that growth (residential, retail and employment) must be accompanied by major investment in alternative transport networks and methods.</li> </ul>   |
| REP/ 017 | Resident 8 | ST1          | <p>Having recently visited Vancouver it was interesting to see the successful methods they have employed to reduce traffic pollution, especially particulates. All new taxi vehicles and currently around 50% of buses (often the worst particulate polluters) operating within the city centre had to be eco-friendly.<br/> <a href="https://www.ptboard.bc.ca/eco_friendly.htm">https://www.ptboard.bc.ca/eco_friendly.htm</a><br/> <a href="https://en.byd.com/news-posts/vancouver-largest-private-bus-operator-goes-green/">https://en.byd.com/news-posts/vancouver-largest-private-bus-operator-goes-green/</a></p>   |

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|                                   |                            |              | <p><a href="https://www.cbc.ca/news/canada/british-columbia/battery-electric-buses-hit-roads-in-metro-vancouver-1.5280462">https://www.cbc.ca/news/canada/british-columbia/battery-electric-buses-hit-roads-in-metro-vancouver-1.5280462</a><br/>Given this plan is for the next 15 years could Crawley not promote something similar within that timeframe?</p> <p><b>Suggested Modifications:</b><br/>Add something like:<br/>"Crawley Borough Council supports measures taken to reduce greenhouse gas emissions. It is establishing policies and communications that promote the use of eco-friendly vehicles as taxicabs, limousines, and shuttle vans. When an application is approved to expand the number of taxis that can operate in the borough, an eco-friendly taxi must be used. The council may also apply this policy when it approves applications to add taxis in other areas, including Gatwick airport."<br/>Add something similar for busses.</p>  |
| REP/018                           | Resident 9                 | ST1          | <p>All seems good</p> <p><b>Suggested Modifications:</b><br/>Why don't the council look at Uber bikes or lime scooters like Milton Keynes to allow movement of people.</p>  |
| REP/032                           | West Sussex County Council | ST1          | <p>This note sets out officer comments upon the proposed submission documents, highlighting key issues and suggesting changes which the County Council is requesting be made to the Local Plan prior to adoption by Crawley Borough Council.</p> <p><b>Transport objection to the Submission Draft Local Plan on the grounds that it has not been 'Positively Prepared' and 'Consistent with national policy'. WSCC would wish to participate in the examination hearings.</b></p> <p>In the County Council's response to the consultation on the draft Crawley Local Plan Review (Reg. 18) the Borough Council was advised to develop a transport evidence base to assess the impacts of development on the transport network and identify mitigation measures.</p> <p>Significant new development is planned through the employment and housing policies:</p> <ul style="list-style-type: none"> <li>• EC1: Sustainable Economic Growth;</li> <li>• EC3: Office Provision;</li> <li>• H1 Housing Provision; and</li> <li>• H2: Key Housing Sites</li> </ul> <p>At present, there is no transport evidence base to support these proposals. Transport study work is about to be commissioned (February 2020) with technical support from the County Council. This work is required to demonstrate the impact of the proposed development on the transport network and the transport measures required to demonstrate compliance with paragraphs 102 to 111 of the National Planning Policy Framework, with particular reference to paragraphs 108 and 109 shown below:</p> <p><b><i>"Considering development proposals</i></b></p> |

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|                                   |                         |              | <p>108. In assessing sites that may be allocated for development in plans, or specific applications for development, it should be ensured that:</p> <p>a) appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location;</p> <p>b) safe and suitable access to the site can be achieved for all users; and</p> <p>c) any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree.</p> <p>109. Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.”</p> <p>As such the completion of the transport study work and agreement of a viable and deliverable strategy for mitigation is fundamental to successfully demonstrating the soundness of the Plan.</p> <p>As this piece of work has not yet started it is not yet known what the total trip generation of the proposed site allocation will be, or how the resulting travel demand will be distributed across the highway and public transport networks. It is common practice for this evidence to have been completed prior to the Regulation 19 Consultation. As it has not been completed it is important to stress that it is crucial that the study is completed prior to Plan Submission, as the County Council cannot consider the plan to be sound until:</p> <ul style="list-style-type: none"> <li>• the impact of the housing and employment allocations is identified in scale and location; and</li> <li>• a transport strategy for sustainable transport (led) and highway solutions to mitigate impacts to capacity, safety and environment has been designed and is demonstrated to be; <ul style="list-style-type: none"> <li>○ effective;</li> <li>○ fully and reliably costed;</li> <li>○ affordable; and</li> <li>○ Without barriers to delivery which may not be overcome.</li> </ul> </li> </ul> <p>The brief for the Transport Study, which has been agreed between the Borough Council, County Council and Highways England is considered to be a sound basis to allow the study to achieve this position. The County Council will continue to provide technical advice to support this work and offer assistance as necessary to address the soundness of the Plan. However, given that this work is expected to take several months during which outcomes will remain uncertain, the County Council objects to the housing and employment allocations in the Plan until such time as the transport evidence base and resulting transport strategy is completed and agreed to the Council’s satisfaction.</p> |
| REP/056                           | Gatwick Airport Limited | ST1          | <p><b>Policy ST1: Development and Requirements for Sustainable Transport</b></p> <p>GAL support Policy ST1 with amendment.</p> <p>GAL broadly supports Policy ST1 but considers that the policy requires amendment</p>   |

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|                                   |                                  |                         | <p><b>Suggested Modifications:</b><br/>with the insertion of the new policy wording and set out as the penultimate paragraph of the policy:<br/>'ST1 c)<br/><i>The development is required to ensure that any needs and impacts on existing major infrastructure, including upon Gatwick Airport as nationally significant infrastructure, are taken in to account when preparing Transport Statements and Transport Assessments for development</i>'.</p>  |
| REP/055                           | Savills on behalf of Wilky Group | Paragraphs 10.4 – 10.10 | <p><b>Introduction</b><br/><b>Background</b><br/>This representation is submitted on behalf of the Wilky Group (TWG or Wilky), which has a long-standing interest in the promotion of strategic employment land within the Crawley Borough Council (CBC) area. It relates to Chapter 10, Gatwick Airport in the Draft Crawley Borough Local Plan, 2020 (DCBLP) and specifically paragraphs 10.4 to 10.10 that address the position on 'Safeguarded Land' for a second runway at Gatwick.<br/>TWG owns about 63.3 ha (149 acres) of land east of Gatwick Airport and north and south of the M23 spur road between Junctions 9 and 9a. The land south of the M23 spur road is being promoted by TWG as a strategic employment opportunity known as Gatwick Green (the Site). The Site is identified on the plan at Appendix 1, which shows the extent of the Gatwick Green opportunity, comprising about 59 ha. TWG owns about 47 ha of land within the Gatwick Green opportunity; about 80% of the Site – the extent of land owned by Wilky is shown on the plan at Appendix 1.<br/>Wilky is in discussions with Aberdeen Standard Investments over how they can work together in respect of Wilky's strategic landholding adjacent to Gatwick Airport to bring forward an integrated mixed-use commercial development with a co-ordinated infrastructure solution.</p> <p><b>Executive Summary</b><br/>TWG has submitted substantive representations on the DCBLP in relation to its land interests east of Gatwick Airport and Balcombe Road to the north of Crawley (59 ha). Its case is primarily concerned with the approach in the DCBLP to safeguarding land for future growth of the airport, the proposal to designate the formerly safeguarded land for the North Crawley AAP and the short and long term approach to identifying land for strategic employment contained in Policies EC1 (Sustainable Economic Growth) and SD3 (North Crawley AAP).<br/>TWG considers that there is no legal or national policy basis to safeguard land for a second runway at Gatwick and consequently the unmet planning and socio-economic needs of the Borough can be accommodated through the identification of land. Runway capacity has been provided for at Heathrow to meet forecast demand, alongside the expansion of other airports based on their existing runway infrastructure. National policy on aviation and airports</p> |

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|                                   |            |              | <p>therefore no longer requires any safeguarding at Gatwick, so TWG fully supports the removal of blanket safeguarding in the DCBLP.</p> <p>The NPPF requires Local planning Authorities to place significant weight on supporting sustainable economic growth by, inter alia, identifying strategic sites for inward investment to accommodate business needs and wider opportunities. Regional and sub-regional economic policy support focusing growth at Crawley/Gatwick in recognition of the area's current role and future potential. Importantly, the evidence base for the Local Industrial Strategy, which planning policy should reflect, supports the identification of major economic development adjacent to Gatwick, identifying land east of the Airport in this regard.</p> <p>TWG supports the policy to identify land for strategic employment and other needs via an AAP for north Crawley, but has put forward evidence that the unmet economic needs of the Borough are higher than noted in policy. In recognition of this and having regard to the removal of blanket safeguarding, evidence has been put forward to support the identification of Gatwick Green for strategic employment to meet the long-standing and urgent unmet needs of the area. Gatwick Green is immediately available to address the short term shortfall of employment land.</p> <p><b>Summary of position on safeguarding</b></p> <p>In the DCBLP, the blanket safeguarding that is applied by Policy GAT2 of the adopted Local Plan has been removed and replaced with a designation for the North Crawley Area Action Plan (AAP) under Policy SD3. This policy removes the blanket safeguarding and applies interim controls over development that might prejudice the provision of a second runway at Gatwick. These controls are similar (though more restrictive) than those in Policy GAT2 and would apply until an AAP is adopted.</p> <p>Wilky's position on safeguarding was set out clearly in its representation on the Regulation 18 DCBLP, Policy GAT2. This explained that in terms of national aviation/airports policy, there is no longer any justification for safeguarding land for the construction of a second runway, outside of the Airport's operational boundary. The representation went on to state that any safeguarding must be justified by robust evidence of need with the area being no more than is critical to serve the purpose of the safeguarding, i.e. related to operational airport infrastructure. TWG therefore supports Crawley Borough Council's (CBC) decision to remove blanket safeguarding from the DCBLP. CBC proposes the North Crawley AAP as a mechanism to address any justifiable infrastructure needs of the Airport alongside meeting the other pressing planning and socio-economic needs of the Borough. TWG considers that the proposal to formally remove the safeguarding and identify the area for a future AAP in accordance with draft Policy SD3 is sound. However, it is aware that Gatwick Airport Limited is likely to make representations against the AAP proposal. In the event that the Examination needs to consider whether to continue safeguarding or allocate currently safeguarded land for other uses, TWG considers that the safeguarded land to the east of the airport, including TWG's land at Gatwick Green, should be removed from safeguarding and allocated for employment purposes as set out in its various</p> |

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|                                   |            |              | <p>representations. TWG considers that there is a clear case to allocate land to address the proper planning and socio-economic needs of the Borough, but acknowledges that the proposed AAP offers a sound, though more protracted, mechanism by which these land use demands can be addressed.</p> <p>This representation therefore responds to the Council's position on safeguarding set out at paragraphs 10.4-10.10 on the DCBLP. Gatwick Airport Ltd (GAL) made representations in strong support of retaining safeguarding in the Local Plan based on its view that such a position was supported by Government policy. However, following opposing representations by TWG and others on the Regulation 18 DCBLP, the Council decided that there was no longer any justification for blanket safeguarding land at Gatwick Airport for a second runway. The Council's rationale for this position is based on the significant shift on national aviation policy since the CBLP was adopted in 2015 such that future runway capacity up to 2050 is to be accommodated at Heathrow (3rd runway) and through making best use of existing runways at other airports, including at Gatwick. This representation therefore sets out the basis of TWG's support for the approach to safeguarding in Chapter 10 and by implication, Policy SD3's designation of the North Crawley Area Action Plan.</p> <p>The national aviation and airports policy framework that prevailed in 2015 supported retaining safeguarding at Gatwick. This policy framework has fundamentally changed such that there is no longer an in-principle case for safeguarding land at Gatwick for a second runway. Accordingly, in the absence of a national policy to safeguard land at Gatwick and any robust evidence from GAL to justify perpetuating safeguarding, the Council has resolved to remove Policy GAT2 (Regulation 18 option 1) and the safeguarding designation from the Local Plan Map. Consequently, the Council intends to undertake an Area Action Plan (AAP) following the adoption of the DCBLP covering most of the former Safeguarded Land to plan for the long-standing unmet economic, housing, infrastructure and community needs of its residents. In contrast with the unjustified need for a new (effectively third) runway at Gatwick Airport, these socio-economic needs are pressing, acknowledged in current policy and exist now. The AAP will also address any legitimate and robust long terms needs of the Airport and will identify any land use requirements in policy. The Council intends to reconcile these potentially competing interests via the AAP.</p> <p>TWG therefore supports the Council's position on safeguarding and sets out its position in this regard in this supporting representation.</p> <p><b>Safeguarded Land Introduction</b></p> <p>There are two fundamental questions that need to be answered in order to come to a position on the need to safeguard land for a second runway at Gatwick:</p> <p>1. Is safeguarding land justified in principle in the context of the national policy framework on aviation and airports?</p> |

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|                                   |            |              | <p>2.Has Gatwick Airport Limited (GAL) put forward 'robust' evidence in its Airport Master Plan (AMP) or in its Regulation 18 representations to support the extent and configuration of land that is 'critical' to accommodate infrastructure as required by national policy and the NPPF, such that this land should be safeguarded from prejudicial development? In summary, it is considered that whilst safeguarding land may have been justified in principle at the time the CBLP was examined and adopted in 2015, the national policy framework on aviation and airports has fundamentally changed such that continuing with safeguarding is no longer justified, particularly in the context of Crawley's critical and acknowledged unmet need for economic infrastructure, housing, transport infrastructure and community facilities. This approach is consistent with the Council's long-standing position, which recognised that safeguarding would need to be revisited if central government decided that a new runway should be built at Heathrow and not Gatwick. Furthermore, it is considered that GAL has not provided any robust evidence to underpin the extent and configuration of the safeguarded land east of the Airport the Gatwick Area Master Plan<sup>1</sup> (GAMP). Consequently, national policy on when safeguarding may be justified has not been met and cannot be met.</p> <p><b>Question 1 - the principle of Safeguarding</b><br/> <b>Past policy on Safeguarding</b><br/> <b>Appendix 2</b> sets out the past approach to safeguarding land for a second runway at Gatwick and notes that up until 2018 and the release of the Airports National Policy Statement<sup>2</sup> (ANPS), there was a case to retain safeguarding at Gatwick for a second runway. Consequently, the Crawley Core Strategy (2007) and the Crawley Borough Local Plan (2015) included a policy to safeguard land at Gatwick for a second runway. The extent of the Safeguarded Land however, is not something which TWG supported in its past representations on the Crawley Core Strategy (2007) and the CBLP (2015).<br/> Current policy on Safeguarding<br/> The current national policy context for airport expansion is very different from that which prevailed at the time of the CBLP 2015. The Airports National Policy Statement (ANPS, June 2018) confirmed an additional runway at Heathrow Airport that fulfilled the future demand for air travel up to 2050, outside of the "best use" of existing runway facilities to increase capacity at other airports.<br/> The ANPS was followed by a policy document on the future of UK aviation outwith Heathrow Airport ('Beyond the Horizons'<sup>3</sup> - BtH). This policy re-states the approach to airport expansion contained in the 2013 Aviation Policy</p> |

<sup>1</sup> Gatwick Airport Master Plan, GAL, July 2019

<sup>2</sup> Airports National Policy Statement: new runway capacity and infrastructure at airports in the South East of England, Department for Transport, June 2018

<sup>3</sup> Beyond the horizon: The future of UK aviation - Making best use of existing runways, UK Government, Department for Transport, June 2018

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|                                   |            |              | <p>Framework<sup>4</sup> (APF), namely that airports should make the best use of their existing runways. Gatwick is in the process of giving effect to this new national policy by seeking consent to lift its flight cap and use its existing emergency or standby runway as a second runway. The original policy and factual basis for safeguarding for an additional runway at Gatwick therefore no longer exists.</p> <p>In summary, the ANPS, the 'Beyond the Horizons'(BtH) document and the draft Aviation Strategy<sup>5</sup> (AS) approved the third runway at Heathrow and limited all other airport expansion to making the best use of existing runways. National policy therefore no longer identifies a specific need for a further new major runway in the South East (much less at Gatwick itself) and does not identify any specific time when such a runway will be needed. Nor does it require land for any such hypothetical runway to be safeguarded. Generic guidance on the approach to safeguarding land for infrastructure related to widening transport choice or to support large scale development is contained in the National Planning Policy Framework (NPPF) at paragraph 104 (c).</p> <p>In the light of the Government's decision to proceed with a third runway at Heathrow and limit expansion elsewhere to making best use of existing runways, the current policy pertaining to airport capacity and safeguarding land for future development at airports can be summarised as:</p> <ul style="list-style-type: none"> <li>• National policy contained in the 'Beyond the Horizons' document (2018) requires that outside Heathrow, airports should make the best use of existing runway infrastructure.</li> <li>• The December 2018 draft AS reaffirms that consideration of safeguarding for airports and their associated surface access requirements, is one for local plan-making authorities applying general national policy in the NPPF. There is no airport-specific runway safeguarding policy at national level.</li> <li>• The NPPF 2019 clearly sets out that the application of a safeguarding planning policy is one that must be tested and justified by local planning authorities based on robust evidence which must clearly demonstrate what is critical to accommodate any infrastructure (para 104(c)).</li> </ul> <p>It is therefore clear that circumstances have materially changed since the adoption of the current Local Plan in 2015. There is no longer any policy requirement at a national level for the continued safeguarding of land for a second runway at Gatwick Airport. The Government has taken the policy decision to support an additional runway at Heathrow to meet capacity need up to 2050. The reason for safeguarding land at Gatwick given in the 2013 APF has now fallen away. As far as other airports like Gatwick are concerned, Government policy is to support additional capacity based on their existing runway infrastructure. This does not require any safeguarding of land at Gatwick. Under these</p> |

<sup>4</sup> Aviation Policy Framework, Department for Transport, March 2013

<sup>5</sup> Aviation 2050: The future of UK aviation – a consultation, UK Government, Department for Transport, December 2018

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|                                   |            |              | <p>circumstances, retaining blanket safeguarding in the Local Plan would be anachronistic and contrary to national policy and related guidance.</p> <p>Based on Government policy, there is presently no established need for a further new runway, nor any established policy that future needs should be met by further runway development. In the context of the current climate emergency – which casts doubt over the scale of additional runway capacity that could be accommodated in environmental terms – the future direction of aviation policy becomes more uncertain. Both current policy and the available evidence suggests that there is significant uncertainty over the need for a second / additional runway at Gatwick and would in any event be a very long term proposition. Safeguarding under these circumstances would be untenable given that it would condemn land acknowledged in policy as being suitable and required for strategic employment, to long term sterilisation. TWG's land has been sterilised for over 15 years – in the current aviation policy context, it would have been wholly unreasonable to deny critical socio-economic infrastructure and sterilise the land for 30 years up to 2035 and beyond.</p> <p>This uncertainty is starkly illustrated in the draft AS (paras 3.11-3.14) in relation to planning for further runway capacity. Para 3.13 indicates that any new framework for growth could accommodate additional runways beyond 2030 if the needs case could be proven (the Airports Commission concluded there was likely to be a demand case for a second additional runway by 2050 or possibly earlier, but not an environmental or commercial case (Airports Commission, Final Report<sup>6</sup>, para 3.64). The Government therefore proposes to ask the National Infrastructure Commission (NIC) to include airport capacity in future national infrastructure assessments to determine whether there is a needs case for further runways. If a need is identified, the preferred location could be decided through (1) a National Infrastructure Commission (NIC) sector study, (2) an independent commission (like the Airports Commission), or (3) an aviation NPS to either set out the criteria any development consent application would need to meet, or by naming airport(s). The Government's preferred approach is an NPS to set out the criteria, but not name specific airports, so leaving it to industry to determine whether and when to bring forward proposals.</p> <p>In summary, it is considered that there is no longer a national aviation policy basis for the blanket safeguarding of land at Gatwick Airport for a second runway.</p> <p><b>Gatwick Airport Master Plan (GAMP), 2019</b></p> <p>Government policy is focused on delivering the third runway at Heathrow and maximising the use of existing runways elsewhere. Consistent with this approach, the proposals for the expansion of Gatwick Airport contained in the Gatwick Airport Master Plan (GAMP, 2019) are focused on expansion via the use of new technology to increase capacity based on the existing runway, and through the routine use of the standby runway for departures.</p> |

<sup>6</sup> Airports Commission: Final Report, Airports Commission, July 2015

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|                                   |            |              | <p>The GAMP contains a short section on the need to safeguard land for a possible future second runway. The introduction sets out the underlying rationale for continuing with safeguarding (para 5.4.1):</p> <p><i>“Gatwick is no longer actively pursuing plans for an additional runway, but there nevertheless remains the possibility of building and operating one in the future. Should this, or a future, Government decide to support an additional runway at Gatwick, we would be ready to take this forward with a view to seeking development consent. Should such policy support materialise, then it would be feasible to open the additional runway towards the end of the 5 to 15 year period. It is for this reason that we have included the additional runway in this draft master plan.”</i></p> <p>This illustrates the fragility of GAL’s case for safeguarding – GAL is no longer pursuing plans for a second runway; the prospect of a second runway is no more than a ‘possibility’; and bringing forward a proposal is dependent on a future decision by the Government. The draft AS confirms that such a decision is unlikely given the Government’s preference for allowing Airports to bring forward schemes based on criteria contained in a future NPS. The Airports Commission found that there was likely to be demand for an additional runway in the South East around 2050 and the draft AS stated that it could emerge after 2030: it is therefore unlikely that there will be demand for an additional runway in the South East until at least 2040, some years after the end date of the DCBLP. Even if such demand materialised, the environmental and economic cases were doubted by the Airports Commission, and without such justification, potential future demand alone – even if it materialised – would not justify safeguarding. The environmental impacts of aviation expansion may impose a brake on aviation growth in the context of the UK policy to end its contribution to global warming by 2050: further airport expansion may be severely restricted or impossible in this policy context.</p> <p>The GAMP goes on to state that land is safeguarded for a second runway as “required by Government” (para 5.4.10). As noted in this representation, there is no such requirement in national policy or guidance in relation to Gatwick Airport. No justification for safeguarding exists, and no explanation has been given as to why the extent of land proposed for safeguarding by GAL should be the same as it was before the Heathrow decision was made.</p> <p>It is worth noting that the GAMP proposes to bring forward the regular use of the standby emergency runway, which in effect is a second runway. A legal agreement in 1979 with West Sussex County Council (WSCC) prevented a second runway being promoted until 2019 – that GAL has brought forward its plans for the use of the standby runway now the time limit has expired, points to the proposal being a second runway for the Airport.</p> <p>The short section on safeguarding in the GAMP provides no evidence-based rationale to underpin the extent of the land area for safeguarding has been put forward. There is no acknowledgement of the Council’s current, pressing and ever growing planning and economic needs, and no explanation for how these have been taken into account in drawing the proposed boundary of the safeguarded land. The section in the GAMP on safeguarding offers no clear evidence to support the extent of safeguarding in the GAMP and falls significantly short of meeting the tests relating to ‘robust’ and ‘critical’ evidence required by the NPPF.</p> |

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|                                   |            |              | <p>Ultimately, the AS places the responsibility on plan-making authorities to ‘consider’ the future needs of airports in the context of national policy on airport expansion. Absent any national policy to provide a new runway at Gatwick and any robust evidence from GAL on the need for safeguarding, it is considered that the Council has made the correct judgement to exclude blanket safeguarding from the Local Plan review.</p> <p><b>Crawley Borough Council corporate position on Safeguarding</b><br/> CBC’s corporate position has unequivocally rejected safeguarding. A Full Council meeting on 12 December 2018 considered the Council’s response to the draft Gatwick Airport Master Plan (2018). In relation to safeguarding, the report to Full Council noted its past objection (to the Airports Commission) to the second runway on environmental impact grounds, particularly noise and the pressure on housing supply. The report also notes that the Council objects to the second runway because the Borough has considerable unmet employment needs much of which could be accommodated within the safeguarded area of 523 ha. The report went on to recommend that the Council only supports the future safeguarding if directed to do so by the Government in the forthcoming Aviation Strategy. It is noted from the minutes of the Full Council meeting that Members spoke of the need for CBC to “take back” safeguarded land for strategic development and also of the importance of diversification within the existing employment offering. The Council resolved that it “strongly disagrees that the land be safeguarded for the future construction of an additional runway” consistent with its previous corporate position. National policy allows the Council to dispense with safeguarding in accordance with its corporate intention and it has now done so through the DCBLP.</p> <p><b>Sustainability Assessment</b><br/> There is a statutory duty under section 19 of the Planning and Compulsory Purchase Act 2004 to carry out a sustainability appraisal of each of the proposals in a Local Plan during its preparation. One of the requirements of the Strategic Environmental Assessment (SEA) Regulations is to include an assessment of any reasonable alternatives, taking into account the objectives and the geographical extent of the plan or programme. The DCBLP SEA<sup>7</sup> contains such as an assessment in relation to the alternative options in relation to safeguarding.<br/> The SEA contains an assessment of four policy options for safeguarding namely (1) to retain safeguarding, (2) to remove safeguarding but do not designate an AAP, (3) safeguard part of the area, or (4) designate land north of Crawley’s built up area, south and east of Gatwick Airport for an AAP.<br/> For option 1 (safeguard land), the Council’s analysis correctly identifies a large number of negatives against the nine assessment criteria, principally from the significant level of socio-economic needs across the Borough that would</p> |

<sup>7</sup> SUSTAINABILITY APPRAISAL / STRATEGIC ENVIRONMENTAL ASSESSMENT, DRAFT REPORT For the Submission Local Plan, Crawley Borough Council, January 2020

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|                                   |            |              | <p>remain unmet. The Council considered that option 2 (remove safeguarding) would lead to some negatives resulting from the ad hoc approach to allocating land for development in the absence of the comprehensive evidence base to address the scale and spatial distribution of development allocations. The Council considered that option 3 (safeguard part of the area) was untenable in that the needs of the Airport are unknown, so would result in uncertainty over the land available for other land uses.</p> <p>The Council therefore favoured option 4 as it had a number of positives against the nine assessment criteria: it provided for an interim policy arrangement whereby the blanket safeguarding in the adopted CBLP could be removed and replaced by an AAP designation under Policy SD3 that would allow the potential future growth needs of the Airport to be properly considered alongside other development needs in Crawley.</p> <p>The SEA has informed the Council's decision to remove blanket safeguarding, but defer a final decision on the need for any safeguarding to an AAP. TWG support this approach, but considers the corollary to be some further delay in addressing the unmet needs of the Borough with some negative consequences. The consequences include the continuation of tight restrictions on development in the AAP area with the consequent perpetuation of planning blight and ongoing uncertainty with regard to meeting the Council's unmet needs. Further, the Inspector for the 2015 CBLP EIP found that the unmet needs of the Borough must be addressed within five years (i.e. by 2020): the departure from this advice is not an ideal outcome in the context of the NPPF requirement to plan positively for growth and meet objectively assessed needs. Nevertheless, TWG accepts the findings of the SEA and ultimately agrees with the soundness of the proposed AAP approach.</p> <p>In summary, TWG supports the Council's decision to remove blanket safeguarding and the related policy from the DCBLP, but considers on balance that the AAP designation whilst sound, is a less than optimal policy response given the potential negative consequences noted above.</p> <p><b>Conclusions on the principle of Safeguarding</b></p> <p>In conclusion, it is considered that there is no longer a basis for safeguarding land at Gatwick Airport for a new (effectively third) runway and the Council's decision to omit blanket safeguarding from the DCBLP is therefore a sound and robust one. Government policy is focused on delivering the third runway at Heathrow and maximising the use of existing runways elsewhere. There is no longer any policy or guidance to specifically safeguard land at Gatwick Airport for a second runway. The GAMP acknowledges that GAL is no longer actively pursuing its plans for an additional runway, although it considers it to be a possibility in the future. Given uncertainty over the need for and timing of any new runway capacity in the South East, combined with the growing limitation on airport growth implied by the need to address climate change, the rationale for a new runway at Gatwick must be weaker than GAL's view that it is a possibility in the future. In this context, CBC has rightly adopted a corporate position to reject ongoing safeguarding and focus on addressing its immediate and significant unmet socio-economic and employment needs.</p> |

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|                                   |            |              | <p>From a plan-making perspective, CBC has clearly scrutinised and tested the robustness of any evidence relating to continued safeguarding contained in the GAMP and in GAL's representations on the Regulation 18 DCBLP. Based on its assessment, CBC has decided to remove blanket safeguarding from the DCBLP and instead review the Airport's longer term needs via an AAP under Policy SD3.</p> <p><b>Question 2 – The existence of 'robust' evidence for Safeguarding for 'critical' infrastructure</b></p> <p>With no national policy to safeguard land at Gatwick for a second runway, any safeguarding must be justified both in principle and in extent in the context of the general provisions relating to safeguarding land for infrastructure. These policy provisions require a robust case to be demonstrated to support the nature and extent of any safeguarding if a Local Plan is to be found sound. In this regard, while the Government's UK Aviation Green Paper, known as the draft Aviation Strategy (AS, 2018) notes that "...it is prudent to continue with safeguarding policy to maintain a supply of land for future national requirements and to ensure that inappropriate developments do not hinder sustainable aviation growth" (para 3.66), it goes on to re-state the guidance in the NPPF and that this provides sufficient "guidance for local planning authorities to consider the future needs of airports and their associated surface access requirements, when developing local plans".</p> <p>In the context of the policy and guidance contained in the APF, the NPPF and the draft AS, the need for any land to be safeguarded must be tested through the plan-making process. The Council has decided to test this need through the AAP, alongside meeting the critical unmet economic, infrastructure and social needs of Crawley. The evidence for safeguarding any land would therefore need to be 'robust' and demonstrate that it extends only so far as to accommodate infrastructure that is 'critical' to the Airport's known expansion plans.</p> <p>GAL can no longer rely on Government aviation policy so it will need to put forward evidence to justify any safeguarding both in principle and in detail against the tests in the APF and the NPPF. GAL has supported the retention of safeguarding in its Regulation 18 representations: in this context the question arises as to the extent of safeguarded land that is 'critical' to accommodate land for airport operational infrastructure.</p> <p>TWG has long made the case that there is no justification for safeguarding land at Gatwick Airport east of Balcombe Road (covering the Site / Gatwick Green); an area shown on Plan 22 of the GAMP for surface car parking. Safeguarding this land is not justified by any 'robust' evidence and is not 'critical' to serving the purpose of the existing safeguarding extent, namely a second runway. The veracity of the safeguarding east of Balcombe Road has been assessed by Mott MacDonald's aviation team, the conclusion of which is that there is no justification for this area of Safeguarded Land: see assessment at <b>Appendix 3</b>.</p> <p>This conclusion is supported by the DCBLP at paragraph 3.20, which states that "<i>the indicative plans for a southern runway provided in the Gatwick Airport Masterplan show a large area for surface car parking, indicating an inefficient</i></p> |

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|                                   |            |              | <p><i>use of valuable land in a constrained borough with high development needs. A more consolidated approach could potentially open up opportunities for other developments”.</i></p> <p><b>Crawley Borough Council’s policy response</b><br/> When deciding on whether to identify Safeguarded Land for long term airport expansion, the NPPF contains general guidance at paragraph 104(c), which states that planning policies should:<br/> <i>“(c) identify and protect, where there is robust evidence, sites and routes which could be critical in developing infrastructure to widen transport choice and realise opportunities for large scale development;”</i><br/> The above tests are particularly important for the future of Crawley given the conflict between providing for unmet employment needs and safeguarding land for airport infrastructure. The NPPF is clear that the question of whether safeguarding policies should be included in a Local Plan is, in the first instance, a matter for the local plan-making authority to consider and justify.<br/> In this context, CBC has concluded that based on the GAMP and the evidence presented by GAL at the Regulation 18 stage, continued blanket safeguarding of land for a notional second runway development cannot be sustained. It has therefore decided to review whether there is any robust evidence to support any land being safeguarded for Airport expansion beyond that which GAL is now proposing as part of its Development Consent Order (DCO). This will be reviewed alongside the Council’s other critical and evidenced unmet needs related to economic growth, housing, infrastructure and community facilities.<br/> The need for and extent of safeguarding will be determined through the AAP process, but the evidence contained at Appendix 3 demonstrates that at the very least, safeguarding is not justified over the Gatwick Green site east of Balcombe Road.</p> |
|                                   |            |              | <p><b>Suggested Modifications:</b></p> <p><b>Conclusions</b><br/> In principle, the past policy of safeguarding land for the second runway at Gatwick was a sound approach in the adopted Local Plan until such time as the future of aviation had been decided through the Airports Commission process. National policy is now clear: an additional runway is proposed at Heathrow Airport; other airports are to maximise the use of their existing runways, and there is no longer a specific policy to safeguard land at Gatwick Airport. In this context, it is considered that there is no longer any justification in-principle to safeguard land at Gatwick in the DCBLP and the Council’s decision to remove the safeguarding policy designation from the Key Diagram and Local Plan Map is supported.<br/> For reasons stated in this representation, the removal of the blanket safeguarding from the DCBLP is supported by TWG. The replacement of the safeguarded area with an AAP designation is also supported, although it may not be the</p>  |

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|                                   |                          |              | <p>optimum policy response given the critique of the SEA contained in this representation. Nevertheless, it is considered that on balance the overall approach to safeguarding in the DCBLP is sound in that:</p> <ol style="list-style-type: none"> <li>1. It removes blanket safeguarding under adopted Policy GAT2, so placing the onus on GAL to demonstrate why safeguarding is justified by 'robust' evidence on the principle and on its extent in terms of what is 'critical'. This approach is consistent with national aviation/airports policy and national planning policy in the NPPF.</li> <li>2. It proposes to review the need for, and extent of any, safeguarding under Policy SD3 and the North Crawley AAP, which introduces interim controls to restrict the scale and nature of development that will be supported within the AAP area. TWG has some concerns about the tightness of those controls, which are addressed in its representation on Policy SD3.</li> <li>3. It enables the significant and urgent unmet socio-economic needs of the Borough to be addressed over the next two years via the AAP – this approach represents an appropriate response to requirement in the NPPF to plan proactively for the objectively assessed needs of the Borough.</li> </ol> <p>It is therefore considered that the DCBLP is sound in relation to its approach to safeguarding contained in Chapter 10 and in Policy SD3 because (1) it removes blanket safeguarding from the Local Plan (2) it provides a policy mechanism for the allocation of land to meet the objectively assessed employment and other needs of the Borough, and (3) it is consistent with national policy which requires that LPAs proactively encourage sustainable economic growth and identify strategic sites for inward investment (NPPF, paras 80-82).</p> <p>Notwithstanding the above position, there are other policy outcomes that may also meet the tests for soundness contained in the NPPF (para 35). Firstly, TWG has brought forward evidence to support the allocation of Gatwick Green for strategic employment on the basis that if the case for any form of safeguarding at Gatwick is unproven, such could enable land to be allocated in the DCBLP in advance of any AAP process. Secondly, in the event that a robust case exists for safeguarding land, this representation sets out a compelling case that safeguarding is not justified on the land east of Balcombe Road. This would exclude the Site from safeguarding enabling it to be allocated for strategic employment via the DCBLP or the AAP processes.</p> <p><b>Appendices sent by email on 2/3/20 Appendix 1</b></p> |
| REP/010                           | Home Builders Federation | ST2          | <p>Policy ST2 requires that new dwelling(s) with a private driveway or garage provide a minimum of 30% of all spaces to have active charging and the remaining spaces to have ducting to provide passive charging. The HBF is supportive of encouragement for the use of electric and hybrid vehicles via a national standardised approach implemented through the Building Regulations to ensure a consistent approach to future proofing the housing stock. In 2018 the Government published its Road to Zero Strategy which set out a mission for all new cars / vans to be effectively zero emission by 2040. Recently the Department for Transport held (ended on 7th October 2019) a consultation on Electric Vehicle Charging in Residential &amp; Non-residential Buildings.</p>  |

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| Ref. No.                          | Respondent | Policy/ Para | Comments  |
|                                   |            |              | <p>This consultation proposes regulatory changes (a new Part to Building Regulations) to result in more EVCPs for electric vehicles across the UK. The overnight charging of cars at home is generally cheaper and more convenient for consumers. It is the Government's intention for all new homes to be electric vehicle ready and require every new home to have an EVCP, where appropriate. An optional standard is not the Government's preferred option. The preferred option is to introduce a new functional requirement under Schedule 1 to the Building Regulations 2010, which is expected to come into force in the first half of 2020. The inclusion of EVCP requirements within the Building Regulations 2010 will introduce a standardised consistent approach to EVCP in new buildings across the country. The requirements proposed apply to car parking spaces in or adjacent to buildings and the intention is for there to be one charge point per dwelling rather than per parking space.</p> <p>However, to limit the possible impact on housing supply the Government has also consulted on introducing exemptions for developments where the requirements are not technically feasible. It is proposed that charging points must be at least Mode 3 or equivalent with a minimum power rating output of 7kW (expected increases in battery sizes and technology developments may make charge points less than 7 kW obsolete for future car models, 7 kW is considered a sufficiently future-proofed standard for home charging) fitted with a universal socket to charge all types of electric vehicle currently on the market and meet relevant safety requirements. All charge points installed under the Building Regulations should be un-tethered and the location must comply with the Equality Act 2010 and the accessibility requirements set out in the Building Regulations Part M.</p> <p>The installation of such charging points is estimated to add on an additional cost of approximately £976. The introduction of EVCPs in new buildings will impact on the electricity demand from these buildings especially for multi-dwelling buildings. A requirement for large numbers of EVCPs will require a larger connection to the development and will introduce a power supply requirement, which may otherwise not be needed. The level of upgrade needed is dependent on the capacity available in the local network resulting in additional costs in relation to charge point instalment. The costs of installing the cables and the EVCP hardware will also vary considerably based on site-specific conditions in relation to the local grid.</p> <p>The Government recognises that the cost of installing EVCPs will be higher in areas where significant electrical capacity reinforcements are needed. In certain cases, the need to install charge points could necessitate significant grid upgrades which will be costly for the developer. Some costs would also fall on the distribution network operator. Any potential negative impact on housing supply should be mitigated with an appropriate exemption from the charge point installation requirement based on the grid connection cost. The consultation proposes that the threshold for the exemption is set at £3,600. In the instances when this cost is exceptionally high, and likely to make developments unviable, it is the Government's view that the EVCP requirements should not apply and only the minimum Energy Performance of Buildings Directive requirements should be applied. It is the HBF's opinion that the CBC should not be setting different targets or policies outside of Building Regulations.</p> |

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| <b>Ref. No.</b>                          | <b>Respondent</b>                           | <b>Policy/ Para</b> | <b>Comments</b>   |
|  |   |                     | <p><b>Suggested Modifications:</b><br/>The Draft Local Plan should not be getting ahead of national policy which is expected to be implemented by mid-2020 and the requirements for electric vehicle charging should be deleted.</p>  |
| REP/023                                  | Savills on behalf of St Catherine's Hospice | ST2                 | <p>St Catherine's support the changes to Strategic Policy ST2.<br/>The introduction of Parking Behaviour Zones and corresponding parking standards is considered justified as it localises the parking policies, reflecting the circumstances of each individual neighbourhood. This is compliant with paragraph 105 of the NPPF and encourages the use of public and active transport in sustainable locations.<br/>This representation is made to the Crawley Borough Council (CBC) Regulation 19 Consultation on the Emerging Local Plan. The consultation is open from 20 January 2020 until 02 March 2020.</p>   |
| REP/026                                  | Rainier Developments LTD                    | ST2                 | <p>Strategic Policy ST2 of the Local Plan requires car parking standards for residential development to be based on the accessibility of the area, levels of car ownership, and the size of any new dwellings. The version of Strategic Policy ST2 in the Regulation 18 Draft Local Plan recognises that a level of car parking provision that falls below the required standards may be acceptable in central, highly accessible locations, where comprehensive car parking controls are in place and where travel plan measures targeted at reducing car ownership are provided. Such locations would include centrally located, highly accessible sites such as MOKA. This flexibility has been omitted from Strategic Policy ST2 of the Draft Local Plan; we recommend this deleted text is reinstated.<br/>By having a flexible approach to the application of car and cycle parking provision, the Council will be able to encourage the use of active and sustainable modes of transport in place of the private car. This will assist in the Council's wider vision of protecting the environment and becoming a carbon neutral town.<br/>Rainier welcomes the opportunity to engage with the Crawley Local Plan 2020-2035. These representations have been prepared with a focus on our land interests at land south of Station Way, MOKA, Crawley, which is currently subject to a planning application for 152 dwellings and has the benefit of a resolution to grant planning permission by Crawley Borough Council Planning Committee.<br/>Rainier welcome the identification of MOKA for residential development at Strategic Policy TC3: Development Sites within the Town Centre Boundary and Strategic Policy H2: Key Housing Sites. We confirm the Site is deliverable early on in the plan period of the new Local Plan.</p> <p><b>Suggested Modifications:</b><br/>See Regulation 18 response</p> |
| REP/060                                  | Savills on behalf of Bellway Homes Ltd      | ST2                 | <p><i>Strategic Policy ST2: Car and Cycle Parking Standards</i><br/>Within the Regulation 19 document we note that the Council is still proposing to retain its own car parking standards (which are currently contained within the Parking Standards Annex to the Urban Design SPD – October 2016). This is despite West Sussex Country Council (as the highway authority for the area) having adopted different car parking</p>   |

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|                                   |  |              | standards. This often leads to conflicting advice on development proposals and uncertainty for applicants. It is considered that Crawley Borough Council should align its car parking standards with West Sussex.<br><b>Future Participation</b><br>I trust that the above is of assistance in the preparation of the new Local Plan. I would be grateful for confirmation of receipt of these representations and would welcome the opportunity to engage with further versions of the new Local Plan in the future. If you have any queries or would like to discuss, please don't hesitate to get in contact with me.  |
| REP/ 063                          | Pegasus Group on behalf of Persimmon Homes Ltd | ST2          | Strategic Policy ST2: Car and Cycle Parking Standards states that the development will be permitted where the proposals provide an appropriate amount of parking facilities. The policy indicates that the standards are set out in the Parking Standard Annex. Crawley Local Plan Parking Standards Annex provides a brief overview of the Electric Vehicle (EV) Charging Infrastructure. The following section states that until the introduction of national requirements for EC charging infrastructure in new developments, Crawley Borough Council will require the provision of 'Active' charging points for electric vehicles should be provided at a minimum of 30% of all parking spaces. The section further states that<br><b>"For planning applications registered in each calendar year following the adoption of the Local Plan, the proportion of parking spaces with active EV charging provision should increase by 4 percentage points, to reflect anticipated increase in demand"</b> .<br>Whilst Pegasus Group supports promotion of the use of electric and hybrid modes of transport, it is argued that the following policy should accord with the Building Regulations. The Strategic Policy ST2: Car and Cycle Parking Standards and the Parking Standards Annex do not provide any further justification of the following requirements nor it identifies the actual evidence providing demand or technical feasibility assessments. There is no indication in the EV Charging Infrastructure requirements are responding to the actual or future demand for this type of infrastructure locally. |
| REP/ 050                          | Montagu Evans on behalf of Homes England       | ST3          | In light of the identified potential for the possible westwards expansion of Crawley, Homes England are pleased to see that amendments recommended under Regulation 18 have been incorporated that clearly identify the potential to strengthen the role of Ifield a suburban rail station in order to meet the needs of any increases in rail patronage.   |
| REP/ 056                          | Gatwick Airport Limited                        | ST3          | <b>Policy ST3: Improving Rail Stations</b><br>GAL objects to Policy ST3<br>Policy ST3 notes that " <i>developments at or within the vicinity of railway stations will be expected to enhance the specific roles of the individual stations</i> " and " <i>...at Gatwick Station, support its function as an airport-related interchange...</i> ".   |

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| Ref. No.                          | Respondent       | Policy/ Para | Comments  |
|                                   |                  |              | <p>However, the further statement in Policy ST3 (a) “...and provide opportunities for broadening the function of the station as an interchange for surface travellers using rail, coach, Fastway and other buses” is not supported by GAL unless qualified with the insertion of the following new additional policy wording to Policy ST3 (a):</p> <p><b>Suggested Modifications:</b><br/> <b>Policy ST3 (a) - Proposed Amendment</b><br/> <i>“at Gatwick Station, support its function as an airport-related interchange and provide opportunities for broadening the function of the station as an interchange for surface travellers using rail, coach, Fastway and other buses without detriment to the safe and efficient operation of the airport</i><br/>           Due to its geographic location relative to residential and employment areas within the borough, Gatwick Airport station is unlikely to be the nearest or most convenient local station for new development except where development is close to or contiguous with the airport boundary. As part of our responsibilities for the safe and secure operation of the airport GAL will not be in a position to support any developments that rely on access to Gatwick Airport station without assessment of the full impacts on the safe and secure operation of the adjoining airport terminal, access routes that require use of airport assets or land including permitted rights of way, or prior agreement with GAL to secure the improvement or enhancement of access routes within the GAL estate. This includes an assessment of the capacity of Gatwick Airport station as well as its entries and exits taking account of the anticipated demand from proposed development.<br/>           The re-development project at Gatwick Airport station noted in paragraph 17.19 reflects the needs of current rail passengers and the future needs of airport-related travel by staff and passengers, noting GAL’s commitment towards sustainable travel. The investment does not assume an increased role or for “<i>broadening the function of the station</i>” as stated. The improvements are being funded by Network Rail, DfT and GAL. GAL has provided further investment to improve accessibility from the bus stops on the A23 adjacent to South Terminal. There has been no additional investment or support from Crawley Borough Council or West Sussex County Council to improve access routes to Gatwick Airport station, or justification for it’s role as an interchange serving the local population. By contrast, investment has been made for improving access to Crawley station and Three Bridges station.</p> |
| REP/002                           | Resident 2       | ST4          | Infrastructure. In the last 10 year, trying to get in and out of Crawley town centre has involved sitting in a traffic jam almost all times of the day. How can the town cope with potentially another 30,000 people and their cars?  |
| REP/011                           | Highways England | ST4          | Highways England has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the strategic road network (SRN). The SRN is a critical national asset and as such Highways England works to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity. We will therefore be concerned with proposals   |

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|                                   |            |              | <p>and policies that have the potential to impact the safe and efficient operation of the SRN. With regards to Crawley, the SRN comprises the M23 and A23, with the M25 nearby.</p> <p><b>Crawley's Unmet Housing Need/ Developments in Vicinity of Crawley</b></p> <p>We note that "Even with further development within the borough, Crawley will not be able to meet its housing needs in full and possibly not all of its employment needs", with a need for 11,280 dwellings (with 5,355 planned for delivery 2020-2035) and 20,541 new jobs. As a result, there is a requirement for neighbouring authorities (especially Horsham, Mid Sussex and Reigate &amp; Banstead) to accommodate Crawley's unmet needs (5,925 dwellings).</p> <p>It is Highways England's view that in order for the overall Local plan and individual developments to accord with national planning and transport policy full, timely coordination with neighbouring authorities will need to be undertaken in assessing the transport impacts upon the local and strategic road networks. This will especially be the case with regard to the significant development to be sited in neighbouring authorities just outside Crawley's boundaries. The sites include the prospective West of Ifield development with associated Crawley Western Relief or Link Road (as outlined in policy ST4) and Horley Business Park developments. In this respect, we note that para 1.14 states "Transport Modelling is to be updated taking into account the cumulative impacts of plans, policies and proposals within adjoining authorities".</p> <p>We note that in addition to development just outside the borders of Crawley, there is the prospective expansion Gatwick Airport and/or North Crawley Area Action Plan as outlined in SD3 within the borough.</p> <p><b>Transport Evidence Base</b></p> <p>We note that the transport evidence base in support of the Local Plan has yet to be prepared, despite the Council consulting on its Reg. 19 plan.</p> <p>We set out our position in June 2019 when consulted on the Infrastructure Plan. It is that because the Local Plan Review involves a change from the current adopted Crawley 2030 Local Plan in terms of the plan years and housing numbers, an updated, robust Transport Assessment will be required.</p> <p>It should include evidence on the location of strategic development within the borough. Associated with this, and in their own right, the evidence base will require assessments for the M23 Junctions 9 to 11 and along the M23 Spur to Gatwick. This because the model used previously is now unlikely to be suitable for further use.</p> <p>In this respect, we note that the need for an updated Transport Assessment is acknowledged in Chapter 17, and we have recently been liaising separately with Crawley Borough Council on our input to the transport modelling brief.</p> <p>We therefore look forward to working with Crawley Borough Council and receiving further information on the transport modelling for review.</p> |

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|                                   |  |              | <p>Until this Transport Assessment is undertaken and agreed, together with any mitigation required (demonstrated to be in accordance with standards, fully funded and deliverable), Highways England will have no option but to object to the development proposals outlined in the revised Crawley Local Plan 2020-2035.</p> <p><b>Assessment of Individual Developments</b></p> <p>It should also be noted that all significant developments (even those allocated in the Local Plan), will need to be supported by a robust Transport Assessment (as outlined in policy ST1). In accordance with NPPF and C2/13 Transport Assessment must consider the impact of the development on the Strategic Road Network for the opening year and a future year equivalent to a) 10 years after the application is submitted or b) the end of Local Plan or c) the date at which the whole development is completed, whichever is latest.</p> <p>Therefore, as things stand at this point in time, we do not consider the Local Plan to be legally compliant, sound or compliant with the duty to co-operate.</p> <p>However, this is not to say that it cannot be made so (for example, we are content with the Council's current transport base tender document that sets out the required work to be completed), and we look forward to working with the Council and the appointed consultants on the above and any other relevant matters.</p> |
|                                   |  |              | <p><b>Suggested Modifications:</b></p> <p>It should also be noted that all significant developments (even those allocated in the Local Plan), will need to be supported by a robust Transport Assessment (as outlined in policy ST1). In accordance with NPPF and C2/13 Transport Assessment must consider the impact of the development on the Strategic Road Network for the opening year and a future year equivalent to a) 10 years after the application is submitted or b) the end of Local Plan or c) the date at which the whole development is completed, whichever is latest.</p> <p>Therefore, as things stand at this point in time, we do not consider the Local Plan to be legally compliant, sound or compliant with the duty to co-operate.</p> <p>However, this is not to say that it cannot be made so (for example, we are content with the Council's current transport base tender document that sets out the required work to be completed), and we look forward to working with the Council and the appointed consultants on the above and any other relevant matters.</p>  |
| REP/013                           | Resident 5 On behalf of The Ifield Society | ST4          | <p>I do not consider the Local Plan document to be 'Sound' regarding Policies GI2 7 GI3 [Biodiversity Opportunity Areas and Local Nature Reserves] Willoughby Fields Local Nature Reserve [GI3] will disappear under tarmac according to Policy ST4 ['Indicative Search Corridor for a Western Link Road'].</p> <p>Kilnwood Vale [Joint Area Action Plan]</p> <p>I do not consider the Local Plan document to be 'Sound' regarding Policies GI2 &amp; GI3 [Ancient Woodland, Local Wildlife Site &amp; Biodiversity Opportunity Areas] 'Proposed amendment to build up area boundary – Kilnwood Vale {Joint Area Action Plan} – north of the railway line and south of Kilnwood Lane – threatens Ancient Woodland, Local Wildlife</p>   |

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|                                   |                     |              | <p>and Biodiversity (Policies GI2 7 GI3). In the 'Proposed amendment to Kilnwood Vale's built up area boundary) i.e. north of railway line) was given planning permission, this would speed up the environmental catastrophe which already threatens this beautiful area (for example, the Environment Agency and CBC have already identified a contamination/pollution problem in Kilnwood Value which threatens Bewbush Brook, Ifield Mill Pond, Ifield Brook &amp; River Mole).</p> <p><b>Suggested Modifications:</b><br/> The modifications I consider necessary to resolve 'Willoughby Fields/Western Relief Link Road would be:<br/> a) Move the Search Corridor to a Western Relief/Link Road (Policy ST4) North e.g. Parallel to the runway along Charlwood Road. The Local Plan has already hinted at that in Para 17.28: "Therefore, the current Search Corridor is located at the Southern edge of land historically safeguarded for a potential future runway at Gatwick Airport But it could move north should the AAP (North Crawley Area Action Plan Policy SD3) work determine".<br/> b) Extend Willoughby Fields Local Nature Reserve (LNR) to include its neighbouring Ifield Brook Meadows Local Green Space [LGS] to prevent an environmental catastrophe in Ifield and beyond.<br/> The modifications I consider necessary to resolve the Kilnwood Vale issue would be to REJECT the "proposed amendment to built-up boundary (ie north of the railway line and south of Kilnwood Lane. These modifications might well avert an environmental catastrophe which threatens both Horsham and Crawley especially at Ifield.</p> |
| REP/014                           | Crawley Green Party | ST4          | <p><b>5.1 Legally compliant?</b><br/> The Council have committed themselves to a Green structure, biodiversity concerning Nature Reserves (Policy GI3) but are proposing to build the Western Relief road through the Willoughby Fields Nature Reserve. (Policy ST4). The road (and the Homes England housing scheme) will also impact on the designated conservation area of Ifield Village and areas of outstanding beauty of Ifield Wood + Ifield Brook Meadows.</p> <p><b>5.2 Sound?</b><br/> The building of the Relief road (= housing scheme of 10,000 + homes) will impact on the Councils pledge of Climate Change Emergency declaration and its targets to reduce carbon emissions of 45% by 2030 and Zero emissions by 2050, as well as increase the air pollution (Nd2 – Nitrogen Dioxide) problems around + in Crawley.</p> <p><b>5.3 Compliant with the duty to co-operate?</b><br/> Will Environmental concerns about the Relief Road (and housing scheme) be given partly to the Economic + Financial concerns _ arguments presented by Homes England and other interested parties in the decision making process?<br/> Will people considering buying houses in the West of Ifield housing estates be made aware of potential flooding and contamination risks from the landfill area of Kiln vale estate?</p>  |

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|                                   |                               |              | <p>If the West of Ifield housing estate goes ahead on the or close of the Ifield flood plain this could cause the Relief road + areas close by to be flooded. Is this acceptable or desirable?</p> <p><b>Suggested Modifications:</b><br/>           To meet Crawley Councils commitment to Green structure and biodiversity policy, in addition to its Climate Emergency declaration and pledge to reduce carbon emissions to 45% by 2030 and zero by 2050, council policy 0<br/>           The Council in order to meet and comply with these policy commitments must incorporate them in the Local Plan.<br/>           This commitment, maybe best served by the creation of a Local Nature Reserve, encompassing Willoughby Fields Nature Reserve, Ifield Woods (ancient woodlands), Ifield Brook Meadows (flood plain) and Ifield Village and any other natural areas close by. To maintain and preserve the ancient woodlands, floodplain, natural habitats and wildlife within the area.<br/>           This would show a meaningful commitment by the Council to its policies and pledges to the Environment and improve upon its desire to create a cleaner, healthier, less polluted environment for the people of Crawley.</p> |
| REP/ 022                          | Sussex Ornithological Society | ST4          | <p><b>Suggested Modifications:</b><br/>           We share Crawley's frustration that no firm proposals for a Western Link Road have yet come forward, although they have long been mooted.<br/>           We are concerned about this policy, which has very little explanation of the level of need, the potential impacts, or explanation of alternative options. The safeguarded area on the small scale map is far from precise, but it appears it could threaten areas of known biodiversity value including a local wildlife site and ancient woodland. Our concern is that whilst development goes ahead in this part of Crawley, and if the large Kilnwood development goes ahead adjacent to it, options for any route will reduce and there will be more risk of Local Wildlife Sites and Ancient Woodland, and the biodiversity they support, being affected by such a road development.</p>   |
| REP/ 033                          | Horsham District Council      | ST4          | <p>We support this policy subject to the following comment:<br/>           The corridor for any future relief road will need to be agreed jointly with HDC as most of the route would be within the administrative area of Horsham. Any area of safeguarding should not prejudice this. It is noted that this is recognised in the supporting text.<br/>           I do hope these comments are helpful. I would like to emphasise that they are made in anticipation of further constructive dialogue between our authorities, and with an expectation that areas of disagreement can be readily addressed, and quite possibly eliminated.<br/>           Officers will be in touch further to arrange further discussions around this point and in respect of the Statement of Common Ground currently being worked upon.</p>  |

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| REP/035                                  | Vail Williams on behalf of Ardmore Ltd | ST4                 | <p>This policy is significant and relevant for our client's site. The identification of the indicative search corridor for the relief road, as shown on page 214 and on the Proposal Map, indicate that there is an area that will be safeguarded against all development throughout the plan period.</p> <p>As stated in our regulation 18 letter, the undulating shape of the search corridor safeguards against any development that will be incompatible with the future delivery of a full western relief road. However, it is unclear where the boundaries of the safeguarded area have come from and indeed the degree of land take that would be required in order to deliver the Crawley Western Relief Road (CWRR).</p> <p>As stated above, we cannot find any further information in the evidence base that determines the need, scope or trajectory of the relief road, including the need for it to be in this location. In addition, the supporting text infers that the requirements is due to new development in the East of the town, in part at Kilnwood Vale however, this was permitted as part of the AAP with Horsham District Council and land was not at that time, indicated to be required to be safeguarded in this location.</p> <p>Whilst we are aware that Horsham are going out for consultation on their Regulation 18 stage of the Local Plan (between 17<sup>th</sup> February and 3<sup>rd</sup> March 2020) and the strategic allocations for shortlisted sites include West of Ifield, this has not been confirmed a suitable nor is it adopted into policy. Therefore, we object to policy ST4 and consider it premature.</p> <p>We would also note that whilst the issue of the AAP to the North of Manor Royal is left to after the adoption of the Local Plan, the boundaries in the Local Plan also cover much of the AAP area, and therefore this issue could be evidenced further and form part of the AAP, rather than under the Local Plan Review.</p> <p>As you are aware, the safeguarding land impacts on the land that already has planning consent under the 2015 application, and the recent approval at Committee in January for a B8 development.</p> <p>We have therefore sought Counsel Advise on this matter and would welcome further dialogue with the Council in this regard. Their response reiterated the risks posed to our client's land and applications as a result of the safeguarding of land for a CWRR. The same conclusions were drawn for the risks posed to the wider Land Consortium as a result of the AAP however, we would seek to engage with the preparation of the AAP, following the adoption of the Local Plan Review.</p> <p>Given the extent and boundary currently shown, the Land Consortium surrounding Jersey Farm would urgently seek further clarity as to why the boundary and land take would be needed. However, there is also concern over the principle of safeguarding for the land for a western relief road, given that it is not evident how such a development may, or could come forward in the Local Plan period.</p> <p>We are grateful for the opportunity to comment on the Regulation 19 Consultation and would seek further to engage directly with the Council in regard to the key matters regarding the AAP, the Crawley Western Relief Road and general economic policies.</p> |

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| REP/041                           | Ifield Village Conservation Area Advisory Committee | ST4          | <p>Paragraphs 17.24 and 17.25<br/>These paragraphs are related to the Strategic Policy ST4 'Safeguarding of a Search Corridor for a Crawley Western Link Road'.</p> <p>There seems to be inconsistency between paras 17.24 and 17.25. Para 17.24 takes that the western relief road being necessary as a given. We question whether this is wise, given that studies in many countries show that relief roads add to traffic (through induced traffic) and reduce the motivation of people to seek public transport alternatives. On the other hand 17.25 implies that the council is not totally committed to a relief road as a solution.</p> <p>We also note that the proposed corridor goes right through Willoughby Fields - a designated green space in Crawley.</p> <p><b>Suggested Modifications:</b><br/>A possible modification could be to make the statements in para 17.24 seem less certain to remove the inconsistency. The use of wording such as 'a full western relief road may be necessary' instead of 'is necessary'</p>  |
| REP/042                           | Resident 12   | ST4          | <ol style="list-style-type: none"> <li>1. I understand that the relief road, proposed by Homes England as part of the new neighbourhood's development proposal west of Ifield, is approximately the relief road referred to in the local plan.</li> <li>2. Much of the road traffic approaching Crawley from Horsham is destined for Manor Royal and Gatwick Airport.</li> <li>3. In the Crawley/Manor Royal/Gatwick Airport geographical area, road and rail traffic is concentrated into a north/south axis.</li> <li>4. There is a lack of east/west road and rail access to this area. From the east there is only the A264 through East Grinstead/Felbridge/Copthorne and which is wholly inadequate for the volume of traffic to/from the said geographical area. Essentially, there is only one small road to/from the east.</li> <li>5. From the east also, the rail connection to/from Crawley was disconnected during the 1960s, compounding the road traffic inadequacy.</li> <li>6. From the west there is only the A264 from the south-west - from as far afield as Worthing Chichester and Guildford, i.e. not from the west. Although this road is duelled, there is no direct access to/from Manor Royal/Gatwick Airport, so, traffic flows east to Crawley and then north to said area.</li> <li>7. With regard to traffic converging from the west, this is from the Dorking direction. Although Dorking is farther to the north than both Manor Royal and Gatwick Airport, there is no direct access, so traffic is travelling further south, before turning east to Crawley, and then north through Crawley.</li> <li>8. Crawley South-West Bypass was built in the 1970s, and much of the traffic heading towards Crawley re-directs to Pease Pottage and to the M23. This, however, compounds the existing limitation of the north/south traffic corridor.</li> <li>9. To the east of Crawley, there is only one access from the M23 to Manor Royal, and only one access from the M23 to Gatwick Airport.</li> </ol> |

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| Ref. No.                          | Respondent | Policy/ Para | Comments   |
|                                   |            |              | <p>10. Due to lack of road access from the west, and the limited accesses from the M23, much traffic also goes along the A23 Crawley Avenue and through the town and through local residential streets and through local rural areas, creating rat-runs which compare to an 'ant city' under the ground.</p> <p>11. Current house-building to the south and west of Crawley is generating more traffic and, planned house-building will generate even more. This will compound the increasing congestion around and through the town.</p> <p>12. That much traffic rat-runs through what were designed as quiet residential neighbourhoods around Crawley, is a consequence of poor initial planning and, subsequent ill-advised planning decisions. Only one of these latter has been reversed - at Broadfield and where the link to/from Southgate Avenue was subsequently closed, returning Broadfield to a quiet residential neighbourhood. Two others remain unchanged - the link from Bewbush to Gossops Green and the link from Gossops Green to Ifield (instead of the Rusper Radial and which would have provided a direct link from the Rusper Road to the A23).</p> <p>13. The relief road suggested in the Homes England proposals runs through the proposed three residential neighbourhoods, thus creating an even worse situation than exists through the three neighbourhoods of Bewbush Gossops Green and Ifield (and fourthly Langley Green). When that relief road becomes congested, more traffic will find its way through the same routes as described above, compounding the existing situation.</p> <p><b>Suggested Modifications:</b></p> <p>14. To the west, there is a missing link in the dual-carriageway of the A24, between Capel Roundabout and the Great Daux Roundabout. This is, to me, clearly intentional. The western relief road should run from both the Great Daux Roundabout and the Capel Roundabout, joining to run directly eastwards to Manor Royal and Gatwick Airport.</p> <p>15. I concur with the Borough Council's decision to safeguard land within the borough to the north of Langley Green for the relief road.</p> <p>16. West Sussex County Council cannot be expected - as some local residents would have it, to deliver any such relief road - including the one included in the Homes England proposals, on their budget.</p> <p>17. Many businesses, on the other hand, stand to gain from a western relief road. These include the owner of Gatwick Airport, and some or many or all of the other 3,400 businesses in and around Crawley. We cannot expect something for nothing - those who stand to gain ought to contribute to its creation.</p> <p>18. There will be many stakeholders involved in and who stand to gain from creating the proposed three new neighbourhoods to the west of Ifield, and the several other new villages proposed to the south of Horsham. All of these developments will generate additional road traffic to/from Manor Royal and Gatwick Airport, with consequences for the roads and environment including the quality of life in rat-run areas. These stakeholders should mitigate the consequences by contributing to the relief road.</p> |

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| Ref. No.                          | Respondent                                | Policy/ Para  | Comments  |
|                                   |   |               | 19. By requiring stakeholders to contribute, the relief road can become a reality. Without contributions, the relief remains wishful thinking.  |
| REP/047                           | Resident 14                               | ST4/1<br>7.22 | <p>The maps showing an 'Indicative search corridor' for the Western Link Road (policy ST4) suggest that the WLR would cut right through the middle of the Willoughby Fields Nature Reserve. Is this necessary? Could the road not be sited to the north of this valuable habitat, e.g. run along the current Charlwood Road immediately south of the runway?</p> <p><b>Suggested Modifications:</b></p> <p>I accept that the word 'indicative' is being used, and that nothing has been decided, but could the text of the Plan document (and the Map) be changed to make clear that the WLR would be sited so as to respect Crawley's rural fringe, and in particular the Willoughby Fields Nature Reserve.</p>  |
| REP/050                           | Montague Evans on behalf of Homes England | ST4           | <p><b>Policy ST4: Safeguarding of a Search Corridor for a Crawley Western Link Road</b></p> <p>Draft Strategic Policy ST4 of the Local Plan Review refers to a Search Corridor for a future Crawley Western Link linking the A264 to the A23. Homes England supports the general rationale for this route, noting the substantive benefits that could be achieved in mitigating traffic impacts along the A23/A2220, which are subject to congestion at peak times. This is crucial in fostering sustainable development as per Paragraph 8 of the NPPF.</p> <p>The draft policy wording explains that the Search Corridor will be “<i>safeguarded from development which would be incompatible with the future delivery</i>” of the link. This is supported not least as it implies that the link will form a central aspect of the future AAP, which is crucial in unlocking strategic scale development at Rowley Farm in Crawley and the West of Ifield development in Horsham. Notwithstanding, the safeguarded corridor should be shown on the Local Plan Map as was the case for the Regulation 18 consultation version. This ensures that the Plan is legible and enshrines the future consideration of the alignment in policy. This would also serve to provide flexibility if the safeguarding area reverts back to the area shown in the Regulation 18 consultation.</p> <p>As stated in the representations for West of Ifield, Homes England's firm intention is to ensure that more detailed masterplanning and transport modelling is undertaken. This is necessary to inform the future AAP and development of proposals to the Land West of Ifield. It should include the work necessary to advance understanding of the Wider Strategic Opportunity and to inform the nature and function of any link.</p> <p>Homes England accepts that the detailed alignment is developed as part of the future AAP but recommend that the Council also prepares the necessary evidence gathering to support this approach. Homes England also considers that the policy should provide reference to the potential need for land acquisition and assembly. While at this stage Homes England accept a delivery solution is not yet determined, the policy should ensure flexibility around the use of future land acquisition strategies.</p> <p>Homes England supports the potential route of the Crawley Western Link through the administrative area of Horsham and is actively engaging in the development of the Horsham Local Plan. The Plan should be explicit that Policy ST4</p> |

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| Ref. No.                          | Respondent                               | Policy/ Para | Comments  |
|                                   |  |              | <p>only relates to land within the administrative authority of Crawley Borough Council, but should reiterate the Council's commitment to joint working with Horsham District Council on this matter as part of the ongoing Duty to Cooperate.</p> <p><b>Summary</b><br/> It is clear that Rowley Farm represents a suitable, available and deliverable site, offering a realistic prospect for the delivery of a significant quantum of employment development through allocation in the future AAP. Homes England reiterates that the Council should seek to actively encourage economic growth in the context of Government policy, its own evidence base and the LEP objectives. The Council has a unique opportunity to drive economic development through plan-making, in delivering sustainable growth.<br/> Homes England looks forward to working positively with the Council and other stakeholders in the development of the Local Plan and the AAP.</p>  |
| REP/050                           | Montagu Evans on behalf of Homes England | ST4          | <p>The CBC Draft Local Plan makes various references to the possible westward expansion of Crawley into Horsham. This spatial development strategy is supported by Homes England. In relation to this, Policy ST4 identifies a Search Corridor for a Crawley Western Link Road (CWRR) as it could be located through the southern edge of land historically safeguarded for a potential future runway at Gatwick Airport. The policy confirms that the Search Corridor with the CBC administrative areas will be safeguarded from development which would be incompatible with the future delivery of a full CWRR.</p> <p>Whilst Homes England accept that further assessment of this area will be subject to Policy SD3 and the AAP Homes England consider that the safeguarded corridor should be as shown under the Regulation 18 Policies Map and should ensure that full consideration of the alignment as it could progress through Rowley Farm is also deferred to the AAP. As stated under the representations under Policy H3g, Homes England's firm objective is to ensure that more detailed masterplanning and transport modelling to inform the development of proposals to the Land West of Ifield, including the work to advance understanding of the wider strategic opportunity, is able to inform the nature and function of any link.</p> <p>Homes England also consider that the policy should provide reference to the potential need for land acquisition and assembly. Whilst at this stage Homes England accept a delivery solution is not yet determined, the policy should ensure flexibility around the use of future land acquisition strategies.</p> <p><b>Suggested Modifications:</b><br/> Finally, the wider reference to the potential route through the administrative area of Horsham will be addressed through the evolution of the Horsham Local Plan, which will include ongoing joint working between both HDC, CBC and all relevant stakeholders. The wording in ST4 will therefore need to be amended to be clear that it can only apply to the part being considered within the CBC area.</p> |

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| Ref. No.                          | Respondent | Policy/ Para | Comments  |
|                                   |            |              | <p>On the basis of the above commentary Homes England recommend policy wording is amended so as to ensure that is both Justified and Effective.</p> <p><i>The Local Plan Map identifies a Search Corridor for a Crawley Western Link Road linking the A264 with the A23. This Search Corridor within the Crawley Borough Council administrative area will be safeguarded from development which would be incompatible with the future delivery of a full Crawley Western Link Road.</i></p> <p><u><i>Once the AAP to be prepared in accordance with Policy SD3 is adopted this policy will be superseded with more detailed guidance contained within the AAP.</i></u></p> <p><i>The design and route of the Western Link Road must take account of:</i></p> <p><i>a. its impact on (but not limited to):</i></p> <p>residential properties close to the route;</p> <ul style="list-style-type: none"> <li>• the flood plain;</li> <li>• the rural landscape;</li> <li>• local biodiversity; and</li> <li>• heritage and heritage landscape assets and visual intrusion.</li> </ul> <p><i>b. the desirability and requirements of bus priority measures (including future proofing for forecast traffic growth and congestion).</i></p> <p><i>c. The Potential requirements and implications of any necessary phasing and land assembly</i></p> <p><i>Connectivity by non-vehicular modes of transport between Crawley's urban neighbourhoods and the wider Sussex countryside should be maintained and enhanced.</i></p> |
| Ref/053                           | QUOD       | ST4          | <p><b>Western Relief Road</b></p> <p>Draft Policy ST4 continues to provide for the safeguarding for a search corridor for a Crawley Western Link Road linking the A264 with the A23. Paragraph 16.27 states that the identification of the alignment for a Western Link Road will form part of the work on the NCAAP (Policy SD3).</p> <p><b>Conclusions</b></p> <p>We welcome the deletion of Draft Policy GAT 2, however Gatwick Airport should not be offered greater time to demonstrate their growth needs through the NCAAP – the robust evidence needs to be provided as part of the Local Plan review. Draft Policy SD3 needs to be updated according.</p> <p>There is a significant need for employment land in Crawley and as currently drafted the Draft Local Plan is unsound. The Site is the most appropriate location north of Manor Royal to meet the identified need and as such should be included within the Manor Royal allocation rather than the NCAAP. Draft Policy SD3 and Draft Policy EC1 should be updated according. Notwithstanding this if the Council continue to identify the Site as being within the boundary of the</p>  |

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| Ref. No.                          | Respondent            | Policy/ Para | Comments  |
|                                   |                       |              | <p>NCAAP the amends proposed with regards to Gatwick Airport and small scale extensions north of Manor Royal need to be made.</p> <p>We welcome the amended location of the Indicative Search Corridor Western Relief Road however its location should be dealt with as part of the Local Plan review process.</p> <p><b>Suggested Modifications:</b></p> <p>We welcome the amended location of the Indicative Search Corridor Western Relief Road. As detailed in the previous section the Site is the most sensible location north of Manor Royal to provide much needed employment floorspace. As such, there needs to be a recognition that the new road does not compromise this important site and its location should be dealt with as part of the Draft Local Plan.</p> |
| REP/061                           | Historic England      | ST4          | Strategic Policy ST4: Safeguarding of a Search Corridor for a Crawley Western Link Road – see comment above. Heritage assets are likely to be impacted by a road in the area indicated in the map on page 214 and these should be factored into any assessment of the appropriate route alignment.  |
| REP/062                           | Environment Agency    | ST4          | <p><b>Sustainable Transport</b></p> <p><b>Strategic Policy ST4 Safeguarding of a Search Corridor for a Crawley Western Link Road</b></p> <p><b>We do not support the inclusion of the route option for the reasons set out below.</b></p> <p>Policy ST4 has a significant potential clash with Willoughby Fields (LNR) and Local Wildlife Site.</p> <p><b>Suggested Modifications:</b></p> <p>It is therefore recommended that this site is highlighted on the proposals map and the safeguarding/search corridor is widened so that important wildlife areas can be avoided should the decision be taken to proceed with this proposal. At this stage we cannot support the inclusion of this route option due to the proposed search area.</p>                                |
| REP/067                           | Resident 15           | ST4          | <b>Traffic</b> – With potentially 10,000 – 15,000 more cars travelling to or through the Crawley area there will be an increase to air pollution when it is <b>already rated as poor due to traffic pollution</b> is madness” our roads just can’t cope and when there is a problem on the A23 the roads through Ifield are jammed. The requirement to build a Western Relief road is imperative to relieve current traffic problems let alone the additional traffic these 10,000 new homes will bring. Before the proposed development is even considered this new road <b>must</b> be built.   |
| REP/068                           | Sussex Wildlife Trust | ST4          | Section 17 Sustainable Transport<br><b>Strategic Policy ST4: Safeguarding of a search corridor for Crawley Western Relief Road.</b> SWT is very concerned about the inclusion of this policy with very little explanation of the level of need, potential impacts or understanding of alternative options. The submission plan now provides a further paragraph (17.28) which suggests the corridors area of search may be on the southern edge or within the area previously safeguarded for Gatwick’s expansion. The safeguarded area is not clear on the map included in the plan and while we acknowledge the   |

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| Ref. No.                          | Respondent              | Policy/ Para | Comments  |
|                                   |                         |              | <p>comments made in relation to Policy SD3 the broad area appears to cover areas of known biodiversity value including a Local Wildlife Site and ancient woodland.</p> <p>More detailed information must be provided to justify the inclusion of this policy.</p>   |
| REP/056                           | Gatwick Airport Limited | ST4          | <p><b>Policy ST4: Safeguarding of a Search Corridor for a Crawley Western Relief Road</b></p> <p>GAL object to the Search Corridor as shown in the draft Plan for the Crawley Western Relief Road as it encroaches on the safeguarded land identified for potential future airport expansion. <i>(GAL has made comments on the Crawley Western Relief Road in its representation in objection to Policy SD3).</i></p> <p><b>Suggested Modifications:</b></p> <p><b>Policy ST4 - Proposed Amendment</b></p> <p>GAL proposes the wording of Policy ST4 should be amended as follows:<br/> <i>“The design and route of the Crawley Western Relief Road must take account of its impact on residential properties close to the route, the flood plain, the rural landscape, local biodiversity, heritage, and heritage landscape assets and visual intrusion and must not encroach on the land safeguarded for the future potential expansion of Gatwick Airport.”</i></p> <p><b>GAL Comment:</b></p> <p>GAL considers that it must be made clear in Policy ST4 and the supporting text that the Crawley Western Relief Road (CWRR) must not compromise the land that is currently safeguarded by national policy for potential future airport expansion. The land currently safeguarded at Gatwick Airport must continue to be protected from inappropriate development which would include the Crawley Western Link Road. This strategic road development is required to deliver the development planned in the Local Plan. It should therefore be delivered on land where availability is certain during the Plan period. This is not true of the safeguarded land. GAL considers that the search corridor should therefore be re-drawn and focused in the area immediately south of the safeguarded land area.</p> <p>In addition, GAL consider that there is a significant risk that the implementation of the Crawley Western Relief Road will increase traffic on the A23 north of County Oak and create considerable additional demand at North Terminal Roundabout and South Terminal Roundabout. Both of these junctions are managed by Highways England and in the case of South Terminal Roundabout is part of the Strategic Road Network (M23 Jn 9a). The policy makes no statement regarding its impact on access for the airport (including whether a new highway would undermine efforts to support bus and rail access from west Crawley and Horsham) or access to the Strategic Road Network. Traffic using the new route to access areas in the centre and north of Crawley will affect the flow of traffic travelling north-south along the A23, potentially creating increased congestion.</p> <p>Without evidence and mitigation of the impacts of such changes in traffic flow on the safe and efficient operation of Gatwick Airport as nationally significant infrastructure, and the impacts of drawing more traffic to M23 Jn9 it is not possible to support consideration of a possible alignment for the new highway. It should be noted that the imminent</p> |

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|          |            |              | completion of the M23 Smart Motorway Project has the potential to impact the distribution of traffic and the full effects on the wider transport network, including the strategic routes to the east and west of Crawley as well as routes through the town centre should be established. Gatwick Airport will be undertaking its own traffic modelling with respect to its Northern runway proposals and will require assurances that the delivery of the Crawley Western Relief Road will not have negative impacts on the operation and accessibility of the airport. |

| <b>Evidence Base</b> |                          |                     |  |
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| <b>Ref. No.</b>      | <b>Respondent</b>        | <b>Policy/ Para</b> | <b>Comments</b>  |
| REP/010              | Home Builders Federation | Viability           | <p>Of all the unavailable evidence base documents our main concern is with regard to the whole plan viability assessment given that the 2019 National Planning Policy Framework (NPPF) requires development viability to be resolved through the local plan and not at the planning application stage. This position is most clearly expressed in paragraph 10-002 of Planning Practice Guidance which states:</p> <p>“The role for viability assessment is primarily at the plan making stage. Viability assessment should not compromise sustainable development but should be used to ensure that policies are realistic, and that the total cumulative cost of all relevant policies will not undermine deliverability of the plan.</p> <p>It is the responsibility of plan makers in collaboration with the local community, developers and other stakeholders, to create realistic, deliverable policies.”</p> <p>It is also highlighted in the preceding paragraph in PPG (10-001) case that the policies in the plan should be informed by the viability assessment that takes account “all relevant policies, and local and national standards, including the cost implications of the Community Infrastructure Levy (CIL) and section 106”. We therefore question whether a plan that has been published under regulation 19 of the Town and Country Planning Regulations 2012 with no viability assessment can have been prepared in a manner consistent with the approach required under the NPPF and its associated guidance. The policies in the plan should have been informed by the evidence and not, as would appear to be the case here, prepare a plan and then test whether it is viable. Plan preparation must be an iterative process informed by evidence rather than one of setting aspirations and then obtaining the evidence to support those aspirations.</p> <p>In relation to this Local Plan there is a clear need to test the cumulative impact of the new policies being proposed as they will place additional burdens on development. These include 10% Net Biodiversity Gains (GI2), higher energy efficiency standards (SDC1), self-build requirements (H7), significant requirements regard design and place making (CL2, SD2, CL6) and electric vehicle charging (ST2) as well as infrastructure costs through S106 and CIL. What is particularly concerning is that the Council are seeking to maximise delivery in a very tightly constrained Borough where a significant amount of development will need to come forward on previously developed land in the urban area. These sites will have above average development costs with existing use values (EUV), and premiums above EUV, that are likely to be high with limited scope for a reduction in land value to address the policy costs in the local plan.</p> <p>We note that the Council commenced engagement with the development industry on development costs and viability during this consultation. Whilst this is to be welcomed it cannot be considered, as we state above, to have contributed to the iterative plan making process required by the NPPF. Clearly the Council will need to consider the additional policy costs arising from this plan. However, in addition it will be necessary to take a cautious approach to other factors. To aid local authorities in the preparation of viability assessments the HBF has written a briefing note setting out the general concerns with how viability testing is undertaken when assessing local plans.</p> |

| Evidence Base |                         |              |   |
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| Ref. No.      | Respondent              | Policy/ Para | Comments  |
|               |                         |              | <p>Whilst this note focuses on all aspects of the viability testing of the residential development, we would like to highlight two particular concerns. The first is the approach taken to abnormal costs. In the past viability assessments have taken the approach that these cannot be quantified and were addressed through the site by site negotiation. However, this option is now significantly restricted by paragraph 57 of the 2019 NPPF and as such abnormal costs must be factored into whole plan viability assessments. We recognise that the very nature of an abnormal costs is difficult to quantify, but it is a fact that they are often substantial and have a significant impact on viability. Where and how these costs arise is also variable. They can occur in site preparation but it is generally with regard to the increasing costs of delivering infrastructure. It is also the case that abnormal costs are higher on brownfield sites where there can be a higher degree of uncertainty as to the nature of the site and the work required to make it developable.</p> <p>The HBF undertook some work with its members in the North East and whilst this is a different context to that found in Crawley it provides an indication as to the abnormal costs that occur on all sites. This study, which was prepared to support our comments on the Durham Local Plan, indicated that abnormal costs on the four PDL sites was £711,000 per net developable hectare and an average of £459,000 per hectare on the 10 greenfield sites. It is therefore important that a significant allowance is made within the viability assessment to take account of these costs if the Council are to ensure that it minimises site by site negotiation.</p> <p>Secondly, we would encourage the Council to use the upper end of any of the ranges suggested with regards to fees. Again, these will vary from developer to developer but given that the Government want to minimise negotiation on planning obligations it would make sense to use the highest point of any range. The changing landscape with regard to viability assessment could lead to development slowing significantly if the correct variables are not taken into account and policies are aspirational rather than realistic.</p> <p>(See attached HBF Local Plan Viability)</p> |
| REP/012       | Department of Education | Viability    | <p>The viability assessment for the Local Plan should take into account the full education needs and likely costs of provision associated with the level of development proposed, in accordance with Planning Practice Guidance on viability and DfE's guidance for local authorities on securing developer contributions for education.<sup>1</sup> Viability assessment should inform options analysis and site selection, with site typologies reflecting the type and size of developments that are envisaged in the borough/district.</p> <p>The total cumulative cost of complying with all relevant policies should not undermine deliverability of the plan, so it is important that anticipated education needs and costs of provision are properly incorporated in the Local Plan evidence</p>  |

<sup>1</sup> Planning Practice Guidance at <https://www.gov.uk/government/collections/planning-practice-guidance> and DfE guidance at <https://www.gov.uk/government/publications/delivering-schools-to-support-housing-growth>.

| Evidence Base |            |              |  |
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| Ref. No.      | Respondent | Policy/ Para | Comments   |
|               |            |              | <p>base, to inform local decisions about site selection and infrastructure priorities. It is important that Local Plan viability factors in the cost of providing new school places as developers are expected to contribute towards this proportionally. In determining the number of early years children, school pupils and post-16 students likely to arise from development (an essential step before understanding the cost of provision), you may be interested in DfE's planned pupil yield methodology, which we aim to publish by the end of this year. This will enable a consistent approach among local authorities to the calculation of pupil yields, based on local evidence from recent developments. In the meantime, existing local approaches to estimate pupil yields remain valid and the Local Plan viability assessment and other evidence should include assumptions about the number of new school places generated by the level development required.</p> <p><b>Suggested Modifications:</b><br/> DfE can offer the following advice in relation to build cost evidence for the delivery of schools.<br/> DfE's Guidance<sup>2</sup> advises that the assumed cost of school places should be based on the national average costs (for both new schools and school expansions) published in the DfE school place scorecards.<sup>3</sup> The scorecards and their supporting guidance direct you on how to adjust the averages to factor in regional variation. It is advised that the national average is used as a baseline, as local evidence is likely to provide too small a sample for underpinning a robust evidence approach. However, for particular projects where there are known abnormalities or other evidence for higher costs, these can be used instead.<br/> Please also refer to paragraph 17 of the Guidance regarding Special Educational Needs school places.</p> <p><b>Conclusion</b><br/> Finally, I hope the above comments are helpful in assessing CBC's Local Plan viability, with specific regard to the provision of new school places as critical social infrastructure.<br/> Please notify DfE when any further evidence is published.<br/> Please do not hesitate to contact me if you have any queries regarding this response. DfE looks forward to continuing to work with you and CBC to develop a sound Local Plan which will aid in the delivery of new schools.</p> |

<sup>2</sup> <https://www.gov.uk/government/publications/delivering-schools-to-support-housing-growth>

<sup>3</sup> <https://www.gov.uk/government/collections/school-places-scorecards>

| Planning Obligations Annex |               |                                |  |
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| Ref. No.                   | Respondent    | Policy/ Para                   | Comments   |
| REP/029                    | Sport England | Planning Obligations Annex OS2 | <p>Should be made clearer that the third paragraph (financial contributions towards enhancement of existing facilities for increased demand) is not appropriate where paragraph 2 applies in respect of playing fields as it is not in accord with para 97 of the NPPF or Sport England's playing field policy</p> <p><b>Suggested Modifications:</b><br/>Clarification of this is required. Existing playing fields and pitches unless demonstrated to be surplus to requirements through the evidence base (PPS) are to be replaced with equivalent or better provision in terms of quantity and quality and in a suitable location.</p> |

| Noise Annex |                         |              |   |
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| Ref. No.    | Respondent              | Policy/ Para | Comments  |
| REP/056     | Gatwick Airport Limited | Noise Annex  | <p><b>Crawley Local Plan Noise Annex</b></p> <p>GAL notes that paragraph 4.1.9 of the Noise Annex refers to aviation noise and repeats the incorrect levels for LOAEL and SOAEL and which are inconsistent with current government guidance and therefore should be revised. Noise Annex Table 1 states the proposed LOAELs, SOAELs, Unacceptable Adverse Effects Levels. New housing in areas above LOAEL (Leq 16-hour day 51dB and Leq 8 hour night 45dB) should therefore only be permitted if adequate mitigation is included in the design. Professional Planning Guidance: Planning &amp; Noise – New Residential Development (May 2017) is referred to in government guidance (PPG- Noise Paragraph: 015 Reference ID: 30-015-20190722 Revision date: 22 07 2019, <a href="https://www.gov.uk/guidance/noise--2">https://www.gov.uk/guidance/noise--2</a> ) and it would therefore be appropriate for the draft Plan to reflect such levels and guidance in the Noise Annex Table 1, including the Lmax levels which are relevant for aircraft noise.</p> <p>The Lmax levels quoted in the Noise Annex also appear to have no basis. For example, the SOAEL Lmax during the day is stated as 70dB whereas at night it is a range of 60-82dB. It cannot be the case that higher levels at night than during the day would be appropriate for new housing development.</p> <p>Paragraph 4.1.6 of the Noise Annex refers to Figure 1 noise contours for a wide spaced second runway. It also notes that the figure will be updated by the Council should these contours be updated. GAL welcomes the commitment to update these as airport proposals come forward such as the Northern Runway proposal.</p> <p>Paragraph 5.5 of the Noise Annex under the heading Noise Impact Assessment notes:<br/> <i>'In all cases, the best practical means (or 'all reasonable steps') of mitigation will be required to mitigate noise impact to an appropriate level, and in liaison with Crawley Borough Council Environmental Health'.</i></p> <p>Whilst Best Practical Mean is defined in noise related law, it is not clear what the 'all reasonable steps' test entails with regard noise mitigation and this needs further clarification in the draft Plan.</p> <p><b>Technical Appendix: Supporting Evidence in Relation to Noise from Transport Sources.</b></p> <p>The Technical Appendix does not provide direct or adequate support for the values given in Table 1. The technical sources of data detailed in the supporting evidence has been superseded and therefore requires updating, for example, Section 5 Noise from Aviation Transport Sources does not refer to the most recent government consultation on aviation strategy (e.g. Consultation Response on UK Aviation Policy: A frameworks for balanced decisions on the design and use of airspace, October 2017, Section 2) that clearly state for example government policy on LOAEL values.</p> |

| <b>Housing Trajectory</b> |                                    |                     |   |
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| <b>Ref. No.</b>           | <b>Respondent</b>                  | <b>Policy/ Para</b> | <b>Comments</b>   |
| REP/058                   | Reigate & Banstead Borough Council | Housing Trajectory  | <p>Housing Trajectory</p> <p>We note that the Housing Trajectory includes a windfall allowance of 55 dwellings per annum for each year of the plan period. Whilst we recognise that this is the same provision as that currently included within Crawley's Local Plan (2015-2030), taking into consideration the tests of soundness, we question whether this windfall allowance is justified. Paragraph 70 of the revised NPPF states that "where an allowance is to be made for windfall sites as part of anticipated supply, there should be compelling evidence that they will provide a reliable source of supply" and that "any allowance should be realistic having regard to the strategic housing land availability assessment, historic windfall delivery rates and expected future trends". We note that no evidence has been provided as to whether the current windfall allowance continues to be an appropriate level going forward (no evidence for example has been provided on previous levels of windfall delivery).</p> <p><b>Suggested Modifications:</b></p> <p>In relation to windfalls we also note that the January 2020 Strategic Housing Land Availability Assessment (SHLAA) identifies three potential sites as coming forward as windfalls: 46-48 Goffs Park Road; 102-112 London Road and 2-4 Tushmore Lane; and 116-136 London Road. We consider that these sites should all be excluded from any windfall allowance: the latter two are identified as not currently available due to multiple landownership and the former is already included within the trajectory as an identified site to come forward within the plan period (we also question whether it should be included in the trajectory as it has uncertain landownership).</p> <p>We also note that the Housing Trajectory includes a number of deliverable and developable "suitable SHLAA sites". We note that a number of the developable sites (such as Rear Gardens Dingle Close/ Ifield Road and Rear Gardens Snell Hatch/ Ifield Road) are included in the trajectory despite not being promoted for housing development. We question therefore, whether in line with the NPPF glossary, there is a reasonable prospect that these sites will become available for development at the point envisaged. Whilst we appreciate the importance of identifying suitable sites as part of the SHLAA, we question whether they should be included in the trajectory as deliverable / developable sites and whether instead they should be treated as windfall sites.</p> |

| Strategic Housing Land Availability Assessment |                               |                                  |   |
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| Ref. No.                                       | Respondent                    | Policy/ Para                     | Comments  |
| REP/016  | Resident 7                    | SHLAA Site Reference 72 page 172 | Site Availability You state Yes<br>Action required/constraints Might be needed to serve a new Horsham neighbourhood as recreational space. (Could mean football pitches etc.)<br>Crawley could lose long term the only site of Special nature (nature reserve) this side of Crawley   |
|  |                               |                                  | <b>Suggested Modifications:</b><br>Site Availability You should state No<br>Action required/constraints. currently pursuing making this area a nature reserve<br>You state that the land is own by Homes England which means we the public own this land and have right to say what its designation should be.  |
| REP/064  | NHS Property Services (NHSPS) | SHLAA                            | <p><b>Crawley Borough Council Strategic Housing Land Availability Assessment Update (January 2020) Document Category I – Sites that are suitable but currently undeliverable Regulation 19 Consultation Crawley Hospital Site, West Green Drive, Crawley, West Sussex, RH11 7DH Site Reference 58</b></p> <p>Thank you for the opportunity to comment on the above document. The following comments are submitted by NHS Property Services (NHSPS). Our representations focus on support (with amendments) in respect of <b>Site Reference 58</b>.</p> <p><b>Foreword</b><br/>NHSPS's Property Strategy team has been supporting Clinical Commissioning Groups and Sustainability and Transformation Plan groups to look at ways of better using the local health and public estate. Local health commissioners are currently developing a strategy for the future delivery of health services within the North West Sussex area which will include this site. It will also identify opportunities to reconfigure the NHS estate to better meet commissioning needs, as well as opportunities for delivering new homes (and other appropriate land uses) on surplus sites emerging from this process. This could include opportunities to make more efficient use of the site, re-providing health services from modern fit for purpose accommodation, alongside the release of 'surplus' parts of sites for redevelopment.<br/>NHSPS is therefore promoting the site as suitable for development in accordance with NHS estate code and guidance. To clarify, all or part of a property can only be released for alternative use by NHSPS once Commissioners have confirmed that it is no longer required for the delivery of NHS services.</p> <p><b>Site 58 – Crawley Hospital</b></p> |

| Strategic Housing Land Availability Assessment |            |              |   |
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| Ref. No.                                       | Respondent | Policy/ Para | Comments  |
|  |            |              | <p>NHSPS are the freehold owner of Crawley Hospital (“the site”) and are supportive of its identification as a suitable development site. However, we suggest several amendments to ensure any future allocation is effective.</p> <p>The site extends to c.2.8ha and comprises of four buildings. The main hospital building is located to the centre of the site and is a part 4 storey, part 6 storey purpose-built block with a flat roof. The ancillary buildings vary in height ranging from single to three storeys and are of brick construction with flat roofs. The remainder of the site comprises of areas of hardstanding which is utilised for car parking. The hard landscaping is softened by mature trees that are sporadically located across the site within these car parking areas. Vehicular access along the north eastern facing side of the site is via an uni-directional access point whereby the traffic moves in a single direction with a separate exit point along this same road. An additional vehicular access point is located on Ifield Road to the south of the site. The area immediately surrounding the site is predominantly in residential use. The area along the northern, southern and western site boundaries is defined by the rear of residential properties. West Green Drive also consists of residential properties. Residential units are generally of semi-detached or terraced in nature and two storeys in height.</p> <p>Due to the proximity to the town centre a range of other uses also surround the hospital site ranging from residential to other non-residential institutions. Further afield buildings to the east of the site which are closer to the town centre have more large-scale commercial uses.</p> <p>The south of the site is a mix of residential properties and commercial units ranging from a motorist centre to a bed and breakfast. Directly north of the site is residential bar a cluster of community facilities including a school, church and a non-profit organisation centre along West Green Drive and a few small local commercial units within the neighbourhood centre.</p> <p>The area is serviced by buses 1 and 2 which both run on West green drive. The 526 and 527 also service the site (for the Ifield Road Entrance). Additionally, Ifield and Crawley train stations which operates a service to London and other central locations are approximately are both 1.2km and 0.9km away respectively from the site. Moreover, the site is circa 180 metres from Crawley Town Centre providing easy access to its shops, services and amenities. It is therefore considered that the site is located within a highly accessible area.</p> <p>The proposed allocation identifies the site as suitable for residential development. NHSPS are supportive of this identification, but suggest that given the surrounding mix of uses, Site Reference 58 should be amended to allow flexibility for alternative compatible uses, including new residential/health facilities/commercial development or a care home. This would provide greater opportunity to make more effective use of this site, providing flexibility over how the site could be redeveloped in the future. This flexibility would help to ensure that future healthcare commissioning requirements for the site can be delivered effectively on this highly sustainable site. Accommodation, alongside the release of ‘surplus’ parts of sites for redevelopment.</p> |

| Strategic Housing Land Availability Assessment |            |              |  |
|--|------------|--------------|--|
| Ref. No.                                       | Respondent | Policy/ Para | Comments   |
|  |            |              | NHSPS is therefore promoting the site as suitable for development in accordance with NHS estate code and guidance. To clarify, all or part of a property can only be released for alternative use by NHSPS once Commissioners have confirmed that it is no longer required for the delivery of NHS services.   |
|  |            |              | <p><b>Suggested Modifications:</b><br/>To ensure Site Reference 58 is sufficiently flexible and supportive of NHS estate management priorities, the following amendments has been suggested;</p> <p>For Site Suitability:<br/><b>Yes</b> - The site offers a potentially unconstrained opportunity for <b>delivering alternative uses, including new residential/healthcare/commercial or care home</b> development close to the town centre. Access arrangements appear satisfactory and although there are a small number of mature trees on site, there is little else preventing development.</p> <p><b>Summary</b><br/>Local health commissioners are considering options to secure the future delivery of services across Crawley and Horsham. These options include assessing the development potential of Crawley Hospital, including making more effective use of the site.<br/>Should any part of the site need to be reconfigured or declared surplus to operational healthcare requirements within the next 15 years, it should be considered suitable for alternative uses, including new residential/healthcare/commercial or care home development, depending on healthcare commissioning needs.<br/>The site is brownfield land in a sustainable location. Any future development would be fully compliant with internal NHS procedures, which seek to effectively manage the NHS estate and services alongside community needs.<br/>Should you wish to discuss this submission further, or for any further clarity on any of the site submissions please do not hesitate to get in touch using the information above.</p> |

| <b>Employment Land Trajectory</b> |                                  |                            |  |
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| <b>Ref. No.</b>                   | <b>Respondent</b>                | <b>Policy/ Para</b>        | <b>Comments</b>  |
| REP/055                           | Savills on behalf of Wilky Group | Employment Land Trajectory | <p>Introduction<br/>Background</p> <p>This representation is submitted on behalf of The Wilky Group (TWG), which has a long-standing interest in the promotion of strategic employment land within the Crawley Borough Council (CBC) area: a proposal known as Gatwick Green. It relates to the Local Plan Employment Land Trajectory (ELT) forming part of the evidence base to the draft Crawley Borough Local Plan, 2020 (DCBLP).</p> <p>TWG owns about 63.3 ha (149 acres) of land east of Gatwick Airport and north and south of the M23 spur road between Junctions 9 and 9a. The land south of the M23 spur road is being promoted by TWG as a strategic employment opportunity known as Gatwick Green (the Site). The Site is identified on the plan at <b>Appendix 1</b>, which shows the extent of the Gatwick Green opportunity, comprising about 59 ha (146 acres). TWG owns about 47 ha (116 acres) of land within the Gatwick Green opportunity; about 80% of the Site – the extent of land owned by Wilky is shown on the plan at <b>Appendix 1</b>.</p> <p>Wilky and Aberdeen Standard Investments are discussing how they can work together in respect of Wilky’s strategic landholding adjacent to Gatwick Airport to bring forward an integrated mixed use development and co-ordinated infrastructure solution.</p> <p><b>Executive Summary</b></p> <p>TWG has submitted substantive representations on the DCBLP in relation to its land interests east of Gatwick Airport and Balcombe Road to the north of Crawley (59 ha). Its case is primarily concerned with the approach in the DCBLP to safeguarding land for future growth of the airport, the proposal to designate the formerly safeguarded land for the North Crawley AAP and the short and long term approach to identifying land for strategic employment contained in Policies EC1 (Sustainable Economic Growth) and SD3 (North Crawley AAP).</p> <p>TWG considers that there is no legal or national policy basis to safeguard land for a second runway at Gatwick and consequently the unmet planning and socio-economic needs of the Borough can be accommodated through the identification of land. Runway capacity has been provided for at Heathrow to meet forecast demand, alongside the expansion of other airports based on their existing runway infrastructure. National policy on aviation and airports therefore no longer requires any safeguarding at Gatwick, so TWG fully supports the removal of blanket safeguarding in the DCBLP.</p> <p>The NPPF requires Local planning Authorities to place significant weight on supporting sustainable economic growth by, inter alia, identifying strategic sites for inward investment to accommodate business needs and wider opportunities. Regional and sub-regional economic policy support focusing growth at Crawley/Gatwick in recognition of the area’s current role and future potential. Importantly, the evidence base for the Local Industrial Strategy, which planning policy</p> |

| <b>Employment Land Trajectory</b> |                   |                     |  |
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| <b>Ref. No.</b>                   | <b>Respondent</b> | <b>Policy/ Para</b> | <b>Comments</b>  |
|                                   |                   |                     | <p>should reflect, supports the identification of major economic development adjacent to Gatwick, identifying land east of the Airport in this regard.</p> <p>TWG supports the policy to identify land for strategic employment and other needs via an AAP for north Crawley, but has put forward evidence that the unmet economic needs of the Borough are higher than noted in policy. In recognition of this and having regard to the removal of blanket safeguarding, evidence has been put forward to support the identification of Gatwick Green for strategic employment to meet the long-standing and urgent unmet needs of the area. Gatwick Green is immediately available to address the short term shortfall of employment land.</p> <p>Policy SD3 removes formal safeguarding and replaces it with restrictive controls over development within the AAP area until an AAP is adopted. Representations on behalf of the TWG set out how the restrictive controls are unsound and should be replaced with the more reasonable controls that applied under Policy GAT2 in the adopted CBLP.</p> <p><b>Key Considerations for the ELT</b></p> <p>Gatwick Green represents a regionally and nationally significant opportunity for high quality mixed-use economic growth that will solve Crawley Borough's growing deficit of employment land as identified in its employment land evidence base. This representation will provide evidence to demonstrate that Gatwick Green can be delivered over the period of the DCBLP. It will therefore address the five considerations identified by Crawley Borough Council in its Regulation 18 consultation with TWG on the ELT:</p> <ul style="list-style-type: none"> <li>• Suitability of the site for employment development.</li> <li>• Availability or likely availability of the site for employment development.</li> <li>• The economic viability of delivering employment on the site.</li> <li>• The amount of employment development which can be delivered on the site.</li> <li>• The likely time-frame for any employment delivery projected for the site.</li> </ul> <p>In the context of the urgent need to plan and provide for the unmet and long-standing employment and economic needs of the Borough and the removal of safeguarding, evidence is put forward to demonstrate that Gatwick Green is deliverable and could be brought forward for development in the short term insofar as it meets the requirements noted above.</p> <p><b>Policy tests</b></p> <p><b>Suitability</b></p> <p>Gatwick Green is a highly suitable site for strategic employment. In view of its close proximity and accessibility to Gatwick Airport, it is well suited to bringing forward a high-quality business hub to optimise the potential of this strategic location at the confluence of several national transport infrastructure networks – Gatwick Airport, London-Brighton Mainline Rail, the Gatwick Express service, the M23 motorway and the Crawley-Gatwick-Horley Fastway bus</p> |

| Employment Land Trajectory |            |              |  |
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| Ref. No.                   | Respondent | Policy/ Para | Comments   |
|                            |            |              | <p>service. A review of employment land requirements and market demand by Savills on behalf of TWG sets out the evidence in relation economic needs and market demand: <b>Appendix 2</b>. The review identifies that there is a need for about 70 ha (173 acres) of land for strategic employment in the Crawley/Gatwick area based on an unconstrained assessment of need. This should be the level of requirement to plan for until an AAP is adopted, not the 33 ha in Policy EC1. Over the DCBLP period to 2035, the need is significantly higher and identified in the Council's Economic Growth Assessment (EGA) at 113 ha (279 acres) to meet the labour supply of the area: this is considered to be a minimum without taking account of market and wider economic considerations. Gatwick Green represents a strategic opportunity in a prime location to meet these immediate and longer term needs.</p> <p>In relation to sites in the AAP area, Savills has undertaken an evaluation of the larger employment sites contained in the ELT against nine assessment criteria – the report is contained at <b>Appendix 3</b>. The assessment concludes that Gatwick Green and land at Rowley Farm represent the most suitable sites in the AAP area, alongside other sites with relative merits. Of the two strategic sites, Gatwick Green offers some advantages in relation to its contribution towards meeting strategic policy objectives, its closer proximity to the Airport, its potential for greater connectivity and in its availability and ability to deliver within the period of the DCBLP. This is a high-level assessment, but it does illustrate that Gatwick Green represents the prime site within the AAP area to deliver early employment development that will best serve the strategic planning and economic policies relating to Crawley/Gatwick and within the LEP and Gatwick Diamond areas. No other land near the Airport benefits from this level of accessibility, which in turn offers the potential for significant levels of sustainable access and modal shift to more sustainable means of transport.</p> <p>The site is not affected by any significant environmental, physical or heritage constraints and could be developed within the current / future aircraft noise environment and aerodrome safeguarding requirements relating to the Airport. A number of evidence based documents have been prepared to support the allocation of Gatwick Green for strategic employment. These update previous work from 2009 and conclude that there are no significant impediments to the site's development, subject to the inclusion of a range of sustainability and mitigation measures to address either policy requirements or site-specific circumstances. The reports cover transport, flood risk, surface water drainage, foul drainage and sewage treatment, water supply, utilities, air quality, noise, ground conditions, renewable energy, landscape &amp; visual, heritage, and ecology &amp; hedgerows. These are attached as appendices to TWG's representations on Policy EC1.</p> <p>The evidence base reports are appended to the representation on behalf of TWG on Policy EC1 and comprise:</p> <ul style="list-style-type: none"> <li>• Transport Strategy</li> <li>• Environmental and Utilities Preliminary Assessment</li> <li>• Updated Preliminary Ecological Appraisal (PEA)</li> <li>• Hedgerow Regulations Assessment</li> <li>• Landscape Character and Visual Appraisal</li> </ul> |

| Employment Land Trajectory |            |              |  |
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| Ref. No.                   | Respondent | Policy/ Para | Comments   |
|                            |            |              | <ul style="list-style-type: none"> <li>Heritage Constraints Appraisal</li> </ul> <p>The site is also complementary to Gatwick Airport's growth plans in its Master Plan 2019, including the DCO for the use of the standby runway Overall, the site is considered to be highly suitable for strategic employment, supported by evidence from Savills review of employment land requirements.</p> <p><b>Availability</b></p> <p>The plan at <b>Appendix 1</b> shows the extent of the Gatwick Green opportunity (59 ha) and the land owned by TWG. Wilky controls most of the land (80%) and continues to undertake significant engagement with other landowners to reach understandings that, in the event Gatwick Green is allocated, these remaining land areas would be brought forward for development in a timely and efficient manner such that the whole allocation could be developed in a comprehensive and phased way including enabling infrastructure. The benefits of TWG's substantial ownership should not be underestimated and will significantly aid the delivery of Gatwick Green.</p> <p><b>Site capacity</b></p> <p>A Development Framework Plan (DFP) has been prepared to assess the high-level capacity of the site and demonstrate its ability to incorporate a range of sustainability and environmental requirements arising out of national and local planning policy and other statutory requirements (<b>Appendix 4</b>). The DFP has assessed the land and floorspace potential of the site of 59 ha to provide 265,000 sqm (2.85 M sq ft) of mixed employment floorspace in use classes B8, B1, B2 and C1, including ancillary uses within use classes A1 - A4 and D1.</p> <p>Gatwick Green is a proposed integrated mixed-use development and co-ordinated infrastructure solution which currently forms part of the land that is identified for an AAP under Policy SD3 of the DCBLP. Whilst still at an early stage, it is anticipated that the development could comprise the following:</p> <ul style="list-style-type: none"> <li>•About 160,000 sqm GEA of B8, B1(c), B2, industrial, warehousing, distribution and logistics.</li> <li>•About 52,500 sqm GEA of B1 office / R&amp;D.</li> <li>•About 52,500 sqm GEA of C1 hotel use.</li> <li>•Supporting education uses for apprenticeships &amp; staff training.</li> <li>•An integrated amenity centre including ancillary shopping, leisure, dining and community uses.</li> <li>•High quality open space with mobility interchange hub.</li> <li>•Sustainable mobility at the heart of the masterplan design, with dedicated public transport, pedestrian and cycle infrastructure.</li> <li>•Ancillary car parking with Electric Vehicle Charging facilities.</li> </ul> <p>The emerging DFP comprises two plans showing (1) a concept for the whole Site and (2) a concept for the land owned by TWG, which comprise about 47 ha or 80% of the whole Site. The above land uses reflect the whole 59 ha site – the</p> |

| Employment Land Trajectory |            |             |   |
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| Ref. No.                   | Respondent | Policy/Para | Comments  |
|                            |            |             | <p>alternative 47 ha site is suitable and viable, so represents an equally deliverable and strategic opportunity based on a similar mix if uses.</p> <p>Gatwick Green represents a strategic opportunity to bring forward a highly sustainable mixed-use employment area, offering a unique opportunity to deliver significant benefits to all three of the key components of sustainability</p> <p>Whilst the site will be a focus for B8 and B2 class floorspace, it has the benefit given its highly accessible location, of being attractive to a mix of non-B class employment uses such as education and training. This will help the site to come forward more quickly given its wider appeal to a number of different sectors and investors (delivery partners). It will also enable the site to deliver a greater variety of jobs to help transform and rebalance the economy and benefit the local community.</p> <p><b>Viability</b></p> <p>A high-level assessment of the site's viability based on a revised development concept has been undertaken. The assessment is based on a development capacity of up to 265,000 sqm (2.85 M sq ft) of mixed employment floorspace and related uses in use classes B8, B1, B2 and C1, including ancillary uses within use classes A1 - A4 and D1. The assessment has also taken account of the likely floorspace absorption rate based on the Savills demand assessment and an estimate of costs related to providing sustainable transport infrastructure to serve the development. A copy of the viability assessment by Savills attached at <b>Appendix 5</b>.</p> <p>The assessment concludes that based on the assumptions noted in Table 3, the Gatwick Green proposal generates a Residual Land Value (RLV) of c £72.5 million, or over £1.2 million per gross hectare. At this level, the land value is significantly higher than the site's Existing Use Value (EUV - c £22,500 per gross hectare). This is over 50 times lower than the estimated RLV generated by the Gatwick Green proposals. Even if the higher 'Greenfield' Benchmark Land Value (BLV) is applied, this would still leave significant head room to help fund wider strategic infrastructure and community benefits. The assessment is a cautious one; for example, the RLV could be higher if the site was phased into smaller parcels with more regular capital receipts being achieved as each parcel is sold or developed.</p> <p>Based on these inputs, the likely Gross Development Value (GDV) of the proposal has been estimated based on local comparable analysis. Taking account of likely development costs (including site access), the Gatwick Green project would generate a Residual Land Value (RLV) significantly above the site's existing use value in agricultural use. The RLV is also significantly higher than a Greenfield Benchmark Land Value which includes a significant land owner's premium. This positive viability profile will enable Gatwick Green, along with contributions from other major developments, such as Gatwick Airport's proposed Development Consent Order for planned use of its emergency runway for passenger flights, to provide the necessary infrastructure to support the new development. This critical infrastructure will also benefit the wider area and could link up with other major development and infrastructure opportunities.</p> |

| Employment Land Trajectory             |  |             |  |  |   |           |               |           |         |                     |                 |          |  |
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| Ref. No.                               | Respondent   | Policy/Para | Comments   |  |   |           |               |           |         |                     |                 |          |  |
|  |  |             | <p>The future success of Gatwick Green is supported by the success of the nearby Manor Royal employment area. It is the largest employment area in the region by some margin and provides a critical source of Grade A employment floorspace. Gatwick Green will share the same attributes, so making it attractive and deliverable to the market, arguably even more so given that it will be clustered around the primary gateway into Gatwick Airport, and lies directly adjacent to the mainline train station and the M23. Gatwick Green will also be complementary to Manor Royal, offering high quality next-generation logistics and industrial opportunities alongside grade-A office floorspace and a mix of quality and budget hotels to serve the growing needs associated with the Airport and sub-regional economy. Under these circumstances, Manor Royal's role as a prime industrial and office campus will remain and indeed will be supported by Gatwick Green.</p> <p><b>Delivery timeframe</b><br/>Gatwick Green could be developed as a mixed-use proposal that achieves a higher density and a better site optimisation than other locations; an appropriate build out rate; parcelled up and phasing to de-risk delivery; benefit from agglomeration, and deliver wider economic benefits. On this basis, it is considered that the market could support a build out over 7 to 10 years finishing around 2035. Evidence put forward by TWG shows that Gatwick Green is available now to meet the short term net shortfall in employment land of c 58 ha.</p> <p><b>Appendices attached separately.</b></p> |  |   |           |               |           |         |                     |                 |          |  |
|  |  |             | <p><b>Suggested Modifications:</b><br/><b>Revised ELR entry</b><br/>Based on the evidence in this representation, a revised entry to the Employment Land Trajectory (ELT) has been prepared, as set out below. If Gatwick Green is to be considered for allocation, then the ELT should be updated to reflect its changed status.</p> <table border="1"> <thead> <tr> <th>Employment Land Trajectory Information</th> <th>Savills Assessment on behalf of the Wilky Group</th> </tr> </thead> <tbody> <tr> <td>Site Name</td> <td>Gatwick Green</td> </tr> <tr> <td>Site Area</td> <td>58.7 ha</td> </tr> <tr> <td>Land Owner/Contract</td> <td>The Wilky Group</td> </tr> <tr> <td>Comments</td> <td>The site is located within the Safeguarded Land for a second runway at Gatwick Airport in the adopted CBLP (2015). However, in that national aviation and airports policy contains no proposal for a second runway at Gatwick and relies on maximising the use</td> </tr> </tbody> </table>  | Employment Land Trajectory Information | Savills Assessment on behalf of the Wilky Group | Site Name | Gatwick Green | Site Area | 58.7 ha | Land Owner/Contract | The Wilky Group | Comments | The site is located within the Safeguarded Land for a second runway at Gatwick Airport in the adopted CBLP (2015). However, in that national aviation and airports policy contains no proposal for a second runway at Gatwick and relies on maximising the use |
| Employment Land Trajectory Information | Savills Assessment on behalf of the Wilky Group  |             |  |  |   |           |               |           |         |                     |                 |          |  |
| Site Name                              | Gatwick Green  |             |  |  |   |           |               |           |         |                     |                 |          |  |
| Site Area                              | 58.7 ha  |             |  |  |   |           |               |           |         |                     |                 |          |  |
| Land Owner/Contract                    | The Wilky Group  |             |  |  |   |           |               |           |         |                     |                 |          |  |
| Comments                               | The site is located within the Safeguarded Land for a second runway at Gatwick Airport in the adopted CBLP (2015). However, in that national aviation and airports policy contains no proposal for a second runway at Gatwick and relies on maximising the use |             |  |  |   |           |               |           |         |                     |                 |          |  |

| <b>Employment Land Trajectory</b> |                   |                    |  |
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| <b>Ref. No.</b>                   | <b>Respondent</b> | <b>Policy/Para</b> | <b>Comments</b>  |
|                                   |                   |                    | <p>of existing runway infrastructure, there is no longer a case or any robust evidence to safeguard land at Gatwick. The site is therefore no longer constrained by airport safeguarding, so in principle is available to be allocated for strategic employment in accordance with the strong need identified in the Council's North West Sussex Economic Growth Assessment (EGA, 2019). The site is situated within the North East Crawley Rural Fringe landscape character area and a Biodiversity Opportunity Area (Gatwick Wood Biodiversity Opportunity Area): proposals will therefore need to comply with the objectives within policies LC5, G11, G12 and G13. A suite of site investigation and surveys by consultants on behalf of the promoter indicate that the site could accommodate employment and related development in a manner consistent with the objectives of these policies and that proposals could bring about a net gain in biodiversity at the site or in the local area. The site was actively promoted through the Local Plan 2015 process and discussed at Examination in Public, with supporting information suggesting that approx 60,500sqm could be dedicated to business use and approx 49,000sqm for supporting uses. This capacity has been re-assessed by the promoter, which shows that the site's capacity as up to 265,000 sqm (2.85 M sq ft) of employment and related floorspace.</p> |
|                                   |                   |                    | <b>Timeframe</b> Years 6 – 15 (2025 – 2035)  |
|                                   |                   |                    | <b>Suitable?</b> Yes   |
|                                   |                   |                    | <b>Available</b> Yes   |
|                                   |                   |                    | <b>Achievable?</b> Yes   |

| Local Plan Map |  |                |  |
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| Ref. No.       | Respondent   | Policy/ Para   | Comments   |
| REP/046        | Firstplan on behalf of Aggregate Industries UK Ltd, Cemex UK Operations Ltd, Day Group Ltd and Brett Group | Local Plan Map | <p>Our clients (Aggregate Industries UK Ltd (AI), Cemex UK Operations Ltd (Cemex), Day Group Ltd (Days) and Brett Group) jointly operate Crawley Goods Yard - an established rail fed aggregates depot and safeguarded railhead. The goods yard has the capacity to handle a million tonnes of aggregate a year with the potential for expansion in the future. The site supports additional key minerals infrastructure and related development including two concrete batching plants, an asphalt plant and construction and demolition waste recycling plant.</p> <p>Crawley Goods Yard is illustrated on the draft Proposals Map as a 'Safeguarded Railhead' with reference made to the WSCC &amp; SDNPA Joint Minerals Local Plan 2018 within the legend. This approach is strongly supported as it signposts people accessing the Local Plan to this important designation within the Joint Minerals Local Plan and therefore raises awareness of the need to take our clients' site into account. This approach was taken in the adopted Proposals Map and found sound by the previous Inspector.</p> <p>It is noted that the 250m buffer surrounding the safeguarded railhead site has been added to the submission version of the Local Plan Map. This is also very much welcomed by the Goods Yard Operators as it makes the need to take account of our clients' site even clearer. The protection of the Crawley Goods yard is supported by the NPPF and joint minerals local plan and therefore the approach taken by the Council should be found sound.</p> <p><b>Suggested Modifications:</b><br/>None subject to site being shown on Proposals Map as currently drafted.</p> |

| <b>Duty to Cooperate</b> |                          |                     |  |                    |                |                |                |                  |                   |        |        |      |        |                 |  |  |  |        |           |  |  |  |        |
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| <b>Ref. No.</b>          | <b>Respondent</b>        | <b>Policy/ Para</b> | <b>Comments</b>  |                    |                |                |                |                  |                   |        |        |      |        |                 |  |  |  |        |           |  |  |  |        |
| REP/010                  | Home Builders Federation | Duty to Co-operate  | <p>As highlighted above we could not find any published SoCG in relation to this local plan. We recognise that the Council and its partners in the housing market area have in the past co-operated with regard to the delivery of housing to deliver some of Crawley's unmet housing needs but it is still important for the necessary statements to be prepared and published. Such statements will be helpful in clarifying the position of Mid Sussex District Council (MSDC) and Horsham Borough Council (HBC). Local Plans for both these local authorities include commitments to deliver housing in recognition that CBC cannot meet its needs and it will be important that the necessary SoCGs clearly state the current position of these councils on this matter. It will be important for CBC to continue to push both these authorities to provide homes to support Crawley's unmet development needs in any new local plans that are being prepared.</p> <p>In addition, the Council will also need to prepare statements with Mole Valley, Tandridge and Reigate and Banstead with regard to housing need and supply. Not only are these neighbouring authorities but they are also part of the Gatwick Diamond and should be looking ensure housing needs for this area are met. We recognise that CBC cannot force these authorities to meet their needs but it is important that they are fully aware of CBC's position and the need for these authorities to deliver sufficient development opportunities to meet both their own needs and those of Crawley.</p>   |                    |                |                |                |                  |                   |        |        |      |        |                 |  |  |  |        |           |  |  |  |        |
| REP/019                  | Arun District Council    | Duty to Co-Operate  | <p>Arun District Council's response is in the form of a Report to the Planning Policy Sub-Committee which met on 25 February and agreed the recommendations of the report - which is attached. This response does not make an objection to the Local Plan under the Duty to Cooperate but that this position is conditional on the recommendations of the Council's response set out in the report, being addressed satisfactorily.</p> <p>The Crawley Reg 19 Publication Local Plan (CLP) is being consulted on for soundness. The consultation closes on 2 March 2020. The CLP is housing supply 'constrained' and consequently only sets out provision as follows:-</p> <table border="1"> <thead> <tr> <th><b>Plan period</b></th> <th><b>2020-25</b></th> <th><b>2025-30</b></th> <th><b>2030-35</b></th> <th><b>2020-2035</b></th> </tr> </thead> <tbody> <tr> <td>Housing Provision</td> <td>+2,500</td> <td>+2,250</td> <td>+605</td> <td>+5,335</td> </tr> <tr> <td>OAN Requirement</td> <td></td> <td></td> <td></td> <td>11,280</td> </tr> <tr> <td>Shortfall</td> <td></td> <td></td> <td></td> <td>-5,945</td> </tr> </tbody> </table> <p>The planned housing provision of 11,280 dwellings over 15 years 2020-2035 will mean that there is a residual shortfall of -5,945 dwellings compared to the OAN requirement based on the Governments' Standard Housing Methodology (SHM).</p> <p>The CLP suggests that the residual unmet need should be accommodated in neighbouring authorities falling within the North West Sussex Housing Market Area (NWSHMA), specifically Horsham and Mid Sussex, through the Duty to Cooperate by negotiating provision in respective local plans (e.g. the potential for urban extensions around</p> | <b>Plan period</b> | <b>2020-25</b> | <b>2025-30</b> | <b>2030-35</b> | <b>2020-2035</b> | Housing Provision | +2,500 | +2,250 | +605 | +5,335 | OAN Requirement |  |  |  | 11,280 | Shortfall |  |  |  | -5,945 |
| <b>Plan period</b>       | <b>2020-25</b>           | <b>2025-30</b>      | <b>2030-35</b>   | <b>2020-2035</b>   |                |                |                |                  |                   |        |        |      |        |                 |  |  |  |        |           |  |  |  |        |
| Housing Provision        | +2,500                   | +2,250              | +605   | +5,335             |                |                |                |                  |                   |        |        |      |        |                 |  |  |  |        |           |  |  |  |        |
| OAN Requirement          |                          |                     |  | 11,280             |                |                |                |                  |                   |        |        |      |        |                 |  |  |  |        |           |  |  |  |        |
| Shortfall                |                          |                     |  | -5,945             |                |                |                |                  |                   |        |        |      |        |                 |  |  |  |        |           |  |  |  |        |

| Duty to Cooperate |            |                 |   |
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| Ref. No.          | Respondent | Policy/<br>Para | Comments  |
|                   |            |                 | <p>Crawley). It is also acknowledged that the Government's SHM has increased housing figures for these authorities so that this is now also becoming more difficult: -</p> <p><i>'...Currently, the adopted Local Plans for Horsham and Mid Sussex districts are anticipated to provide an additional 3,150 dwellings , above their objectively assessed housing needs, in order to meet Crawley's unmet need. However, through the Local Plan Reviews this figure is likely to change, particularly as the Standard Method increases their own housing requirements to above their current adopted Plan commitments (see paragraph 2.28)'</i></p> <p>In context, the issue of an existing level of unmet housing need identified across the West Sussex and Greater Brighton Area, adds to the urgency to achieve progress on the update to the Local Strategic Statement (i.e. LSS3). This progress is needed to inform the 'Duty to Cooperate'. For example, on 27 January 2020 Elmbridge Borough Council (in Surrey) wrote to Arun District Council (ADC) and other authorities seeking assistance with unmet housing need (of circa 4,000 dwellings), under the 'Duty to Cooperate'.</p> <p>While ADC is remote from and does not have direct cross boundary/strategic issues with Crawley Borough (or indeed Elmbridge Borough), until Crawley's unmet need is resolved by neighbouring districts, there may be consequent implications for the Arun local planning authority area.</p> <p>Currently – there appears to be no up to date evidence on Crawley Borough's web site in support of the CLP with regard to the 'Duty to Cooperate' and 'Statements of Common Ground' or 'Memoranda of Understanding', addressing how unmet need is to be accommodated through adjacent local plans or via the LSS3 process.</p> <p>It is understood that Horsham District's draft Local Plan (2019-2036) will undergo a Regulation 18 consultation 17 February – 30 March. Amongst other options, that draft Local Plan will include a potential urban extension of circa 10,000 dwellings on a site at Ifield adjacent to Crawley urban area. This would offer a significant potential contribution towards Crawley's unmet housing need. Crawley Borough Council is therefore, urged to set out in Statements of Common Ground with neighbouring authorities within its Housing Market Area, how its unmet need is to be resolved before the plan is submitted for examination.</p> <p>It must be stressed that Crawley Borough Council has not asked ADC to assist with any unmet housing need given the CLP seeks assistance from Horsham and Mid Sussex and other authorities within the NWSHMA. However, given the wider unmet need outlined above, and risks should there be insufficient progress on LSS3, ADC should seek a specific Statement of Common Ground with Crawley Borough consolidating this position.</p> <p><b>Suggested Modifications:</b></p> <p>Before the plan is submitted, there needs to be up to date evidence via signed Statements of Common Ground with neighbouring authorities within the North West Sussex Housing Market Area (WSHMA) on how any residual unmet housing need is to be accommodated. Similarly, a Statement of Common Ground needs to be agreed with Arun</p> |

| <b>Duty to Cooperate</b> |                          |                         |  |
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| <b>Ref. No.</b>          | <b>Respondent</b>        | <b>Policy/<br/>Para</b> | <b>Comments</b>  |
|                          |                          |                         | <p>District Council given that there is a formal request from Crawley Borough Council for authorities outside of the WSHMA to consider whether assistance can be provided on a level of unmet housing need.</p> <p>That Planning Policy Sub Committee agrees that:-</p> <ol style="list-style-type: none"> <li>1) In response to the Crawley Local Plan Regulation 19 consultation, Crawley Borough Council is urged to clearly set out in updated Statements of Common Ground with neighbouring authorities within its Housing Market Area, how its unmet need is to be resolved before the plan is submitted for examination; and</li> <li>2) In the absence of progress on the LSS3 update, a Statement of Common Ground is agreed specifically with Arun District Council to clarify that no assistance will be required in order to help with the level of unmet need arising from the Borough.</li> </ol>  |
| REP/021                  | Gladman Developments LTD | Duty to Co-operate      | <p>The Duty to Cooperate (DtC) is a legal requirement established through section 33(A) of the Planning and Compulsory Purchase Act 2004, as amended by Section 110 of the Localism Act. The DtC requires local planning authorities to engage constructively, actively and on an ongoing basis with neighbouring authorities on cross-boundary strategic issues through the process of ongoing engagement and collaboration.<sup>1</sup></p> <p>The Framework (2019) has introduced a number of significant changes to how local planning authorities are expected to cooperate including the preparation of Statement(s) of Common Ground (SOCG) which are required to demonstrate that a plan is based on effective cooperation and has been based on agreements made by neighbouring authorities where cross boundary strategic issues are likely to exist. The Framework (2019) sets out that local planning authorities should produce, maintain, and update one or more Statement(s) of Common Ground (SOCG), throughout the plan making process<sup>2</sup>. The SOCG(s) should provide a written record of the progress made by the strategic planning authorities during the process of planning for strategic cross-boundary matters and will need to demonstrate the measures local authorities have taken to ensure cross boundary matters have been considered and what actions are required to ensure issues are proactively dealt with e.g. unmet housing needs. The preparation of a SOCG will be of particular importance for Crawley District with regards their relationship with the both Horsham and Mid Sussex and in particular the issue of unmet housing needs and where these are to be accommodated.</p> <p>Gladman have been unable to find within the Council's evidence base any Duty to Cooperate Statement or SOCG regarding these matters. Whilst it is noted that the Council and its neighbouring authorities have in the past worked together regarding housing needs across the HMA and specifically the delivery of unmet needs from Crawley, it is</p> |

<sup>1</sup>PPG Reference ID: 61-021-20180913

<sup>2</sup> PPG Reference ID: 61-001-20180913

| <b>Duty to Cooperate</b> |                                    |                     |   |
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| <b>Ref. No.</b>          | <b>Respondent</b>                  | <b>Policy/ Para</b> | <b>Comments</b>   |
|                          |                                    |                     | <p>still of fundamental importance that the necessary statements regarding cross boundary working are prepared and published. These statements would help to clarify the position of both Horsham Borough Council and Mid Sussex District Council regarding unmet housing needs.</p> <p>As noted above these SOCG should have been prepared and updated throughout the plan preparation and should have been made publicly available. Gladman reserve the right to provide further comments on the DtC and in particular the cross-boundary issues of delivering unmet housing need once these documents have been published.</p> <p>As demonstrated by the outcome of the examination of the St Albans Local Plan in 2017, if a Council fails to satisfactorily discharge its statutory duty to engage in the DTC, a Planning Inspector must recommend non-adoption of the Plan. This legal test cannot be retrospectively rectified with modifications to the plan.</p>   |
| REP/025                  | Resident 10                        | Duty to Co-operate  | <p>Second, with regard to the overall scope and vision of the consultation draft document and notwithstanding any Duty to Cooperate, the statement in the Foreword about Forge Wood being the last full neighbourhood that can be built within the borough boundary because ‘...there is simply no space left’ is most telling. Whilst the document makes reference to reliance on effective cooperation for development that might come forward, the danger is now at the gates. Development is taking place beyond the boundary, outside of CBC control, and will continue to do so in a way that is openly feared as being contrary to the neighbourhood principle on which Crawley’s success is founded, at the same time as imposing damaging infrastructural pressures within the existing boundary that will become increasingly impossible to resist or accommodate in an acceptable or sustainable manner. It is evident that the Duty to Cooperate between neighbouring authorities has already failed in at least one major development on the CBC/MSDC boundary, and central government planning imposition threatens on the HDC boundary (Homes England West of Ifield) and from Gatwick (through DCO/NSIP permissions.) The consultation draft plan may well comply with legal requirements, and it certainly mentions duty to cooperate, but in so far as it remains acquiescent of a boundary that is doomed to meaninglessness in terms of self-determination of the borough, and that it has declared no physical plan for what it would seek in the areas coming forward beyond its boundaries to redefine the extent of a greater Crawley, the consultation draft can barely claim to be sound.</p> |
| REP/058                  | Reigate & Banstead Borough Council | Duty to Co-operate  | <p><b>Crawley 2035 – Local Plan Review – Regulation 19 Publication, draft Sustainability Appraisal/ Strategic Environmental Assessment and Habitats Regulations Assessment Screening Report</b></p> <p>Thank you for the opportunity to comment on the Regulation 19 Crawley Borough Local Plan 2020-35 (January 2020), draft Sustainability Appraisal / Strategic Environmental Assessment and Habitats Regulations Assessment Screening Report. We have the following comments.</p> <p>Outstanding Evidence</p>   |

| <b>Duty to Cooperate</b> |                   |                         |   |
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| <b>Ref. No.</b>          | <b>Respondent</b> | <b>Policy/<br/>Para</b> | <b>Comments</b>   |
|                          |                   |                         | <p>We appreciate the need for swift adoption of the Local Plan Review to ensure that Crawley Borough Council (CBC) retains an up-to-date Local Plan in accordance with Paragraph 33 of the revised National Planning Policy Framework (NPPF). However, we think that it may be prudent to consider completion of further evidence before finalising and submitting the draft Local Plan for examination.</p> <p>The Town and Country Planning (Local Planning) (England) Regulations 2012 (“the Regulations”), require at Regulation 19 Publication a copy of each of the “proposed submission documents” (and a statement of the representations procedure) to be made available in accordance with Regulation 35 of the Regulations. As part of this publication, we have been invited to consider whether the Local Plan complies with legal requirements, the duty to co-operate and is sound. For reasons of legal compliance, we are concerned that there are a number of key pieces of evidence that are key to assessing needs within the borough and identifying an appropriate strategy to meet the identified needs, that we would expect to be included as “proposed submission documents” to inform the Plan review which have not been made available. These include Plan viability; transport modelling; open space, sport and recreation; heritage; Gatwick sub-region Water Cycle Study and Strategic Flood Risk Assessment; and Gypsy and Traveller Needs Assessment. Given that these studies have not been made available, we and other specific and general consultees will not have had an opportunity to consider these evidence documents (save the Gatwick Water Cycle Study which we are jointly commissioning), nor how their findings may justify the strategy in the Plan to be submitted. Part of the test of soundness (NPPF Paragraph 35) is for the Plan’s strategy to be based on proportionate evidence.</p> <p><b>Legal Compliance and Duty to Co-Operate</b></p> <p>Section 33A of the Planning and Compulsory Purchase Act 2004 places a duty upon local authorities and other prescribed bodies to co-operate on strategic matters that cross administrative boundaries. In order to demonstrate compliance with duty to co-operate, Paragraph 27 of the revised NPPF states that “strategic policy-making authorities should prepare and maintain one or more statements of common ground, documenting the cross-boundary matters being addressed and progress in cooperating to address these”. It advises that “these should be produced using the approach set out in national planning practice guidance, and be made publicly available throughout the plan-making process to provide transparency”. Compliance with national policy, which includes the NPPF, is part of the test of soundness of a Local Plan.</p> <p>As part of the Regulation 19 publication we note that no statements of common ground have been produced, and this Council has not been approached yet by CBC to produce one. This is contrary to Paragraph 020 Reference ID: 61-020-20190315 of the national planning practice guidance (PPG) which specifically advises that “authorities should have made a statement of common ground available on their website by the time they publish their draft</p> |

| <b>Duty to Cooperate</b> |                   |                         |  |
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| <b>Ref. No.</b>          | <b>Respondent</b> | <b>Policy/<br/>Para</b> | <b>Comments</b>  |
|                          |                   |                         | <p>plan, in order to provide communities and other stakeholders with a transparent picture of how they have collaborated”.</p> <p>It also leads to questions regarding the soundness of the plan proposed. Paragraph 35 of the revised NPPF which outlines the tests of soundness states that for plans to be “positively prepared”, plans should provide a strategy which is informed by agreements with other authorities and that in order for plans to be “effective” they should be based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>Without statement of common ground(s) it is difficult to understand what the strategy will be to meet unmet needs in the borough, which again raises questions of soundness.</p>  |
| REP/065                  | Mole Valley       | Duty to Co-operate      | <p><b>Employment</b></p> <p>Joint working across Northern West Sussex (NWS) also resulted in a joint assessment of economic growth. The NWS Economic Growth Assessment (EGA) 2020 update recommends an identified need for a total of 33ha of employment land in Crawley based on the continuation of past development trends which in turn is based on a constrained land supply. However, Crawley’s Employment Land Trajectory only identifies a supply of circa 12Ha, resulting in an unmet need of at least 21ha of employment land over the plan period. Furthermore, the EGA update 2020 also said there is potential for a greater level of business growth based on the ‘unconstrained’ local housing need figure of 752 dwellings per annum. Using this approach, the EGA identifies an ‘unconstrained’ employment land requirement of 113ha for Crawley. CBC consider this amount of employment land is likely to be needed should further major urban extensions to Crawley come forward.</p> <p>It is considered, for the reasons set out below, MVDC is not in a position to be able to assist CBC in meeting its unmet employment needs.</p> <p><b>Functional Economic Market Area</b></p> <p>The NWS EGA update 2020 concluded that NWS authorities (Crawley, Horsham and Mid Sussex) continue to operate as a broad functional economic market area (FEMA). The assessment also identifies that influential economic linkages also exist with Coastal West Sussex, Reigate &amp; Banstead (e.g. Horley) and East Sussex. Mole Valley is not included within the NWS FEMA nor is the district identified as having influential economic influences with NWS authorities.</p> <p>MVDC considers that as Mole Valley does not form part of the NWS FEMA, the responsibility for meeting Crawley’s unmet employment needs, in the first instance, would fall to those local planning authorities within NWS FEMA and then subsequently, if necessary, those areas with which influential economic linkages exist, which doesn’t include Mole Valley.</p> |

| <b>Duty to Cooperate</b> |                   |                         |   |
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| <b>Ref. No.</b>          | <b>Respondent</b> | <b>Policy/<br/>Para</b> | <b>Comments</b>   |
|                          |                   |                         | <p><b>Constraints</b><br/> CBC say its adopted Local Plan is acknowledgement that there is very limited land within Crawley for accommodating further development because of the boroughs tight administrative boundaries; the historic Gatwick Airport 'safeguarded' land for a potential southern runway; physical constraints such as aircraft noise contours, flooding, nature conservation constraints, and; few infill opportunities due to the age and planned nature of Crawley New Town.</p> <p>As stated previously, Mole Valley is also heavily constrained. 75% of the district is within the Metropolitan Green Belt and this includes land adjacent to Crawley's administrative boundaries. The district is also constrained by the Surrey Hills Area of Outstanding Natural Beauty (AONB), the Mole Gap to Reigate Escarpment Special Area of Conservation (SAC). As with Crawley, Mole Valley is also constrained by areas prone to flooding and aircraft noise contours associated with Gatwick. In addition, transport links and public transport connections between Mole Valley and Crawley are weak.</p> <p><b>Suggested Modifications:</b><br/> Area Action Plan for Land North of Crawley<br/> As mentioned previously, CBC proposes removing the 'safeguarding' of some 613ha of land for a potential southern runway at Gatwick Airport and preparing an Area Action Plan (AAP) for the future development of this land. The AAP will assess needs for future growth and operational needs of airport alongside other development needs arising in Crawley including for economic growth. CBC would commence work on the AAP after the adoption of their new Local Plan and CBC say this work may conclude sites for Strategic Employment Locations can be identified within Crawley should some or all of the land encompassed by the AAP not be required for airport expansion.</p> <p>Given the AAP covers approximately 613ha and the unconstrained employment land need is 113ha, it appears that all of Crawley's employment needs can be met within the Borough with surplus land available within the AAP which can be used to meet other development needs, including housing. MVDC therefore supports CBC in seeking to remove the current safeguarding. CBC should also consider bringing forward preparation of this AAP to align with the Local Plan Review 2020-2035 in order to determine the amount of employment land that can be developed within the AAP boundary.</p> <p><b>Summary</b><br/> In summary:</p> <ul style="list-style-type: none"> <li>• MVDC is not in a position to be able to assist CBC in meeting the boroughs unmet housing needs.</li> <li>• MVDC is not in a position to be able to assist CBC in meeting the boroughs unmet employment needs.</li> </ul> |

| <b>Duty to Cooperate</b> |                   |                         |  |
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| <b>Ref. No.</b>          | <b>Respondent</b> | <b>Policy/<br/>Para</b> | <b>Comments</b>  |
|                          |                   |                         | <ul style="list-style-type: none"> <li>• MVDC supports the removal of safeguarding land for a potential southern runway at Gatwick Airport and supports the preparation of an AAP setting out the future development of this land to meet development needs arising in Crawley.</li> <li>• <input type="checkbox"/> CBC should consider bringing forward preparation of the AAP to understand the level of developments needs that can be accommodated within the AAP boundary.</li> </ul> |

| Sustainability Appraisal/Strategic Environmental Assessment |                               |   |  |
|---|-------------------------------|---|--|
| Ref. No.  | Respondent                    | Policy/ Para  | Comments   |
| REP/021   | Gladman Developments LTD      | SA/SEA Sustainability Appraisal/ Strategic Environmental Assessment | In accordance with Section 19 of the Planning and Compulsory Purchase Act 2004, policies set out in Local Plans must be subject to a Sustainability Appraisal (SA), and also incorporate the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004 (the SEA regulations). The SA/SEA is a systematic process that should be undertaken at each stage of the Plan's preparation, assessing the effects of the emerging Local Plan proposals on sustainable development when judged against all reasonable alternatives. The Council should ensure that the future results of the SA clearly justify its policy choices. In meeting the development needs of the area, it should be clear from the results of this assessment why some policy options have progressed, and others have been rejected. This must be undertaken through a comparative and equal assessment of each reasonable alternative, in the same level of detail for both chosen and rejected alternatives. The Council's decision-making and scoring should be robust, justified and transparent.   |
| REP/022   | Sussex Ornithological Society | SA/SEA Sustainability Appraisal/ Strategic Environmental Assessment | <p>The SOS recognises that England needs new houses and we are not challenging the assumptions behind the numbers needed, as that is not our expertise. However, we do feel well qualified to speak out when we can see that proposals are being put forward that would result in houses being built in areas that are of particular importance to birds of conservation importance, as that would harm them.</p> <p>In this respect our issue with the Crawley Local Plan 2020-2035 is not where it is intended to build 5355 houses within the Crawley Borough Council boundary in the plan period (although we do have concerns about one of these proposals, see 20(b) below) but the assumptions that lead to the conclusion that 5925 houses cannot be built in Crawley, but will have to be built by neighbouring Local Authorities under the Duty to Cooperate obligations – and Crawley's assumptions that these dwellings must be built as an urban extension adjacent to Crawley's boundaries.</p> <p>Why is there a fundamental assumption that Crawley will not fulfil their housing supply target by building new homes at a high enough density so as to enable all 11,280 to be built within their boundary? Put simply if the average new home in this Local Plan is going to be two and a half stories high so that only 47 % of them can be built in Crawley, then if they were five stories high all 11,280 dwellings could be built in Crawley instead. And the taller you build some dwellings the lower the residual dwellings would need to be.</p> <p>No attempt appears to have been made to consider building at sufficiently high densities to achieve this – <b>instead the assumption appears to be that it is essential that the current character of Crawley is maintained without considering what the implications of that assumption on the proposed overflow areas are.</b> In other words the impact on the characteristics of adjoining local authorities does not appear to have been considered.</p> <p>We strongly object to the assumptions that most of the 5925 overflow dwellings must be built as an urban extension of Crawley Borough – i.e. on land adjacent to Crawley - as that assumption will have a very serious</p> |

| Sustainability Appraisal/Strategic Environmental Assessment |            |              |  |
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|   |            |              | <p>impact on scarce birds of conservation concern, as well as wider adverse biodiversity impacts if any of this overflow is built on the High Weald AONB</p> <p>The inference of the 5925 overflow is that Crawley is full and that there will never be space within its boundaries to ever again build any more dwellings. It would follow from this that future Local Plans will require that all Crawley's future needs for new dwellings will have to be met by adjoining Local Authorities. We simply do not believe that that is a valid scenario. On that basis there would never again be any new development of dwellings in many boroughs and cities across England, yet huge numbers of new dwellings are being built in many boroughs and cities across the UK where the density of population is already far higher than in Crawley. Instead what Crawley appear to envisage is that there will be an ever-increasing expansion of its urban area beyond its current boundaries, absorbing more and more of the West Sussex countryside in Horsham DC, and more and more of the High Weald AONB in Mid Sussex DC.</p> <p>We believe that Crawley must face up now to the need to build new dwellings at a sufficiently high density that it can deliver its future housing needs within its Borough Boundaries, and that it should fundamentally change its planning principles to achieve this. In particular we believe that none of its overflow should be built in the High Weald AONB.</p> <p><b>The High Weald AONB along the east side of the M23/A23, immediately adjacent to the boundary of Crawley Borough, is one of the very best areas for woodland birds in all of Sussex, with significant numbers of Section 41, Schedule 1 and red-listed species of high conservation concern recorded using this area in the last 10 years. For this reason SOS objects to any proposals by Crawley to destroy parts of the AONB by insisting that overflow dwellings are built on it, and that urban Crawley extends into it.</b></p> <p>Appendix 1 gives details of bird species of conservation concern that are found in this area.</p> <p>Crawley's proposals for urban extensions into Mid Sussex DC suggest that it is acceptable for the character of part of the High Weald AONB to be substantially destroyed in order to accommodate Crawley's overflow. We do not accept that part of the High Weald AONB should be destroyed just because Crawley do not wish to consider building homes at a higher density. What is the justification for this? Moreover the planning system provides high levels of protection from development to Areas of Outstanding Natural Beauty, alongside National Parks. As the High Weald AONB Management Plan 2019 states (P20, Planning and AONB's) <i>The National Planning Policy Framework (NPPF), Paragraph 172, requires that: "Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to these issues. The conservation and enhancement of wildlife and cultural heritage are also important considerations in these areas, and should be given great weight in National Parks and the Broads. The scale and extent of development within these designated areas should be limited. Planning permission should be refused for major developments other than in exceptional circumstances....."</i></p> |

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|   |            |              | <p>The southern part of Crawley, south of the A264, lies within the High Weald AONB. Crawley's Local Plan has not allocated any of this area for development (other than to allocate a reserve site for 10 Gypsy and Traveller pitches, if needed) and (commendably) Crawley appear to be paying particular attention to protecting the part of the AONB that lies within their boundary. Yet they assume it will be OK to plan for a substantial urban extension of circa 1000 dwellings in the Mid Sussex portion of the AONB. The logic of this is not apparent!</p> <p>Moreover, since there is no recognition of the need to change planning principles the implication is that more and more of Crawley will extend into the AONB in future Local Plans. Against this background we would make the following specific comments about the Crawley Local Plan 2020-2035.</p>   |
|   |            |              | <p><b>Suggested Modifications:</b><br/> <b>Topic area E – Natural Environment.</b></p> <p>SOS thanks the Council for their responses, documented in Appendix B, to the comments we made on this topic when we responded to the Regulation 18 Sustainability document. However, we remained concerned that not enough is being contemplated to offset the negative impacts on the Natural Environment of the Crawley Local Plan 2020-35.</p> <p>Crawley has a particularly rich amount of protected and open green spaces, including 12 LWS's (8 owned by the Council), 6 Local Nature Reserves, ancient woodland, parks and recreation areas and a Green Infrastructure network. Much of this is owned/ controlled directly by the Borough Council. Tilgate Park is a particularly large area. It is therefore disappointing to see that as part of the Local Plan/ Sustainability Appraisal there appears to be no stock take of the current biodiversity quality of these areas and no plans to actively manage them in a way that will increase their biodiversity value so as to try and offset some of the negative pressures on their biodiversity that will inevitably come from the densification and growing population (of humans and of pets) in Crawley over the Plan period. It is hard to see how Crawley can hope to deliver a real net gain in biodiversity without such an initiative being put in place. This appears to be a major omission.</p> <p>Table 4.3 suggests a worthwhile objective under item 6, namely to “<i>Conserve and enhance the biodiversity habitats, key landscape features, fauna and flora within the borough</i>”. We welcome the fact that the number of indicators have increased to three but we still think these are inadequate.</p> <p>a) One of three quantifiable measures proposed is “<i>Amount of trees with tree preservation orders lost annually</i>” Data on page 80 of the Sustainability document shows that there had been a net loss of trees with TPO's over the three years reported, so this is currently going the wrong way.</p> <p>b) the two new measures are</p> |

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|   |            |              | <p>- Number of trees and soft landscaping secured on site or through S106 contributions. This is worthwhile measurement but only if the number of trees lost to development is also measured, so that the net impact can be measured. Moreover mature trees need to be “valued” at a considerably higher rate than newly planted trees.</p> <p>- Hectares/percentage of land in Crawley identified as Local Wildlife Sites. We think this is a worthwhile measure, particularly given the pressure some of these sites are under from developers.</p> <p>We would also suggest that another meaningful measure might be to assess the condition of LWS’s every 5 to 10 years, including recording their species inventory, to see how it changes over time.</p> <p>We disagree with the impact assessments in Table 5.1 that the policies in the Local Plan will have no significant negative impact (red coloured) on Sustainability Issue 6 (to conserve and enhance the biodiversity habitats, key landscape features, fauna and flora within the borough). We believe that fauna (including birds) and flora will be significantly affected as open spaces come under pressure, become more crowded and reduce in size. And as outlined in 3 to 15 above, and Appendix 1, the proposal that Mid Sussex should permit development in the AONB bordering Crawley to deal with part of Crawley’s overflow will create a very negative impact on birds (and trees). This needs to be factored into Crawley’s biodiversity “arithmetic” as it would be a direct consequence of this Plan. We believe that more work needs to be done on the environment and biodiversity elements of the Sustainability Appraisal, with a particular focus on actively trying to improve the quality of biodiversity in Crawley’s numerous LWS’s, LNR’s and green spaces so as to make this a major contribution to delivering a net gain in biodiversity. It is hard to see how the Crawley Local Plan can hope to offer any real net gain in biodiversity without these spaces contributing towards this. There are very many losses of biodiversity that are going to occur because of the development plans that are being put forward in the Local Plan, and these need to be more than offset by getting the most out of the unusually high number of sites of conservation importance in the Borough, many of which are managed by the Council.</p> <p>Therefore, positive plans to improve biodiversity in Crawley’s green spaces need to be developed, measured and reported on, and monitoring needs to be more comprehensive than proposed in this document. As a minimum we would hope to see an inventory of the current biodiversity quality of the eight Borough-owned LWS’s, listing key species including Section Species and species of conservation concern. These need to be supported by Management Plans with clear and measurable goals that will deliver net gains in biodiversity.</p> <p>Unfortunately time does not permit us to comment on the detailed assessments of the impact on biodiversity, flora and fauna of the policies and housing proposals that are listed in Appendices E and F, but we applaud the detailed assessments that have been made both of the rejected developments as well as the proposed developments...</p> <p>However, as noted in 29 above we believe them to be too optimistic. What does not appear to be being taken into account is the impact of the growth in population in Crawley over the plan period, resulting in greater use of the different types of open areas (both by humans and their pets) with consequence greater disturbance to both flora</p> |

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|   |   |   | and fauna. This can be a significant negative influence, especially if the amount of open space is contracting as that will mean even more increases in usage of the residual areas.   |
| REP/044   | Tim North & Associates Ltd on behalf of HX Properties Ltd | Sustainability Appraisal/ Strategic Environment Assessment GAT2 Options 1 and 2 | <p><b>Draft Crawley Borough Local Plan Review 2020-2035 – Regulation 19 Consultation</b></p> <p>My clients, HX Properties Ltd, object to the assessment carried out in the Sustainability Appraisal/Strategic Environmental Assessment (hereinafter referred to as SA/SEA) dated January 2020 accompanying the Regulation 19 Version of the Draft Crawley Borough Local Plan 2020-2035 (hereinafter referred to as the DCBLP), where it relates to Policy GAT2. It is contended that the SA/SEA is deficient, inadequate and unsound where the appraisal concerns Policy GAT2.</p> <p>There is a duty to carry out a legally adequate SA/SEA in order to comply with the EU Strategic Environmental Assessment Directive 2001/42. The SA/SEA must consider Policy GAT2 and “<i>reasonable alternatives</i>” to it, with Article 5 of the Directive setting out the requirement to identify, describe and evaluate the likely significant environment effects of “<i>reasonable alternatives</i>”. These provisions have been transposed into UK law through the Environmental (Assessment of Plans and Programmes) Regulations 2004, Regulation 12 being involved in the preparation of an environmental report.</p> <p>It is contended that additional “<i>reasonable alternatives</i>” to Policy GAT2 exist, which have not been evaluated by the Local Planning Authority, which it is argued represents a fundamental flaw in the soundness of the assessment process. There is no obligation, as far as the law is concerned, to choose the most sustainable option, or the most sustainable of two policy options, since the requirements of the appraisal are entirely procedural [<i>R (on the application of Friends of the Earth) v The Welsh Ministers (2015) EWHC 776 (Admin)</i>] {12} and {75}. Reasons must, however, be given for the rejection of “<i>reasonable alternatives</i>” so that consultees are able to know what those reasons are. (<i>Save Historic Newmarket Community v Forest Heath District Council (2011) EHCW 606</i>).</p> <p>In the case of the Regulation 19 version of the DCBLP, two alternative policy scenarios have been considered: Option 1 being to provide additional car parking within the airport boundary; and Option 2 to allow car parking in other areas. These are precisely the same two policy options that were considered in the SA/SEA dated December 2015, where it relates to equivalent Policy GAT3 in the statutorily adopted Crawley Borough Local Plan 2015-2030.</p> <p>The SA/SEA as part of the statutorily adopted Crawley Borough Local Plan 2015-2030 considered both policy options against ten sustainability objectives. Sustainability objectives 1 to 8 inclusive set out in the SA/SEA dated December 2015 are precisely the same as the sustainability objectives against which Policy GAT2 of the Regulation 19 version of the DCBLP has been assessed.</p> |

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|   |            |              | <p>Sustainability objectives 9 and 10 where they relate to the SA/SEA dated December 2015 concerning the adopted Local Plan have been amalgamated to produce one sustainability objective 9 in the SA/SEA Regulation 19 version of the DCBLP. In effect, what were previously sustainability objectives 9 and 10 namely <i>“To promote active cohesive and socially sustainable communities”</i> and <i>“To ensure everyone has the opportunity to participate in sport and to encourage active, healthy and independent lifestyles”</i> respectively, have now been amalgamated into a single sustainability objective 9 where it forms part of the SA/SEA Regulation 19 version of the DCBLP, viz: <i>“To ensure healthy, active, cohesive and socially sustainable communities. To ensure all benefit from a good quality of life., To ensure everyone has the opportunity to participate in sport and to encourage active lifestyles.”</i></p> <p>It follows that the SA/SEA methodology has not materially changed between that relied upon in the adopted Crawley Borough Local Plan 2015-2030 where it relates to Policy GAT3, and that which forms the basis to the Regulation 19 version of the DCBLP where it concerns the equivalent Policy GAT2. This being the case, and given that the two policy options are virtually identical between the two SA/SEAs; no reasoned justification has been advanced as to why the scores in respect of the two SA/SEAs where they relate to Policies GAT3 and GAT2 respectively, have now changed in the SA/SEA concerning the Regulation 19 version of the DCBLP. In the SA/SEA dated December 2015 relating to the adopted Crawley Borough Local Plan 2015-2030, the two options concerning Policy GAT3 scored identically in respect of all ten sustainability objectives. It is therefore surprising that when the same two options in Policy GAT2 are examined in the context of the SA/SEA relating to the Regulation 19 version of the DCBLP, different scores are recorded, particularly in respect of Policy Option 2. Sustainability objectives 1 and 2 concerned with the need to minimise climate change, and adapt to climate change respectively, both scored a single minus, (i.e. having a negative impact on the sustainability objective) in respect of both options relating to Policy GAT3 in the SA/SEA relating to the adopted Local Plan. The scoring has now been altered in the Regulation 19 version of the DCBLP where it concerns equivalent Policy GAT2. Sustainability objectives 1 and 2 now score a double minus (significant negative impact on the sustainability objective) where it relates to Option 2 of Policy GAT2, i.e. to allow car parking in other areas; with Option 1 retaining a single minus score as was previously the case with the adopted Local Plan. Similarly, sustainability objective 7 concerning the need to promote sustainable journeys, previously scored a single minus in respect of both Options where they relate to Policy GAT3 forming part of the SA/SEA of the adopted Local Plan. There has been a change in the Regulation 19 version of the DCBLP with Option 2 relating to Policy GAT2 in the SA/SEA now recorded as having a double minus score, where it previously scored a single minus.</p> <p>It is alterations of this nature at times when circumstances have not fundamentally changed and the sustainability objectives remain almost identical, which casts doubts on the veracity of the entire SA/SEA</p> |

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|   |            |              | process. All other sustainability objectives score identically between the two SA/SEAs where they relate to Policies GAT3 and GAT2.   |
|   |            |              | <p><b>Suggested Modifications:</b></p> <p>There are a number of other objections to the SA/SEA prepared in association with the Regulation 19 version of the DCBLP which need to be recorded, particularly as representations were not raised to the SA/SEA process where it forms part of the statutorily adopted Crawley Borough Local Plan 2015-2030.</p> <p>Firstly, Option 2 is described as “<i>To allow car parking in other areas</i>”, being ill-defined such that it does not amount to a “<i>reasonable alternative</i>”. Long term off-airport car parking can take many different forms, but three generic types can be identified.</p> <p>Passengers can elect to rely on a “<i>meet and greet</i>” company in which they drive their car to the airport only for the “<i>meet and greet</i>” operator to meet the customer at the airport and transfer their car to an off-airport car parking site. This may involve an intermediary step with the car being driven to a holding site prior to it being parked at an off-airport location. The “<i>meet and greet</i>” operator then drives the customer’s car to the airport on their return, enabling the passenger to drive home or to their place of work directly from the airport. A derivation of this form of off-airport car parking is where customers take advantage of a package in which they leave their car at a hotel close to an airport, where their car is often relocated to a long term off-airport car parking site. The car can either be returned to the hotel awaiting the passenger’s return, or alternatively the passenger’s car can be driven to the airport for collection by the customer.</p> <p>This form of off-airport parking is materially different from the traditional “<i>park and ride</i>” long term off-airport car parking facility which involves a site with available reception facilities and compound areas where cars are blocked parked, where a courtesy mini bus or coach transfers the passengers to the airport terminals. The reverse occurs when the passenger returns, when they are picked up by the courtesy bus or coach and transferred back to the long term off-airport car parking facility to collect their car. The mini buses or coaches in such circumstances are normally replaced every three to four years, so there is the added benefit of the means of transportation relied on being the most efficient in terms of carbon emissions. In the case of a traditional long term off airport car parking use comprising Option 2 where it forms part of the SA/SEA to Policy GAT2, to score a double minus (having a significant negative impact on the sustainability objective) is, in these circumstances, disingenuous.</p> <p>Certain passengers prefer to take advantage of technological platforms such as JustPark as part of the sharing economy in which they pay a reduced fee to park their car on the driveway of mostly residential properties in close proximity to the airport, where they can then either walk, take a taxi or minicab, or alternatively obtain a lift to the airport from the owners of the property. The reverse happens when the passenger returns to the airport.</p> |

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|   |            |              | <p>Secondly, Option 2 does not state what criteria the appraisal has in mind. It is appreciated that the appraisal is operating at strategic level, but Policy GAT2 in the DCBLP is not a strategic policy in the same way as a policy relating to housing distribution is considered to be strategic policy. On the contrary, Policy GAT2 is addressing a site specific issue, with "<i>reasonable alternatives</i>" required to be assessed on an alternative basis, so as to provide the information set out in Annex I to the Directive. It follows that a statement of the principles to be applied to long term off-airport car parking is necessary in order to assess this option fairly, and on an equivalent basis, as part of an assessment of Policy GAT2.</p> <p>This is required because the principles underlying the various generic forms of long term off-airport car parking affect the sustainability performance of Option 2, with certain categories of long term off airport car parking use being capable of at least being equivalent to, if not more preferable than Option 1.</p> <p>Thirdly, the Council are under an obligation to record any difficulties encountered in compiling the information required by the Directive (Annex I, paragraph (h)). As it has not sought to do so, would imply that it has some criteria or principles in mind, since otherwise it is difficult to see how an appraisal could be carried out without some notion of how Option 2 would operate.</p> <p>In this way, it is considered necessary for the SA/SEA of Policy GAT2 to be redefined where it relates to Option 2, if only to distinguish between "<i>meet and greet</i>" types of long term off-airport car parking, and traditional "<i>park and ride</i>" form of long term off-airport car parking use.</p> <p>These two basic generic forms have an impact on the sustainability objectives of Policy GAT2, in that they possess different characteristics affecting both the numbers and method of movement of passengers to and from the two terminals, with a traditional long term off airport car parking facility being able to take advantage of low emission mini-buses. These two types of long term off airport car parking use have different impacts on congestion and carbon emissions, as well as having an effect on residential property, particularly in cases where dwellings front onto Class A and B highways. It means that reliance placed on distance alone to the terminals is not considered to be the single determining criterion when measuring the sustainability objectives of Policy GAT2.</p> <p>Fourthly, the SA/SEA with respect to Policy GAT2 of the DCBLP records that in providing additional car parking within the airport boundary as part of Option 1, no impact on the sustainability objective of conserving/enhancing biodiversity and landscape is recorded, yet the same sustainability objective is scored with a single minus (negative impact on the sustainability objective) with respect to Option 2.</p> <p>There is simply no justification for this difference in scores given that there are policies within the DCBLP which seek to protect and enhance biodiversity and landscape considerations. In the case of a long term off-airport car park use based on the park and ride model, there is no reason why the scores in respect of sustainability objective 7 should not score equal to, or better than those in Option 1, given that it is in the interests of the</p> |

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|   |   |   | <p>owners of the site to manage and maintain landscaping, at the same time paying due regard to biodiversity interests, if only to ensure that a professional image of a well-run operation is portrayed to their customers. Fifthly, a similar situation arises with respect to maintaining and supporting employment which forms the subject of sustainability objective 5. A new long term off-airport parking use is likely to generate between 70 and 100 jobs, so that it is perverse to consider Option 2 as possessing a neutral impact on this sustainability objective, when evaluating a long term of airport car parking use of the traditional model.</p> <p>It follows that there is need for a complete re-evaluation of the SA/SEA of the Regulation 19 version of the DCBLP where it relates to Policy GAT2, with a reappraisal of reasonable alternatives where they relate to Option 2, if the same process is not to be considered unsound.</p>  |
| REP/044   | Tim North & Associates Ltd on behalf of HX Properties Ltd | SA/SEA Sustainability Appraisal/ Strategic Environment Assessment EC6 | <p>It has been noted that there has been a change of approach on behalf of the Authority, where previously it was contended that parking at hotels and guest houses constituted an ancillary use which did not constitute development requiring planning permission. This becomes evident from the contents of the SA/SEA relating to Policy EC6. In the event that the Council's view on this matter were to have remained unchanged, there would clearly be no need for Policy EC6.</p> <p>It is recognised that the Airport Owner and Operator enjoy permitted development rights in accordance with Schedule 2 Part 8 Class F of the Town &amp; Country Planning (General Permitted Development) (England) Order 2015 (As Amended). However, as your officers will appreciate, the phrase "<i>operational building</i>" is defined in Schedule 2 Part 8 Class O as meaning "<i>a building, other than a hotel required in connection with the movement or maintenance of aircraft, or with the embarking, disembarking, loading, discharge, or transport of passengers, livestock or goods at a relevant airport</i>". In short, hotels do not benefit from permitted development rights, reinforcing the point regarding the need for consistency with both the sequential and demonstrable needs tests in respect of Policy EC6.</p> <p>The reasoned justification in paragraph 9.73 relating to Policy EC6 requires applicants to have regard to Local Plan Policy EC3 and its supporting text when considering hotel development in the Manor Royal Main Employment Area. Policy EC3 is found under the title "<i>Manor Royal</i>", in which it is stated that proposals which are not for B Class development will be permitted if it can be demonstrated that they are of a scale and function that does not undermine the established role and function of Manor Royal. Paragraph 9.44 provides part of the reasoned justification to Policy EC3, setting out complementary business facilities and staff amenities needed to support the day to day needs of Manor Royal businesses and employees.</p> <p><b>Suggested Modifications:</b></p> <p>My clients' concerns in this regard is that the contents of paragraph 9.44 do not refer to hotels and visitor accommodation, and neither more importantly does Policy EC4. It follows that there appears to be a conflict</p> |

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|   |            |              | <p>between the provisions of Policies EC3 and EC6 where they relate to business supporting facilities on the Main Manor Royal Employment Area, concerning the question of hotel and visitor accommodation proposals. My clients' reservations also extend to the implications arising from the last paragraph of Policy EC6. The reasoned justification in paragraph 9.74 refers to the need to ensure consistency with Local Plan Policy GAT2, but it appears that the implications of this policy have not been fully appreciated.</p> <p>The commentary to Option 3 in the SA/SEA of the Regulation 19 version of the DCBLP concerning Policy EC6 states: <i>"Off airport hotels in sustainable locations such as the town centre can accommodate guests using the airport, without the need for them to drive at all, thereby reducing the need to provide extensive areas of car parking."</i></p> <p>This statement presumes that travellers to town centre hotels will arrive by public transport, but there is no guarantee of that, and to the extent that a passenger wishes to rely on their private cars and stay overnight at a town centre hotel before leaving their car at an on or off-airport parking site, or alternatively rely on a minicab or taxi to ferry them to the airport, cannot constitute a sustainable form of access to London Gatwick Airport. Indeed, it is less sustainable than if a long term off-airport car parking use were permitted in close proximity to London Gatwick Airport.</p> <p>It also does not prevent a hotel in a town centre location from using its car park as a temporary drop off point in connection with a long term off-airport car parking use, where cars would then be moved to an alternative location whether on or off airport, pending the customers' return. This is already taking place in hotels nearer to Gatwick Airport with restricted car parking provision.</p> <p>Either way, and despite the fact a change of use for long term off-airport car parking purposes would be required, the end result would be longer journeys to the airport or relying on mini cabs/taxis ferrying the passengers from the hotel to the airport. Restricting the use of hotel car parks will, in my clients' experience, exacerbate unauthorised long term off-airport car parking which is of no benefit to the Council, the Airport Operator or those wishing to establish lawful long term off-airport car parking uses.</p> <p>Equally, there are important implications in terms of staff resourcing, at a time when until recently, it has been accepted by your Council that unauthorised car parking provides a constituent part of airport related parking supply which is likely to continue.</p> <p>In conclusion, any choice made with respect to the options for Policy EC6 seen from the SA/SEA perspective, requires to consider not only consistency with Policy GAT2, but also the implications for airport related car parking generally from a wider sustainability perspective, and in particular the consequences for those using hotels, as well as on issues of resourcing.</p> |

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| REP/050   | Montagu Evans on behalf of Homes England | SA/SEA Sustainability Appraisal/ Strategic Environment Assessment | <p>Homes England acknowledge the updates made to the Regulation Sustainability Appraisal / Strategic Environmental Assessment (SA/SEA) since comments made under Regulation 18. We note CBC's Regulation 18 response that notes Paragraph 2.14 of the SA that explains that the focus of the Local Plan is upon Crawley Borough, but that growth to meet Crawley's unmet needs may take place in neighbouring authorities, and that the SA/SEA for these developments would be the responsibility of the relevant Planning Authority. With all comments addressed under re-drafting, Homes England have no further comment and consider the document sound.</p> <p>Please contact me if you would like to discuss any points raised in this submission. In the meantime, I would be grateful if you could continue to keep Homes England informed in relation to the CBC Local Plan and progression towards Examination.</p>   |
| REP/058   | Reigate & Banstead borough Council       | SA/SEA Sustainability Appraisal/ Strategic Environment Assessment | <p><b>Strategic Policies</b></p> <p>We note that from the table on page 10 of the Regulation 19 Crawley Borough Local Plan that adoption is anticipated for December 2020. Paragraph 22 of the revised NPPF advises that "strategic policies should look ahead over a minimum 15-year period from adoption (except in relation to town centre development), to anticipate and respond to long-term requirements and opportunities, such as those arising from major improvements in infrastructure". Should the anticipated adoption slightly slip, the strategic policies in the plan will not look ahead over the minimum 15-year period.</p> <p><b>Draft Sustainability Appraisal/ Strategic Environmental Assessment</b></p> <p>We note that given that the Regulation 19 Crawley Borough Local Plan is largely a review of the current Crawley Local Plan, CBC have sought largely to only review the previous SA / SEA conclusions, update where changes are proposed, and where new options are proposed consider these. We recognise that the only policy that identified a potential negative impact is GAT2 "Gatwick Airport Related Parking". As stated previously in this response, this policy is in line with Policy TAP2 "Airport Car Parking" in our adopted DMP and we support this approach and consider that it is sound as it reflects the historic and cross-boundary policy position to meet airport car parking needs.</p> <p>More generally we have the following comments:</p> <p><i>Measurability of criteria/ objectives:</i> Whilst we appreciate that this is only a review of the current SA/ SEA, from reading the document there appears to be limited specificity with regards to the criteria and objectives used to assess the options.</p> <p><i>Evidence:</i> It is recognised that a number of evidence studies are still being finalised, the findings of these studies will need to be taken into consideration in an update to the SA/ SEA.</p> |

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|   |            |              | <p><i>Paragraph 3.7:</i> Incorrectly states that CBC has a 9.59 year land supply position, the Housing Trajectory produced to accompany the consultation identifies a land supply position of 5.80 years.</p> <p><i>Paragraph A32:</i> We question whether this paragraph should be amended to reflect the fact that as local authorities we work together to measure/ monitor/ mitigate air quality issues.</p> <p><i>Paragraph C11:</i> We note that the mix identified for affordable housing is different to that identified in Paragraph 13.14 of the Regulation 19 Crawley Borough Local Plan.</p> <p><i>Paragraph C11:</i> We note that only 0.5% of 4-bedroom properties have been delivered despite a need for 5%/5-10%. We are currently in the process of preparing a Affordable Housing SPD, as part of this our Housing Services Team suggested that we should require 3-bedroom accommodation to be provided as 3b6p accommodation not 3b5p as some of the need for 4-bedroom properties is due to families with three children not being able to be housed in 3b5p houses.</p> <p><i>Paragraph D5:</i> Recognises that “the allocated Horley Business Park in RBBC will help to meet some of Crawley’s unmet business land needs”, this however isn’t reflected in the economic growth options.</p> <p><i>Policy H5: Affordable Housing:</i> We note that Option 4 “40% affordable housing with no threshold” has been identified as the “chosen option”. Whilst we recognise the need for affordable housing, we note that this is contrary to national policy which states that “the provision of affordable housing should not be sought for residential developments that are not major developments” (Paragraph 63 revised NPPF). Major developments are defined in the revised NPPF as sites “where 10 or more homes will be provided, or the site has an area of 0.5hectares or more”.</p> <p>We note that the options include only the provision of either 30% or 40% affordable housing with/out a threshold. No rationale for these options is provided. The 40% threshold is a continuation of the current Local Plan policy. No testing of a higher percentage requirement/ rationale for not including a higher percentage threshold.</p> <p><i>Policy H1: Housing Provision:</i> It is noted that five options were tested:</p> <ul style="list-style-type: none"> <li>• Option 1: Housing requirement of 1,848dpa based on identified affordable housing need of 739dpa (i.e. total housing required to meet need on basis of 40% affordable housing provision)</li> <li>• Option 2: Housing requirement based on Government’s standard method for calculating housing need, excluding the cap (752dpa)</li> <li>• Option 3: Housing requirement based on Government’s standard method for calculating housing need, including the cap (476dpa)</li> <li>• Option 4: Supply-led locally determined housing requirement (minimum of 357dpa 2020-2035 stepped as a 500dpa requirement years 1-5; 450dpa years 6-10; and 121dpa years 11-15)</li> </ul> |

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|   |                    |   | <p>• Option 5: Supply-led locally determined housing requirement (minimum of 357dpa 2020-2035 stepped as a 500dpa requirement years 1-5; 450dpa years 6-10; and 121dpa years 11-15) with 'unmet need' expressed. and that Option 4 was identified as the "chosen option".</p> <p>Following our comments on the affordable housing appraisal, we note that no options were considered to deliver the full amount of affordable housing with a different percentage requirement.</p> <p>More generally we note that some of the commentary is quite general/ includes untested statements such as for Option 1 "housing delivery at this level would be well beyond what has been achieved in recent years, suggesting that market factors and the capacity of the construction industry are likely to prevent delivery at this level, which would involve excess provision of market housing ... kit is also a level unlikely to be met or sustained by the housing industry (with annual delivery levels traditionally averaging around a quarter to a third of this)".</p>  |
| REP/ 061  | Historic England   | SA/SEA Sustainability Appraisal/ Strategic Environment Assessment | <p>Crawley Local Plan Strategic Environmental Assessment Scoping Report</p> <p>Thank you for your email of 20 January 2020 inviting comments on the Scoping Report for the above strategic environmental assessment. Historic England is a statutory consultation body in relation to the SEA Directive in regard to any matters affecting the historic environment. We are content that the scoping report for Crawley Local Plan adequately covers the issues that may arise in respect of the potential effects of proposed development sites on heritage assets.</p> <p>Historic England has prepared generic guidance with regards to our involvement in the various stages of the local plan process which you may find helpful in preparing the Sustainability Appraisal. This is available to download here: <a href="https://historicengland.org.uk/images-books/publications/sustainability-appraisal-and-strategic-environmental-assessment-advice-note-8/">https://historicengland.org.uk/images-books/publications/sustainability-appraisal-and-strategic-environmental-assessment-advice-note-8/</a>.</p> <p>This opinion is based on the information provided by you and for the avoidance of doubt does not affect our obligation to advise you on, and potentially object to any specific development proposal which may subsequently arise from this or later versions of the plan which is the subject to consultation, and which may, despite the SEA, have adverse effects on the historic environment.</p> |
| REP/ 062  | Environment Agency | SA/SEA Sustainability Appraisal/ Strategic Environment Assessment | <p><b>SUSTAINABILITY APPRAISAL</b></p> <p><b>Water resources and efficiency</b></p> <p>In the table below para 5.11, "Reduction of Water Consumption" is one of the key topics, but there is no relevant assessment criterion.</p> <p><b>References on p51 &amp; p86:</b></p> <p>Thames Water has published a "Revised draft Water Resources Management Plan 2019" and updates to it.</p>  |

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|   |                       |              | <p>Southern Water has published a final "Water Resources Management Plan 2020–70" South East Water has published a final "Water resources management plan 2019".</p> <p>SES Water has published a "FINAL Water Resources Management Plan 2019"</p> <p>Page 206 - Appendix A: Sustainability Objectives – To promote sustainable use of water resources and improving the quality of water bodies should one of the key sustainability objectives. Water resources and water quality are often forgotten because these issues are excluded when listing main objectives.</p> <p>Page 195 - 15.43 <i>The EU Water Framework Directive establishes a framework for the protection of inland surface waters (rivers and lakes), transitional waters (estuaries), coastal waters and groundwater. The government has stated that the environmental protections arising from this and other EU legal instruments will remain in place after the UK leaves the European Union, and the 2018 '25 year Environment Plan' has announced the intention to improve 'at least three quarters of our waters to be close to their natural state as soon as practicable'</i><sup>138</sup>. <i>The council supports this work through the proper and sensible management of water in all new development.</i></p> <p>It is encouraging that the council supports protection of the water environment although this needs to be reflected further in the objective SD1 of the draft Local Plan.</p> <p><b>Suggested Modifications:</b></p> <p><b>Flood Risk</b></p> <p>Due to the flood risk that exists within Crawley and the constraints in terms of available land for future development, ensuring that there is suitable and robust Policy to ensure that flood risk is suitably assessed and managed is essential. The inclusion of specific Policy within the draft Local Plan and the Sustainability Appraisal (SA) in relation to flood risk is noted and welcomed. The SA highlights that without specific local Policy related to flood risk management, National Policy and guidance, as well as Environment Agency advice, would be followed. However, Crawley have recognised that having local Policy would better inform future development proposals in terms of flood risk, especially in the face of climate change. This is welcomed, we are supportive of Crawley's approach in the choice of Option 2 for Policy EP1.</p> <p>In terms of Policy EP2, the choice of Option 1 is also supported. This type of development can have a cumulative impact on flood risk, by providing specific guidance on smaller scale development it also offers those who wish to carry out, for example, householder extensions in flood risk areas, clear guidance on how to approach making an application.</p> <p>We hope you find our comments useful. If you have any queries please do not hesitate to contact me.</p> |
| REP/068   | Sussex Wildlife Trust | SA/SEA       | SWT encourages CBC to ensure that the parameters that it intends to use to assess the impacts of the plan are effective in what they are trying to measure. We suggest they look at the effectiveness of these measures in   |

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|   |                                  | Sustainability Appraisal/ Strategic Environment Assessment | <p>relation to the last iteration of the Local Plan and Sustainability Appraisal to consider whether the sustainability predictions the previous SA came to fruition in terms of impacts on the sustainability objectives. There will be a clear impact on the natural environment from development coupled with a clear focus on the need for planning to deliver net gains to biodiversity. CBC need to ensure they have a sufficient evidence base in place and effective monitoring of targets to demonstrate how this net gain has been achieved. Do CBC think the Sustainability appraisal has gone far enough to address the impacts of development on quality of biodiversity as well as quantity?</p> <p>We hope our recommendations are adopted to ensure that the policies within the Crawley Local Plan are as robust and effective as possible. SWT would be happy to discuss any of the above points with CBC. We do wish to attend the Examination in Public to ensure our views are given due consideration</p>  |
| REP/ 055  | Savills on behalf of Wilky Group | SA/SEA Pages 111 and 296-297                               | <p><b>Introduction</b></p> <p><b>Background</b></p> <p>This representation is submitted on behalf of the Wilky Group (TWG or Wilky), which has a long-standing interest in the promotion of strategic employment land within the Crawley Borough Council (CBC) area. It relates to the Sustainability Appraisal / Strategic Environmental Assessment (SEA)<sup>1</sup> that provides one of the key documents that support the Draft Crawley Borough Local Plan, 2020 (DCBLP).</p> <p>TWG owns about 63.3 ha (149 acres) of land east of Gatwick Airport and north and south of the M23 spur road between Junctions 9 and 9a. The land south of the M23 spur road is being promoted by TWG as a strategic employment opportunity known as Gatwick Green (the Site). The Site is identified on the plan at Appendix 1, which shows the extent of the Gatwick Green opportunity, comprising about 59 ha (146 acres).</p> <p>Wilky and Aberdeen Standard Investments are discussing how they can work together in respect of Wilky's strategic landholding adjacent to Gatwick Airport to bring forward an integrated mixed-use development and co-ordinated infrastructure solution.</p> <p><b>Executive Summary</b></p> <p>TWG has submitted substantive representations on the DCBLP in relation to its land interests east of Gatwick Airport and Balcombe Road to the north of Crawley (59 ha). Its case is primarily concerned with the approach in the DCBLP to safeguarding land for future growth of the airport, the proposal to designate the formerly safeguarded land for the North Crawley AAP and the short and long term approach to identifying land for strategic employment contained in Policies EC1 (Sustainable Economic Growth) and SD3 (North Crawley AAP).</p> |

<sup>1</sup> Sustainability Appraisal / Strategic Environmental Assessment, Draft Report for the Submission Local Plan, Crawley Borough Council, January 2020

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|  |                   |                     | <p>TWG considers that there is no legal or national policy basis to safeguard land for a second runway at Gatwick and consequently the unmet planning and socio-economic needs of the Borough can be accommodated through the identification of land. Runway capacity has been provided for at Heathrow to meet forecast demand, alongside the expansion of other airports based on their existing runway infrastructure. National policy on aviation and airports therefore no longer requires any safeguarding at Gatwick, so TWG fully supports the removal of blanket safeguarding in the DCBLP.</p> <p>The NPPF requires Local planning Authorities to place significant weight on supporting sustainable economic growth by, inter alia, identifying strategic sites for inward investment to accommodate business needs and wider opportunities. Regional and sub-regional economic policy support focusing growth at Crawley/Gatwick in recognition of the area's current role and future potential. Importantly, the evidence base for the Local Industrial Strategy, which planning policy should reflect, supports the identification of major economic development adjacent to Gatwick, identifying land east of the Airport in this regard.</p> <p>TWG supports the policy to identify land for strategic employment and other needs via an AAP for north Crawley, but has put forward evidence that the unmet economic needs of the Borough are higher than noted in policy. In recognition of this and having regard to the removal of blanket safeguarding, evidence has been put forward to support the identification of Gatwick Green for strategic employment to meet the long-standing and urgent unmet needs of the area. Gatwick Green is immediately available to address the short term shortfall of employment land.</p> <p><b>Sustainability Appraisal / Strategic Environmental Assessment</b></p> <p>There is a statutory duty under section 19 of the Planning and Compulsory Purchase Act 2004 to carry out a sustainability appraisal of each of the proposals in a Local Plan during its preparation. One of the requirements of the Strategic Environmental Assessment (SEA) Regulations is to include an assessment of any reasonable alternatives, taking into account the objectives and the geographical extent of the plan or programme. The DCBLP SEA contains such as an assessment in relation to the alternative options in relation to safeguarding and Policy SD3 which it replaces.</p> <p>TWG broadly supports the findings of the SEA – however, a review of the SEA in relation to safeguarding and Policy SD3 has identified some further considerations that need to be recorded. Insofar as the SEA does not assess the Gatwick Green strategic employment opportunity, an assessment has been undertaken that shows that the site has a more positive sustainability profile compared with that for the AAP area as a whole.</p> <p><b>Review of the SEA</b><br/> <b>SEA of the North Crawley AAP (Policy SD3)</b></p> |

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|   |            |              | <p>The SEA contains a sustainability appraisal of the North Crawley AAP area (Policies EC1 and SD3) against nine sustainability assessment criteria. This concludes that the AAP area is assessed as offering possible significant positive impacts against 1 criteria, possible positive impacts against 6 criteria and 1 possible negative impact. The assessment concludes as follows:</p> <p><i>“...land identified for the AAP represents the most sustainable location for strategic employment growth in Crawley. It is a large area of land take, and some areas within the broad identified area will be more sustainable than others – this will be assessed further through the work on the AAP. It would enable highly sustainable, high quality new development to complement and deliver linkages with the existing residential and business communities.”</i></p> <p>The findings of the SEA are supported. However, there is one possible negative impact related to the potential for negative impacts against the criterion to “Conserve/ Enhance Biodiversity and Landscape” – whilst there may be some negative effects from development, it is considered that the need to provide mitigation and/or compensation, especially under the net biodiversity gain policy in the NPPF (and soon to be mandated in the Environment Bill) will ensure that effects relating to this criterion would be neutral to positive.</p> <p><b>SEA of safeguarded land</b></p> <p>The SEA contains an assessment of four policy options for safeguarding namely (1) to retain safeguarding, (2) to remove safeguarding but do not designate an AAP, (3) safeguard part of the area, or (4) designate land north of Crawley’s built up area, south and east of Gatwick Airport for an AAP.</p> <p>For option 1 (safeguard land), the Council’s analysis correctly identifies a large number of negatives against the nine assessment criteria, principally from the significant level of socio-economic needs across the Borough that would remain unmet. The Council considered that option 2 (remove safeguarding) would lead to some negatives resulting from the ad hoc approach to allocating land for development in the absence of the comprehensive evidence base to address the scale and spatial distribution of development allocations. The Council considered that option 3 (safeguard part of the area) was untenable in that the needs of the Airport are unknown, so would result in uncertainty over the land available for other land uses.</p> <p>The Council therefore favoured option 4 as it had a number of positives against the nine assessment criteria: it provided for an interim policy arrangement whereby the blanket safeguarding in the adopted CBLP could be removed and replaced by an AAP designation under Policy SD3 that would allow the potential future growth needs of the Airport to be properly considered alongside other development needs in Crawley.</p> <p>The SEA has informed the Council’s decision to remove blanket safeguarding, but defer a final decision on the need for any safeguarding to an AAP. TWG support this approach, but considers the corollary to be some further delay in addressing the unmet needs of the Borough with some negative consequences. The</p> |

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|   |            |              | <p>consequences include the continuation of tight restrictions on development in the AAP area with the consequent perpetuation of planning blight and ongoing uncertainty with regard to meeting the Council's unmet needs. Further, the Inspector for the 2015 CBLP EiP found that the unmet needs of the Borough must be addressed within five years (i.e. by 2020): the departure from this advice is not an ideal outcome in the context of the NPPF requirement to plan positively for growth and meet objectively assessed needs. Nevertheless, TWG accepts the findings of the SEA and ultimately agrees with the soundness of the proposed AAP approach.</p> <p><b>SEA for Gatwick Green</b><br/> The SEA does not contain a suitability assessment (SA) for the Gatwick Green site because the DCBLP is not identifying sites to meet Crawley's unmet employment land needs, instead deferring such to the proposed North Crawley AAP. Savills has therefore undertaken a high-level sustainability assessment of the Gatwick Green site using the same methodology as adopted in the Council's SEA. The Gatwick Green SA is contained at Appendix 2 to this representation. It demonstrates that the site has a sustainability profile that is more positive than that for the whole AAP area: this provides clear evidence that the Gatwick Green site is a highly accessible location and can be developed in a very sustainable manner consistent with national planning and environmental policy.</p> <p><b>Appendices were sent by email dated 2/3/20 and are attached separately.</b></p> <p><b>Conclusion</b><br/> In order to provide a profile of the relative sustainability of the Gatwick Green site compared with the AAP area as a whole, an evaluation has been undertaken using the same approach and method adopted in the Council's SEA. The site has therefore been assessed against the nine Sustainability Objectives taking account of the assessment criteria as set out in the SEA.<br/> The strategic environmental assessment of Gatwick Green has demonstrated that the site offers the capability to meet the identified need for strategic, high-quality employment space in Crawley to serve the wider region in a highly sustainable manner. It would enable highly sustainable, high-quality new development to complement Manor Royal and the Airport and deliver important linkages with the existing residential and business communities in the Borough. Overall, the site has the following attributes: limited environmental and landscape values; significant opportunities for biodiversity gain; an opportunity to rebalance the local economy and reduce out-commuting; contribute towards the quality of the built environment; provide sustainable transport modes that benefit the wider area; deliver socio-economic benefits; minimise impacts on climate change, but build in resilience to the same; deliver sub-regional economic objectives, and incorporate innovative infrastructure to provide local benefits.</p> |

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|   |                 |                          | These attributes largely arise from the size, location and high profile of Gatwick Green, which means it has a higher sustainability profile than the Area Action Plan area as a whole. It therefore provides the opportunity for a strategic employment location which can be brought forward efficiently and sustainably to deliver significant socio-economic benefits to communities across Crawley and Reigate and Banstead in the event that the proposal for an AAP in the DCBLP is not adopted.   |
|   |                 |                          | <p><b>Suggested Modifications:</b></p> <p><b>Conclusions</b></p> <p>In conclusion, the findings of the SEA are supported, but subject to the following conclusions with regard to the assessments in relation the proposed North Crawley AAP under Policy SD3, safeguarding for airport expansion and with regard to proposed strategic employment development at Gatwick Green:</p> <ol style="list-style-type: none"> <li>1. In relation to the AAP, the SEA identifies a possible adverse effect related to the potential for negative impacts on the aim to conserve / enhance biodiversity and landscapes. Whilst there may be some negative effects from development, it is considered that the need to provide mitigation and/or compensation under the net biodiversity gain policy in the NPPF will ensure that overall, the effects would be neutral to positive.</li> <li>2. In relation to safeguarding, the SEA supports the decision to remove blanket safeguarding from the DCBLP, but TWG considers on balance that the AAP designation whilst sound, is a less than optimal policy response given the potential negative consequences associated with any delay in allocating land for strategic employment.</li> <li>3. A high-level sustainability assessment of the Gatwick Green site has concluded that it has a sustainability profile that is more positive than that for the AAP area as a whole: this provides clear evidence Gatwick Green represents a strategic opportunity that can be developed in a very sustainable manner consistent with national policy.</li> </ol> |
| REP/069   | Natural England | Sustainability Appraisal | <p>Planning consultation: Submission draft Crawley Local Plan (Regulation 19)</p> <p>Natural England has reviewed the Crawley Local Plan Regulation 19 and accompanying appendices together with the Habitats Regulations Assessment (HRA) and Sustainability Appraisal (SA). Please note that we have not provided comments on all policies but those that are within our remit. Natural England has no comment to make on the policies not covered in this response. We agree with the findings in the Sustainability Appraisal and Habitats Regulation Assessment. We have no further comments in relation to this submission.</p>   |

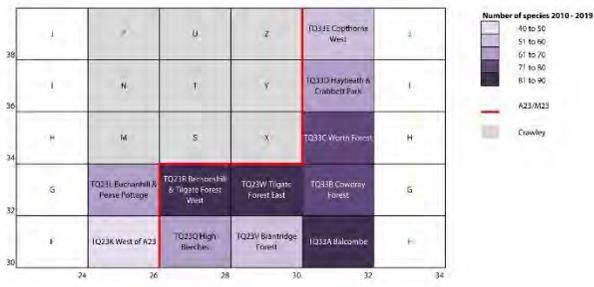
| Infrastructure Plan |  |                     |  |
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| REP/032             | West Sussex County Council               | Infrastructure Plan | <p><b>These comments relate to the Infrastructure Plan – for information</b></p> <p><b>Page 14 ‘Current Findings’ seventh bullet:</b> should be amended to reflect the expansion of Ifield Community by 1FE from 2020 and so lowering the overall demand</p> <ul style="list-style-type: none"> <li>• A site for a <del>8-10</del> <b>6-8</b> FE secondary is therefore required going forward. Due to the lack of an identified site in Crawley ....</li> </ul> <p><b>Transport – Road (page 32) Evidence base:</b> reference to the signalisation of Bewbush Manor Roundabout is not mentioned in this section</p>   |
| REP/050             | Montagu Evans on behalf of Homes England | Infrastructure Plan | <p>Homes England acknowledge the updates made to the Draft Infrastructure Plan since comments made under Regulation 18. It must be acknowledged that the total infrastructure requirement to mitigate development at Land West of Ifield is yet to be fully determined. Requirements to mitigate impact will be determined as masterplanning advances and the scheme is subject to planning and environmental assessment. This will also include engagement with relevant statutory consultees and service providers to ensure that infrastructure requirements are planned with foresight of longer-term ambitions and the wider strategic opportunity that exists West of Crawley.</p> <p>Under the section covering Transport and Bus Provision, Homes England consider that there should be explicit reference under the ‘Future Studies and Plans’ section that references the intent to support upgrades of the busway in accordance with expected growth.</p> <p>Homes England are committed to sharing updates at the earliest possible stage.</p> |

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| REP/022                         | Sussex Ornithological Society | Habitat Regulations Assessment Screening Report | <p>The SOS recognises that England needs new houses and we are not challenging the assumptions behind the numbers needed, as that is not our expertise.</p> <p>However, we do feel well qualified to speak out when we can see that proposals are being put forward that would result in houses being built in areas that are of particular importance to birds of conservation importance, as that would harm them.</p> <p>In this respect our issue with the Crawley Local Plan 2020-2035 is not where it is intended to build 5355 houses within the Crawley Borough Council boundary in the plan period (although we do have concerns about one of these proposals, see 20(b) below) but the assumptions that lead to the conclusion that 5925 houses cannot be built in Crawley, but will have to be built by neighbouring Local Authorities under the Duty to Cooperate obligations – and Crawley’s assumptions that these dwellings must be built as an urban extension adjacent to Crawley’s boundaries.</p> <p>Why is there a fundamental assumption that Crawley will not fulfil their housing supply target by building new homes at a high enough density so as to enable all 11,280 to be built within their boundary? Put simply if the average new home in this Local Plan is going to be two and a half stories high so that only 47 % of them can be built in Crawley, then if they were five stories high all 11,280 dwellings could be built in Crawley instead. And the taller you build some dwellings the lower the residual dwellings would need to be.</p> <p>No attempt appears to have been made to consider building at sufficiently high densities to achieve this – <b>instead the assumption appears to be that it is essential that the current character of Crawley is maintained without considering what the implications of that assumption on the proposed overflow areas are.</b> In other words the impact on the characteristics of adjoining local authorities does not appear to have been considered.</p> <p>We strongly object to the assumptions that most of the 5925 overflow dwellings must be built as an urban extension of Crawley Borough – i.e. on land adjacent to Crawley - as that assumption will have a very serious impact on scarce birds of conservation concern, as well as wider adverse biodiversity impacts if any of this overflow is built on the High Weald AONB</p> <p>The inference of the 5925 overflow is that Crawley is full and that there will never be space within its boundaries to ever again build any more dwellings. It would follow from this that future Local Plans will require that all Crawley’s future needs for new dwellings will have to be met by adjoining Local Authorities.</p> <p>We simply do not believe that that is a valid scenario. On that basis there would never again be any new development of dwellings in many boroughs and cities across England, yet huge numbers of new dwellings are being built in many boroughs and cities across the UK where the density of population is already far higher than in Crawley.</p> <p>Instead what Crawley appear to envisage is that there will be an ever-increasing expansion of its urban area beyond its current boundaries, absorbing more and more of the West Sussex countryside in Horsham DC, and more and more of the High Weald AONB in Mid Sussex DC.</p> |

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|                                 |            |              | <p>We believe that Crawley must face up now to the need to build new dwellings at a sufficiently high density that it can deliver its future housing needs within its Borough Boundaries, and that it should fundamentally change its planning principles to achieve this. In particular we believe that none of its overflow should be built in the High Weald AONB. <b>The High Weald AONB along the east side of the M23/A23, immediately adjacent to the boundary of Crawley Borough, is one of the very best areas for woodland birds in all of Sussex, with significant numbers of Section 41, Schedule 1 and red-listed species of high conservation concern recorded using this area in the last 10 years. For this reason SOS objects to any proposals by Crawley to destroy parts of the AONB by insisting that overflow dwellings are built on it, and that urban Crawley extends into it.</b> Appendix 1 gives details of bird species of conservation concern that are found in this area.</p> <p>Crawley's proposals for urban extensions into Mid Sussex DC suggest that it is acceptable for the character of part of the High Weald AONB to be substantially destroyed in order to accommodate Crawley's overflow. We do not accept that part of the High Weald AONB should be destroyed just because Crawley do not wish to consider building homes at a higher density. What is the justification for this?</p> <p>Moreover the planning system provides high levels of protection from development to Areas of Outstanding Natural Beauty, alongside National Parks. As the High Weald AONB Management Plan 2019 states (P20, Planning and AONB's)</p> <p><i>The National Planning Policy Framework (NPPF), Paragraph 172, requires that:</i><br/> <i>"Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to these issues. The conservation and enhancement of wildlife and cultural heritage are also important considerations in these areas, and should be given great weight in National Parks and the Broads. The scale and extent of development within these designated areas should be limited. Planning permission should be refused for major developments other than in exceptional circumstances....."</i></p> <p>The southern part of Crawley, south of the A264, lies within the High Weald AONB. Crawley's Local Plan has not allocated any of this area for development (other than to allocate a reserve site for 10 Gypsy and Traveller pitches, if needed) and (commendably) Crawley appear to be paying particular attention to protecting the part of the AONB that lies within their boundary. Yet they assume it will be OK to plan for a substantial urban extension of circa 1000 dwellings in the Mid Sussex portion of the AONB. The logic of this is not apparent!</p> <p>Moreover, since there is no recognition of the need to change planning principles the implication is that more and more of Crawley will extend into the AONB in future Local Plans.</p> <p>Against this background we would make the following specific comments about the Crawley Local Plan 2020-2035.</p> |

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|                                 |            |              | <p><b>Suggested Modifications:</b></p> <p>We note that a further investigation is being carried out to assess the “in Combination” affects on European designated sites outside the Borough Boundaries, to reflect increased levels of development and resulting increased levels of traffic. We have no other comments to make on the HRA Screening Report.</p> <p>We recognise that Crawley have many factors and opinions to consider in the preparation of this Local Plan. We are very happy to work with you in any way that we can to help.</p> <p style="text-align: center;"><u>SOS concerns about potential housing overflow into The High Weald AONB</u></p> <p>The Sussex Ornithological Society is very concerned to note that Crawley are proposing that there should be “urban extensions” in Mid Sussex in order to deliver part of the 5925 overflow of dwellings that they do not propose be built within the Borough Boundaries. This appears to open up the possibility of further development in or close to the woodland and farmland from Bensonhill and Highbeeches Forest in the west to Worthlodge Forest in the east in order to accommodate housing which Crawley Borough has to build, but which they feel cannot be constructed within the Borough boundaries.</p> <p>This area lies within the High Weald Area of Outstanding Natural Beauty (AONB). Although it is protected both by policies LC5 and LC6 of the Crawley Local Plan and by policy DP16 of the Mid-Sussex District Plan 2014-2031, development has already been allowed in this part of the AONB at Parish Lane, Pease Pottage.</p> <p>The SOS is of the view that in order to maintain already depleted levels of bio-diversity, any further development of land in the area in this area of the AONB, lying within the arc bounded to the north by the minor road running from Turners Hill to Crawley via Compasses Corner, and to the west and north-west by the M23 and A23, should not be contemplated.</p> <p>Although much of the woodland is private and bird survey work has been constrained, fieldwork from public rights of way and through permission to enter private land has demonstrated that the mixed deciduous and coniferous woodlands in the area are home to an unusually rich variety of birds, comparable in diversity and value to Ashdown Forest and other protected landscapes. The diagrammatic map in Figure 1 below shows the number of species recorded by 2km squares (tetrads) using the Ordnance Survey grid reference system. It will be seen that in five of these tetrads 70 to 90 bird species have been recorded in the last ten years.</p> |

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|          |            |              | <p>Sussex Ornithological Society - Figure 1</p> <p>CRAWLEY OVERSPILL AREA - NUMBER SPECIES RECORDED</p>  <p>(In figures 1 and 2 the M23/A23 is diagrammatically shown as a red line as its route is close to the grid references shown)</p> <p>Figure 2 shows how many of the species in Fig 1 are Red-listed, Schedule 1 or Section 41 species, and again the same five tetrads contain a high proportion of these uncommon or vulnerable species (see notes below for an explanation of these conservation designations).</p> <p>To give some detail: these forests contain three or more breeding pairs of Goshawk <i>Accipiter gentilis</i> and two of Honey-buzzard <i>Pernis apivoru</i>, which are both very scarce and local breeding species in Sussex, Goshawk with an estimated 18 breeding pairs in 2019 and Honey-buzzard with seven breeding pairs in 2019. Both are Schedule 1 species and Honey-buzzard is also an amber-listed species. These birds are susceptible to disturbance and require large areas of mixed forest and farmland in which to breed.</p> |

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|          |            |              | <p>Sussex Ornithological Society - Figure 2</p> <p>CRAWLEY OVERSPILL AREA - NUMBER OF RED LISTED/SCHEDULE 1/SCHEDULE 41 SPECIES RECORDED</p> <p>Also of particular concern is the presence in these forests of Lesser Spotted Woodpecker <i>Dryobates minor</i> (Schedule 41 and red-listed). This species has declined very severely in recent decades, and locally might be in danger of extinction in Sussex.</p> <p>Other breeding species of concern include Woodcock <i>Scolopax rusticola</i> (a severely declining red-listed species), Common Redstart <i>Phoenicurus phoenicurus</i> (amber-listed and here at the highest densities in Sussex outside Ashdown Forest), Spotted Flycatcher <i>Muscicapa striata</i> (Section 41 and red-listed), Hobby <i>Falco Subbuteo</i> (Schedule 1), Common Crossbill <i>Loxia curvirostra</i> (Schedule 1) and Yellowhammer <i>Emberiza citrinella</i> (Section 41 and red-listed). The red-listed Grey Wagtail <i>Motacilla cinerea</i> breeds along woodland streams and the severely declining Cuckoo <i>Cuculus canorus</i> and Marsh Tit <i>Poecile palustris</i> (both Section 41 and red-listed) also breed. Woodlark <i>Lullula arborea</i> (Schedule 1 and Section 41) sometimes breeds, depending on the stage of management of plantations. Tree Pipit <i>Anthus trivialis</i> (Section 41 and red-listed) has occurred and may breed. The adjacent farmland is of value to both breeding and migrant birds, including breeding Skylarks <i>Alauda arvensis</i> (Section 41 and red-listed). In winter the forests are an important feeding and/or roosting area for finches, and can hold three figure flocks of Brambling <i>Fringilla montifringilla</i>, Chaffinch <i>Fringilla coelebs</i> and the red-listed Lesser Redpoll <i>Acanthis cabaret</i>.</p> <p><u>Notes on conservation designations</u></p> <p>1. The UK's leading bird conservation organisations have worked together to review the status of birds in the UK, Channel Islands and Isle of Man and the latest results are published in Birds of Conservation Concern 4. The bird species that breed or overwinter were assessed against a set of objective criteria to be placed on the Green, Amber</p> |

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|                                 |                                    |  | <p>or Red list. Green-listed species are of least conservation concern, amber-listed species are of medium conservation concern and red-listed species are of high conservation concern.</p> <p>2. Schedule 1 of The Wildlife and Countryside Act 1981 contains a list of 83 species of birds which enjoy extra protection. It is an offence to intentionally or recklessly disturb Schedule 1 bird species at, on or near an 'active nest'.</p> <p>3. Section 41 of the Natural Environment and Rural Communities (NERC) Act 2006 lists 949 species of all taxa (including 49 species of bird) whose conservation is of principal importance for the well-being of biodiversity in England. Section 41 species are the only ones considered under the criteria for designating SSSI's and there must also be evidence of the presence of some Section 41 species when designating Sussex LWS's.</p>   |
| REP/058                         | Reigate & Banstead Borough Council | Habitats Regulations Assessment Screening Report | <p><b>Habitats Regulations Assessment Screening Report</b></p> <p>RBBC recognises that for the 2015 Local Plan, evidence was gathered to demonstrate that the possible effects of the local plan would not have a significant impact either on their own or "in-combination" with other plans on the three European Sites within 15km of CBC. We understand that due to the findings of the Lewes and South Downs Joint Core Strategy 2017 Legal Challenge in relation to how "in-combination" effects are considered that CBC will do further work to understand the possible impacts on the European sites arising from the Regulation 19 Crawley Borough Local Plan and "in-combination" with other plans.</p> <p>We hope that you find these comments helpful. Should you have any queries, please do not hesitate to contact us. We are very happy to discuss any of the points raised above in more detail.</p> <p><b>Suggested Modifications:</b></p> <p>We suggest that when considering the findings of the 2015 Habitats Regulations Assessment Screening Report, consideration is given to the 'People over Wind' judgement<sup>1</sup> which clarified that when making screening decisions for the purposes of deciding whether an Appropriate Assessment is required, competent authorities cannot take into account any mitigation measures.</p> <p>We note that Paragraph 5.6 states that "the following authorities have considered/ are considering the Habitat Regulation Assessment requirements as part of their plan-making processes in light of the legal judgement in relation to the "in-combination" effects ..." As part of the preparation/ examination of our DMP, we also took into consideration "in-combination" effects. We then undertook an Appropriate Assessment which included consideration of the potential changes in air quality from the "in-combination" effects on predicted traffic. It then assessed mitigation measures to protect the foraging habitat referred to as a 'functional linkage' of Bechstein's bats surrounding the Mole Gap to Reigate Escarpment SAC. The Appropriate Assessment concluded that the DMP</p> |

<sup>1</sup> Case C-323/17 People Over Wind and Peter Sweetman v Coillte Teoranta ('People Over Wind')

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|                                 |                             |  | would not result in any adverse effect on the integrity of any European designated site within 15km of the borough boundary either alone or “in-combination” with other local authorities.   |
| REP/066                         | Mid Sussex District Council | Habitat Regulation Assessment Screening Report | <p>Mid Sussex is concerned about the conclusions reached in the HRA Screening Report and considers that further work is required to ensure that the Plan is <b>sound</b>.</p> <ul style="list-style-type: none"> <li>• Paragraph 4.8-4.9 (air pollution) –New homes and employment are being planned by Crawley Borough Council. The distance of 10km from the borough’s boundaries is not a relevant consideration. Mid Sussex Council have undertaken transport modelling, air quality modelling and then ecological interpretation to assess the potential air quality impacts on the Ashdown Forest SAC to support the preparation of the District Plan and Site Allocations DPD.</li> <li>• The 1000 AADT is not the only factor that needs to be taken into account and in any case this needs to be an in-combination assessment (taking account of recent case law as acknowledged).</li> <li>• At paragraphs 5.7 to 5.10 reference is made to the transport modelling undertaken for the Mid Sussex District Plan. This information has been superseded by the Mid Sussex Transport Model (2019) which is a new transport model that has been prepared to support the preparation of the Site Allocations DPD. This new evidence should be taken into account.</li> </ul> <p><b>Suggested Modifications:</b><br/> <b>Change required:</b> In order to ensure the Plan is sound the Council should prepare the necessary evidence to conclude no adverse impact on the Ashdown Forest SAC habitat. It would be helpful to see some more recent and relevant correspondence from Natural England setting out their view on the likely significant effect on the Ashdown Forest SAC.</p> <p><b>Conclusion</b><br/> Mid Sussex is committed to continuous and close co-operation and joint working and welcomes the opportunities to work on an ongoing basis to address unmet development needs and we will use the well-established joint working arrangements in place, to address these outstanding issues.</p> |
| REP/069                         | Natural England             | Habitats Regulations Assessment                | <p>Dear Sir/Madam,<br/> Planning consultation: Submission draft Crawley Local Plan (Regulation 19)<br/> Thank you for your consultation on the above dated 20 January 2020 which was received by Natural England on 20 January 2020<br/> Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.</p>  |

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|  |                   |                     | <p>Natural England has reviewed the Crawley Local Plan Regulation 19 and accompanying appendices together with the Habitats Regulations Assessment (HRA) and Sustainability Appraisal (SA). Please note that we have not provided comments on all policies but those that are within our remit. Natural England has no comment to make on the policies not covered in this response.</p> <p>We agree with the findings in the Sustainability Appraisal and Habitats Regulation Assessment.<br/>We have no further comments in relation to this submission.</p> |