

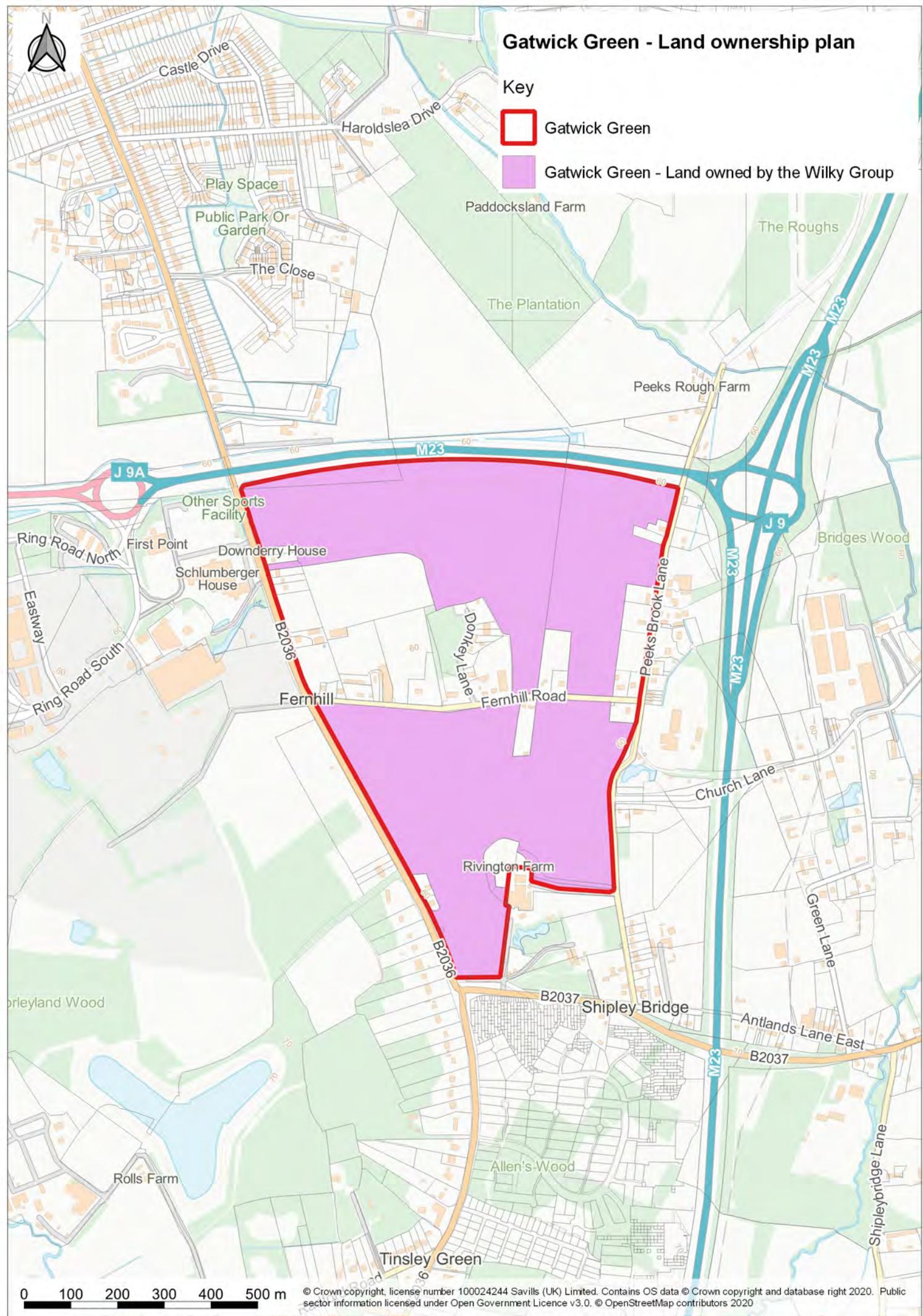
Gatwick Green - Land ownership plan



Key

Gatwick Green

Gatwick Green - Land owned by the Wilky Group



Appendix 2

The Past approach to Safeguarding

- 1 It is worth understanding the history of safeguarding at Gatwick Airport and the premise on which it was based. In the political and national policy context which prevailed at the time the Crawley Core Strategy (2007) and the CBLP (2015) were adopted, Government policy was that land should be safeguarded for additional runway capacity; this was embodied in Core Strategy Policy G2, which was superseded by Policy GAT2 in the adopted CBLP. A number of policy documents prevailed as outlined below.
- 2 The now withdrawn PPG 13 Annex B (2001) contained no guidance on safeguarding, instead noting that for the purposes of determining planning applications and defining planning policy, LPAs should consider the extent development is related to the operation of the airport. It went on to define operational needs (e.g. terminals); related development (e.g. airport car parking), and less directly related development (e.g. hotels / offices) which should be justified by their relationship to airport related businesses and appropriate in scale relative to core airport uses.
- 3 The now revoked Air Transport White Paper (ATWP, 2003) noted that if conditions attached to construction of a third runway at Heathrow could not be met, and as there was a strong case for a second runway at Gatwick after 2019, land should be safeguarded for this. The ATWP contained a plan that showed proposed Safeguarded Land at Gatwick extending east of Balcombe Road based on a second wide-spaced runway.
- 4 The Guidance on the Preparation of Airport Master Plans (2004) contains guidance on safeguarding and remains extant. The guidance states that master plans should identify long-term land requirements for future airport development and whether these require changes to airport boundaries. Such additional land should be clearly identified to minimise long-term uncertainty and non-statutory blight.
- 5 The above guidance and planning policy formed the backdrop to the identification of the Safeguarded Land in Gatwick Airport's Master Plans of 2005¹ and 2006². In turn, these informed the Safeguarded Land boundary in the Core Strategy (2007).
- 6 Following adoption of the Core Strategy, the first iteration of the National Planning Policy Framework (NPPF, 2012) emerged, which required that the extent of any safeguarding should be justified by 'robust' evidence that sites or routes are 'critical' to providing the infrastructure (this remains unchanged in the current NPPF (2019)). This guidance was reiterated in the Aviation

¹ Gatwick Airport Outline Master Plan, Draft for Consultation, BAA, March 2005

² Gatwick Airport Interim Master Plan, BAA, July 2006

Policy Framework (APF - 2013), but critically this was qualified in the following way: “*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*” (Savills emphasis). This qualification time limited the need for safeguarding to the release of Government policy on aviation. In effect, the need for safeguarding was retained only whilst a policy vacuum existed.

- 7 Whilst the NPPF (2012 – para 41) embodied in planning policy the need to consider safeguarding land for future infrastructure previously contained in the ATWP (in relation to airports), it did so with the pre-requisites relating to ‘robust’ evidence and that such land was ‘critical’ to the provision. Subsequently, the APF (2013) reinforced the need for safeguarding, but only until the Government had released its final aviation policy in response to the findings of the Airports Commission. The CBLP (2015) was prepared in this context and at the time of its Examination, the Airports Commission had not reported, so the guidance in the APF and NPPF prevailed. The Inspector therefore confirmed that Policy GAT2 and the Safeguarded Land boundary were sound. The Safeguarded Land area in the adopted CBLP (2015) is similar to that in the Core Strategy, but was adjusted to reflect the boundary shown in the 2012 Airport Master Plan³.
- 8 Based on this assessment of past national policy and guidance, the principle of safeguarding land for the second runway at Gatwick remained a sound approach at that time until the future of aviation had been decided through the Airports Commission process. However, this is no longer the case, as explained in the principal representations on behalf of by TWG on Chapter 10 (Gatwick Airport) of the submission DCBLP (2020) and in further evidence from Mott MacDonald contained in Appendix 3 to that representation.

Crawley Borough Council’s past position on safeguarding

- 9 The evolution of CBC’s position on safeguarding since 2010 reveals that whilst it has paid heed to earlier Government aviation policy, it has over time aired its concerns over the impacts of safeguarding and justification for it in both principle and extent. This is set out in a number of planning Topic Papers on airport growth. The Topic papers can be summarised as follows:
 - **Topic Paper 9 (2010)** – Despite the Government’s decision (at that time) to proceed with expansion at Heathrow and Stansted, land must continue to be safeguarded for a second runway at Gatwick because this was policy in ATWP (2003) and because the South East Plan (Regional Spatial Strategy) had a policy requiring land to be safeguarded.
 - **Topic Paper 9 (2012)** – This noted that the Government was preparing a UK Framework on Aviation, but that in the meantime, the ATWP remained extant policy including

³ Gatwick Airport Master Plan, GAL, July 2012

safeguarding land at Gatwick Airport. However, the Topic Paper considered what the position might be in the context of the UK Framework on Aviation stating that "*It is felt that there needs to be discussion, if it is concluded that a second runway at Gatwick is not currently required, about whether it may be prudent to safeguard land on a very long term basis to retain it as a future option even if it is not needed now*". The Council was clearly acknowledging that in the event that a second runway is not currently required, it would need to look closely at whether safeguarding land on a very long term basis was prudent.

- **Topic Paper 1 (2014)** – This Topic Paper informed the EiP on the CBLP. It was issued following the publication of the APF in 2013 which contained generic advice on the need for safeguarding at airports and which also led to the revocation of the ATWP (containing the specific requirement to safeguard land at Gatwick), but in advance of the decision of the Airports Commission on runway capacity. The Paper put forward three scenarios (1) that a second runway is promoted by Government, (2) that a second runway is not supported and safeguarding at Gatwick is lifted, and (3) that a second runway is not supported, but that safeguarding at Gatwick should remain.
- 10 In relation to Topic paper 1, the aviation policy-vacuum meant that a second runway at Gatwick remained a possibility in aviation policy terms, so the Council retained safeguarding in its Local Plan. This position was reinforced by the Inspector at the CBLP Examination in 2015 in which he confirmed that land north of Manor Royal and east of the Airport were the preferred locations for strategic employment to complement the existing provision at Manor Royal and the Airport utilising established transport connections and infrastructure and that "*there is no realistic prospect of bringing this land forward in advance of the Government's decision on airport expansion*". Topic Paper 1 provided the backdrop to the adopted CBLP: given that aviation policy was in a state of uncertainty in 2014/2015, safeguarding was retained in the adopted CBLP (2015).

Appendix 3

Employment Land Needs in Crawley

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Gatwick Green: Employment Land Need

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1. Introduction

1.1.1. Crawley Borough Council (CBC) published in January its Consultation Draft Local Plan 2020-2035 (hereon referred as draft Local Plan). This uses an updated evidence base that reviews the current and future need for employment land (B use). The updated study has been undertaken by Lichfields and was published in January 2020.

1.1.2. The NPPF states the following about the preparation or review of all policies.

“The preparation and review of all policies should be underpinned by relevant and up-to-date evidence. This should be adequate and proportionate, focused tightly on supporting and justifying the policies concerned, and take into account relevant market signals” (paragraph 31)

1.1.3. This appendix reviews the method and the results of this study to conclude on the future employment land need included in the draft Local Plan.

1.1.4. The appendix is structured as follows:

- Section 2 lists the main employment centres in Crawley and sets out the employment land need in the adopted and consultation draft plans.
- Section 3 reviews the method and results of the Northern West Sussex Economic Growth Assessment (EGA) Update.
- Section 4 focuses on the role of airports in local property markets.
- Section 5 provides a market update for B uses in Crawley and concludes on the employment land need.

1.1.5. This appendix concludes that Crawley should plan for at least 70.2 ha of employment land over the short term to address the historic under supply of employment land and pent-up unmet demand. This mean a minimum employment need over the short term of 58.2 ha after taking account of the 12 ha of total employment land already identified in the Employment Land Trajectory. This employment land can be provided in North Crawley, in particular at Gatwick Green, following the release of land previously safeguarded for a second runway at the airport. Given the extent of the unmet need, there is a case to consider the allocation of Gatwick Green in the short term to address these requirements. The strong viability characteristics identified in Appendix 5 to the representation on the Employment Land Trajectory means the site could come forward relatively quickly and at the necessary scale to meet current unmet market demand.

1.1.6. The proposed North Crawley AAP will address any justified needs of the airport alongside Crawley's other unmet socio-economic needs over the longer term related to meeting the requirements derived from the Borough's labour supply and identified in the EGA as 113 ha. It is considered that the labour supply-derived need should be treated as a minimum longer term need (policy-off) given that it takes no account of wider considerations as required by PPG, such as market signals, wider economic trends, the influence of the airport and regional economic policy objectives (policy-on). A longer-term need taking account of these considerations will need to be used to meet in full Crawley's objectively assessed housing and population growth requirements and improve Crawley's employment retention rate.

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- 1.1.7. The allocation of Gatwick Green can offer up to 58.7 ha of employment land and we believe it represents a suitable site of regional / nation significance in a location sought after by commercial investors and occupiers. Failure to plan positively can jeopardise the economic growth of the wider area due to Crawley's important position and affect the growth aspirations of the Coast to Capital (C2C) Local Economic Partnership (LEP), particularly as many other LEPs and Local Planning Authorities in other parts of England are seeking to bring forward major commercial investments in highly accessible locations nearby to airports.
- 1.1.8. This submission should be read in conjunction with Savills Regulation 19 representations on behalf of the Wilky Group and the Savills Gatwick Economic Development Area Market Analysis Report (November 2018) which was referenced in representations on behalf of the Wilky Group at the Regulation 18 stage.

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2. Crawley Local Plan

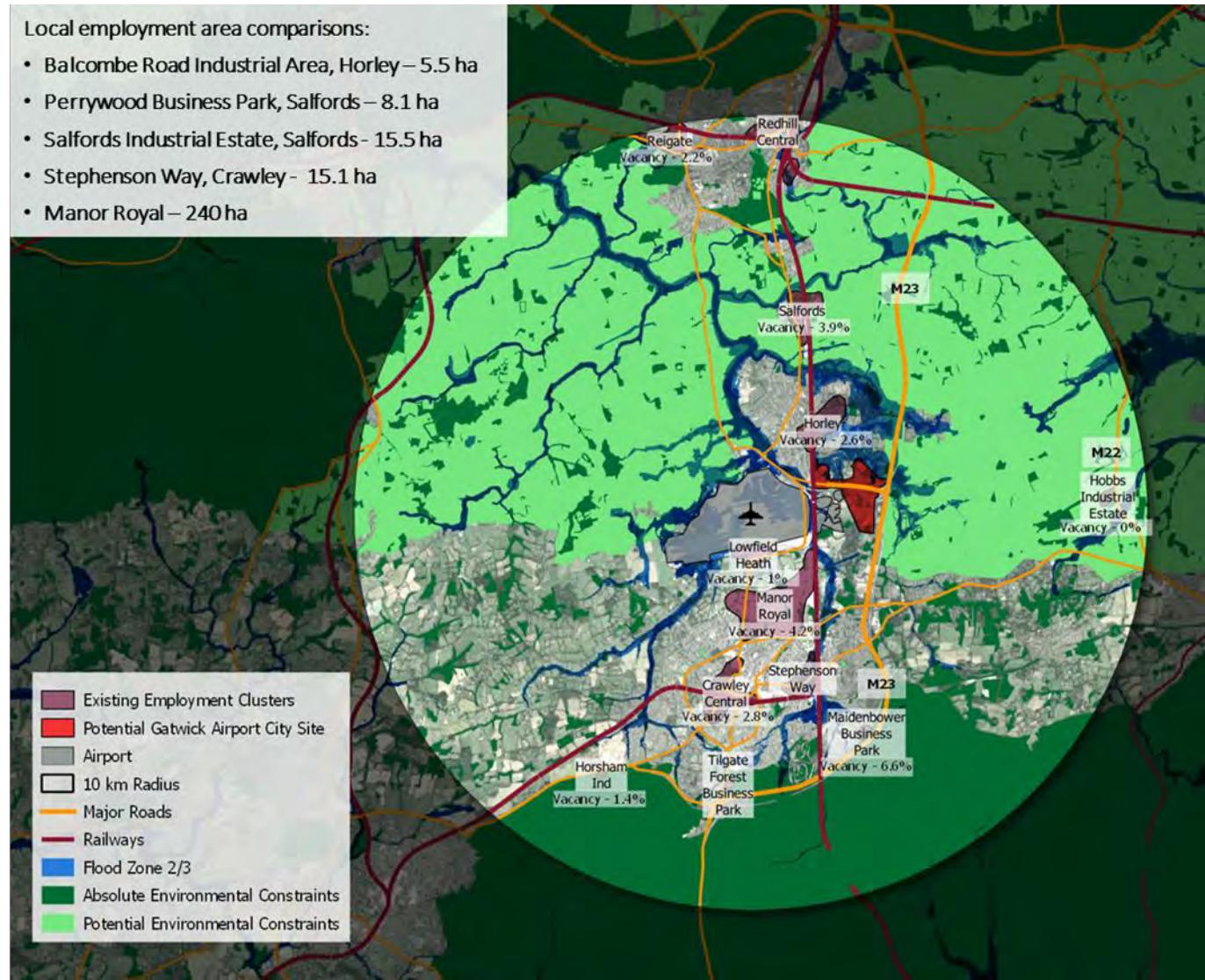
- 2.1.1. This chapter describes Crawley's main economic centres and comments on its employment land need.
- 2.2. Main Economic Centres**
- 2.2.1. The draft Local Plan identifies Gatwick Airport as one of the three key economic centres for Crawley alongside Manor Royal and Crawley Town Centre. Crawley's local economy depends significantly on Gatwick Airport with 75% of Crawley's employment being in distribution, hotels, transport, communications, banking and finance sectors which have strong links with airports. Gatwick Airport generates approximately 25,000 direct jobs accounting for 26.5% of the total jobs in Crawley. The draft Local Plan states that 26.9% the airport's employees are Crawley residents.
- 2.2.2. Manor Royal is identified in the draft Local Plan as one of the largest business parks in the South East region covering a total of 240 hectares and is home to more than 600 businesses and over 32,000 jobs. These account for 40% of Crawley's total number of jobs. Manor Royal provides 77% of Crawley's employment land and since its official naming in 1950, it has evolved and diversified its employment offer from its traditional manufacturing base. Manor Royal was the last major business park developed in Crawley and since 1950 it has replenished its stock without significant outward growth. However, the draft Local Plan suggests that there are still present opportunities in Manor Royal for employment land re-use and intensification to deliver net floorspace gains and support of Crawley's economic development. The draft Local Plan also supports minor extensions to manor Royal under Policy EC1, provided these don't prejudice the wider development of the AAP area: these sites would be very modest in scale and there is some uncertainty as to whether such sites will come forward.
- 2.2.3. The success of Manor Royal is testament to the benefits of its location nearby the airport and the M23. It attracts the highest average rents for better quality premises in the region, £23.20 per sqft for offices and £13.50 per sqft for industrial. It is one of the largest employment areas in the region as shown on **Figure 1** below. The Gatwick Green site is located in a more prominent and visible location with respect to the M23 and location directly adjacent to the Airport and Gatwick's rail station underpins its high level of connectivity, so underlining its strong viability as an employment location.

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Figure 1 Locally significant clusters of economic activity



Source: Wilky Group and the Savills Gatwick Economic Development Area Market Analysis Report, November 2018

2.3. Employment Land Need

- 2.3.1. In terms of employment land the adopted Local Plan (2015) identifies a significant shortfall of 35 ha of employment land with the identified land of 23 ha being sufficient only for the early part of plan period (2015-2030). The adopted Plan states that strategic growth could be constrained if additional land cannot be identified in Crawley.
- 2.3.2. For this reason, the adopted Local Plan makes provision for a thorough sequential assessment of employment site options once a final decision has been made by the Government on UK airport expansion and safeguarding. These options will focus first in the north of the Borough.

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- 2.3.3. The draft Local Plan (2020) post-dates the decision to build a third runway at Heathrow airport to meet the runway capacity needs of the South East until 2050. One of the main aims of the draft Local Plan is to identify enough employment land to support Crawley's economic growth in the short term, with the balance to be addressed in the North Crawley AAP. The evidence base, explained in detail below, identifies a minimum need for 33 ha of employment land with only 12 ha of this need being currently identified in the Employment Land Trajectory. This leads to a shortfall of 21 ha of employment land. For reasons set out in this paper, it is considered that the Council's land requirement significantly underplays the real need for new employment land in Crawley over the short term.
- 2.3.4. The draft Local Plan identifies the potential of addressing this shortfall by identifying land north of Manor Royal and east of Gatwick Airport for an AAP to be undertaken following adoption of the draft Local Plan. The Council commits to produce the North Crawley Area Action Plan (AAP) to address the above unmet needs and ensure airport development is properly considered alongside other needs. The proposed timing of the AAP will undoubtedly result in further uncertainty regarding how, when and where future employment land needs are to be satisfied. In order to capture the commercial investment Crawley so desperately needs, the draft Local Plan needs to provide certainty by way of new employment land allocations. If it does not, important investment may be lost, not just from Crawley but the region as a whole. No other area in the region provides the benefits of adjacency to the UK's second largest airport; visibility from the region's major movement corridor (M23), and direct servicing from one of the most connected railway stations in the country (Gatwick Airport station serving over 129 destinations directly).

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3. Crawley Employment Land Evidence Base

3.1.1. This chapter sets out the assumptions and results of Northern West Sussex EGA Update.

3.2. Results

3.2.1. The Northern West Sussex EGA Update recommends that Crawley should consider the past take-up base requirement of 33 ha of employment land as a minimum. The EGA states that this would enable historically strong levels of employment development to continue in the Borough over the new plan period: in reality, those past rates have been significantly constrained by the poor land supply as a result of safeguarding as paragraph 9.9 of the DCBLP acknowledges.

3.2.2. **Table 1** below summarises the results of the Northern West Sussex EGA Update under each scenario with the recommended scenario being the use of past development rates.

Table 1 Indicative Gross Land Requirements by Scenario to 2036 (ha)

| Use | 1. Baseline Job Growth | 2. Past Development Rates | 3. Baseline Labour Supply |
|------------------------|------------------------|---------------------------|---------------------------|
| Offices (B1a/B1b) | 5.6 | 4.5 | 8.9 |
| Manufacturing (B1c/B2) | -6.0 | 28.5 | 19.2 |
| Distribution (B8) | -0.7 | | 84.9 |
| All B Uses | -1.1 | 33.0 | 113.0 |

Source: Northern West Sussex EGA Update, January 2020

3.3. Assumptions

3.3.1. Northern West Sussex EGA Update states that the commercial property is relatively self-contained with most of business space enquiries coming from within the region. However, the assessment also states that Crawley continues to attract strong levels of demand from multinational firms and local businesses. Therefore we believe that Crawley and in particular the major employment locations near the M23 and Gatwick Airport, such as Manor Royal and the potential Gatwick Green site, are not self-contained. These locations are nationally and regionally significant in terms of their market attractiveness for commercial uses, which means they attract demand from further afield on top of strong local demand.

3.3.2. The EGA also states that continuing strong demand for commercial space in Crawley is down to the town's highly competitive infrastructure and communications offer linked to an international airport, including good motorway connections and rail links to London and the South Coast. The importance of the Airport is also clear given the size and success of Manor Royal as Crawley's, and the region's, major employment location.

3.3.3. The assumptions for each of the above scenarios are detailed in the EGA and summarised below:

- Baseline Job Growth: This scenario is based on employment forecast for the area provided by Oxford Economics which is then translated into employment floorspace with the use of the Employment Density Guide (HCA, 2015).

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- Past Development Rates: This is based on net construction completions of employment floorspace provided by Crawley Borough Council.
- Baseline Labour Supply: This scenario uses the population growth associated with the planned housing provision and identifies the floorspace needed for a certain proportion of the economically active population in the future to be retained within Crawley.

3.3.4. These scenarios are then turned into employment land need with the use of the following plot ratios.

- Industrial (B1c/B2/B8):0.4 plot ratio
- Office (B1a/B1b): assumed half of the new floorspace will be in lower density development with a plot ratio of 0.4 and half in higher density locations with a plot ratio of 2.0.

3.3.5. Based on our analysis, we do not consider the first two scenarios above to fully capture local market signals. This is due to:

- The Baseline Job Growth is based on Oxford Economics employment forecasts which capture future growth trends as currently estimated. However, the role of the Local Plan is to positively and proactively encourage sustainable economic growth. Therefore we consider the use of current employment forecasts inadequate to serve the above purpose, especially considering the historic shortfall of employment land in Crawley.
- Past Development Rates take into account historic trends since 2011 in Crawley's constrained market based on low floorspace availability and limited new land being allocated for development. Also the 'look back' period adopted covers the aftermath of the Global Financial Crisis, which suppressed demand well below historical averages. Further, this approach takes no account of the Airport's predicted 50% growth from 46.5 to 72.0 million passengers per annum (mppa) over the plan period to 2036. Due to these reasons, the scenario does not adequately cover the future potential of the local economy.

3.3.6. The baseline labour supply scenario focuses on employment land needed to serve the forecast workforce growth and is based on the employment retention rates assumption in the Northern West Sussex Strategic Housing Market Assessment (2019). Crawley reported a low employment retention rate in 2011 with 40% of people working in Crawley being also Crawley residents.

3.3.7. We believe that the two most appropriate scenarios for gauging future employment land need are:

- A property market demand forecast that builds on the current constrained supply of employment land and takes into account a growing Airport. The details and results of this approach are provided in Chapter 5.
- The baseline labour supply scenario described above, but only as a longer term minimum. This is because allocating employment land in attractive locations such as Gatwick Green should increase local employment retention, further increasing the need for employment floorspace as the increasing local labour force (associated with future housing growth) seeks to work locally.

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4. The Role of Airports in Local Economies

4.1. Gatwick Airport

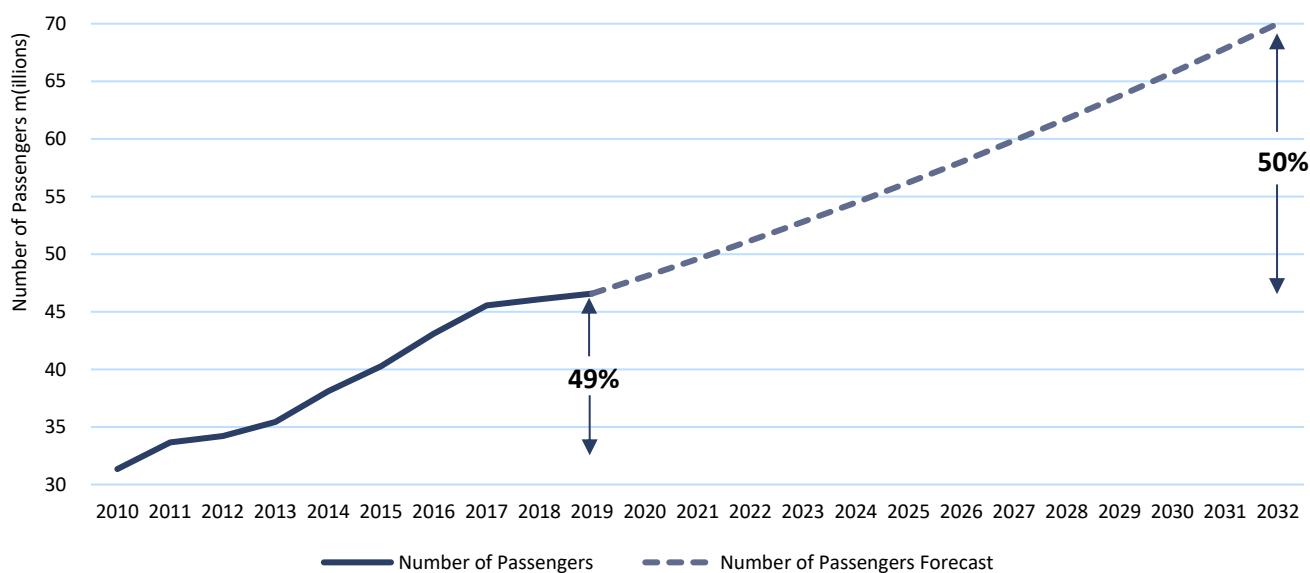
- 4.1.1. Airports have always been important economic generators for the local and regional economies within which they are located. However, in more recent times they have transformed from a facility with the sole purpose of transportation to one which offers an array of services and amenities, including shops, restaurants, hotels and entertainment. This recognises that airports can perform beyond its traditional aeronautical services to obtain high amounts of revenue (40-60%) through non-aeronautical revenue, as well as catalysing numerous real estate opportunities in the areas surrounding them, such as hotels, offices, medical facilities and more. In response, the 'Airport City' concept has emerged in many airports across the world and its applicability to Gatwick Airport was reviewed extensively in the Savills Gatwick Economic Development Area Market Analysis Report (November 2018).
- 4.1.2. Within this report, a number of key European Airports were reviewed to help understand how commercial development is responding to airport growth. These case studies help to demonstrate that the 'Airport City' concept is real and is being aggressively pursued in Europe and throughout the world whether it be a 20 million or 70 million passenger airport. A clear correlation has been established between growth in passenger numbers and freight volumes and the ability of airports to attract new commercial development, both in terms of larger companies as well as certain business sectors that are attracted to the agglomeration benefits of an airport location.
- 4.1.3. Accordingly, adjacency to Gatwick Airport is considered to be crucial to maximising the economic and investment opportunity for commercial uses in particular. Focusing development activity where it will be in most demand and achieve the highest values should enable 'new commercial uses at Gatwick Green to best contribute to wider infrastructure needs of the region, sub-region and Borough. The majority of future infrastructure requirements will benefit both the Airport and Gatwick Green and therefore offer investment and utilisation efficiencies that will also serve the transport sustainably objectives of the Council.
- 4.1.4. Finally, there is a lack of alternative development sites in the wider region of this scale with as strong motorway and rail accessibility, not to mention adjacency to a large and growing international airport. As outlined throughout the Savills Gatwick Economic Development Area Market Analysis Report (November 2018) and presented in **Figure 1** above, existing employment clusters within a 10 km radius of Gatwick Airport are relatively small in size at between 5 to 15 ha versus 59 ha for Gatwick Green. Manor Royal is the exception at 240 ha, but it is restricted from growing its footprint under current and emerging Local Plan policy. The existing employment areas within a 10 km radius of the Airport have limited land and floorspace availability to accommodate the strong future commercial floorspace demand identified in this report. Gatwick Green represents a prime opportunity to accommodate this future demand alongside a growing Gatwick Airport.

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- 4.1.5. The importance of Gatwick Airport is acknowledged by the C2C LEP, which identifies it as the single biggest driver of economic growth in the area. Its influence is especially important to the M23 corridor. C2C encourages the collaboration of planning and strategic authorities around Gatwick to maximise the economic potential of the area around the airport. The excellent public transport and road connectivity of the airport, and the lack of planning constraints on much of the land around it (provided the airport safeguarding is removed), make it an ideal anchor for further development of business space and housing, both of which are in acute demand in the area. By developing the economic infrastructure around the airport, the airport and its zone of influence can benefit not only Crawley, but the wider sub-region and region.
- 4.1.6. **Figure 2** below shows that the historic number of passengers flying from and to Gatwick airport. The number of passengers has grown by 49% over the last nine years. This is equal to a compound annual growth rate of 4.5%.

Figure 2 Number of Passengers



Source: Department for Transport Statistics Table TSGB0202b (AVI0102b), Gatwick Airport Master Plan 2019

- 4.1.7. Gatwick Airport published its final master plan in 2019. This proposes significant growth through the use of its existing runways and states that it is no longer actively pursuing plans for an additional runway. This master plan forecasts 70 million passengers by 2032 based on bringing the standby (emergency) runway into regular use for departing aircraft. This is a 50% growth over 13 years and is equal to a high compound annual growth rate of 3.2%.

4.2. UK Airports and Commercial Floorspace

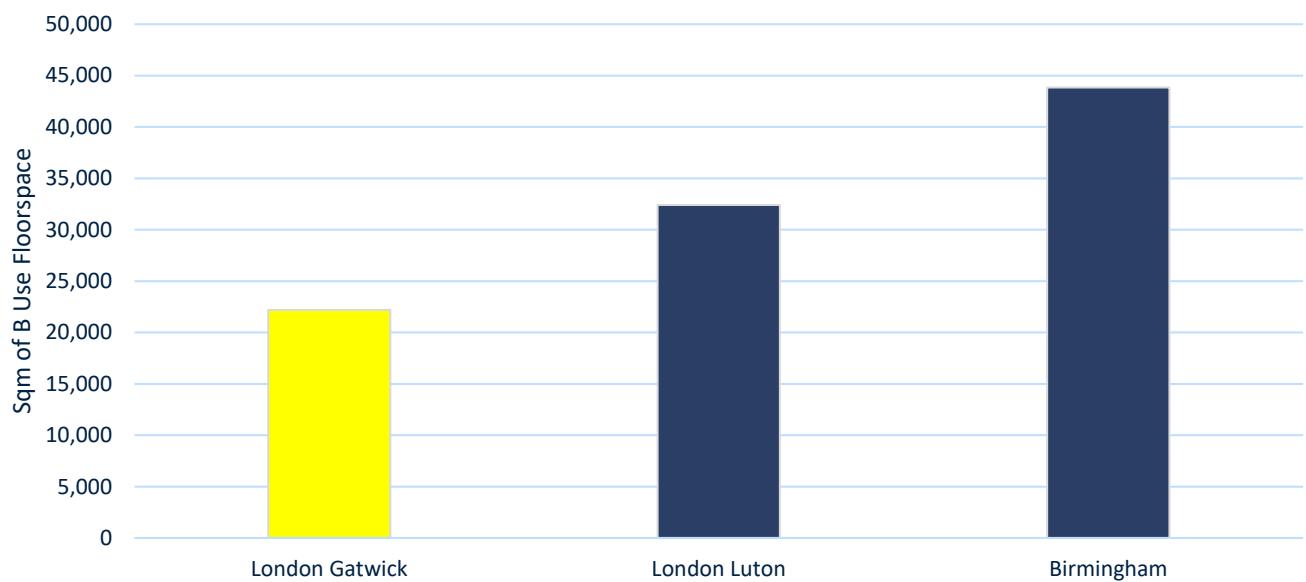
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- 4.2.1. **Figure 3** below shows the existing provision of B use floorspace per million of passengers within a 2 mile radius from key UK airports. This shows Luton and Birmingham having a higher provision per million passengers than Gatwick Airport, illustrating the under provision of B use floorspace in Gatwick's zone of influence. This is 32% less than London Luton and 49% lower than Birmingham, despite these being much smaller airports.

Figure 3 Existing B Use Floorspace Provision per Million Passengers



Source: CoStar 2020, Department for Transport Statistics Table TSGB0202b (AVI0102b)

- 4.2.2. Outline permission was granted some years ago to deliver Century Park, a 70 acre commercial development east of London Luton airport. The park is part of the London Luton Airport Enterprise Zone, supported by South East Midlands LEP. The enterprise zone is anticipated to deliver up to 7,200 new jobs and attract inward investments to support economic growth across the sub-region. More recently, the airport has commenced work on a Development Concept Order (DCO) application to permit the airport to expand from c 18 mppa to about 32 mppa, alongside the provision of a similar scale of adjacent commercial development to that envisaged by the Century Park proposal, but reconfigured to enable a viable arrangement.
- 4.2.3. As shown on **Figure 2**, Birmingham Airport has high access to employment floorspace with Birmingham Business Park (60 ha), Elmdon Trading Estate (17 ha) and Jaguar Land Rover Solihull (105 ha) being within a two-mile radius from Birmingham Airport. The draft local plan of Solihull identifies the airport's area as unique with the potential to deliver major growth on a nationally significant scale both to meet the economic growth aims of the Borough as well as the wider growth aspirations of the Greater Birmingham and Solihull LEP and the West Midlands Combined Authority. The same plan identifies land for employment at Damson Parkway to allow for the future expansion of Jaguar Land Rover.

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- 4.2.4. It is evident from these two examples how airports are being viewed by their respective local planning authorities and LEPs as major economic drivers for attracting further economic activity. Therefore, its vitally important Crawley Borough Council and C2C LEP take the opportunity to identify the potential of the zone of opportunity at Gatwick and allocate prime employment land at Gatwick Green now that the draft Local Plan review has removed blanket safeguarding from the land east of the airport. If the Council does not seize the opportunity to harness the economic potential of a growing Gatwick Airport, the economic downsides will be felt both in Crawley Borough and more widely in the region.

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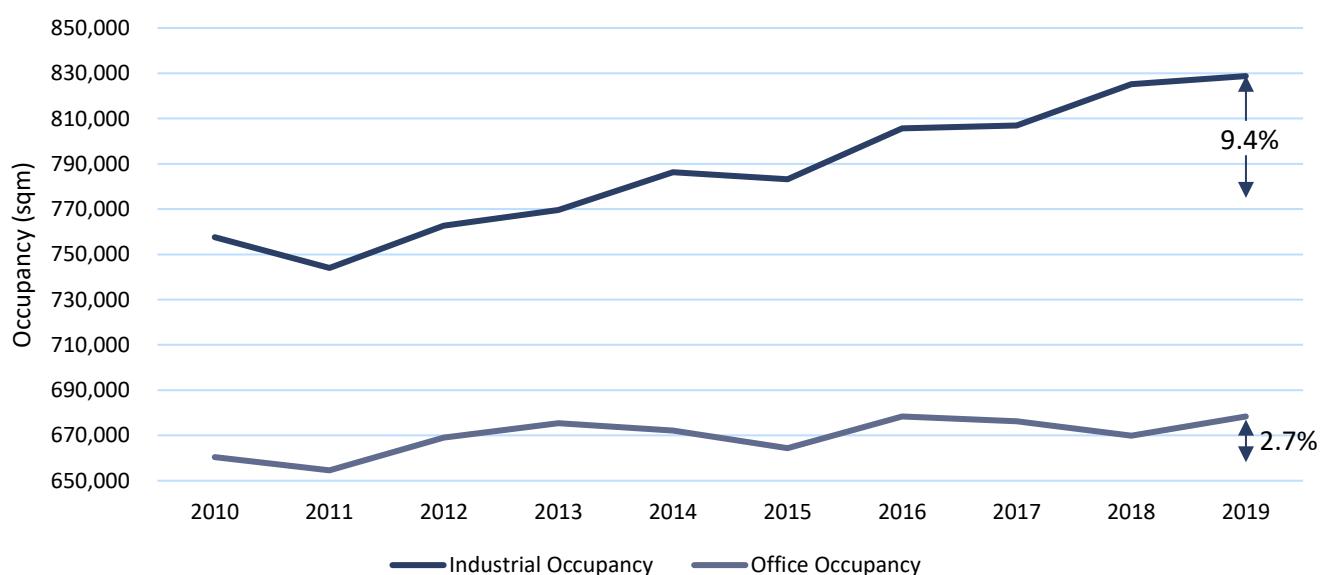
5. Crawley Property Market Update

- 5.1.1. This section analyses occupancy levels for office and industrial floorspace in Crawley and presents a set of forecast scenarios that demonstrate the Council baseline need of 33 ha represents an underestimate of true need.

5.2. Historic Trends

- 5.2.1. This section provides a market update on B use floorspace in Crawley. **Figure 4** below shows occupancy growth in Crawley for industrial and office uses. This shows that occupancy has grown by 9.4% and 2.7% since 2010 for industrial and office space, respectively. This is a much lower growth once compared with the growth of passenger numbers in Gatwick Airport over the same period. Passenger numbers have grown by 9.4%, while employment floorspace has grown by only 2.7%, presenting a clear mismatch. This clearly reflects the consequence of Crawley not being able to meet its employment land needs in its adopted Local Plan, which identified a 35 ha deficit.

Figure 4 Office and Industrial Occupancy in Crawley



Source: CoStar 2020

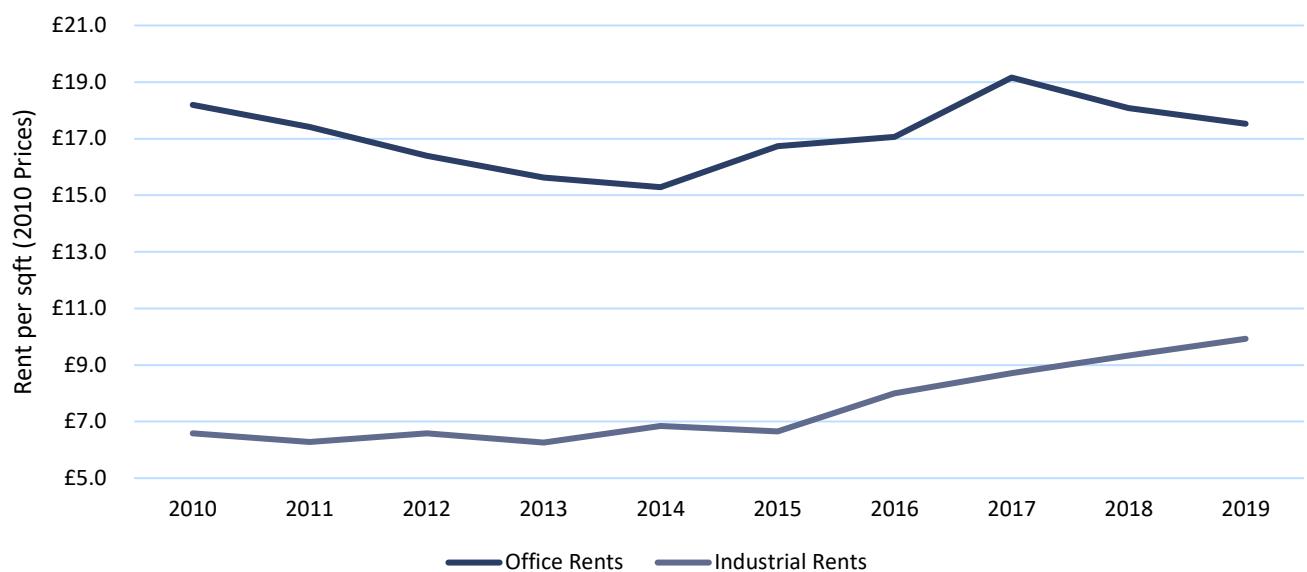
- 5.2.2. **Figure 5** below shows average rents per sqft for office and industrial uses in 2010 prices. These rents exclude inflation and show that in real term, rents have grown significantly for industrial (50% increase) and remain relatively stable for office. This shows a potential constrained supply of industrial floorspace in particular.

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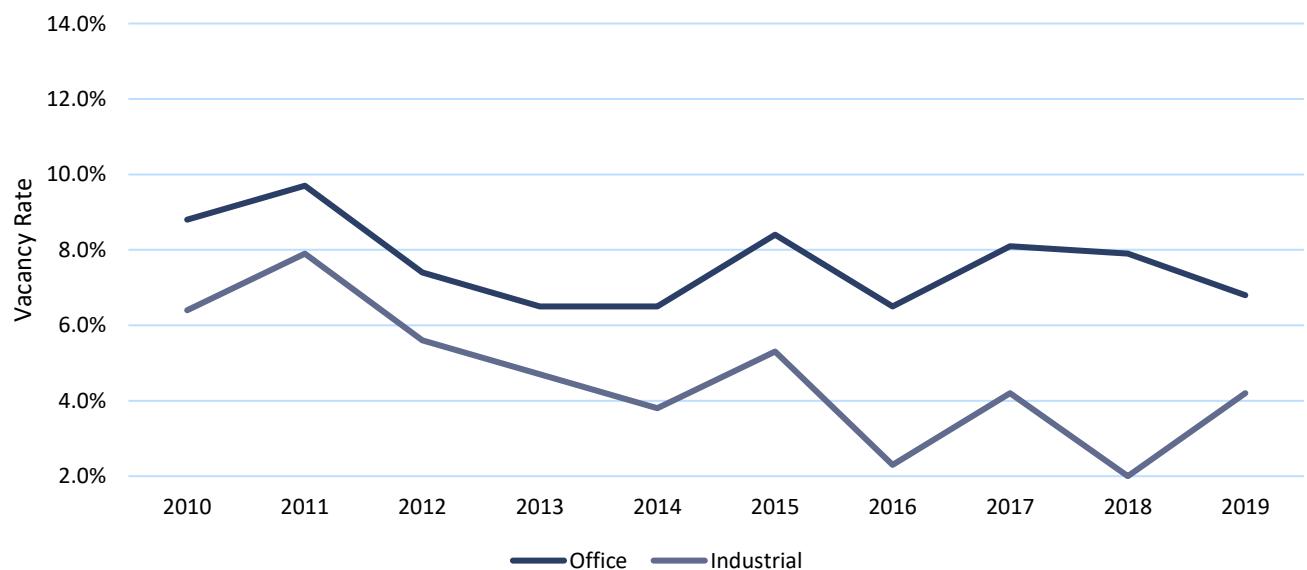
Figure 5 Office and Industrial Real Rents per sqft in 2010



Source: CoStar 2020

- 5.2.3. **Figure 6** below shows the vacancy rates in Crawley since 2010 for office and industrial uses. Overall vacancy rates follow a decreasing trend and are currently lower than the frictional vacancy rate of eight per cent used in the London Plan (2016). This is evidence of a very tight employment land and floorspace market.

Figure 6 Office and Industrial Availability Rate



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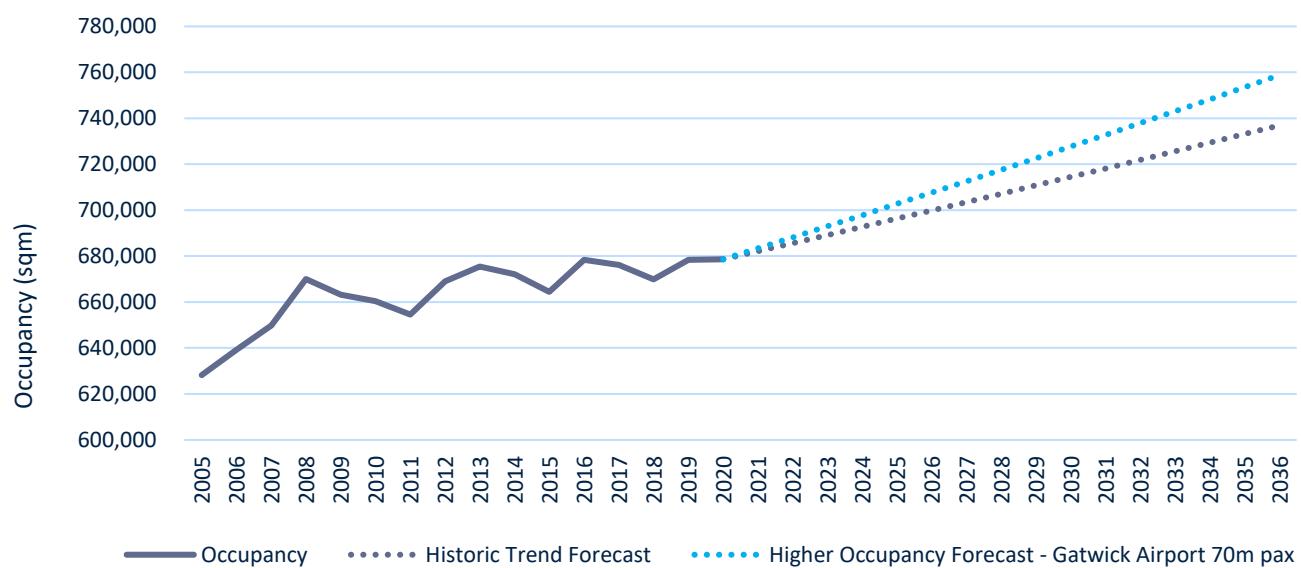
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Source: CoStar 2020

5.3. Projected Trends

- 5.3.1. **Figure 7** below shows historic office occupancy for Crawley and two forecasts. The first forecast uses the compound annual growth rate since 2005 (0.5% per annum) to project occupancy by 2036 whereas the other scenario takes into account the fact that historic occupancy is floorspace / land constrained and assumes a higher annual growth rate (0.7%) due to the airport's planned growth to 70 million passengers per annum.

Figure 7 Crawley Office Occupancy and Forecasts



Source: CoStar 2020, Savills 2020

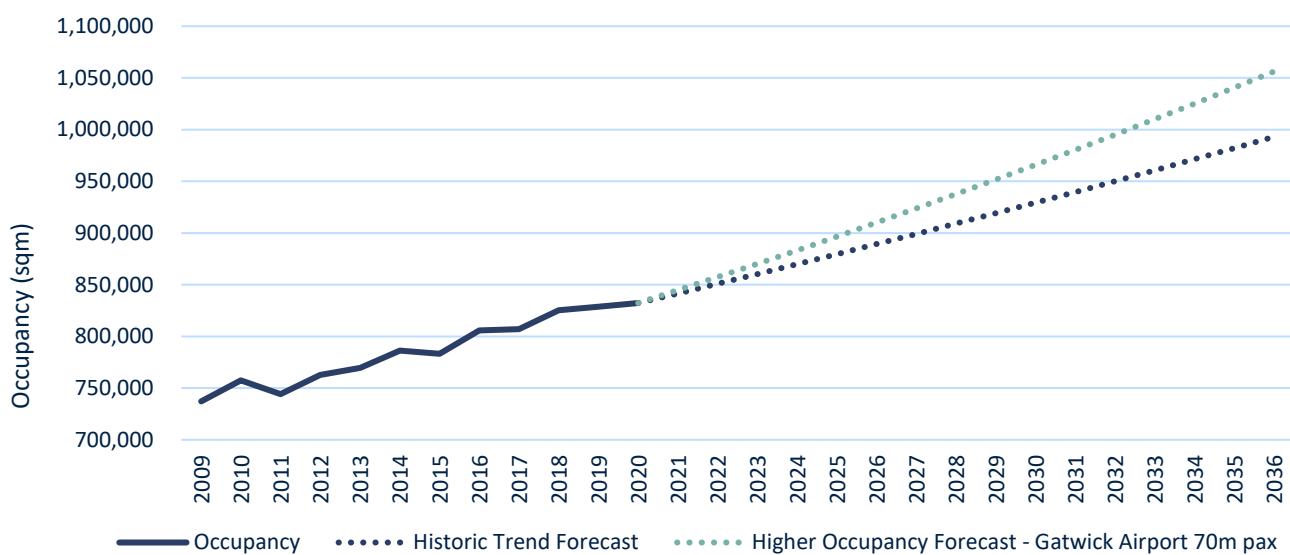
- 5.3.2. The above scenarios suggest an office occupancy uplift of 67,000 and 89,000 sqm by 2036. Once this is converted to employment land by using the plot ratio assumptions noted in **Section 3.3**, we forecast a need for 10.0-13.3 ha of land for office only.
- 5.3.3. Figure 8 below shows historic industrial occupancy and two forecast scenarios. One uses the compound annual growth rate since 2009 (1.1%) and the other uses a higher annual growth rate (1.5%) taking into account that past occupancy trends are land / floorspace constrained and the airport's planned growth to 70 million passengers per annum.
- 5.3.4. The above industrial occupancy scenarios result into an occupancy uplift of 164,000 and 228,000 sqm. Once this is converted to employment land using the plot ratio assumptions noted in **Section 3.3**, we identify a need for 41.0-56.8 ha of land for industrial only.

Appendix 3

Gatwick Green: Employment Land Need

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Figure 8 Crawley Industrial Occupancy and Forecasts



Source: CoStar 2020, Savills 2020

5.4. Minimum Employment Land Need

- 5.4.1. Once the unconstrained industrial and office forecast needs noted in Section 5.3 are taken into account, we estimate that the additional employment land needed is between 51.1 ha and 70.2 ha. This shows that by looking at historic trends of a constrained market, a higher need for additional employment land (51.1 ha vs 33.0 ha) can be justified. This is due to our forecasts using a longer period and an indicator (occupancy vs net completions) that more directly reflects market signals.
- 5.4.2. However, we consider the Crawley property market to be constrained and historic trends not to be a suitable basis to proactively plan for economic growth. We therefore recommend using the higher growth rates that reflect better the unconstrained function of Crawley's market and additional potential from Gatwick Airport's projected passenger growth.
- 5.4.3. We therefore recommend that the Plan should allocate at least 70.2 ha of employment land over the shorter term to meet historic unmet market demand. A higher minimum figure based on the baseline labour supply scenario should be adopted over the longer term to take account of the planned future housing growth to 2036.
- 5.4.4. Gatwick Green can offer a new mixed-use commercial development that will likely attract substantial new investment and jobs. The site can cover a mix of uses including office, industrial (warehousing and distribution), hotels and training and education components. Office and hotel developments are likely to benefit the most from proximity to the station and airport terminals. Whereas, warehouse and distribution uses should benefit from convenient access to the Strategic Road Network.

Appendix 3

Gatwick Green: Employment Land Need

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- 5.4.5. Demand for additional hotels at Gatwick Airport is likely given the forecast passenger growth. Higher and further education investments are based on clear locational preferences and wider trends concerning government funding, visa requirements for attracting international students and demographic trends.

Appendix 3

Gatwick Green: Employment Land Need

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6. Conclusion

- 6.1.1. LEPs use airports as key economic drivers to attract further economic activity near them. The importance of airports in the wider economy is also shown by the support that others and Gatwick Airport receive from LEPs. These rely on areas near airports to support economic growth in their regions. Failure to plan positively can jeopardise the economic growth of the wider area due to Crawley's important position and affect the economic growth of C2C LEP.
- 6.1.2. This appendix reviews the evidence base assessing the employment land needs for Crawley. The recommended minimum land requirement of 33 ha is found to be inadequate to proactively support future economic growth in Crawley over the short term as it is based on historic trends of a constrained property market.
- 6.1.3. Our analysis of Crawley's property market area concludes that Crawley should plan for a minimum of 70.2 ha of employment land over the shorter term and identify additional sites to address the current minimum shortfall of 58.2 ha. This employment land can be provided in North Crawley, in particular at Gatwick Green, following the release of the safeguarded land around the airport. The Gatwick Green site is available, deliverable and viable and should be taken forward as a strategic employment allocation by the Council through the draft Local Plan review / North Crawley AAP. The allocation of Gatwick Green can provide up to **58.7 ha of employment land and cover the minimum current shortfall identified above.**
- 6.1.4. Over the longer term, the North Crawley AAP must address the longer term economic needs of the area. As a minimum, this should be 113 ha to 2036 based on the 'policy-off' baseline labour supply scenario identified in the Council's EGA. We consider this to be a longer term 'minimum' need given that the new employment allocations will help improve the current low local labour retention alongside the growth in the labour supply itself (associated with new housing).

Appendix 3

Gatwick Green: Employment Land Need

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Strategic Employment Provision

Context

- 3.3.152 There is increasing pressure on existing employment land provision in the borough from alternative uses. Recent changes to permitted development rights introduced by central government are resulting in a loss of employment sites to residential uses, at a time when the economy is growing, but still fragile from the recent economic downturn. The NPPF highlights the importance of planning to support existing business sectors and identifying and planning for new or emerging sectors that are likely to locate in the area. In addition it is increasingly clear that some nearby authorities may not be able to fully meet their own employment needs. Gaps in the range, type and quality of business premises currently available in the borough and across the wider Gatwick Diamond area to serve business needs have been identified through both the Coast to Capital Strategic Economic Plan (2014) and evidence commissioned by the Council.
- 3.3.153 The principle of larger ‘strategic’ employment developments has been identified in previous studies about the wider Gatwick Diamond area within which the borough sits, including in the Gatwick Diamond Initiative LDF Group Study (2008) and the Gatwick Diamond Futures Plan (2008).
- 3.3.154 The potential for strategic employment developments has also been recognised by the Coast to Capital Local Enterprise Partnership, with the ‘heart of the Diamond’ being identified as a strategic growth location that should be a focal point for future inward investment and growth.

Core Strategy

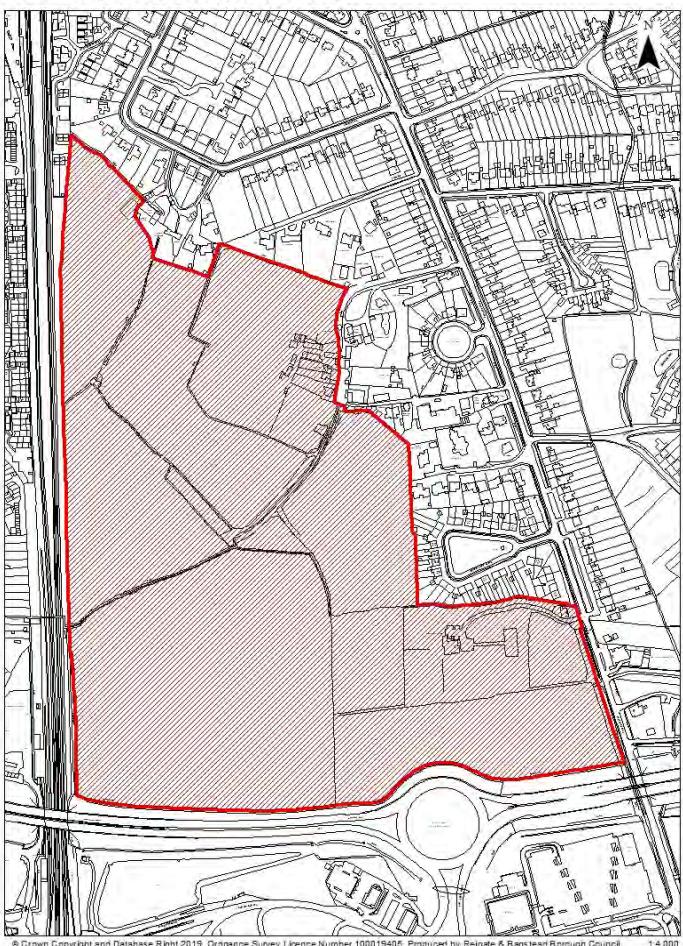
- 3.3.155 The Core Strategy envisages that the majority of employment provision in the borough will be made through the reuse and intensification of existing employment land, however national policy changes discussed above, in particular the offence to residential permitted development rights, mean that this is likely to be challenging.
- 3.3.156 Whilst the Core Strategy does not explicitly plan for greenfield employment provision, it recognises that unanticipated strategic proposals may come forward. Core Strategy Policy CS5 includes a criterion to ensure that “new employment development outside [existing employment areas] reflects wider policy priorities and is located in accordance with sustainability principles”.
- 3.3.157 Following additional studies of employment land and need it is clear that there is great potential for increased provision for “strategic employment floorspace i.e. floorspace that is suitable for larger businesses or collections of businesses, or which is aligned to the needs of growth or strategically important business sectors.

Horley Strategic Business Park

- 3.3.158 Land west of Balcombe Road, Horley adjacent to the M23 spur road to Gatwick Airport, which previously was designated as part of the Rural Surrounds of Horley in the 2005 Borough Local Plan, provides a singular opportunity to address this need. However, this requires sensitive consideration of environmental and other factors such as traffic to ensure that the development of this site achieves its full sub-regional potential whilst respecting other longstanding planning policy objectives and to meet the planning constraints as identified in the policy. No alternative sites have been identified within the borough that have the potential to deliver strategic employment floorspace in a highly desirable and accessible location within the short to medium term.
- 3.3.159 The planning of a successful office-led strategic business park of this scale will require careful attention to key components as set out in the following policy.

Policy HOR9 - Horley Strategic Business Park

HOR9: Horley Strategic Business Park, Horley



Site area:

31ha

Existing/previous use:

Fields

Source:

HELAA Ref: HC11, HC12, HC28, and HC33

Development timeframes:

See below

Allocation:

The site is allocated for:

- A strategic business park of predominantly offices
- A complementary range of commercial, retail and leisure facilities to serve and facilitate the main business use of the site
- At least 5 ha of new high quality public open space, including parkland and outdoor sports facilities

Requirements:

Development will be subject to the following requirements and considerations:

Movement and Accessibility:

- Demonstrate through a Transport Assessment that there will be no severe residual impact on the local and strategic road network, taking into account the operation of Gatwick Airport as nationally significant infrastructure, the impact of committed developments in the borough and surrounding areas including West Sussex and any necessary mitigation
- A new dedicated, direct access onto the strategic road network (M23 spur)
- A cap on number of vehicles accessing the site per hour from the strategic road network M23 J9A spur (and how to monitor and enforce this if it is breached) if needed. To be determined at the planning application stage
- A secondary access to the site from Balcombe Road for use by emergency services, public transport and other sustainable transport modes. The secondary access will also be available for use by a limited number of registered vehicles of local employees using the site. The number and proportion of registered vehicles permitted to access the site via Balcombe Road shall be assessed and agreed at the planning application stage and will be restricted/enforced through a planning obligation or planning condition(s). Use of this secondary access shall be subject to appropriate local road network mitigation and/or improvements together with robust mechanisms (such as ANPR and/or barriers) to prevent traffic from Balcombe Road accessing the strategic road network through the site (or vice versa)

Policy HOR9 - Horley Strategic Business Park (continued)

- Measures and improvements to manage the impact of additional traffic in surrounding local roads
- Provision of appropriate levels of on-site parking and a comprehensive Travel Plan
- Improvements to public transport facilities, including existing bus infrastructure/passenger facilities financial contribution to increase capacity at Gatwick Airport station if determined to be required as part of a planning application, and measures to maximise the accessibility of routes/services to future occupiers in and around the site
- Upgrading and extension of pedestrian/cycle routes from the Business Park to Horley town centre and Gatwick Airport station
- Public Right of Way footpath (362a) to be retained or re-routed across the site to maintain a pedestrian link from Balcombe Road to the footbridge across the railway
- Air quality modelling should be submitted alongside a Transport Assessment, to include consideration of cumulative impacts

Drainage:

- A site-specific flood risk assessment must be undertaken which takes account of the Strategic Flood Risk Assessment (SFRA) Level 2 (2017)
- Layout to ensure no buildings other than carparks and supporting infrastructure on land within Flood Zone 2, and incorporate a buffer zone and improvements to the ditch network within the site
- Inclusion of flood mitigation and attenuation measures as appropriate. These measures should ensure no increase in the risk of flooding to the site and nearby properties and should seek opportunities to reduce both the cause and impact of existing flooding. Opportunities to reduce cause and impact of flooding should be explored
- Measures to manage and reduce surface water run-off including a comprehensive system of SuDS
- Early discussions with Thames Water are needed to consider on- and off-site drainage requirements and the likely load/flow from the proposed development, to ensure that sufficient wastewater capacity is available when required, and consider the potential need for trade effluent license (depending on uses proposed)

Design:

- Design and layout to achieve an appropriate transition to, and relationship with, neighbouring residential and countryside areas, including through appropriate height, massing and siting of buildings and suitable consideration of shared boundaries to include measures to reinforce existing tree and hedgerow screening
- Inclusion of an appropriate landscape buffer, and public open space, to reinforce the distinctive identity of Horley and its separation from Gatwick Airport (and Crawley) and the wider countryside setting to the east of the site
- Buildings to be of an exemplar standard of design to reflect the strategic business park concept including sufficient flexibility and adaptability in building parameters and to provide adaptability to cater for a range of micro- businesses, expanding and established businesses and major occupiers and to be complemented by high quality public realm

Policy HOR9 - Horley Strategic Business Park (continued)

- Protection and enhancement of existing trees and hedgerows where possible and enhancement of green/blue infrastructure on site, and reflecting the River Mole Biodiversity Opportunity Area
- Height and design of buildings, lighting and other design aspects to be consistent with the operational standards of Gatwick Airport and to respect aerodrome safeguarding requirements
- As the southern part of the site is within the 57dB LEQ airport noise contour, design of buildings within this area must ensure an appropriate interior environment for users
- Provide measures to minimise the impact of lighting upon neighbouring residential and adjoining countryside areas which are intrinsically dark to avoid light pollution to the night sky
- Mitigate noise intrusion from activities on the site to adjacent residential and open areas
- Development proposals must have regard to conserving the setting of the Listed Buildings at Fishers Farm and the locally listed buildings at Bayhorse Farm and Bayhorse. The retention of important hedgerows will be encouraged as will retention of a buffer to the green corridor along Balcombe Road to retain the historic landscape character

Uses:

The predominant use of the site should be for B1a purposes with limited B1b, B1c, B8, and non-B Class uses including appropriate airport-related Sui Generis uses.

Complementary uses could include on-site catering, limited retail provision, hotel and conference facilities, gym, crèche and medical services and similar provision but not at a scale likely to significantly divert trade from the wider area or to detract from the prime focus of the site as a Strategic Business Park.

An impact assessment must be produced in line with national policy.

Delivery:

Planning conditions and obligations to control delivery of the development, the use of the site and appropriate off- site considerations will be required, including for infrastructure, open space and social commitments. These will include:

- Requirement for ongoing economic impacts testing
- Use of local labour, local supply chain procurement and similar skills/capacity support (in conjunction with local education and training providers)
- Measures to encourage use of transport to provide non-car alternatives to facilitate accessibility not reliant on the use of private cars
- Provision and delivery of the public open space area

The development of the site will be in accordance with an agreed master plan, produced by the site promoter in consultation with the Council, and requiring comprehensive development in line with the above requirements. The master plan will be submitted at the outline planning application stage to assist the consideration of subsequent planning application (s) and must include phasing, programming of infrastructure and details on quantum of development and appropriate uses.

To assist with the proper planning and on-going functioning of the site Supplementary Planning Guidance will be provided.

Explanation:

Availability

3.3.160 There is a reasonable prospect of the site being made available for development. The Council has entered into a joint venture to help bring forward development in this location and the use of CPO powers for site assembly has, in principle, been confirmed by the Council.

Key Considerations

- In the northern part of the site some areas are at risk of flooding (Flood Zone 2).
- In the southern part of the site the land is affected by 57dB LAeq airport noise contour.
- There is a well-established need to reflect consistency with the policies of adjacent local authorities to preserve the distinctiveness, setting and individual character of Horley, Gatwick Airport and Crawley.
- Any proposals would need to have regard to conserving the setting of the nearby Listed Buildings as well as retention of historic hedgerows and a buffer to the green corridor along Balcombe Road to retain the undesignated historic landscape character.
- There are a number of access solutions to the strategic road network that could range from a new access to the existing roundabout through to a grade-separated junction, depending on the level of development traffic, other committed development in the local area and surrounding network traffics. The means of access will need to comply with the Secretary of State's for Transport's policy as set out in Department for Transport Circular 02/2013 (or any successor) and the Licence from the Secretary of State for Transport appointing Highways England as a strategic roads company. Any access arrangement should be viable and deliverable.

Site Context

3.3.161 This site is located to the western side of Balcombe Road, a short distance from Horley town centre and Gatwick airport to the south. The main site comprises predominantly open fields which are used for a combination of grazing and equestrian activities. An existing small office set within large grounds also forms part of the site.

3.3.162 The site is in a highly accessible location, with good access to the M23 spur linking the site to the strategic road network and scope for direct pedestrian access to the Gatwick Airport Terminal and associated railway station providing direct links to London and other towns and cities in South East England.

Evidence Base

3.3.163 The development of a Strategic Employment site in this location would support the local economy by providing:

- a highly visible centre for business and innovation in the local area
- specialised modern property and facilities for businesses; and
- the creation of flexible space to support new businesses to start and grow-on within the same facility.

3.3.164 *Advice on Scope for a Strategic Employment Site within Reigate and Banstead (2014)* was prepared by Nathaniel Litchfield and Partners to inform the Regulation 18 version of the DMP. This explored the potential scope of, and market demand for, strategic employment provision in the south of Reigate and Banstead. It concluded that:

- It will be a key challenge for the Gatwick Diamond sub-region to be able to accommodate business expansion and relocation moving forward.
- Demand for a strategic business site is likely to be driven by occupiers seeking a highly accessible location.
- A mixed employment area is considered to have greatest potential to meet current identified

needs; as would an office/business park; however, the latter has higher risks in terms of market demand/occupation.

- Reigate and Banstead borough is well placed to capture strategic employment needs.
- Land within the south of Reigate and Banstead borough provides a relatively unconstrained opportunity to accommodate a strategic employment site. The south of Horley is an optimal location from the perspective of connectivity.
- 20-30ha of land is likely to be required to provide sufficient “critical mass” for an office/business park, 40-50ha would be required for a mixed employment area.

3.3.165 This advice paper informed the *Strategic Employment Site Opportunity Study* which also forms part of the DMP evidence base. This study identifies this site as being potentially suitable for strategic employment provision.

3.3.166 Fit with critical success factors:

- The potential development site is assessed as having a strong fit with all of the critical success factors for a strategic employment site, in particular providing a highly accessible location with potential for direct access onto the strategic road network.
- It is also large enough to meet the minimum size likely to be required (20ha), is well related to the existing town centre of Horley and has prominence on the M23 spur and in relation to Gatwick airport, with scope for direct access to the strategic road network.

3.3.167 A subsequent *Strategic Employment Site: Economic Assessment (Task 1 and 2)* (2017) has been prepared by Chilmark Consulting to further report on the suitability of the allocation of this site as a Strategic Business Park. This evidence tested current market indications and good practice and advised on the likely demand for and economic impact of indicative floorspace allocations. Detailed master planning and further market testing will advise on the final quantum and mix consistent with the underlying Strategic Business Park concept. Indicative quanta are as follows:

- Up to 200,000sqm of floorspace, predominantly focusing on B1(a), B1(b) and B1(c) including floorspace for new incubator/start-up units/Small Medium Enterprise.
- Up to 10,500 sqm of community facilities, including A1 (predominantly convenience shops); A3 (Food and Drink); D1 (Children’s Nursery) and/or D2 (Gymnasium).

3.3.168 The borough currently hosts a number of national and international employers, although the majority of businesses in the borough are small or micro business. In line with the study recommendations the site should provide office space for incubator/start-ups, expanding/stable businesses and major/anchor occupiers, as well as provision of shared specialist facilities and shared meeting and conference space. This would support existing business whilst also attracting bigger employers which provide a large number of jobs and support the local economy.

3.3.169 To make the business park a coherent business community, the design and management must ensure as much interaction as possible between the people working within the business park. This may be achieved by providing for:

- on-site catering
- limited retail provision (predominantly convenience)
- gym
- crèche
- medical services and local pharmacy

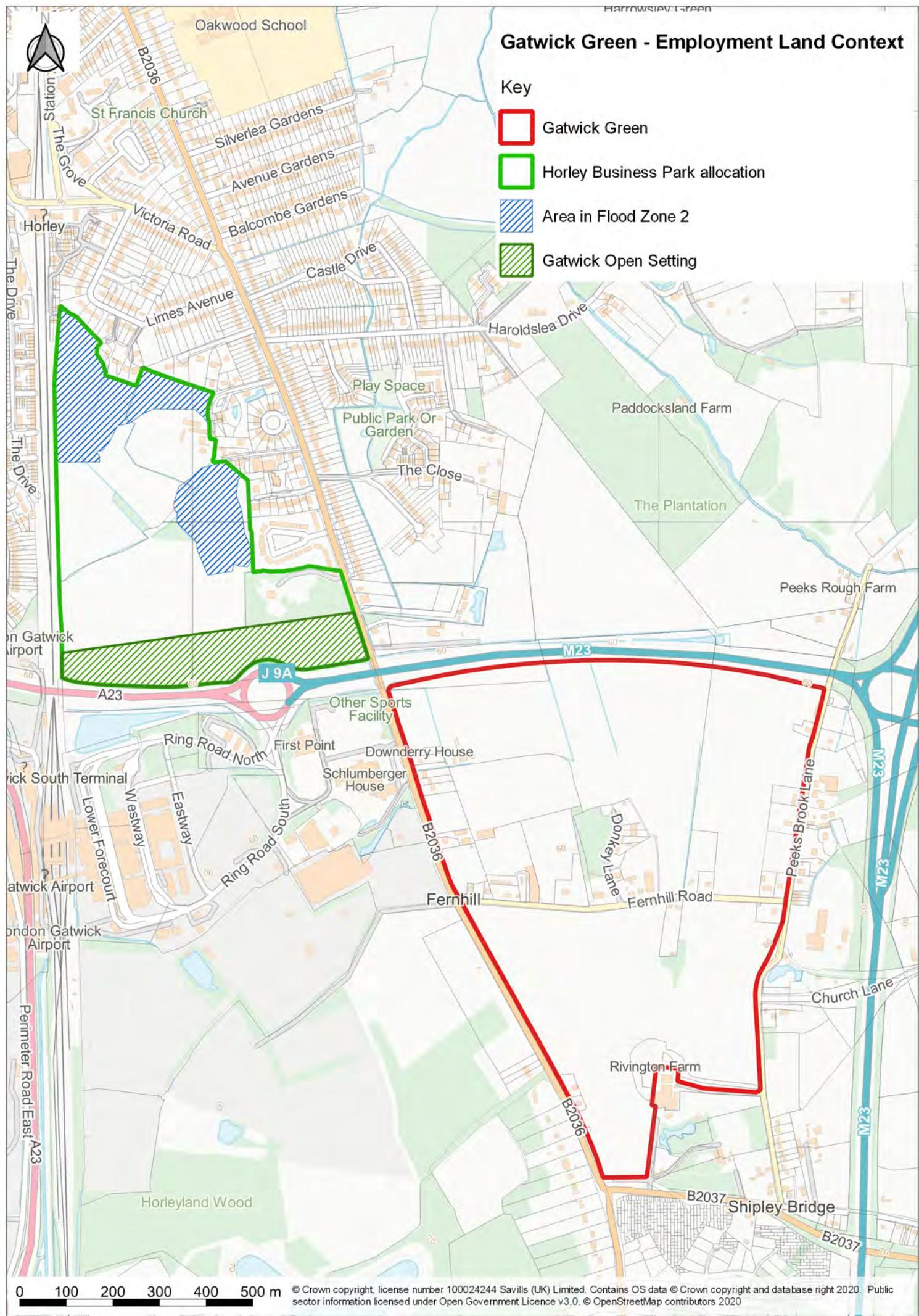
Delivery

3.3.170 The timing of delivery (possibly to continue beyond this plan period) and the need to ensure that there is a high level of overall quality in terms of the design and performance of the site as a whole requires a clear set of design principles and codes be created. This will allow effective control of the overall development over time and ensure future phases (which may be at the end or beyond the current plan period) can be controlled and permitted swiftly. This will also ensure

that the impact on the surrounding area is properly managed and minimised, with infrastructure improvements and mitigation provided when needed to support the development, including cross-boundary infrastructure whilst allowing flexibility for future market changes. This will be delivered through a supplementary planning document to facilitate the masterplanning and subsequent stages in the achievement of the objectives and development of the site and to ensure wider public engagement in the detailed planning of this important site.

- 3.3.171 The economic impacts identified in the *Strategic Employment Site: Economic Assessment (Task 2) Study (2017)* are based on a notional scheme and include some assumptions made about floorspace mix, etc. Further work on scheme design will need to identify detailed floorspace mix, taking into account economic impact and economic circumstances. This means that the final scheme may vary from the indicative maximum floorspace levels stated above. Therefore, there will be a need to ensure ongoing economic effects modelling and impact testing as the proposed scheme is implemented and constructed. Ongoing economic impacts testing will therefore need to be incorporated into any future S106 planning obligation for the potential Strategic Employment site's development.
- 3.3.172 Given the large scale and strategic nature of this site, ongoing dialogue with strategic partners, including cross boundary cooperation, will be important to achieve the good planning, delivery and success of the Business Park in economic, transport, social and environmental terms.

Gatwick Green - Employment Land Context





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Drawing
Development Framework Plan (Masterplan)

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Status
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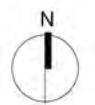
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Drawing
Development Framework Plan (Wilky Control)

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Gatwick Green, Gatwick

Transport Strategy

The Wilky Group

i-Transport Ref: JDW/ITB14440-002C

Date: 02 March 2020

Produced by i-Transport in conjunction with Tony Cross, Empiric Partners

Gatwick Green, Gatwick

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Quality Management

| Report No. | Comments | Date | Author | Authorised |
|---------------|--------------|------------|--------|------------|
| ITB14440-002A | Draft | 12/02/2020 | JDW | JDW |
| ITB14440-002B | Second Draft | 19/02/2020 | JDW | JDW |
| ITB14440-002C | Final | 02/03/2020 | JDW | JDW |

File Ref: T:\Projects\14000 Series\14440ITB Gatwick Green\Admin\Report and Tech Notes\002 -Transport Strategy\ITB14440-002C Transport Strategy.docx

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EXECUTIVE SUMMARY

The Wilky Group (TWG) propose to bring forward an integrated mixed-use development and co-ordinated infrastructure solution to deliver the 47.3 ha (117 acre) site which lies within the heart of the Gatwick Diamond, to the east of Balcombe Road. The site currently forms a part of the land identified for the North Crawley Area Action Plan under policy SD3 of the Draft Crawley Borough Local Plan (DCBPL), January 2020.

This report is being submitted as part of the representations on the Regulation 19 DCBPL. The note identifies that the site is well located in a sustainable location, where public transport, walking and cycling can be readily accommodated and enhanced.

The scheme will bring forward a package aimed at delivering non car access as a priority, whilst ensuring the local highway network can accommodate predicted vehicular traffic. While some car borne traffic is inevitable, measures will be put in place to ensure trips are completed as sustainably as possible.

The transport package will include:

- Delivery of on-site public transport (Fastway) provision, with all the site within a short walk to an interchange hub;
- Contributions towards strengthening existing Fastway and bus routes and delivery of targeted Fastway / bus infrastructure, including bus priority and transit routes;
- Delivery of a network of pedestrian and cycle routes across the site, to put walking and cycling at the heart of the development;
- Contribution towards enhancing existing pedestrian and cycle routes, plugging the 'missing gaps' and connecting to / delivery of the Crawley Local Cycling and Walking Infrastructure Plan;
- A defined strategy to link the site with Crawley town centre, Horley, Forge Wood, Manor Royal, Three Bridges and Gatwick Airport;
- Delivery of infrastructure designed to accommodate current modes of travel as well as future modes and cater for changing attitudes towards travel;
- A site access strategy suitable for accommodating all models of travel, designed to maximise non car modes, whilst minimising impacts on the local road network;

- An ability to link to / integrate with wider sustainable transport networks being pursued by the council (e.g. western link road public transport);
- A strategy to deliver Electric Vehicle charging for all occupiers, including freight movements, users of the development, visitors and residents; and
- A Full Travel Plan and associated environmental strategy.

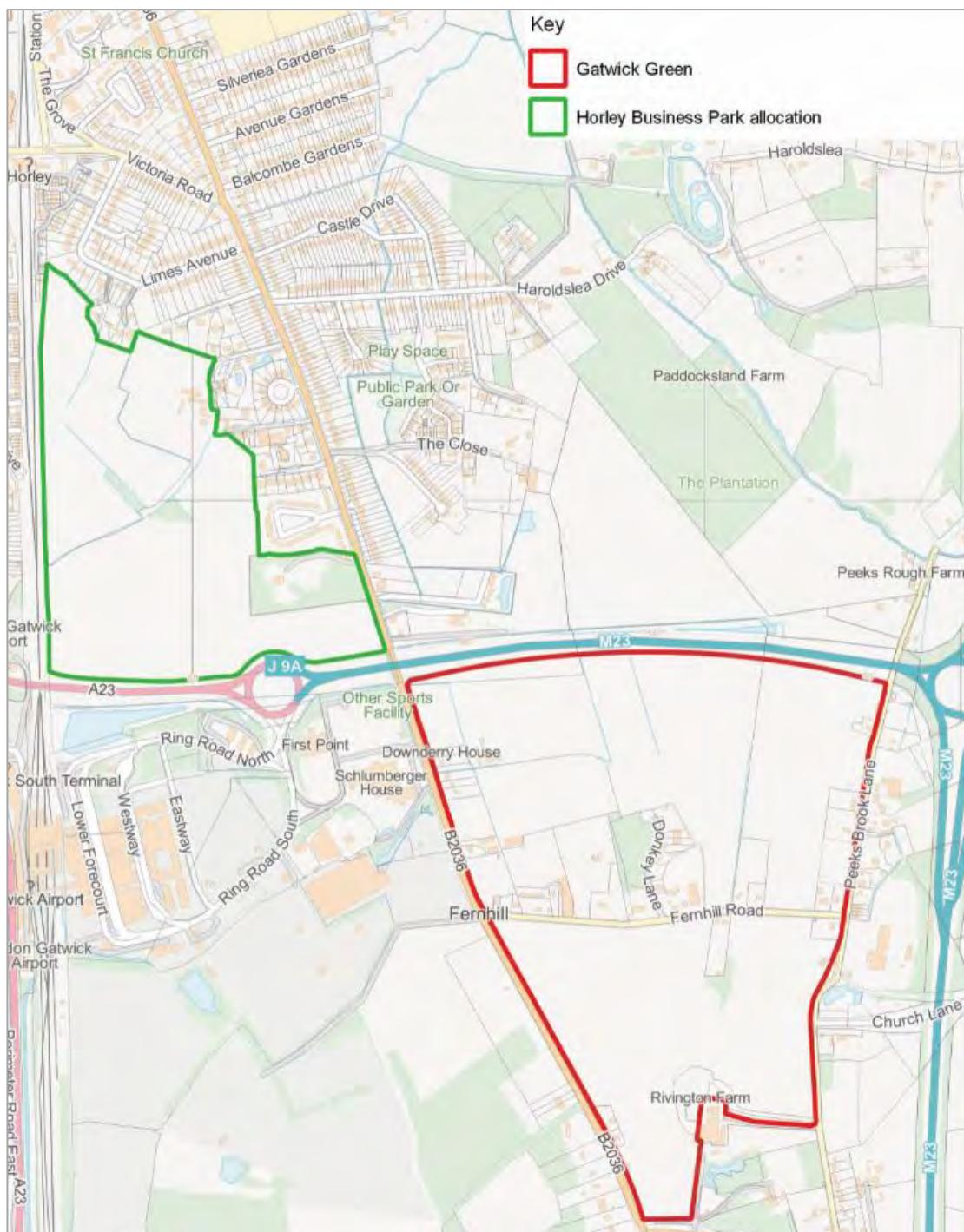
The proposal will link new and existing residential development with employment opportunities through infrastructure and transport services that cater for carbon neutral modes of travel, potentially reducing reliance on the private car and in line with the concept of Mobility as a Service, (MAAS).

SECTION 1 INTRODUCTION AND BACKGROUND

1.1 Background

- 1.1.1 This Transport Strategy is submitted as supporting evidence to the Regulation 19 DCBLP 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.
- 1.1.2 The report is not intended to be a full Transport Assessment, rather it is a high level assessment identifying an access and mobility strategy to demonstrate that the site can be accessed in a sustainable manner. It also shows that there are no 'showstoppers' to delivering development, in terms of access and residual impacts. A full Transport Assessment will be provided in due course.
- 1.1.3 TWG owns 47.3 ha (117 acre) of land east of Gatwick Airport and south of the M23 spur road between Junctions 9 and 9a. This forms part of a larger site of 59ha which is being promoted by TWG for employment.
- 1.1.4 The site is located to the east of the B2036 Balcombe Road. The site is bordered by the M23 to the north, Peeks Brook Lane to the east and the B2037 Antlands Lane to the south. Fernhill Road provides an east/west route through the middle of the site and Gatwick Airport and Gatwick Airport Station are located to the west of Balcombe Road.
- 1.1.5 A site location plan can be found at **Figure 1** with an extract shown at **Image 1.1**.

Image 1.1: Site Location Plan



Source: Savills

- 1.1.6** In the adopted Crawley Borough Local Plan 2015 (CBLP), the Wilky land south of the M23 spur road (about 47.3 ha / 117 acres) forms a small part of the land that is 'Safeguarded' for a second runway at Gatwick Airport: TWG's land is required for landside facilities. Consequently, the Council has been unable to allocate the land and instead designated it as part of an Area of Search for a Strategic Employment Location (SEL) under adopted Policy EC1 (Sustainable

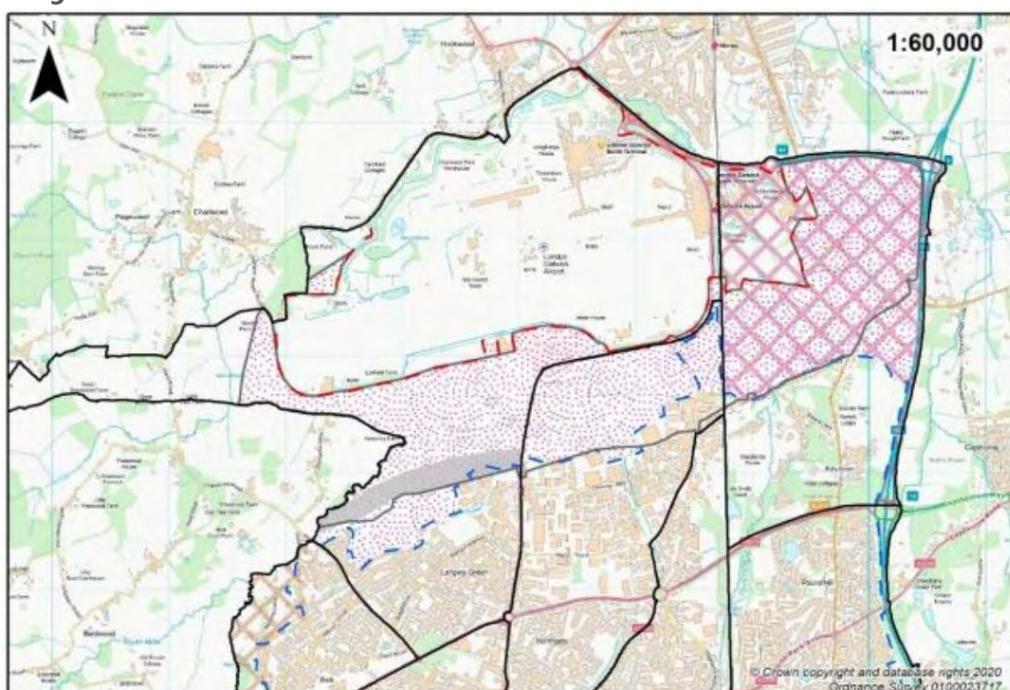
Economic Growth). In the event there is no longer justification to safeguard land for the second runway, the Council intended to select one or more SELs. TWG's landholdings within the Area of Search make it a major stakeholder in the future of the local economy and its continued and sustainable economic growth.

- 1.1.7** The DCLBP (January 2020) has removed adopted Policy GAT2 that safeguarded land for the second runway: this was on the basis that future runway capacity has been provided at Heathrow and so there is no longer a national policy requirement to safeguard land at Gatwick. The DCLBP identifies the former safeguarded land for a future Area Action Plan (AAP) under Policy SD3 (North Crawley Area Action Plan). The AAP will address the land requirements for strategic employment, housing, infrastructure and other community uses, alongside any critical needs associated with the Airport. The intention is that the AAP will allocate land for these uses and is to be started soon after the adoption of the DCBLP, which is expected at the end of 2020.

Local Plan / AAP

- 1.1.8** The area has been designated as part of an AAP under Policy SD3 North Crawley AAP of the DCBLP (2020). This is shown on **Image 1.2**.

Image 1.2: AAP Area



Source: Draft Crawley Borough Local Policy Map, January 2020

1.2 Development Proposal

1.2.1 TWG propose to bring forward an integrated mixed-use development and co-ordinated infrastructure solution to deliver the 47.3 ha (117 acre) site which currently forms part of the land that is proposed for an AAP:

1.2.2 Whilst still at an early stage, it is anticipated that the development could comprise the following:

- Circa 160,000sqm GEA of B8 (Warehousing, distribution and logistics);
- Circa 52,500sqm GEA of B1 (Office / employment use);
- Circa 52,500sqm GEA of C1 (Hotel use);
- Supporting education uses for apprentices and staff training;
- Ancillary facilities including an integrated amenity centre including ancillary shopping, leisure, dining and community facilities (this could include a café / restaurant / bar / children's nursery / local convenience store /gym or wellbeing centre);
- High quality open space with mobility interchange hub;
- Sustainable mobility at the heart of the masterplan design, with dedicated public transport, pedestrian and cycle infrastructure; and
- Ancillary car parking with Electric Vehicle Charging facilities.

1.2.3 A copy of the emerging development framework plan is included at **Appendix A**.

1.2.4 The development will 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 the active modes, walking and cycling and potentially, personal electric transport.

1.2.5 The site provides the opportunity 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.

1.2.6 The proposal is of a scale which has the value necessary to deliver investment in innovative and carbon neutral transport services and infrastructure.

1.3 Mobility Strategy

- 1.3.1 TWG is committed to delivering a development which is in line with the Authorities' aspirations to establish a multi-modal, comprehensive and flexible Sustainable Transport Strategy which is phased in line with new development.
- 1.3.2 Given its sustainable location within Crawley's boundary and close to existing employment areas and neighbourhoods, there is an opportunity to link the site into established bus and Fastway routes and the emerging Fastway development programme. Opportunity also exists to maximise pedestrian and cycling links, especially those identified within the Crawley Local Walking, Cycling and Implementation Plan (LCWIP).
- 1.3.3 Sustainable mobility can be delivered in unison with some limited new road links and highway improvements to address gaps in the highway network, provide alternative route choices and additional capacity, however these type of improvements 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.
- 1.3.4 A strategy to assist in the delivery and integration of Mobility as a Service (MaaS) into the local area including the facilitation of innovative new mobility service providers such as; ride sharing, e-hailing bike hire and sharing, car sharing services as well as on-demand "pop-up" bus services, with a large focus on the first and last mile of trips.
- 1.3.5 The site would also be supported by a Full Travel Plan and associated environmental strategy with the aim to promote the use of sustainable travel options, including measures such as car clubs, digital travel platforms.
- 1.3.6 Figure 2 identifies how the site could be delivered and connected to wider sustainable infrastructure measures as part of a comprehensive Borough-wide approach to planned development.
- 1.3.7 The proposed access strategy, traffic impact and sustainable transport strategy are subject to ongoing discussions with WSCC Policy Local Highway Authorities, (WSCC and SCC), Highways England (HE), Crawley Borough Council (CBC) and the local Fastway and bus operator, Metrobus.
- 1.3.8 In preparing the Transport Strategy, the following has been considered:

- Crawley New Directions; Transport and Access for the 21st Century;
- Draft Crawley Borough Council Local Plan 2020 – 2035;
- The Local Transport Plans of Crawley Borough Council (CBC) and West Sussex County Council (WSCC);
- The proposals within the Crawley Borough Council (CBC) Growth Programme;
- The recently published Gatwick Airport Limited (GAL) Masterplan which proposes the intensification of use of the existing emergency runway;
- The Development Consent Order for Gatwick Airport as submitted (28 August 2019) has been reviewed. The currently identified improvements (see reference below at para 1.3.9) are noted and any additional information will be examined and proposals considered as the DCO progresses;
- The committed and proposed measures which form part of the Coast to Capital Growth Fund and, in particular, those indicated in the Gatwick 360 Strategic Economic Plan;
- The emerging Transport Strategy for the South East;
- The Network Rail improvements to Gatwick Railway station which have recently been announced and are expected to begin in May 2020 with completion due in 2023;
- Priorities and future aspirations of the transport network providers and operators;
- The committed and proposed development in the area, which includes promoted strategic schemes at pre-planning stage;
- Guidance and best practice, including Manual for Streets (MfS) and Manual for Streets 2 (MfS2); and
- Changing travel behaviours and likely future travel patterns.

1.3.9 The Development Consent Order for Gatwick Airport (August 2019) identifies the following in terms of highway capacity improvements:

"Traffic conditions approaching Gatwick and Crawley will be substantially improved by the completion of the Highways England M23 Smart Motorway project. This project will add an extra running lane between M23 junctions 8 and 10 and on the westbound M23 Spur from junction 9 to 9a. This will help to reduce peak congestion and accommodate traffic growth. It will also introduce the latest technology for incident management and traffic control.

However this, and the growth in road traffic, will place additional pressure on the capacity of South Terminal entry roundabout (M23 Junction 9a) and the North Terminal entry roundabout, and the capacity at both junctions will therefore need to be increased to improve traffic flow. We are undertaking a planning and design process for proposed improvements that includes local widening on junction entry/exit lanes, adding signals to existing roundabouts and enhanced signing."

1.4 Structure of Report

1.4.1 In line with the requirements of the National Planning Policy Framework (NPPF) and the National Planning Practice Guidance (NPPG), this report considers the transport implications that may arise from allocating Gatwick Green for employment, and to consider the proposal in the context of relevant transport policy.

1.4.2 Specifically, the report considers the three critical tests outlined in paragraph 108 of the National Planning Policy Framework:

- Will safe and acceptable access be provided to the site for all modes?
- Will the opportunities for sustainable travel be taken up?
- Will there be a 'severe' residual cumulative transport impact?

1.4.3 The remainder of this report is structured as follows:

- **Section 2** – sets out how the proposal is in line with and consistent with national and local policy;
- **Section 3** – summarises the potential access strategy;
- **Section 4** – sets out the sustainability credentials of the site and how sustainable travel will be encouraged;
- **Section 5** – identified how the likely traffic impacts will be assessed; and
- **Section 6** – summary and conclusion.

SECTION 2 POLICY COMPLIANCE

2.1 Introduction

2.1.1 As part of the ongoing assessment of the site and to influence any future Transport Assessment a review of both national and local policy has been undertaken and reported in this section.

2.2 National Policy

2.2.1 In line with the requirements of the National Planning Policy Framework (NPPF) and the National Planning Practice Guidance (NPPG), this report has considered the transport implications that may arise from allocating Gatwick Green for employment, and to consider the proposal against relevant transport policy.

2.2.2 Specifically, the report identifies that:

- Safe and acceptable access can be provided to the site for all modes;
- The site is in a sustainable location and the opportunities for sustainable travel will be promoted and taken up; and
- Future work will show that the impacts arising from the proposal will be cost effectively mitigated and that the proposal will not lead to a 'severe' residual cumulative transport impact.

2.3 Local Policy

2.3.1 Local Policy will form a large part of the Transport Assessment and the following local policies will be considered as part of the assessment.

Draft Crawley Borough Local Plan (DCBLP), January 2020

2.3.2 The DCBLP makes a commitment to assess, through an Area Action Plan (AAP), how land that has been subject to safeguarding can most appropriately be used for to ensure the planned future growth needs of the airport can be properly considered alongside other development and infrastructure needs in Crawley.

2.3.3 TWG welcomes the Sustainability Objectives together with the Policies set out in the Sustainable Transport chapter of the Draft Crawley Borough Local Plan (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.

2.3.4 The Crawley Borough Council Local Plan Review Sustainability Appraisal and Strategic Environmental Assessment (December 2019) includes an assessment of the North Crawley Area Action Plan Area (Policies SD3 and EC1), within which the Gatwick Green site is located. As set out in the tables included at Appendix E of the Submission Local Plan Site Allocations and Designations, it is identified that the Gatwick Green site is in a sustainable location and that:

- There is an opportunity through the AAP approach to ensure that new development is sustainably located to cluster with existing employment sites and to maximise access to sustainable transport links;
- Development could be designed with climate change adaptation in mind;
- A sustainable location within Crawley's boundary and close to existing Main Employment Areas and neighbourhoods presents an opportunity to link into established bus and Fastway routes and maximise pedestrian links and as such would perform positively again the "promoting sustainable journeys indicator";
- Appropriately sized employment development creates the opportunity for a wider provision of infrastructure, serving the site and possibly wider needs; and
- Development within the AAP area would be well placed to link the existing employment areas at Manor Royal and Gatwick Airport and residential areas of Langley Green, Three Bridges and Forge Wood, via enhanced sustainable transport, including Fastway, bus, pedestrian and cycle networks.

2.3.5 For ease of reference the North Crawley Area Action Plan Area (Policies SD3 and EC1) sustainability appraisal matrix is included as **Appendix B** of this report.

2.3.6 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.

2.3.7 TWG has sought, in discussion with existing transport and network providers, to "operationalise" key delivery principles to demonstrate that new employment at Gatwick Green would significantly contribute to the simultaneous delivery of growth and a reduction in carbon emissions.

2.3.8 TWG is supportive of the following additional measures which would assist in addressing the question defined in the Sustainable Transport chapter of the Regulation 18 Draft Local Plan "*In what key ways would you like transport in Crawley to be different in 2035*":

- 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;
- 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;
- High quality and strategically located transport interchanges with a focus on sustainable modes. The concept of "super-hubs" is consistent with this aspiration; and
- 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. In this context, TWG believes that the answer to the consultation question "*would a Western Relief Road be a benefit to the town*" rests on its capacity to accommodate the full range of transport modes.

2.3.9 The Crawley Infrastructure Plan identifies potential improvements to the road, rail, pedestrian and cycle networks. It is stated that these would be funded through:

- The Crawley Area Transport Package;
- Developer funding through Community Infrastructure Levy;
- Section 106 funding;
- Strategic Economic Plan funding; and

- WSCC bids for funding.

2.3.10 TWG notes and supports the approach to funding the required improvements identified within the Infrastructure plan. It is accepted that the proposed infrastructure will be funded through a variety of mechanisms and will be undertaken following agreement with WSCC, SCC, HE and CBC as necessary.

2.4 Policy Ambitions

2.4.1 The strategy adopted by TWG to promote walking and cycling is consistent with national and local policies, including:

- New Directions for Crawley;
- Crawley Infrastructure Plan;
- Local Cycling and Walking Infrastructure Plan (LWCIP);
- Surrey County Council Local Transport Plan; and
- Reigate and Banstead Local Plan – Core Strategy.

New Directions for Crawley (January 2020)

2.4.2 New Directions for Crawley is a developing strategy which outlines a vision, defines the current situation and presents issues and options for the Borough. A multi-modal transport study will be undertaken which will inform a detailed action plan. This document provides information on Crawley's Local Plan, West Sussex Transport Plan, Cycling and Walking and other items such as Climate and Electric Vehicles.

2.4.3 Section 4 of this report confirms that proposed development at Gatwick Green is in line with the ten-point plan setting out how the vision can be delivered, namely by:

- 1 Locating development in close proximity to existing residential (Crawley and Horley) and employment (Manor Royal and Gatwick) development and within an area suitable for taking up sustainable travel modes;
- 2 Investing in cycle infrastructure to improve connectivity;
- 3 Proving modern bus / Fastway SuperHubs within the development;
- 4 Linking to existing local rail stations via multiple modes of transport;

- 5 Managing the demand for on-site parking;
- 6 Investing in pedestrian and cycle structure and linking into the LCWIP;
- 7 Implementing a Travel Plan, with potential for initiatives such as a car club on site;
- 8 Providing electric vehicle charging points on site for employees, visitors and other users;
- 9 Ensuring that employees of the site are aware of digital travel platforms and that the on-site infrastructure incorporates MaaS; and
- 10 The delivery of a site wide Travel Plan and delivery and services management plan aimed at promoting smart working practices and reducing general development impacts.

2.4.4 In addition to the above, TWG has made representations to the consultation on the New Directions document. For ease of reference these are included at **Appendix C**.

Crawley Infrastructure Plan (January 2020)

2.4.5 The Crawley Infrastructure Plan (January 2020) sets out that the current provision and the future studies and plans for infrastructure in Crawley. As part of this plan, details are provided for walking and cycling improvements.

2.4.6 The plan currently sets out that there are current links to the town centre, Manor Royal and Gatwick, however although there is a good cycle network there are gaps between routes and therefore there is potential for further improvements to the cycle network. Notwithstanding this there are new footpaths and cycle routes being provided as part of Forge Wood (Crawley North East Sector) which link to existing networks. The future studies and plans for walking and cycling in Crawley include:

- Implementation of improvements to the cycle network; and
- Crawley Borough Council is currently developing an LCWIP (Local Cycling and Walking Infrastructure Plan). This will identify approximately 10 routes for further development following a 6-step process prescribed by the Department for Transport (and will include cost estimates).

Local Cycling and Walking Infrastructure Plan (LWIP) – As part of New Directions

2.4.7 A Local Cycling and Walking Infrastructure Plan (LCWIP) has been prepared to improve access and connections between existing neighbourhoods and proposed new development. New Directions provides a useful guide to the routes which are subject to proposed extension or

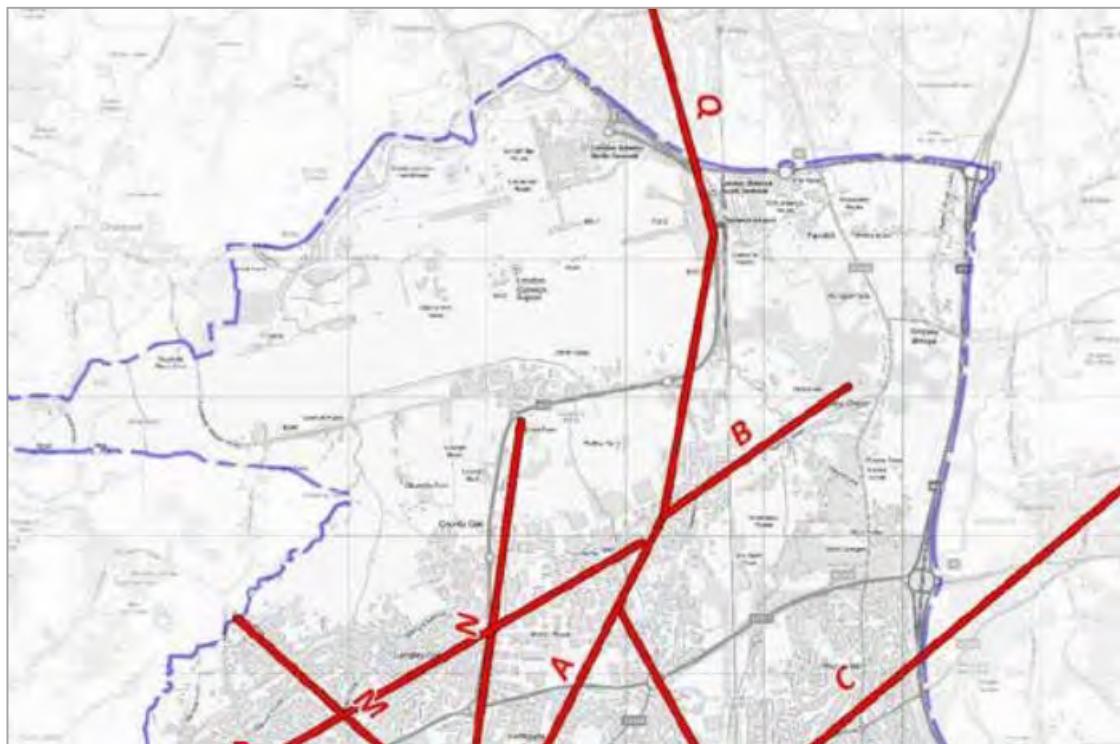
improvement to achieve safe, prioritised and direct cycle and pedestrian links between residential, employment and other amenities.

2.4.8 The first stages of the Crawley LCWIP were completed in December 2019 and identifies a number of movement corridors. The corridors in the vicinity of the site shown on **Image 2.1**. This identifies that the site is located in close proximity to corridors:

- 'A - Gatwick Airport to Town Centre via Manor Royal and Northgate'
- 'B – Forge Wood to Manor Royal' and
- 'Q – Gatwick Airport to Horley'

2.4.9 These corridors provide opportunities to travel from the site to key local destinations and the centres of Crawley and Horley.

Image 2.1: LCWIP Movement Corridors



Source: Extract from Crawley LCWIP Movement Corridors – Crawley New Directions

2.4.10 Further analysis will be undertaken to determine the best way to link Gatwick Green with existing and proposed pedestrian and cycle routes.

Surrey County Council (SCC) Transport Plan (2011-2026)

2.4.11 The SCC Local Transport Plan is the third Local Transport Plan for the County and proposes strategies up to 2026. The objectives of the Transport Plan include:

- ***"Effective Transport: To facilitate end-to-end journeys for residents, business and visitors by maintaining the road network, delivering public transport services and, where appropriate, providing enhancements.***
- ***Reliable Transport: To improve the journey time reliability of travel in Surrey.***
- ***Safe Transport: To improve the journey time reliability of travel in Surrey.***
- ***Sustainable Transport: To provide an integrated transport system that protects the environment, keeps people healthy and provides for lower carbon transport choices."***

2.4.12 There are number of transport strategies which from part of the Surrey Transport Plan which include:

- Cycling Strategy;
- Local Transport Strategies and Forward Programmes;
- Parking Strategy;
- Passenger Transport Strategy Part 1 – Local Bus;
- Passenger Transport Strategy Part 2 – Information;
- Rights of Way Improvement Plan;
- Surrey Rail Strategy; and
- Travel Planning Strategy.

Reigate and Banstead Local Plan – Core Strategy

2.4.13 The Reigate and Banstead Core Strategy provides a spatial strategy for Reigate and Banstead over a 15 year period until 2027. It covers a wide range of planning issues, including economic development, regeneration, housing, environmental protection, transport, health and education.

2.4.14 Area 3 is the most southern area and borders with West Sussex County Council. The core strategy notes that the DMP will confirm employment land designations for Area 3 (which includes Salfords and Horley) in addition to the wider Gatwick Diamond area.

2.4.15 Policy CS17: Travel options and accessibility provides information on how the local area will be developed. Key parts of the policy include:

- ***"Improving the efficiency of the transport network by:***
 - ***To facilitate end-to-end journeys for residents, business and visitors by maintaining the road network, delivering public transport services and, where appropriate, providing enhancements.***
 - ***Delivering improvements to the road network to meet all street users' needs, enhance accessibility along key corridors and accommodate the forecast increase in journeys.***
- ***Facilitate sustainable transport choices, by:***
 - ***Improving travel options through enhanced provision for bus, rail, walking, cycling and bridleways***
 - ***Promoting walking and cycling as the preferred travel option for shorter journeys***
 - ***Promoting non-car travel***
 - ***Requiring the provision of travel plans and transport assessments for proposals which are likely to generate significant amounts of movement."***

2.4.16 The policies and strategies adopted by SCC and RBBC will be taken into account to ensure that cross boundary travel from Gatwick Green can be accommodated by the most sustainable transport modes.

SECTION 3 ACCESS STRATEGY

3.1 Introduction

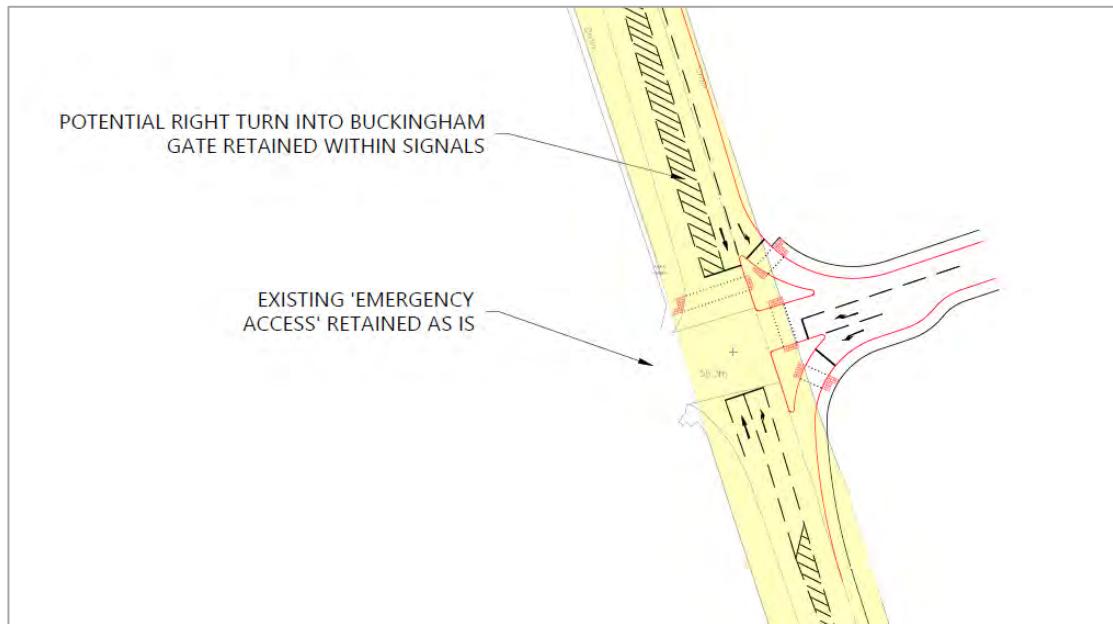
- 3.1.1 The site is located to the east of the B2036 Balcombe Road. The site is bordered by the M23 to the north, Peeks Brook Lane to the east and the B2037 Antlands Lane to the south. Fernhill Road splits the site and routes from west to east.
- 3.1.2 It is assumed that the allocation for employment use in the Reigate and Banstead Development Management Plan under HOR9 (Horley Business Park) adjacent to Junction 9A, north of the M23 spur) will only have limited access onto Balcombe Road. This is consistent with the adopted Local Plan which states that "the Balcombe Road junction can only be used for emergency services, public transport, other sustainable transport modes and a 'limited' number of registered vehicles for employees".
- 3.1.3 South of the M23 spur, the site has ample frontage onto Balcombe Road, both north and south of Fernhill Road. It is currently proposed that two separate access points will be provided into the site from Balcombe Road i.e. no direct access to the M23, M23 spur or Junction 9A.
- 3.1.4 The two junctions would be linked by an internal spine road via Fernhill Road providing a multi modal corridor through the site. This will deliver a permeable access solution as well as the opportunity to provide Fastway penetration through the site.
- 3.1.5 All junctions have been designed based on the latest guidance and best practice. The accesses have been sized to accommodate likely traffic flows associated with the proposed development. This has been based on trip generation rates, derived from TRICS which will be reviewed as the mobility strategy comes forward.
- 3.1.6 Along with the potential to provide non-car mode access as part of the two vehicular access points identified, additional dedicated pedestrian and cycle points of access, and associated crossing points will be provided.

3.2 Northern Access

- 3.2.1 To gain access into the northern land parcel it is proposed to provide a new signal junction arrangement. On each approach of the junction there would be two lanes to allow for all

directions of traffic. The proposed access arrangement is shown indicatively below on **Image 3.1.**

Image 3.1: Potential Northern Access Arrangement



- 3.2.2** The proposed access would allow for the integration of the existing access into Buckingham Gate (to the west of Balcombe Road) if necessary. This could be either in the form of a full, restricted or emergency access arrangement.

3.3 Southern Access

- 3.3.1** In order to gain access into the southern land parcel it is proposed to provide a new three arm roundabout. This arrangement is shown indicatively at **Image 3.2.**

Image 3.2: Proposed Southern Site Access



3.4 Antlands Road

3.4.1 Access opportunities using the frontage of Balcombe Road and Antlands Road are also being explored. The development at Forge Wood has identified potential improvements at this junction, the delivery of Gatwick Green could bring forward additional land including the opportunity to provide priority to Fastway services, pedestrian and cycle routes into the site.

3.5 Additional Accesses

3.5.1 Additional points of access will be considered as the scheme is developed, but could include:

- Additional discreet points of access onto Balcombe Road;
- Secondary access points onto Fernhill Road;
- Access from Antlands Road; and
- Emergency / limited access onto Peeks Brook Lane.

3.5.2 As part of future iterations of the access options identified above and in line with discussions with transport operators, public transport access into the site will either be in the form of

dedicated routes, i.e. bus gates, bus priority at the key junctions, and on the approaches to site access/egress.

3.6 Operational Assessments

- 3.6.1 All junctions have been designed in accordance with latest guidance and best practice and initial assessments have been undertaken of the two access points identified above. Based on anticipated future traffic flows on Balcombe Road (including those associated with potential HOR9) and expected traffic generation from the site.
- 3.6.2 Both access options would provide a high-quality access to the proposal and critically would do so without introducing any significant detriment to the operation of Balcombe Road.
- 3.6.3 Any planning application will be accompanied by a Construction and Environmental Management Plan (CEMP) which will ensure that all the junctions and proposed development can be delivered with minimal impact on the highway network. The CEMP may include the identification of temporary construction access points, as part of any measures to minimise impacts.

3.7 Summary

- 3.7.1 In the context of the NPPF transport tests, it is demonstrated that the site benefits from two deliverable points of access that ensure that safe and suitable access to the site can be delivered for all modes.

SECTION 4 SUSTAINABLE TRANSPORT STRATEGY

4.1 Development Philosophy

- 4.1.1 The overarching transport strategy for Gatwick Green is to ensure people can reach the new facilities by appropriate transport modes, promoting sustainable travel as part of a lifestyle choice allowing employees and visitors to access the site by foot, cycle and public transport. The aim is to reduce the use of private cars for shorter journeys from the neighbouring residential areas and those further afield through high quality public transport (transit system), including Fastway.
- 4.1.2 At the heart of the development philosophy will be a transport strategy aimed at maximising sustainable transport opportunities, whilst acknowledging that there will still be a residual demand for vehicular access, supported by local mitigation schemes on the road network. To ensure a consistent approach to the delivery of new transport services and infrastructure across borough/county boundaries, TWG is committed to working in collaboration or partnership with the local planning and highway authority, Highways England and relevant agencies such as the Coast to Capital LEP and Transport for the South East (TfSE).
- 4.1.3 This section describes the existing transport conditions in the area, including the opportunities for walking, cycling and public transport.

4.2 Walking and Cycling

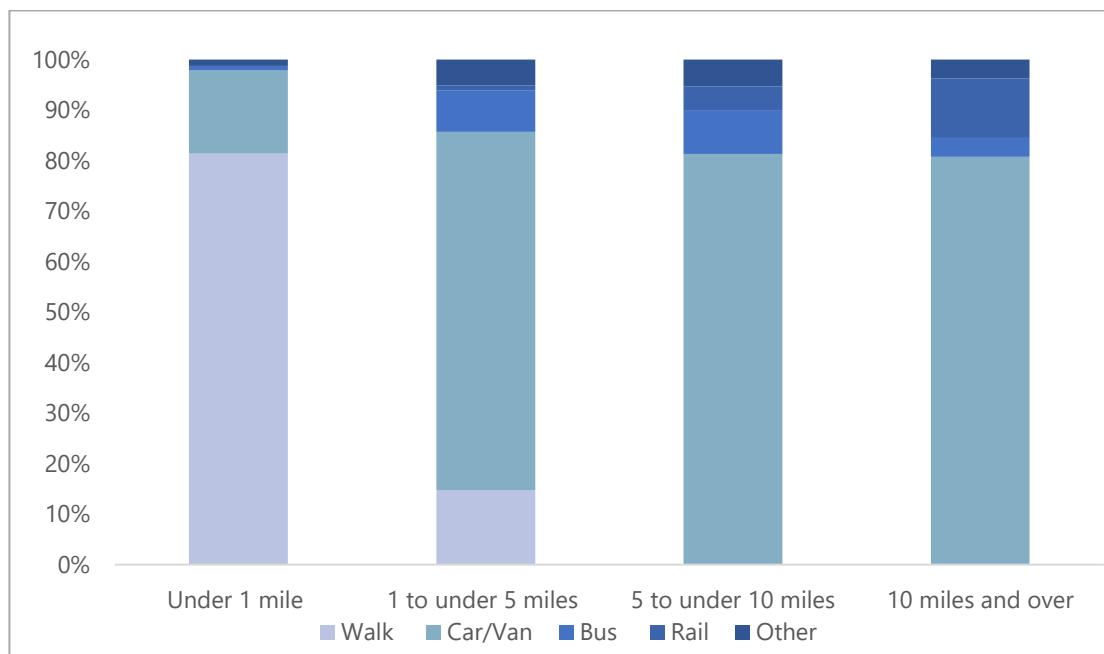
Walking Distances

- 4.2.1 Paragraph 4.4.1 of the Manual for Streets identifies that "***Walkable neighbourhoods are typically characterised by having a range of facilities within 10 minutes' (up to about 800 m) walking distance of residential areas***" and "***this is not an upper limit and PPG13 states that walking offers the greatest potential to replace short car trips, particularly those under 2km.***"
- 4.2.2 It is important to note that 2km is not however a maximum walking distance. Historically, the Design Manual for Roads and Bridges (DMRB) TD91/05 "Provision for Non-Motorised Users" at paragraph 2.3 has stated that:

"Walking is used to access a wide variety of destinations including educational facilities, shops, and places of work, normally within a range of up to 2 miles. Walking and rambling can also be undertaken as a leisure activity, often over longer distances".

- 4.2.3 Whilst TD91/05 has been superseded there is no evidence to suggest that is not still the case.
- 4.2.4 These distances are corroborated by the National Travel Survey (NTS) 2018 which identifies the mode share journeys of different lengths (Image 4.1) and confirms that the vast majority (80%) of trips of up to one mile (1.6km) are undertaken on foot.

Image 4.1: Mode Share of Trips by Main Mode for Different Trip Lengths



Source: National Travel Survey: England 2018

- 4.2.5 Providing development within one mile (1.6km) of existing and emerging development areas will provide the greatest opportunity for a significant proportion of trips to be made on foot.
- 4.2.6 A mile is not however, the maximum that people are prepared to walk and should not imply that development must be located within that distance of all amenities. The NTS data (Image 4.1) identifies that a significant proportion (around 31%) of journeys between one and two miles are undertaken on foot i.e. a significant proportion of people are prepared to walk for journeys of up to 2 miles (3.2km). This demonstrates that walking is a realistic and viable travel option for many people for such journeys.

Cycling Distances

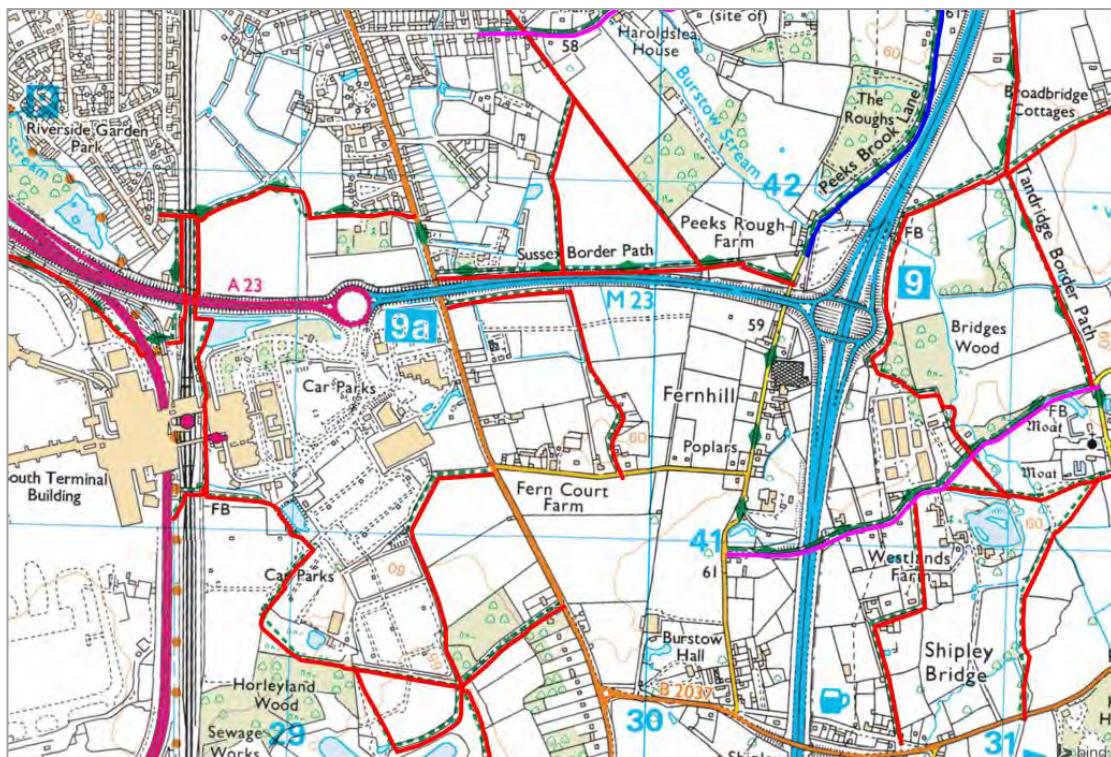
- 4.2.7 Paragraph 1.5.1 of the DfT Document LTN 02/08 Cycle Infrastructure Design addresses typical cycle trip distances and states that many highway networks primarily cater for local journeys with utility cycle trips typically under three miles (4.8km), although for commuters a distance of 5 miles (8km) is not uncommon.
- 4.2.8 Historically DMRB TA 91/05 "Provision for Non-Motorised Users" paragraph 2.11 stated:
- "Cycling is used for accessing a variety of different destinations, including educational facilities, shops and places of work, up to a range of around 5 miles. Cycling is also undertaken as a leisure activity, often over much longer distances. As well as being a mode of transport in its own right, cycling frequently forms part of a journey in combination with cars and public transport."***
- 4.2.9 Whilst TD91/05 has been superseded there is no evidence to suggest that is not still the case.
- 4.2.10 As identified in TA91/05 cycling also frequently forms part of a longer journey in combination with public transport. This approach is central to the 'New Directions' and Crawley Growth Programme.
- 4.2.11 By locating development in such close proximity to exiting residential and employment areas the development provides 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.
- 4.2.12 Shorter journeys are made more easily by the active modes, such as walking and cycling. This evidence is supported by NTS which state that 80% of trips under 1 mile are undertaken on foot and that a significant proportion (around 90%) of journeys between one and two miles are undertaken on foot or by bike i.e. a significant proportion of people are prepared to walk or cycle for journeys of up to 2 miles (3.2km).
- 4.2.13 The promotion of walking for short trips and cycling for increasingly longer distances, particularly as a result of the emergence of powered cycles, alongside conventional and demand responsive public transport networks is important and forms an important part of the Authorities ambitions.
- 4.2.14 In this respect the site is well located to the existing centre of Crawley and its northern suburbs (Pound Hill, Three Bridges, Northgate, Langley Green and Ifield), central Horley, the emerging residential areas such as Forge Wood, and complimentary employment areas of Manor Royal

and Gatwick Airport. Additional analysis will be undertaken to establish connectivity between Gatwick Green and the residential and central employment areas.

Public Right of Way Network

- 4.2.15** There are a number of public rights of way in the local area (**Image 4.3**). An existing public footpath runs through the northern part of the site and connects onto Balcombe Road. Opposite the junction of Ferndown Road on Balcombe Road, adjacent to the southern development parcel, the network of public rights of way continue west providing access into Gatwick Airport and the Rail Station. As part of the package of sustainable transport measures, there will be an opportunity to improve this network.

Image 4.3: Public Right of Way Network



Source: ROW Maps

4.3 Public Transport

Bus Travel

- 4.3.1** Bus stops are located and operate on Balcombe Road / Meadowcroft Close to the north of the site and on Antlands Road to the south of the site. The locations of these bus stops provide different opportunities to travel to a range of destinations including Horley, Crawley, Reigate and Redhill.

4.3.2 The bus stops on Balcombe Road / Meadowcroft Close are located some 1.3km to the north of the site i.e. outside of typical walking distances and are served by route 26 which provides four services a day on Monday, Wednesdays and Fridays. These provide a route to Horley and the nearby suburbs. The bus stop on Antlands Road is some 1.2km from the centre of the site and provides a more frequent, hourly service Monday to Saturday via bus service 424. This route provides the opportunity to travel to Crawley, Horley, Reigate and Redhill.

4.3.3 While there are bus services which operate within the local area, due to limited development in the immediate vicinity of the proposed site the local bus infrastructure is limited. A copy of existing routes in the vicinity of the site is included within **Appendix D**.

4.3.4 However, due to the size of the site and the approach to providing twin accesses onto Balcombe Road there is opportunity to divert existing services or provide a new Fastway/bus route which will penetrate the site. This will incidentally provide additional services to Balcombe Road, benefitting existing residents and businesses and potentially development along the route at Horley.

4.3.5 Discussions with the local Fastway bus operator (Metrobus) are ongoing, however from these early discussions it is envisaged that:

- The existing service number 3 (Crawley Town Centre - Forge Wood - Gatwick South Terminal) could be extended and diverted into the site;
- Public transport into the site will be in the form of dedicated access e.g. bus gate, priority incorporated into the junctions and on the approaches to site access junctions;
- As part of wider improvements to the Fastway network, service Fastway 10 could be extended to serve the site;
- There could be further opportunities to extend services 4 and 5 to serve the proposal; and
- That the internal layout of the site will be designed to incorporate the extension of the Fastway network.

4.3.6 Public transport provision for the site will therefore be integrated into the Fastway Development Programme and subject to further analysis provides an opportunity for additional funding to be made available to enhance the network of routes through targeted funding. The site could for example be linked via public transport to Manor Royal, Crawley Town Centre and the emerging

development opportunities at Ifield (which includes 10,000 homes located within Horsham DC). Strategic Policy ST4 Safeguarding of a Search Corridor for a Crawley Western Link of the CBLP identifies that the design of a Western Link Road between the A264 and A23 should take account of "*the desirability and requirements of bus priority measures (including future proofing for forecast traffic growth and congestion).*"

- 4.3.7** Within the site, on the proposed bus Fastway route small transport hubs and/or 'Super Hubs' will be developed. These hubs, which are already planned as part of a pilot scheme at Manor Royal, would act as a bus Fastway waiting area, but would have expanded facilities such as Wi-Fi, phone charging, coffee outlet, bike storage (either private or hire), electric bike and electric scooter (subject to legislation change) charging and even child and adult play areas / gym equipment.
- 4.3.8** This type of infrastructure allows for seamless and hassle-free interchange between ride sharing, public transport and non-motorised modes of travel and is in line with existing initiatives, such as those identified within the Crawley Growth Programme and Crawley New Directions.

Rail Travel

- 4.3.9** The site is located within the vicinity of three local railway stations, with the closest being Gatwick Airport to the west. Horley Railway Station is located to the north, whilst Three Bridges Railway Station is located to the south.
- 4.3.10** As identified within the Local Plan supporting evidence, station improvements at Crawley and Three Bridges stations are already identified within the Crawley Growth Programmes, while Gatwick Airport station is to be significantly improved, and upgraded alongside improved access to local Fastway bus services. The identified improvements will enhance these transport interchanges and help achieve modal shift away from the private car.

Gatwick Airport

- 4.3.11** Gatwick Airport is located some 1.7km from the centre of the site and provides an opportunity to travel to key destinations including London Victoria, Brighton, Horsham, Cambridge, Peterborough and Reading.
- 4.3.12** A scheme to improve Gatwick Airport Railway Station is currently underway, including measures to improve accessibility, widening platforms 5 and 6 and installing new escalators, stairways and

lifts. In addition, the size of the railway concourse will be increased, connections to the airport terminals and passenger wayfinding will be upgraded.

- 4.3.13 It is possible to access the station via existing pedestrian facilities on Buckingham Gate and via Ring Road South, as well as via the Public Right of Way network using Footpath 359Sy. The station is also within an easy cycle distance from the site, via relatively quiet roads.

Horley

- 4.3.14 Horley Railway Station is located some 2.3km from the centre of the site and provides the opportunity to travel to Peterborough, London Bridge and Horsham.
- 4.3.15 The railway station is within a reasonable cycle distance and there are 76 cycle spaces at the station. It can also be accessed using bus service 26 and 424.
- 4.3.16 It is possible to access Horley Railway Station via Balcombe Road. At least one footway is provided along Balcombe Road and continues along Victoria Road from the roundabout. This footway continues to Horley Railway Station. An additional route via Footpaths 362a, 360 and 355a from Balcombe Road and across the railway line up to the station is also available.

Three Bridges

- 4.3.17 Three Bridges Railway Station is located some 5.2km from the centre of the site and provides opportunities to travel to similar destinations to Horley and Gatwick Airport. Three Bridges has a station car park in addition to 276 cycle spaces.
- 4.3.18 It is possible to access the station via Balcombe Road, Milton Mount Avenue and Worth Park Avenue. Although crossing points are limited in some locations at least one footway is provided for the entire route. A shared footway / cycleway is provided along Worth Park Avenue on approach to Three Bridges Railway Station.

Station Accessibility Improvements

- 4.3.19 As part of the package of measures to improve and enhance accessibility, localised improvements to walking, cycling and Fastway routes will be brought forward which will improve accessibility between the site and the local Railway stations.

4.4 Summary

- 4.4.1** In the context of the NPPF Transport tests, it is demonstrated that there will clearly be opportunities for sustainable travel which will attract users and simultaneously discourage use of the private car.

SECTION 5 TRAFFIC IMPACT

5.1 Introduction

5.1.1 As part of the Transport Assessment, the impact of the proposed development on the local highway network and the strategic highway network including the M23 is being undertaken with traffic surveys already completed across the area.

5.2 Assumptions

5.2.1 The following assumptions will be reviewed and included within the traffic analysis:

- Committed developments (applications which have planning permission) nearby in both Crawley and Reigate and Banstead which will generate traffic on nearby local roads;
- Local Plan developments as set out in Crawley Borough Local Plan and Reigate and Banstead Local Plan. Nearby developments which will have an impact on the local network will be reviewed;
- HOR9 – the proposed development for Horley Business Park will be considered and included as part of the ongoing traffic assessments; and
- Trip generation rates have been derived from TRICS and at this stage are worst case estimates before further modal shift assumptions have been applied.

5.3 Local Interventions

5.3.1 Many of these may potential developments will include junction improvements to the local highway network. Initial research has been undertaken on the Forge Wood development and proposed junction improvements are being reviewed and considered when assessing the local highway network.

5.4 Strategic Interventions

5.4.1 In addition to the local highway improvements, consideration will also be given to other strategic schemes including the M23 smart motorway and improvements to Junction 10.

5.5 Traffic Modelling

- 5.5.1** Modelling will be undertaken using industry standard software including Junctions 9 (for priority and roundabout junctions) and LinSig (for signalised junctions)¹. This will model both the existing highway network and any proposed improvements which are likely to come forward as a result of committed developments and will be approved by WSCC highways

5.6 Summary

- 5.6.1** The highway network will be tested using the assumptions set out in Section 5.2. Any traffic impacts arising as part of this assessment will be addressed through a mitigation strategy which will include measures to improve public transport, walking and cycling.

¹ Junctions 9 and LinSig are comprehensive design and modelling packages for modelling junctions either individually or in a network of several junctions and are the recognised tools for assessing development impacts on independent junctions.

SECTION 6 SUMMARY AND CONCLUSIONS

6.1 Summary

- 6.1.1 i-Transport has been appointed by The Wilky Group (TWG) to provide highway and transport advice in relation to the promotion of Land to the east of Balcombe Road, for a strategic scale employment development.
- 6.1.2 It is concluded that safe and suitable access can be provided to the site through the delivery of a new signalised junction on the northern land parcel and a three-arm roundabout on the southern land parcel. Additional studies are ongoing in respect to providing access from Antlands Road.
- 6.1.3 Both access options will be refined in liaison with WSCC, but overall it is demonstrated that safe and suitable access to the site can be delivered wholly within the control of TWG / highway land.
- 6.1.4 The site has excellent accessibility to existing residential areas, and offers strong potential for sustainable travel using walking, cycling and public transport from both the local area and further afield.
- 6.1.5 The layout of the site will be designed to maximise sustainable travel, with a network of pedestrian and cycle routes through the site. The two points of access and internal link road will allow bus / Fastway penetration through the site.
- 6.1.6 Along with the proposed development, the site could provide a range of new day-to-day facilities which provide for the everyday needs of employees and local residents. The provision of such amenities within employment centres can remove the need for off-site trips. Shorter journeys are made more easily by the active modes, walking and cycling and potentially, personal electric transport.
- 6.1.7 The proposal will deliver and contribute towards infrastructure that achieves 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 being piloted in Crawley).
- 6.1.8 The transport package will include:
- Delivery of on-site public transport (Fastway) provision, with all the site within a short walk to an interchange hub;

- Contributions towards strengthening existing Fastway and bus routes and delivery of targeted Fastway / bus infrastructure, including bus priority and transit routes;
- Delivery of a network of pedestrian and cycle routes across the site, to put walking and cycling at the heart of the development;
- Contribution towards enhancing existing pedestrian and cycle routes, plugging the 'missing gaps' and connecting to / delivery of the Crawley Local Cycling and Walking Infrastructure Plan;
- A defined strategy to link the site with Crawley town centre, Horley, Forge Wood, Manor Royal, Three Bridges and Gatwick Airport;
- Delivery of infrastructure designed to accommodate current modes of travel as well as future modes and cater for changing attitudes towards travel;
- A site access strategy suitable for accommodating all models of travel, designed to maximise non car modes, whilst minimising impacts on the local road network;
- A strategy to delivery Electric Vehicle charging for all occupiers, including freight movements, users of the development, visitors and local residents; and
- A Full Travel Plan and associated environmental strategy.

6.1.9 Whilst it is inevitable that new development will generate additional traffic demands, initial review has demonstrated that these impacts can be offset by the facilitation of sustainable travel modes accessible to all, alongside local and strategic highway improvements. A full and detailed transport assessment would be provided to identify any further mitigation needed.

6.2 Conclusion

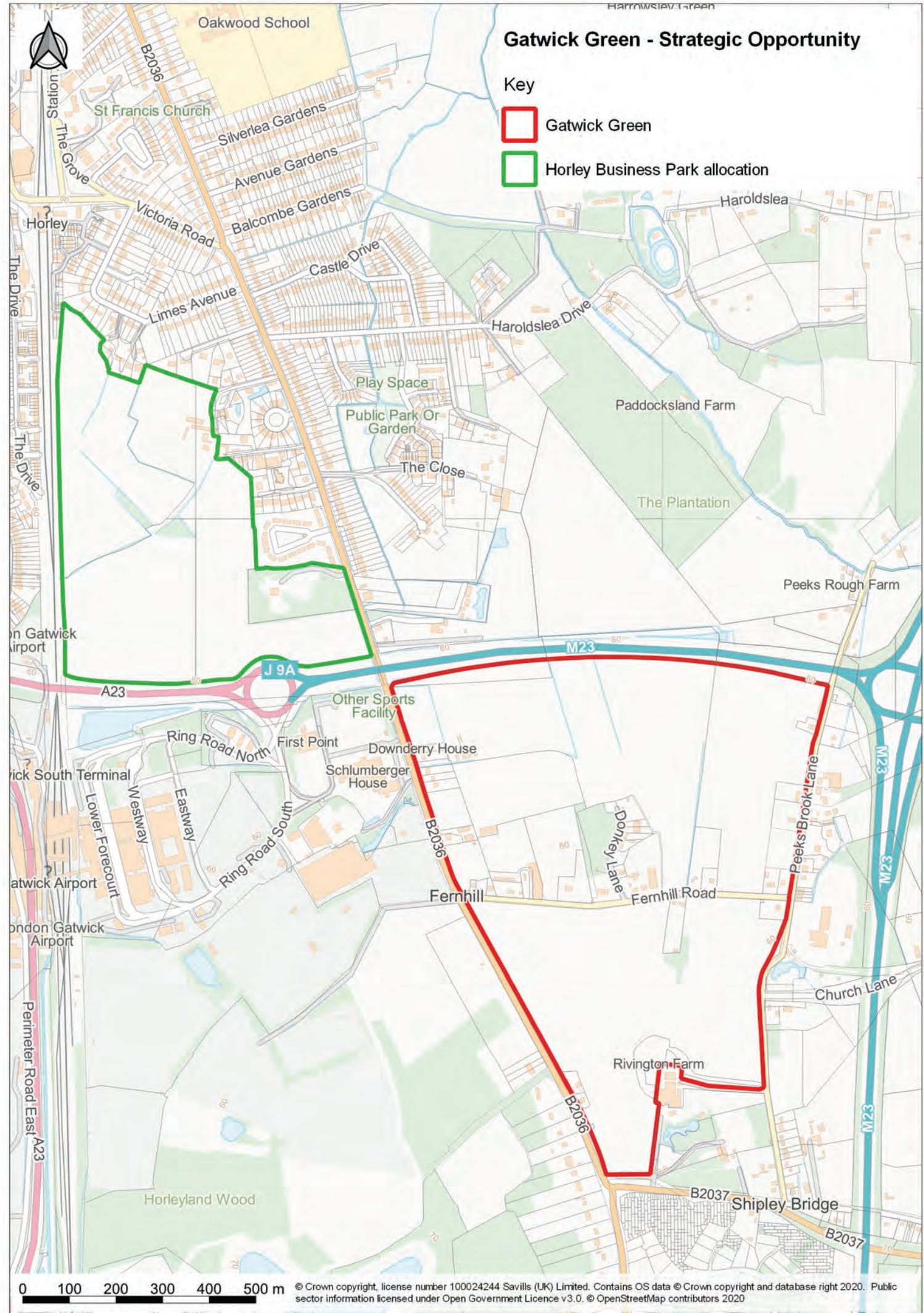
- 6.2.1** This report has demonstrated that the site is in an accessible location, that safe and suitable multi-modal access can be readily delivered, and that the residual cumulative impacts of the development would not result in a severe impact upon the local highway network.
- 6.2.2** In conclusion, the site can be brought forward in a manner which fully accords with the highway and transport requirements of both local policy and the NPPF.

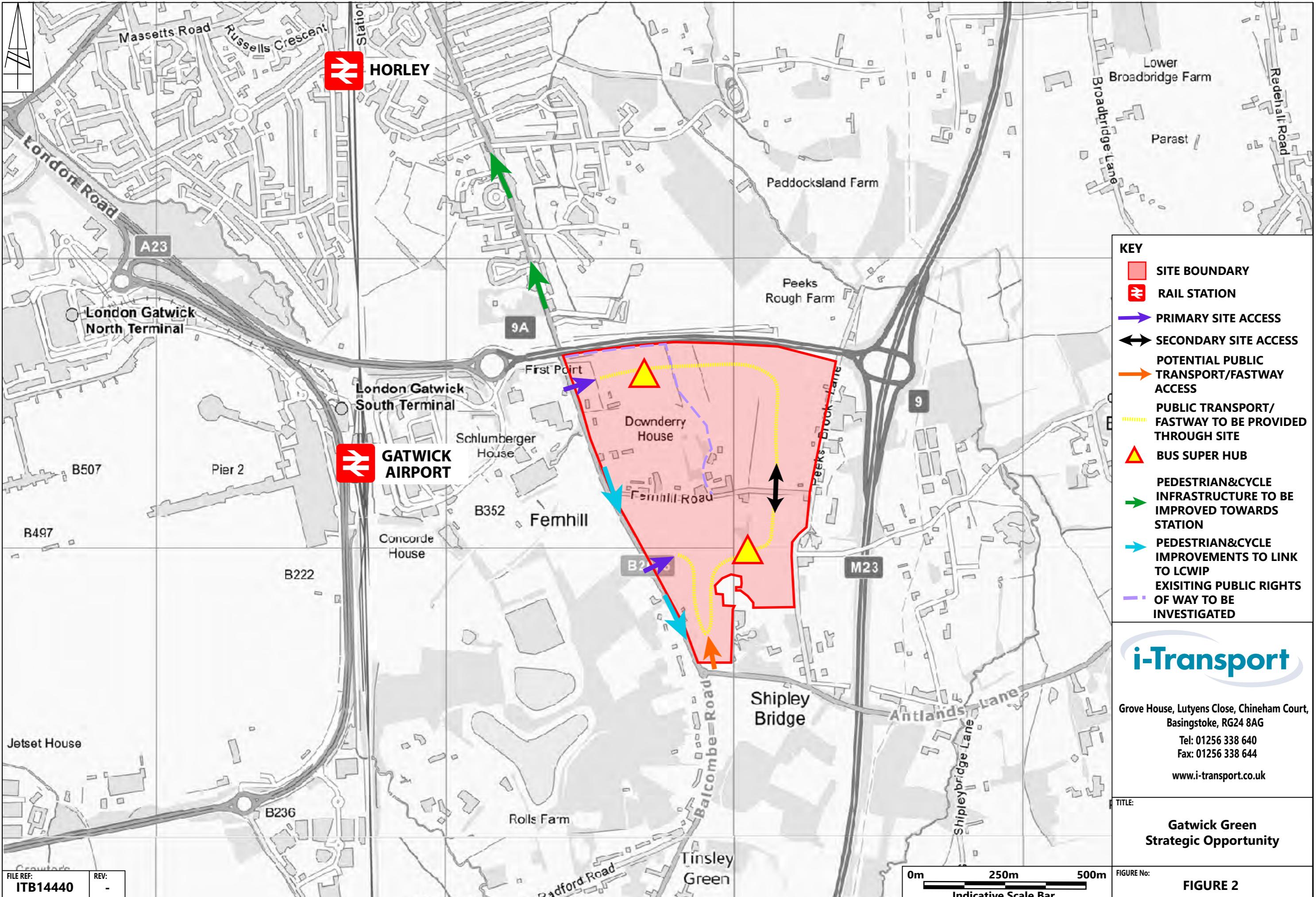
FIGURES

Gatwick Green - Strategic Opportunity

Key

 Gatwick Green

 Horley Business Park allocation




APPENDIX A. Emerging Development Framework Plan



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Job N Drg N
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Rev
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Date
26/02/2020

Scale
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Status
PRELIMINARY

Author
JA

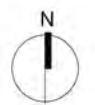
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Job
GATWICK GREEN

Drawing
Development Framework Plan (Wilky Control)

NOTE: All figures are approximate and have been measured and expressed in a manner as defined by the current edition of the RICS Code of Measuring Practice, unless otherwise stated. Figures relate to the current stage of the project and any development decisions to be made on the basis of this information should include due allowance for the increases and decreases inherent in the design and building processes.
Reproduced from Ordnance Survey mapping under Licence Numbers 100022432 & 100018493

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Date
26/02/2020

Director
JA

Author
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Drawing
Development Framework Plan (Masterplan)

NOTE: All figures are approximate and have been measured and expressed in a manner as defined by the current edition of the RICS Code of Measuring Practice, unless otherwise stated. Figures relate to the current stage of the project and any development decisions to be made on the basis of this information should include allowance for the increases and decreases inherent in the design and building processes.

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APPENDIX B. Sustainability Appraisal Matrix

CRAWLEY BOROUGH COUNCIL LOCAL PLAN REVIEW

SUSTAINABILITY APPRAISAL / STRATEGIC ENVIRONMENTAL ASSESSMENT

DRAFT REPORT For the Submission Local Plan

**Overview & Scrutiny Committee (25 November 2019)
Cabinet (27 November 2019) and
Full Council (16 December)**

DRAFT Cabinet 27.11.19

November – December 2019

North Crawley Area Action Plan (Policies SD3 and EC1)

Site Name: North Crawley Area Action Plan.

Site Potential Designation: The Local Plan makes a commitment to assess, through an Area Action Plan (AAP), how land that has been subject to safeguarding can most appropriately be planned for to ensure the potential future growth needs of the airport can be properly considered alongside other development and infrastructure needs in Crawley. The outcomes of work on the AAP are not yet known and evidence may prove that the area, or a part of it, is still required for the future expansion needs of the airport. However, planning the area in detail could allow for a range of different uses, including employment sites to be planned in this area. This assessment focuses specifically on the principle of locating a Strategic Employment Site or Sites within the AAP area, should work on the AAP determine that land could be made available.

Site Description: Land that forms part of the North Crawley Area Action Plan is shown on the Local Plan Map. This includes land to the north of Manor Royal, land to the North of the Forge Wood and land south and east of Gatwick Airport (including land South of M23 Junction 9A). The area currently comprises a number of fields dispersed with a few residential properties along Poles Lane, a cluster of commercial properties as part of Southways, and ribbon development along London Road including Gatwick Manor Hotel. The Eastern aspect of this land is characterised by predominately open space and fields, but with ribbon development along Balcombe Road. A mix of commercial properties is situated in proximity to the airport, whilst to the south, the Forge Wood neighbourhood is being developed. The area is largely identified within the Local Plan as countryside.

Impacts of the Development

| SA Objective | Commentary and/or Impact |
|---|--|
| 1. Mitigate Climate Change & Local Pollution | The AAP area is situated beyond the Built up Area Boundary in a countryside location, and largely represents greenfield land. New strategic employment development would involve a loss of countryside land, and would potentially increase the need to travel to access new jobs. There is, however, the opportunity through the AAP approach to ensure that new development is sustainably located to cluster with existing employment sites and to maximise access to sustainable transport links. The greenfield nature of the site provides scope to further mitigate climate change impacts, presenting the opportunity for highly sustainable new built development. On this basis, although it is recognised that the development of greenfield land can potentially have a negative impact in terms of climate change and local pollution, the development itself could provide opportunities to offset this impact. It is therefore uncertain what the impact would be on this indicator. Uncertain Impact ? |
| 2. Adapt to Climate Change | Identification of employment site(s) through the AAP, particularly where these are well connected to existing Main Employment Areas, represents the most sustainable option. Though this would result in urban extension onto greenfield land, development could be designed with climate change adaptation in mind. Strategic employment development within the wider AAP area potentially brings an area of greenfield land into development, though strategic level new build could itself be sustainably designed in order to facilitate adaptation to climate change. On this basis it is considered that development could offer scope to respond positively to climate change through the planning process. Possible Positive Impact +? |
| 3. Protect and/or Enhance the Built Environment | There is significant demand for additional business land and floorspace to meet identified business needs. The Local Plan is clear that the use of existing Main Employment Areas will be maximised before sites at the periphery of Crawley are brought forward. However, should development come forward through the AAP, Local Plan policy will require that the principles of good design are adhered to. Any potential new development would need to have regard to its surroundings, including its relationship with the countryside, and enhance the overall aesthetics of the built environment. It is therefore considered that development identified through the AAP could contribute positively against this objective. Possible Positive Impact +? |
| 4. Decent/ Affordable Homes | The identification of main employment areas as employment destinations will not directly deliver decent/affordable homes. However, any employment growth identified through the AAP will help the Plan to balance the demands of employment and housing on Crawley's limited land supply. For this reason, land identified for the AAP for employment generating use is viewed as having an uncertain, but potentially positive impact against this indicator. Possible Positive Impact +? |

| SA Objective | Commentary and/or Impact |
|---|--|
| 5. Maintain/ Support Employment | Business-led employment development, either as an extension to Manor Royal or a stand-alone complementary employment destination, would help address the significant need for new business land in Crawley. This would be expected to support and complement Crawley's existing business offer, particularly that of Manor Royal. The provision of new strategic employment land would support sustainable economic growth in Crawley and that of the wider Gatwick Diamond, attracting new business and facilitating the expansion of existing business. As such, economic development through the AAP, could present a significant opportunity to accommodate the business needs of Crawley, supporting its role as the leading employment destination in the Gatwick Diamond. Possible Significant Positive Impact ++? |
| 6. Conserve/ Enhance Biodiversity and Landscape | The AAP area is broad in its geographical scope, covering much of the northern part of Crawley. The area is therefore varied in terms of its biodiversity value and landscape character, ranging from low grade farmland to areas of SNCI/Local Nature Reserve and Ancient Woodland/hedgerows. Development of greenfield land for employment use is likely to be negative in terms of its impact on biodiversity and landscape, although the AAP work will identify the areas which need to be protected and opportunities for enhancement. A well located and designed development could be brought forward in a manner that minimises an uncertain, but potentially negative impact against this objective. Possible Negative Impact -? |
| 7. Promote Sustainable Journeys | Development through the AAP could extend the existing and/or create a new employment destination which would increase the need to travel. However, a sustainable location within Crawley's boundary and close to existing Main Employment Areas and neighbourhoods presents an opportunity to link into established bus routes and maximise pedestrian linkages. On this basis it is considered that development in the Area of Search could perform positively again this indicator. Possible Positive Impact +? |
| 8. Provide Sufficient Infrastructure | The AAP area represents a semi-rural location that is characterised in part by small-scale pepper potted commercial and residential development. Any critical mass of larger scale employment development would therefore create opportunity for a wider provision of infrastructure, serving the site and possibly wider needs. This would, however, be dependent on scale. Possible Positive Impact +? |
| 9. Promote Sustainable Communities and encourage active lifestyles. | Development within the AAP area, either as an extension to Manor Royal or a stand-alone complementary employment destination, would be well placed to link with existing Main Employment Areas at Manor Royal and Gatwick Airport. There are also possible opportunities to reinforce links to the neighbourhoods of Langley Green, Three Bridges and Forge Wood, enhance sustainable linkages with the bus, pedestrian and cycle network, whilst offering scope to contribute to the encouragement of healthy lifestyles through the design process. Employment development through the AAP would therefore be well placed to perform positively against this indicator. Possible Positive Impact + |
| Conclusions | As an extension to a Main Employment Area, or as a standalone site(s) for Strategic Employment Location(s) to meet the business land needs of Crawley as a sub-regional employment destination, 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. |

APPENDIX C. TWG Representation Comments – New Directions

New Directions for Crawley; Transport and Access for the 21st Century

Response to Consultation by Tony Cross, Empiric Partners

On Behalf of The Wilky Group, February 2020

Introduction

The Wilky Group (TWG) welcomes the publication of New Directions which sets out the aspirations of Crawley Council for mobility and access within the borough. The principles underlying the document are endorsed by TWG, notably a vision for a low carbon, healthy and attractive town. The focus on people and goods rather than vehicles will encourage an approach in keeping with national and regional policies which focus on mobility and places rather than the historic concentration on the expansion of capacity to meet increasing demand for travel.

It is also good to see a recognition that future policy and investment should achieve a balance between encouraging growth and economic prosperity and the need to facilitate travel by the active modes and much improved public transport. This balanced approach generates realistic and pragmatic measures to significantly improve transit systems, affording priority to fast and frequent services such as Fastway.

The focus on cycling and walking as an important means of accessing employment and town centre facilities is also a welcome objective of New Directions. In short this document is fit for purpose and should guide planners, developers, service and network providers as they seek to deliver growth within the context of the declared “climate Emergency”.

Commentary

As responsible developers, TWG are approaching plans to create new employment opportunities in North East Crawley with a strategy for access which has synergy with the themes running through New Directions. TWG based its indicative Transport Plan for North East Crawley/Gatwick (published to interested parties in October 2019), on the need to deliver sustainable solutions through an integrated approach to planning and transport. The common themes include;

- The need to address the climate emergency
- The serious concerns over air quality
- The growth in obesity amongst young people, (partly as a result of car borne travel)
- The impact of the private car on urban design and life-styles
- Ongoing issues associated with road congestion and personal safety
- Importance of walking, cycling and zero carbon public transport in addressing issues
- The role of planning and development in generating joined-up solutions
- Need to recognise shared agenda with health, education and sustainable growth

These themes are endorsed by TWG, it is understood that they inform the agenda for mobility defined in New Directions and will therefore influence the access and transport measures associated with the proposed development at Gatwick Green.

The timing of the publication of New Directions is helpful as consultation is simultaneously underway for the Crawley Local Plan. It is therefore important for the “joined-up” approach to land use and transport planning to be a central feature of the forthcoming Examination in Public for the Local Plan. In devising a Transport Strategy for Gatwick Green, TWG is mindful of the emphasis placed on “sustainable development” and the need to cater for mobility through an approach which is “transit orientated”. Discussions are therefore well advanced with Metrobus in recognition of their vision for an expansion of the Fastway services within Crawley.

Equally TWG is aware of the measures captured in the Local Cycling and Walking Infrastructure Plan, (LCWIP) to improve access and connections between existing neighbourhoods and proposed new development. New Directions provides a useful guide to the routes which are subject to proposed extension or improvement to achieve safe, prioritised and direct cycle and pedestrian links between residential, employment and other amenities. This will assist developers to deliver sustainable travel opportunities for both residents and those travelling into the Borough. TWG supports this initiative.

The announcement of a Multi-Modal Transport Study alongside Development Plans and modelling of options is considered essential to provide an evidence base for the defined Action Plan, (to 2030). It is important to ensure that this study embraces some of the measures which will be required to encourage those moving around Crawley to choose sustainable means of travel. The aspirations and vision contained in New Directions will be easily frustrated by the exclusion of measures designed to render car use less attractive and thereby to promote active modes and travel by high quality transit services.

There are some issues which remain to be addressed if the vision for mobility and access in Crawley is to be delivered effectively within the next decade. TWG believes that whilst New Directions offers clarity in its ambition to reduce carbon and create a healthy and attractive town the following challenges will need to be met;

- Creating a network of high quality transit services will require cross boundary planning and a joined-up approach between the myriad of local authorities grouped around the Gatwick area.
- Effective co-ordination between agencies responsible for the provision of transport networks and services is hard to achieve. This is however essential if the narrowly defined roles of individual providers are to be put aside in favour of a consensual approach to mobility planning
- In close relation to the previous point, clear, defined leadership is of critical importance in promoting a vision which is genuinely integrated between local authorities, national agencies and crucially private sector developers.
- Funding through Community Infrastructure Levy, (CIL) and other mechanisms will need to be co-ordinated to ensure the timely delivery of measure in accordance with the Action Plan. TWG is encouraged by the success of the Crawley Growth

Programme and innovative approaches to investment in the town. New Directions will need to achieve cross sector, (health, transport and education) agreement to secure the funding necessary to meet the ambitious objectives.

- The role of private sector developers in helping to finance new and improved transport infrastructure and services is recognised within New Directions and acknowledged by TWG. It is important however, that contributions are proportionate and calculated as “stepping-stones” towards the delivery of schemes which are part of a defined approach to mobility. It is unlikely that individual development , (except for the expansion of Gatwick Airport) will be able to fund major infrastructure or extensive new services.
- The involvement of TWG in Crawley over many years along with recent engagement with Transport for the South East and Coast to Capital LEP all point to an appetite for a new approach to planning land use, transport and economic growth. New Directions defines a vision for the town which along with the Local Plan offers an opportunity to consolidate this emerging consensus. Communicating this important message to residents, employers and investors is, in the opinion of TWG, critical to its ultimate success.

New Directions confirms that Crawley is at the forefront of new thinking on transport. The aspirations have the support of TWG, and we look forward to playing a part in helping to deliver the vision. The challenges which no doubt lie ahead can be met by a determination to create an Action Plan that is realistic, deliverable and supported by public and private sector stakeholders committed to sustainable growth. As a long-standing player within Crawley, we understand the way forward and endorse your “direction of travel”.

Tony Cross on behalf of The Wilky Group

Managing Partner

Empiric Partners LLP

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Office: 01256 338440

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APPENDIX D. Existing Bus Routes



Redhill 100

Park 25
St Anne's Mount
Redhill Bus Station
Brook Road
Wilton Road
The Cutting
Church Road
Wimborne Avenue
Tollgate Avenue
West Avenue
Copsleigh Avenue
Salfords Church
Salbrook Road
Wood Close
Pear Tree Hill
Crossoak Lane
Skylane Hotel
Chestnut Road
Benhams Drive
Southlands Avenue
Vicarage Lane
Court Lodge Road (southbound)
Emlyn Road
Gower Road (northbound)

Salfords 100

Langshott 20

Brookfield Drive West
Brookfield Drive Central
Orchard Drive
Jubilee Close Langshott
Wheatfield Way North
Kings Head
Horley Town Centre
Meadway (northbound only)
Balcombe Road

20 100 Horley

Brighton Road
Povey Cross Road East
Povey Cross Road West
Massets Road
Horley Station
Air Balloon
Horley Library
Court Lodge Shops
Rutherford Close
Court Lodge Road
Emlyn Road
Gower Road (northbound)

Gatwick Airport 100



10 20 100 Manor Royal

Gatwick Manor Hotel
Betts Way
Business Quarter North
Business Quarter Central
Business Quarter South
London Road Central
London Road South
Crawley Multiplex
Morrisons (northbound)

Three Bridges 20 100

10 20 100 Crawley

Broadway
Crawley Bus Station
Exchange Rd (southbound)
Magistrates Court
Woodside Road
Midgley Road
Northgate Parade
Haslett Ave East
Town Centre South (northbound)
Arora Hotel (southbound)

10 Bewbush

Bewbush Dorsten Square
Breezehurst Drive West (southbound)
Breezehurst Drive East
Broadfield Barton North
Pelham Drive
Creasy Drive North
Creasy Drive West
Creasy Drive South
Creasy Drive East

Broadfield 10 20

Maidenbower 100

Southgate Avenue Central
Southgate Avenue South
Broadfield Stadium
Coachmans Drive North
Coachmans Drive Central
Coachmans Drive South
Southgate Avenue North
Haslett Ave East
Town Centre East (southbound)
Southgate Avenue
Squareabout
Haworth Road
Stirling Close
Fenchurch Road
Oriel School
Palmer Road
Tullett Road
Laud Drive
Evans Close
Allyington Way
Europa Hotel
Brandon Close
Carter Road
Maidenbower Place
Delfont Close
Moorland Road
Gabriel Road
Lyon Close

Daily service
from 27 April 2019.

3

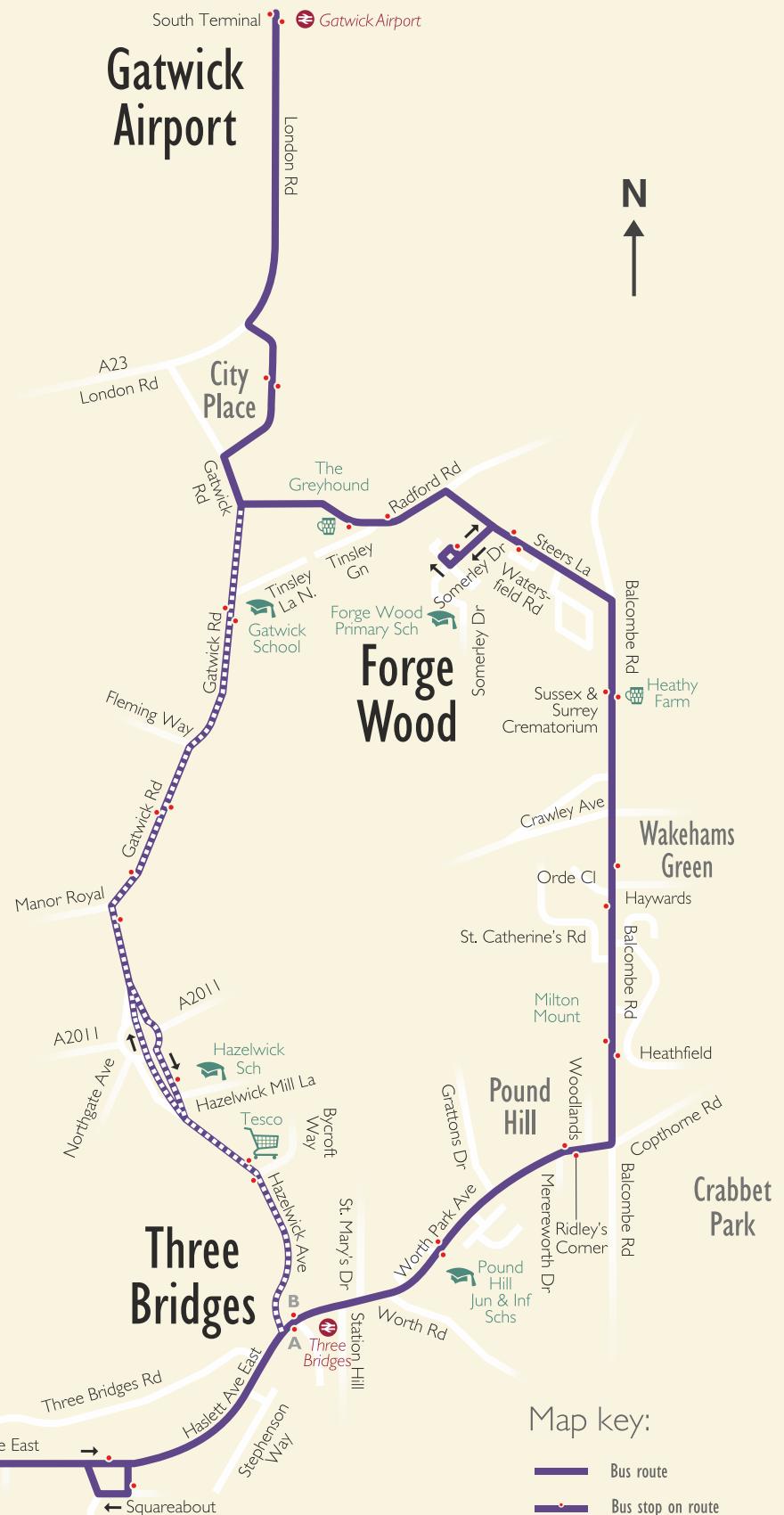


CRAWLEY ★ THREE BRIDGES
★ BALCOMBE ROAD
★ FORGE WOOD ★ GATWICK

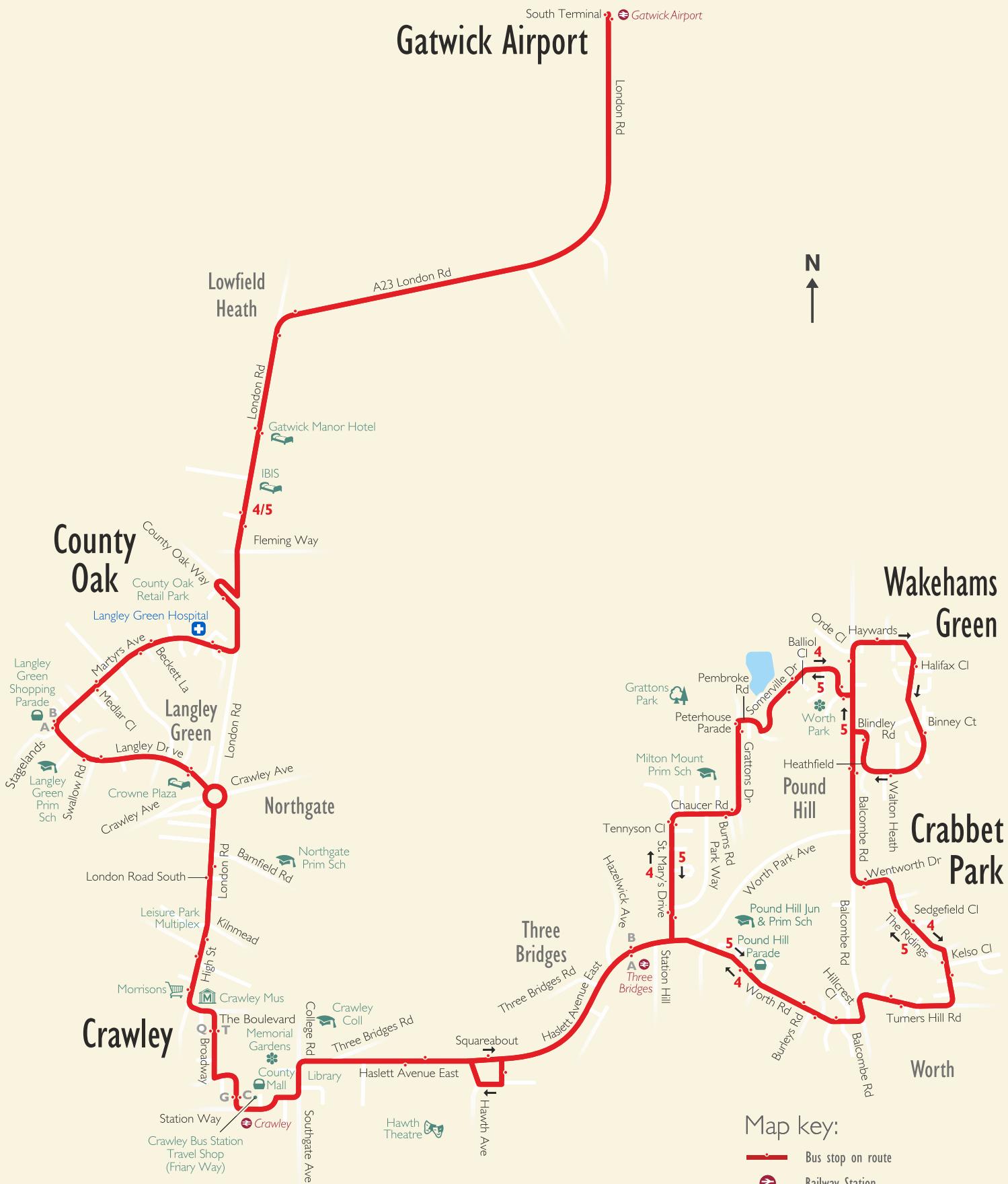
ROUTE



Appears before 0500
every day of the week, and
up to every **30 minutes**
Mon-Sat daytime.



Daily service from 1 September 2018.



26 HORLEY TOWN BUS

Mondays, Wednesdays & Fridays ONLY except Public Holidays

| | | | | | |
|---------------------------------|---|------|------|------|------|
| Balcombe Road Meadowcroft Close | | 0953 | 1053 | 1153 | 1253 |
| Horley Railway Station | ↔ | 0957 | 1057 | 1157 | 1257 |
| Waitrose | | 0958 | 1058 | 1158 | 1258 |
| Russells Crescent The Drive | | 1000 | 1100 | 1200 | 1300 |
| Upfield The Ridgeway | | 1003 | 1103 | 1203 | 1303 |
| Cheyne Walk | | 1004 | 1104 | 1204 | 1304 |
| Oldfield Road | | 1006 | 1106 | 1206 | 1306 |
| Hookwood Tesco | | 1009 | 1109 | 1209 | 1309 |
| Horley Library | | 1013 | 1113 | 1213 | 1313 |
| Horley Row Benhams Drive | | 1017 | 1117 | 1217 | 1317 |
| Meath Green Lane Landen Park | | 1021 | 1121 | 1221 | 1321 |
| Lee Street Parkhurst Road | | 1023 | 1123 | 1223 | 1323 |
| Thornton Place | | 1026 | 1126 | 1226 | 1326 |
| Court Lodge Road Shops | | 1028 | 1128 | 1228 | 1328 |
| Horley Library | | 1031 | 1131 | 1231 | 1331 |
| Hookwood Tesco | | 1035 | 1135 | 1235 | 1335 |
| Oldfield Road | | 1038 | 1138 | 1238 | 1338 |
| Cheyne Walk | | 1040 | 1140 | 1240 | 1340 |
| Upfield The Ridgeway | | 1041 | 1141 | 1241 | 1341 |
| Russells Crescent The Drive | | 1044 | 1144 | 1244 | 1344 |
| Waitrose | | 1046 | 1146 | 1246 | 1346 |
| Horley Railway Station | ↔ | 1047 | 1147 | 1247 | 1347 |
| Balcombe Road Meadowcroft Close | | 1051 | 1151 | 1251 | 1351 |



For all Compass bus times and coach hire information, please contact:
Compass Travel (Sussex) Ltd, Faraday Close, Worthing, West Sussex. BN13 3RB
Tel: 01903 690025 | Fax: 01903 690015 | Email: office@compass-travel.co.uk
Website: www.compass-travel.co.uk

EFFECTIVE FROM 24.04.2017

236 East Grinstead - Oxted

357 Reigate - Selsdon

409 East Grinstead - Selsdon

410 Redhill - Hurst Green

411 Caterham Town Service

422 Crawley - Reigate

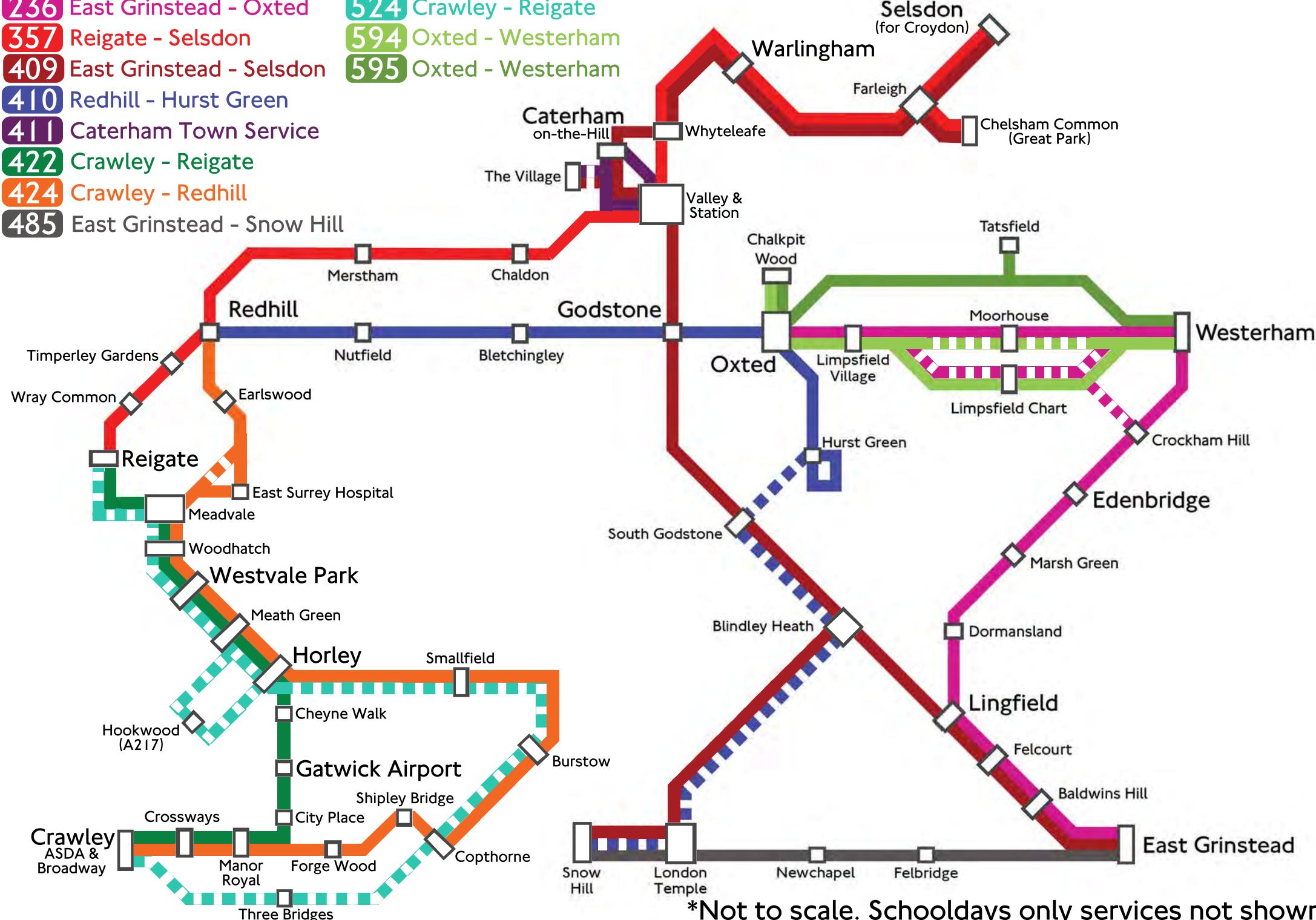
424 Crawley - Redhill

485 East Grinstead - Snow Hill

524 Crawley - Reigate

594 Oxted - Westerham

595 Oxted - Westerham

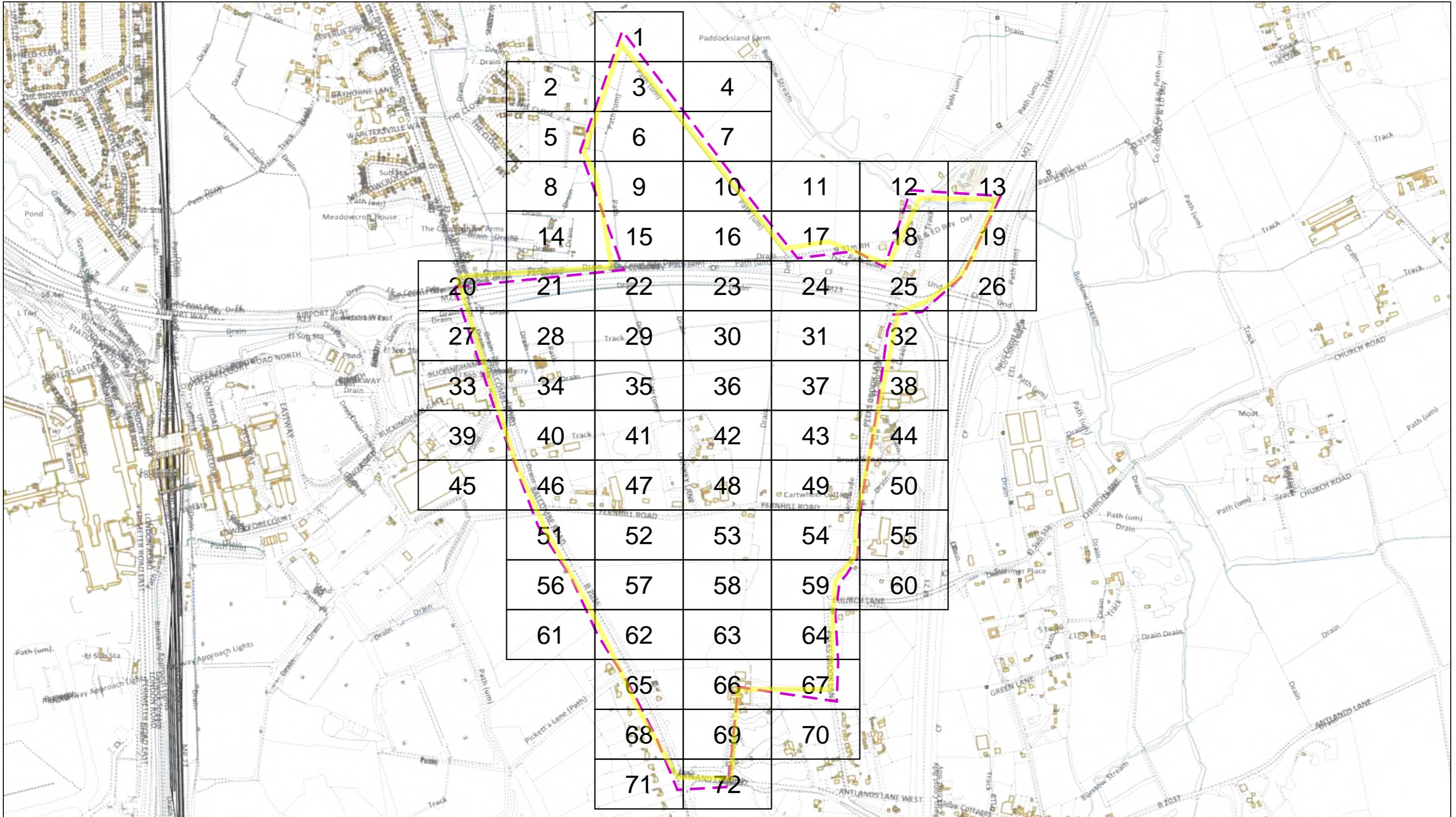


*Not to scale. Schooldays only services not shown.



i-Transport – Basingstoke | Manchester | London | Leeds
www.i-transport.co.uk

Appendix D – Local Power network



Dig Sites

Area: Line:

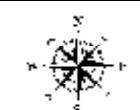
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- Subject to paragraph 2 UK Power Networks has no liability to you in contract, in tort (including negligence), for breach of statutory duty or otherwise for any loss, damage, cost, claims, demands, or expenses that you or any third party may suffer or incur as a result of using the information provided whether for physical damage to property or for any economic loss (including without limitation loss of profit, loss of opportunity, loss of savings, loss of goodwill, loss of business, loss of use) or any special or consequential loss or damage whatsoever.
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Date Requested: 22/10/2019
Job Reference: 17059737
Site Location: 528280 140136
Requested by:
Miss Celeste Imthurn
Your Scheme/Reference: 606255 -
Gatwick Green
Scale: 1:8200 (When plotted at A3)

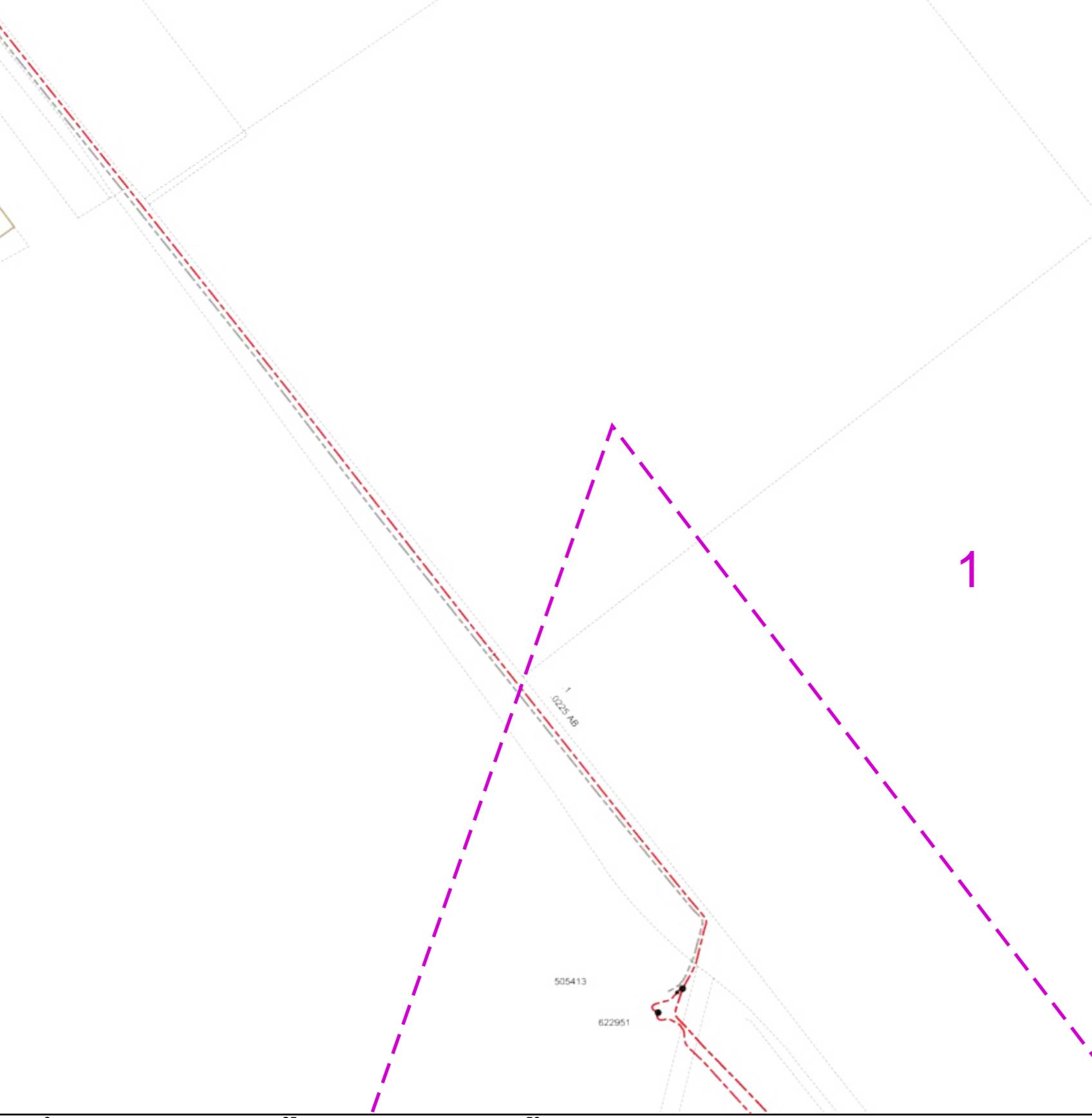


IF IN DOUBT - ASK!
PHONE 0800 056 5866
EMERGENCY - If you
damage a cable or line
Phone 0800 783 8838
(24hrs) URGENTLY



ALWAYS LOOK UP
BEFORE
YOU START WORK
Refer to HSE
Guidance note GS6

Maps produced at 1:2500 scale are Geo-Schematics which show LV mains cables and overhead lines (in some cases all voltages). Prior to carrying out excavations you must refer to the 1:500 records to determine the location of all known underground plant and equipment.



0 25 50
metres

Dig Sites Area: Line:

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Miss Celeste Imthurn
Your Scheme/Reference: 606255 -
Gatwick Green
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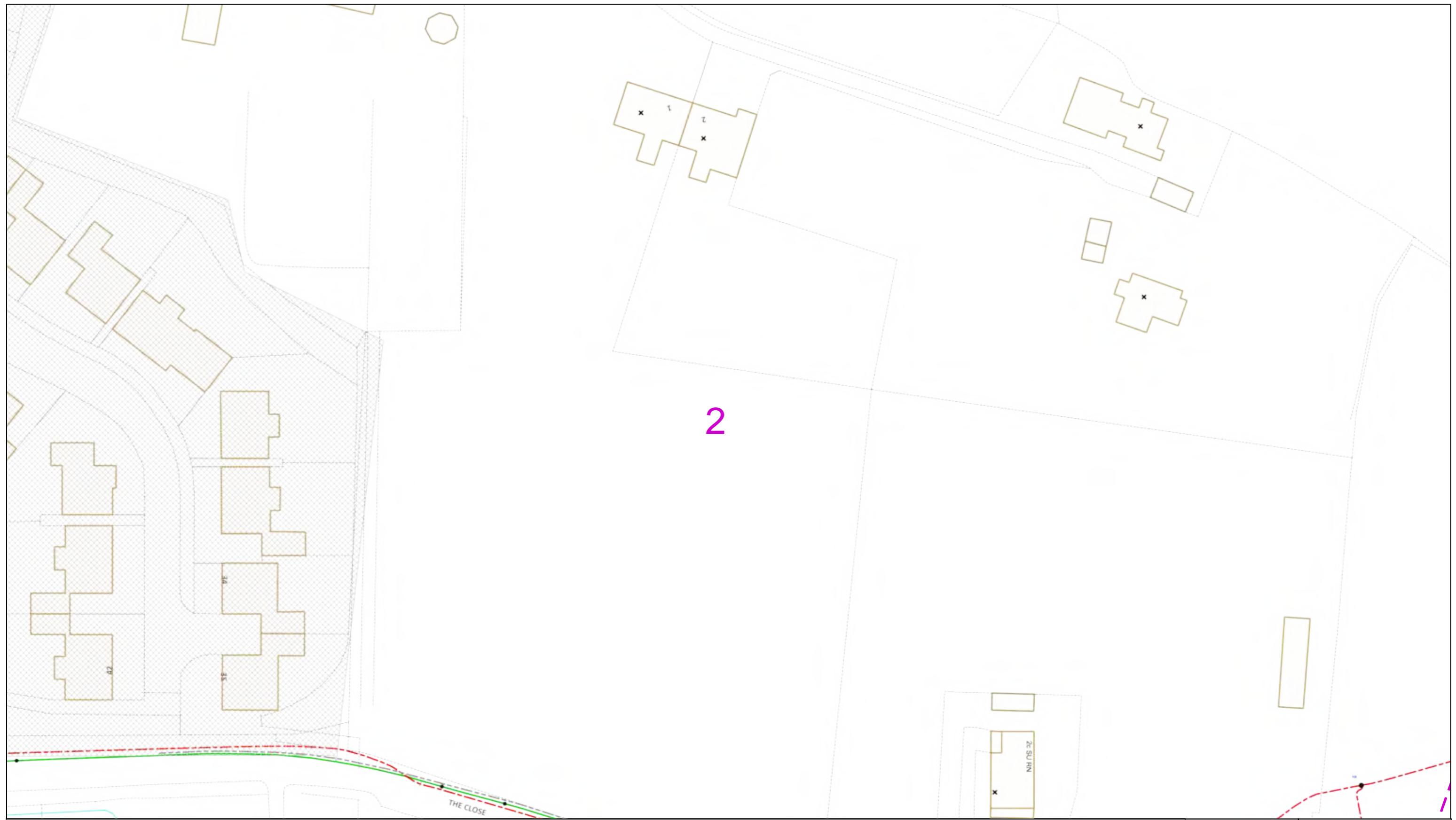


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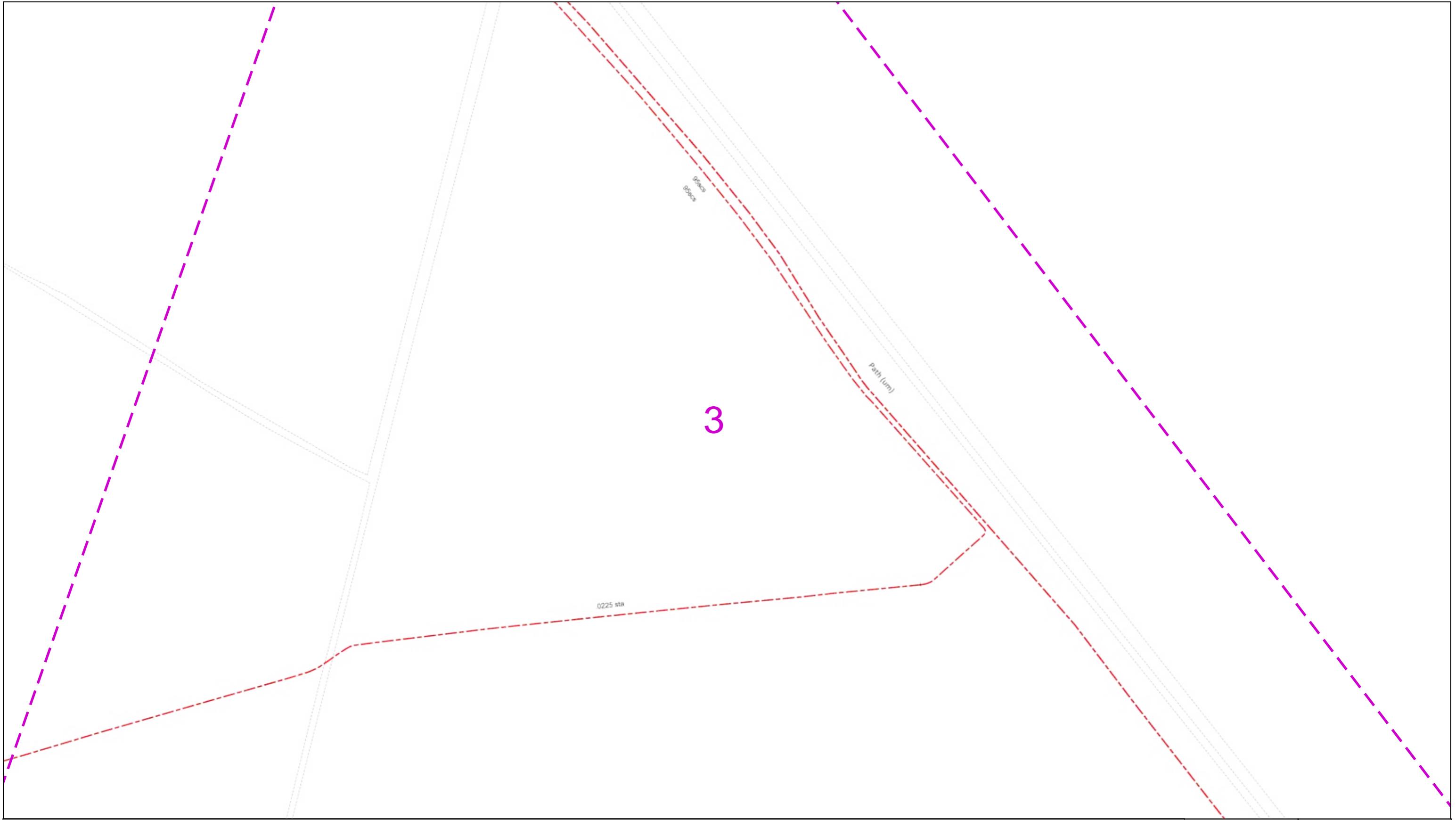


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| | | |
|---|--|---|
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| Date Requested: 22/11/2019 Job Reference: 17059737 Site Location: 528280 140136 Requested by: Miss Celeste Imthurn Your Scheme/Reference: 606255 - Gatwick Green Scale: 1:500 (When plotted at A3) | The quality and accuracy of any print will depend on your printer, your computer and its print settings. Measurements scaled from this plan may not match measurements between the same points on the ground. | IF IN DOUBT - ASK! PHONE 0800 056 5866 EMERGENCY - If you damage a cable or line Phone 0800 783 8838 (24hrs) URGENTLY |
| | ALWAYS LOOK UP BEFORE YOU START WORK Refer to HSE Guidance note GS6 | |



0 25 50
metres

Dig Sites Area: Line:

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Job Reference: 17059737
Site Location: 528280 140136
Requested by:
Miss Celeste Imthurn
Your Scheme/Reference: 606255 -
Gatwick Green

Scale: 1:500 (When plotted at A3)
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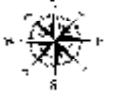
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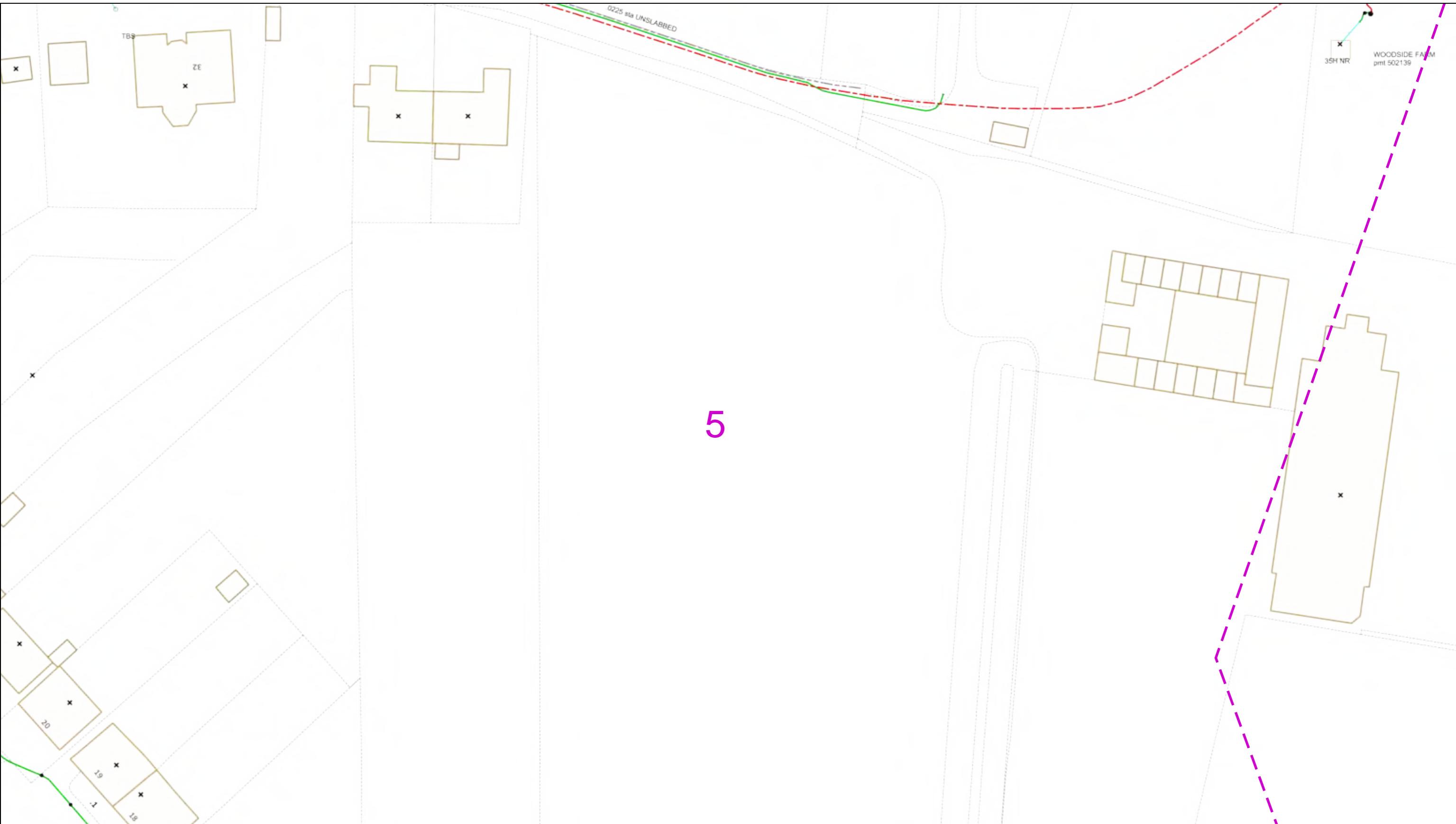
4

| | | | | | | |
|--|----|----|--|---|---|---|
| 0 | 25 | 50 | Dig Sites Area:  Line:  | The quality and accuracy of any print will depend on your printer, your computer and its print settings. Measurements scaled from this plan may not match measurements between the same points on the ground. |  |  |
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5



0 25 50
metres

Dig Sites Area: [] Line: []

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Scale: 1:500 (When plotted at A3)
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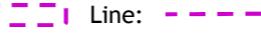


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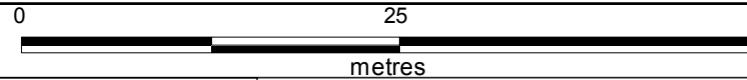
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6

| | | | | | | |
|---|----|----|--|---|---|---|
| 0 | 25 | 50 | Dig Sites Area:  Line:  | The quality and accuracy of any print will depend on your printer, your computer and its print settings. Measurements scaled from this plan may not match measurements between the same points on the ground. |  |  |
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7



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document.

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Job Reference: 17059737
Site Location: 528280 140136
Requested by:
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Your Scheme/Reference: 606255 -
Gatwick Green
Scale: 1:500 (When plotted at A3)

Dig Sites

Area: Line:

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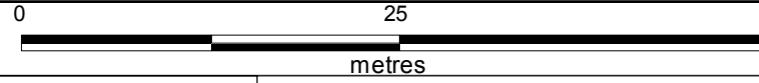
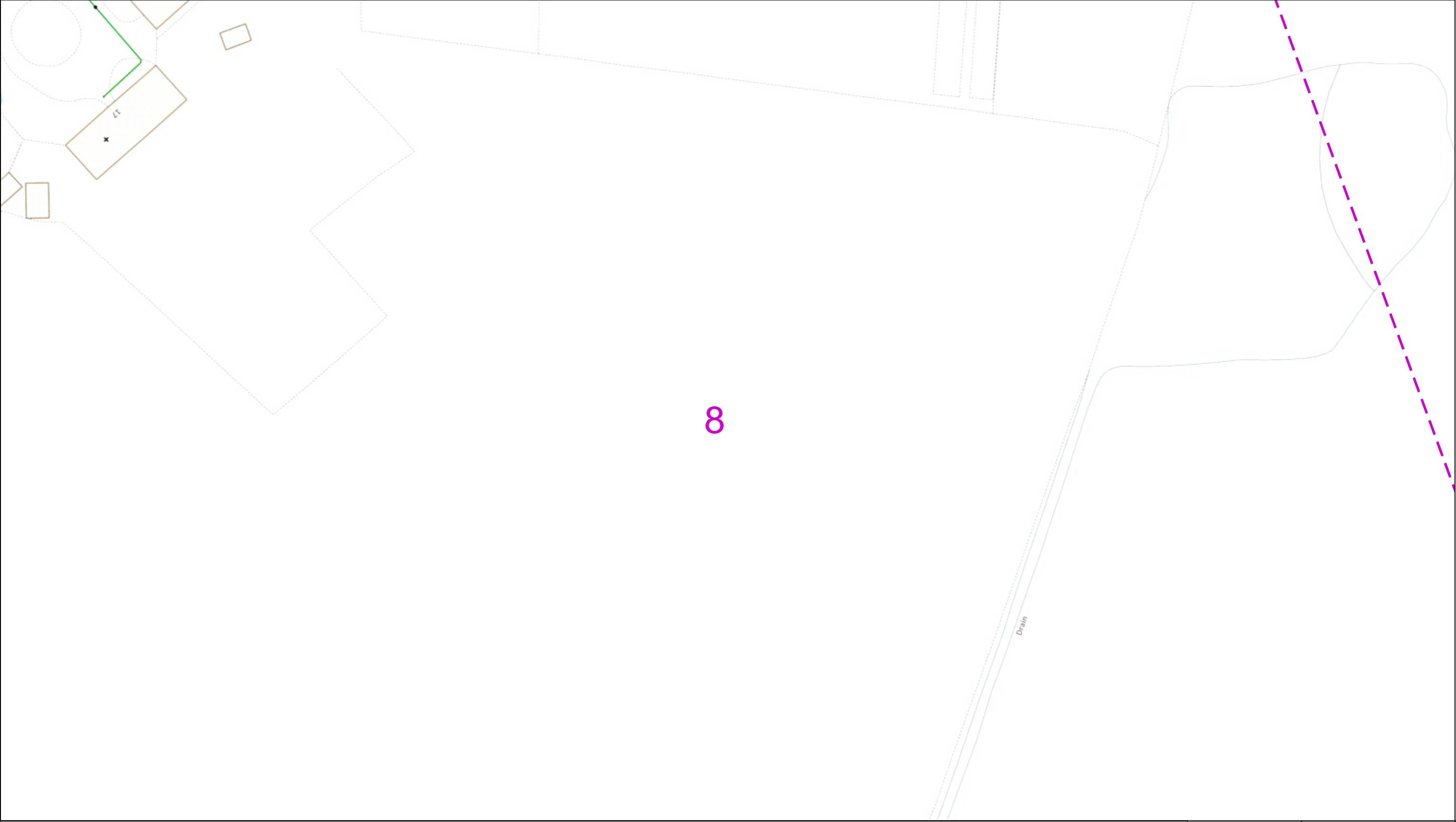
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8



Dig Sites Area: Line:

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Date Requested: 22/11/2019
Job Reference: 17059737
Site Location: 528280 140136
Requested by:
Miss Celeste Imthurn

Your Scheme/Reference: 606255 -
Gatwick Green
Scale: 1:500 (When plotted at A3)

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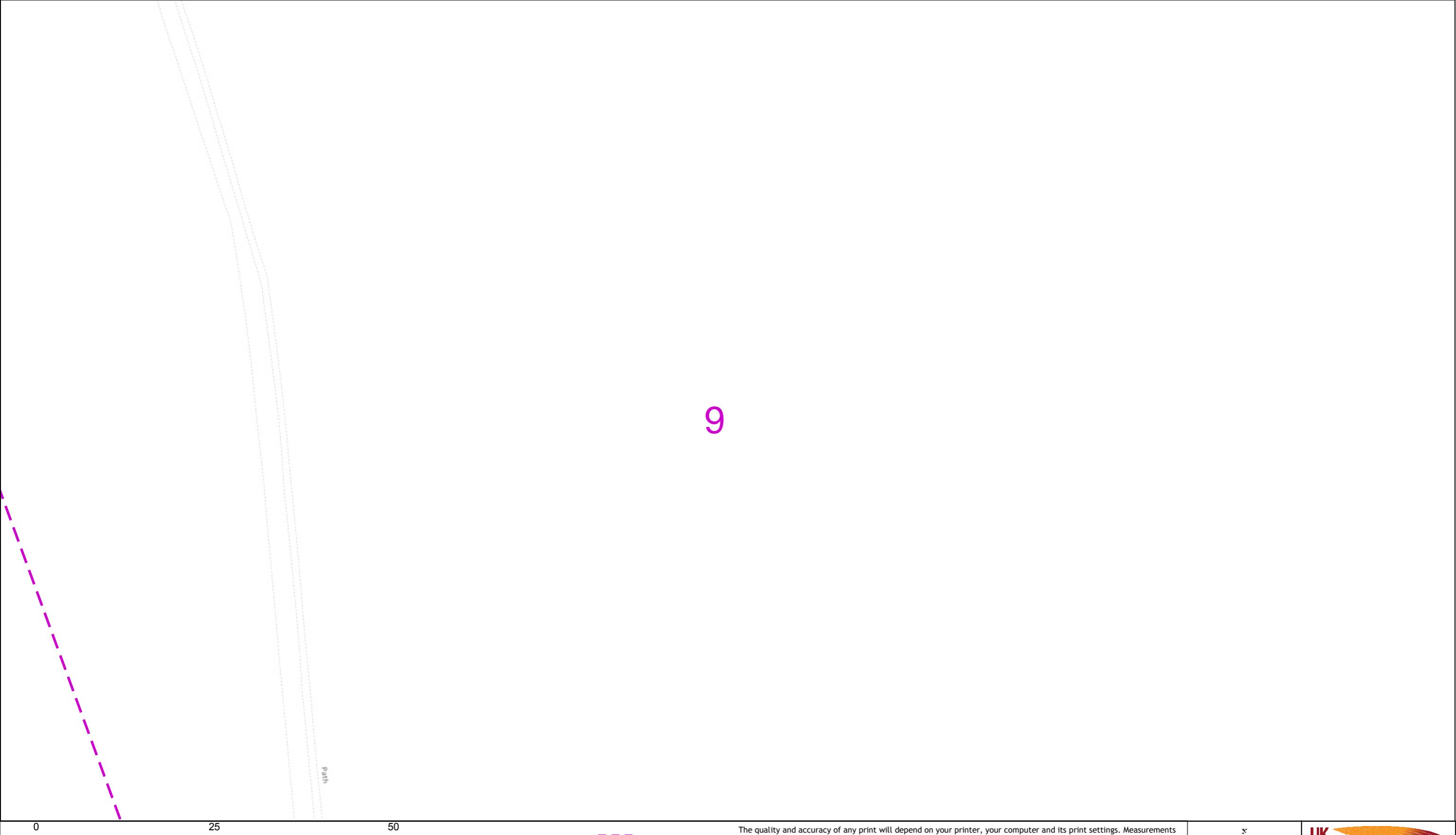


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Dig Sites

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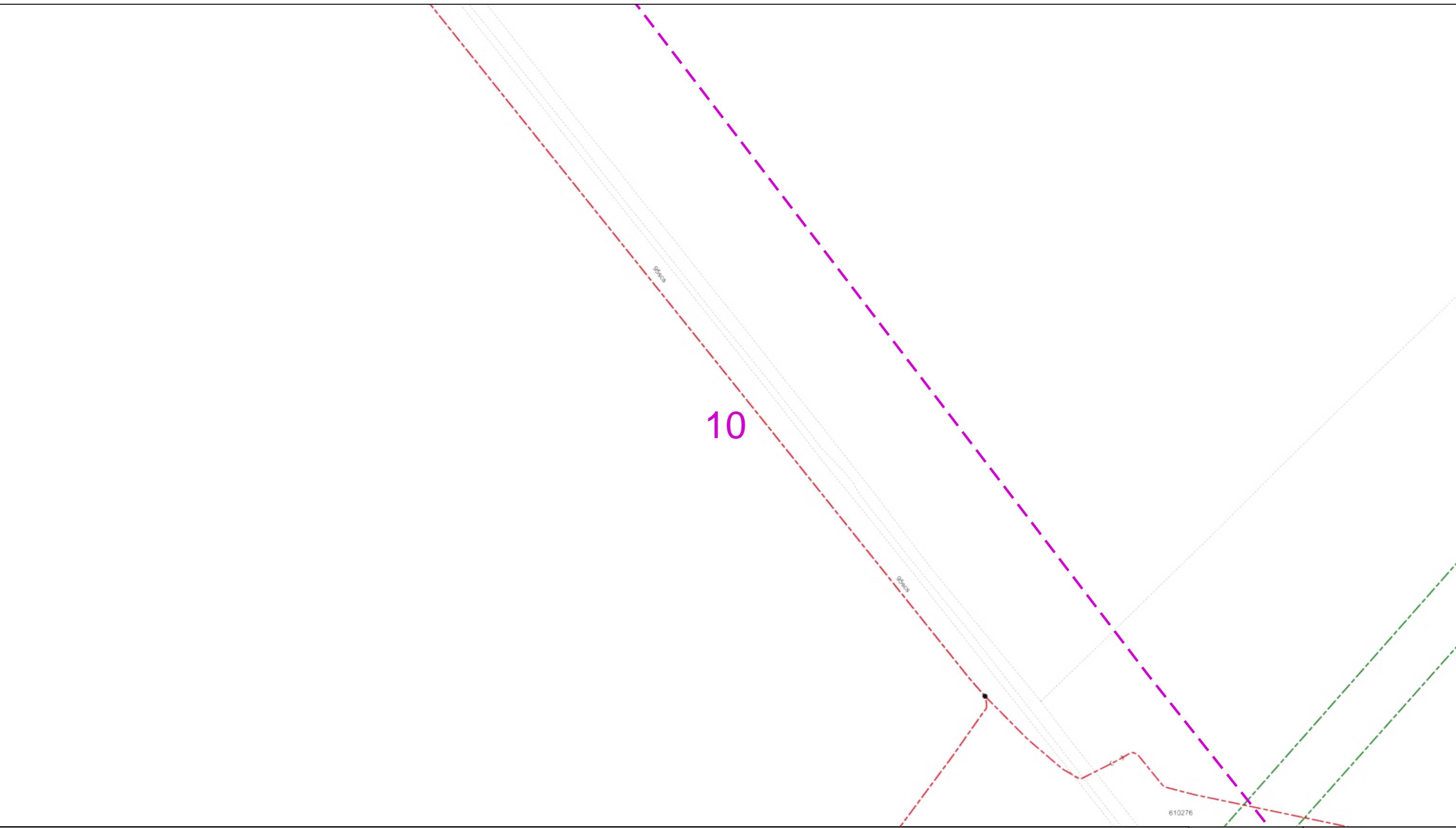
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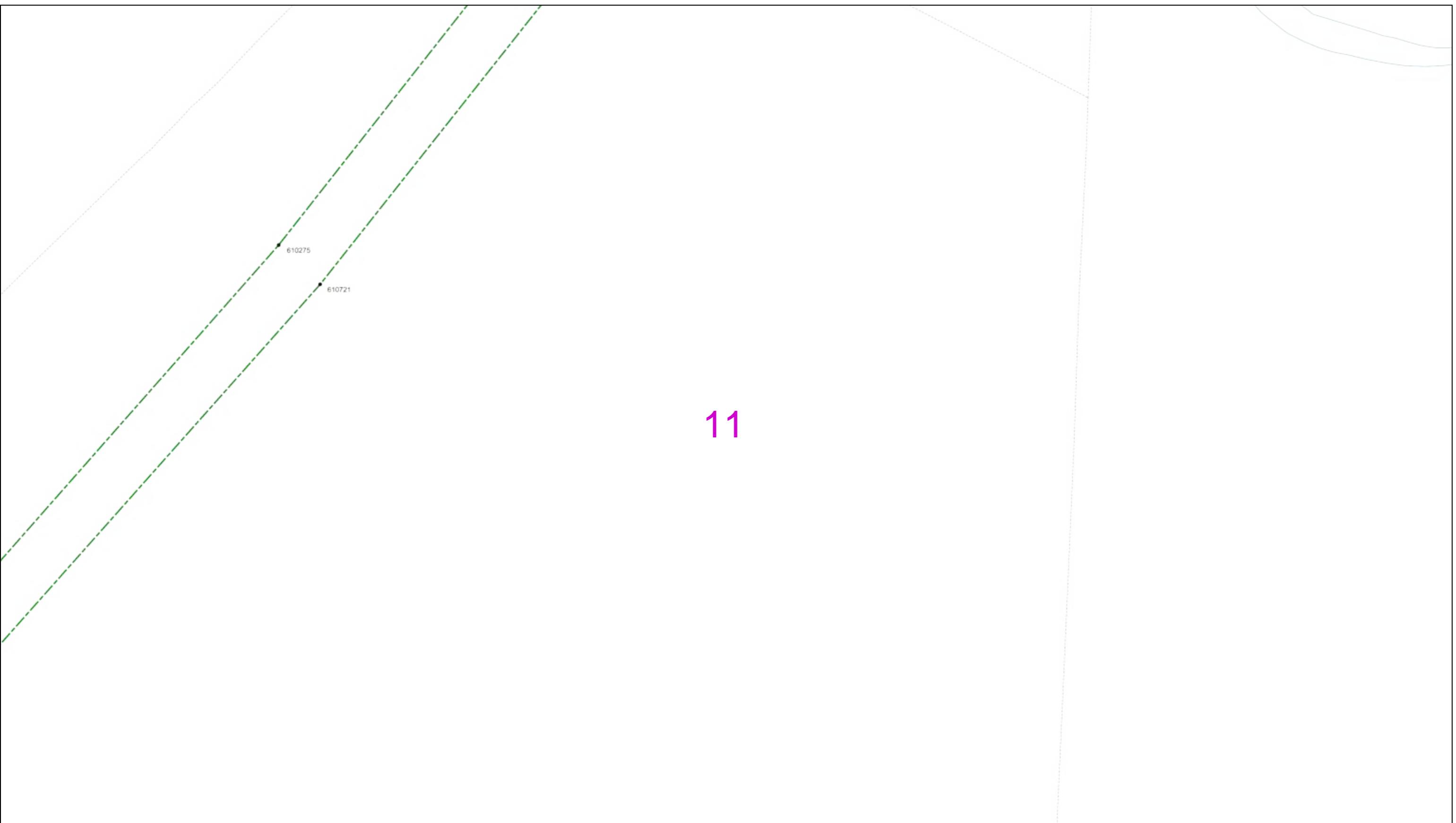


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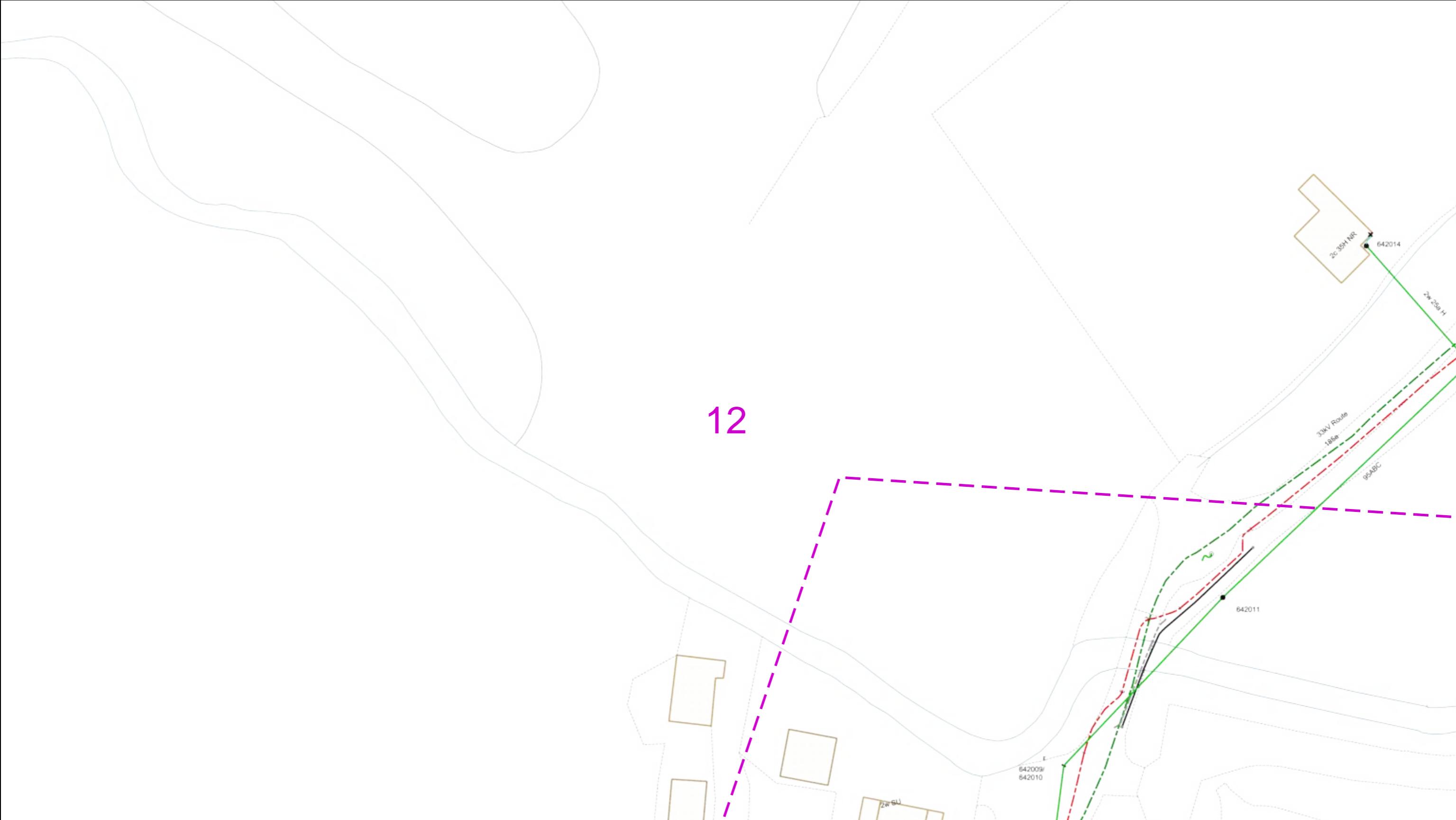
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|---|----|----|-----------|--|-------|---|--|
| 0 | 25 | 50 | Dig Sites | Area: | Line: | The quality and accuracy of any print will depend on your printer, your computer and its print settings. Measurements scaled from this plan may not match measurements between the same points on the ground. | |
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12



0 25 50
metres

Dig Sites Area: Line:

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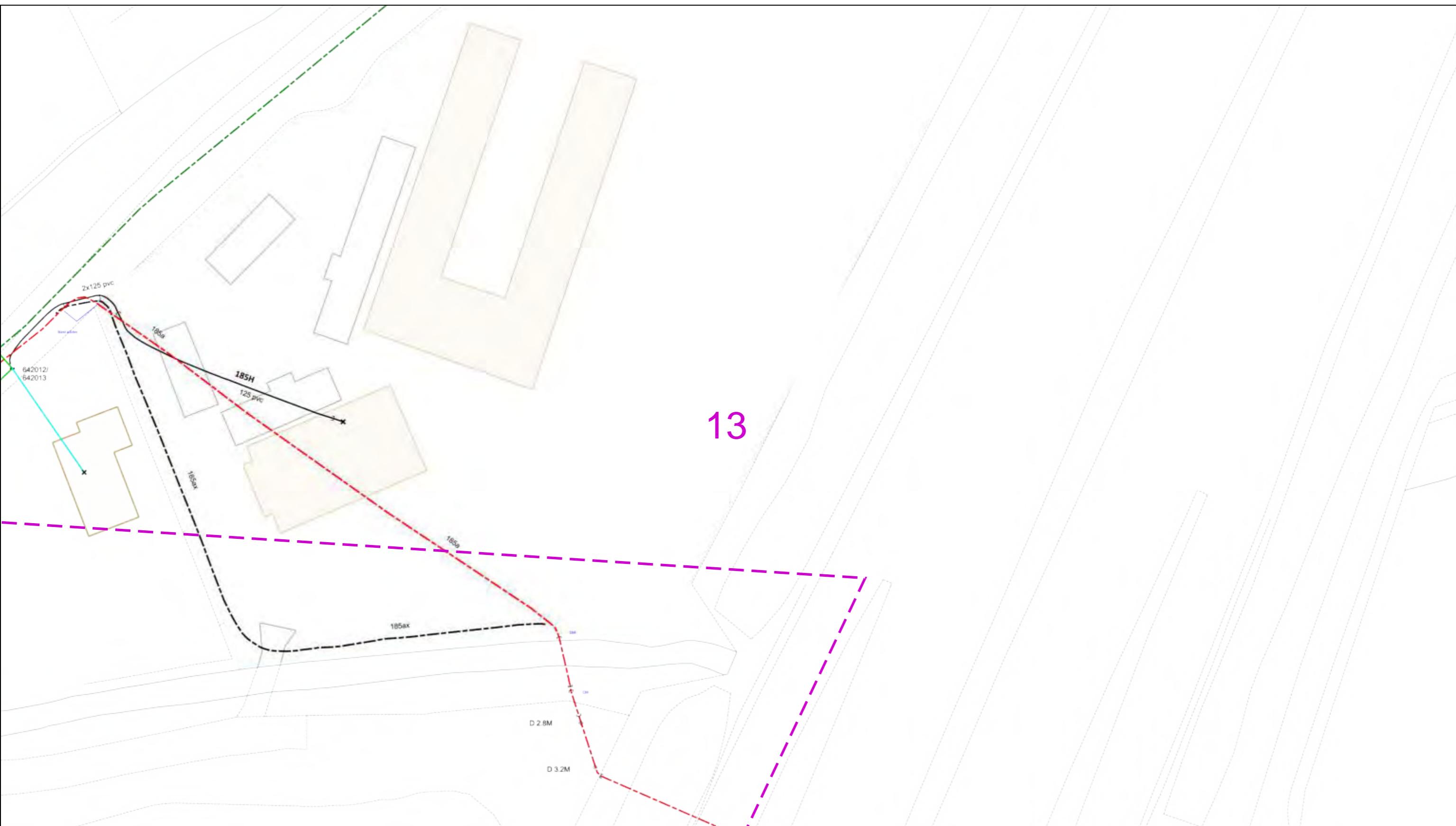


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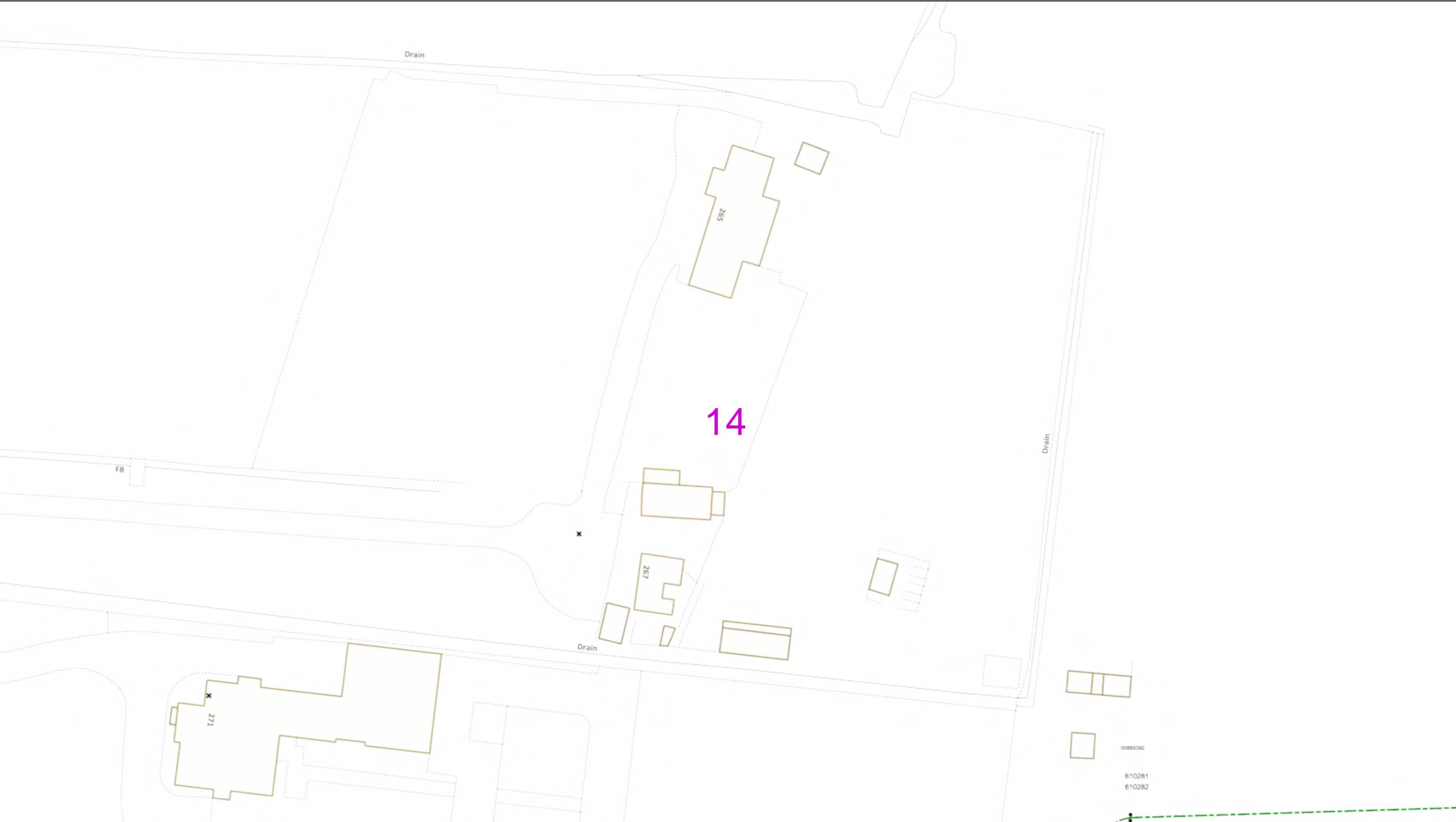
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0 25 50
metres

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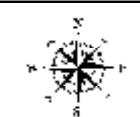
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15

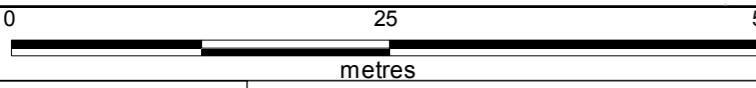
610280

33kV Route

33kV Route

610279

610725



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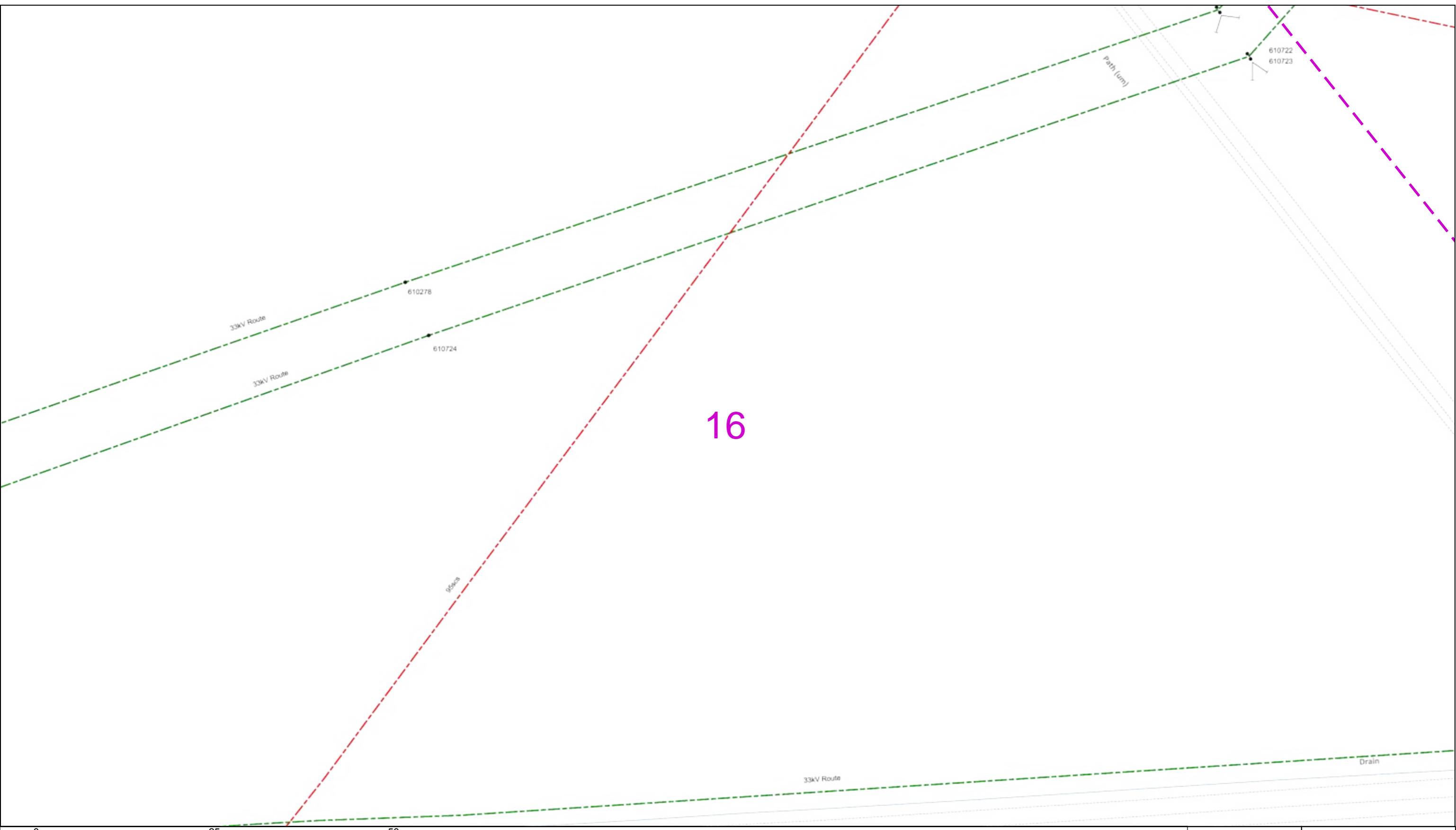
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16



0 25 50
metres

Dig Sites Area: Line:

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This plan must be used with the attached 'Symbols' document.

Date Requested: 22/11/2019
Job Reference: 17059737
Site Location: 528280 140136
Requested by:
Miss Celeste Imthurn
Your Scheme/Reference: 606255 -
Gatwick Green
Scale: 1:500 (When plotted at A3)

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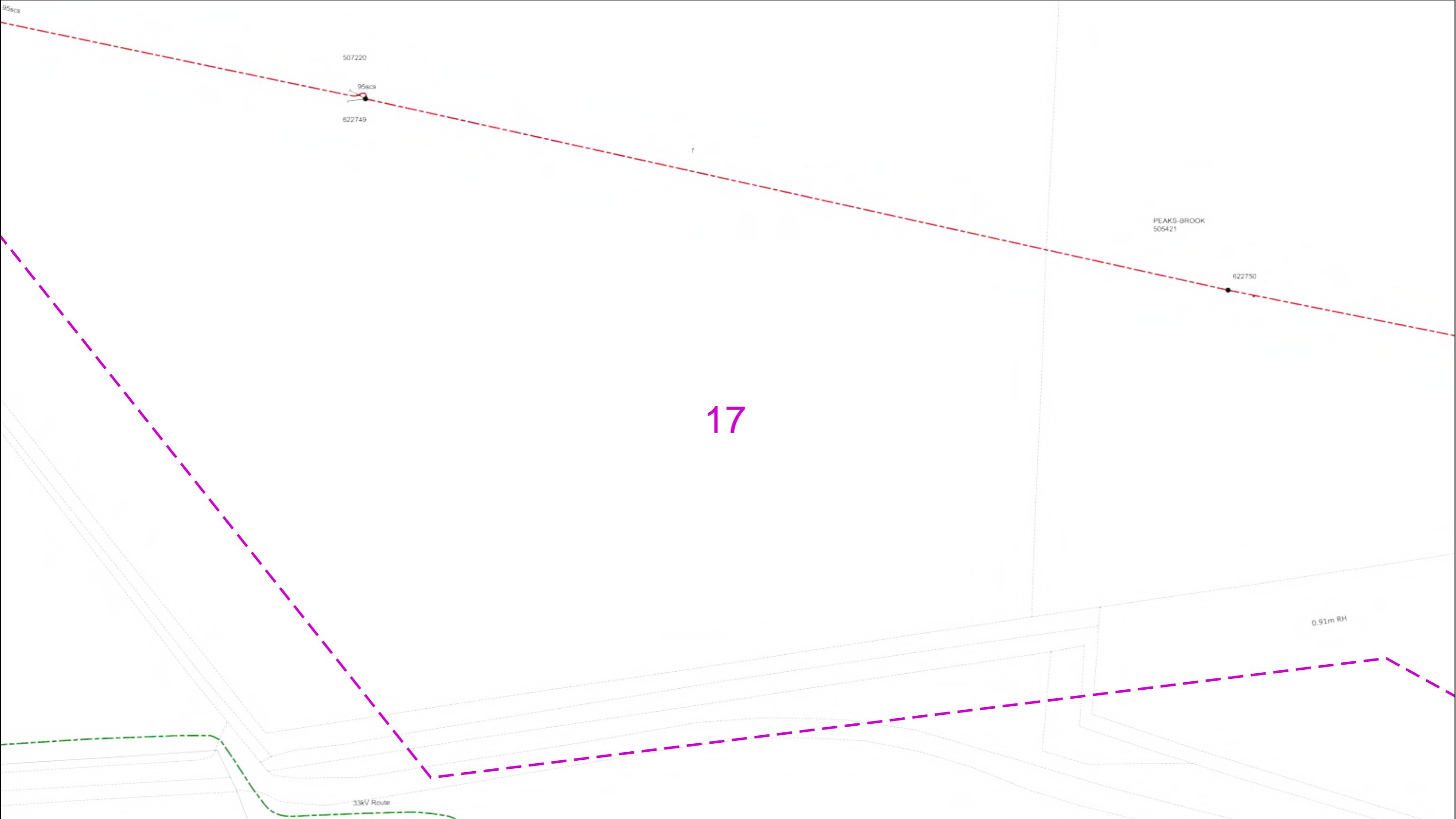


IF IN DOUBT - ASK!
PHONE 0800 056 5866
EMERGENCY - If you
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Phone 0800 783 8838
(24hrs) URGENTLY



ALWAYS LOOK UP
BEFORE
YOU START WORK
Refer to HSE
Guidance note GS6

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0 25 50
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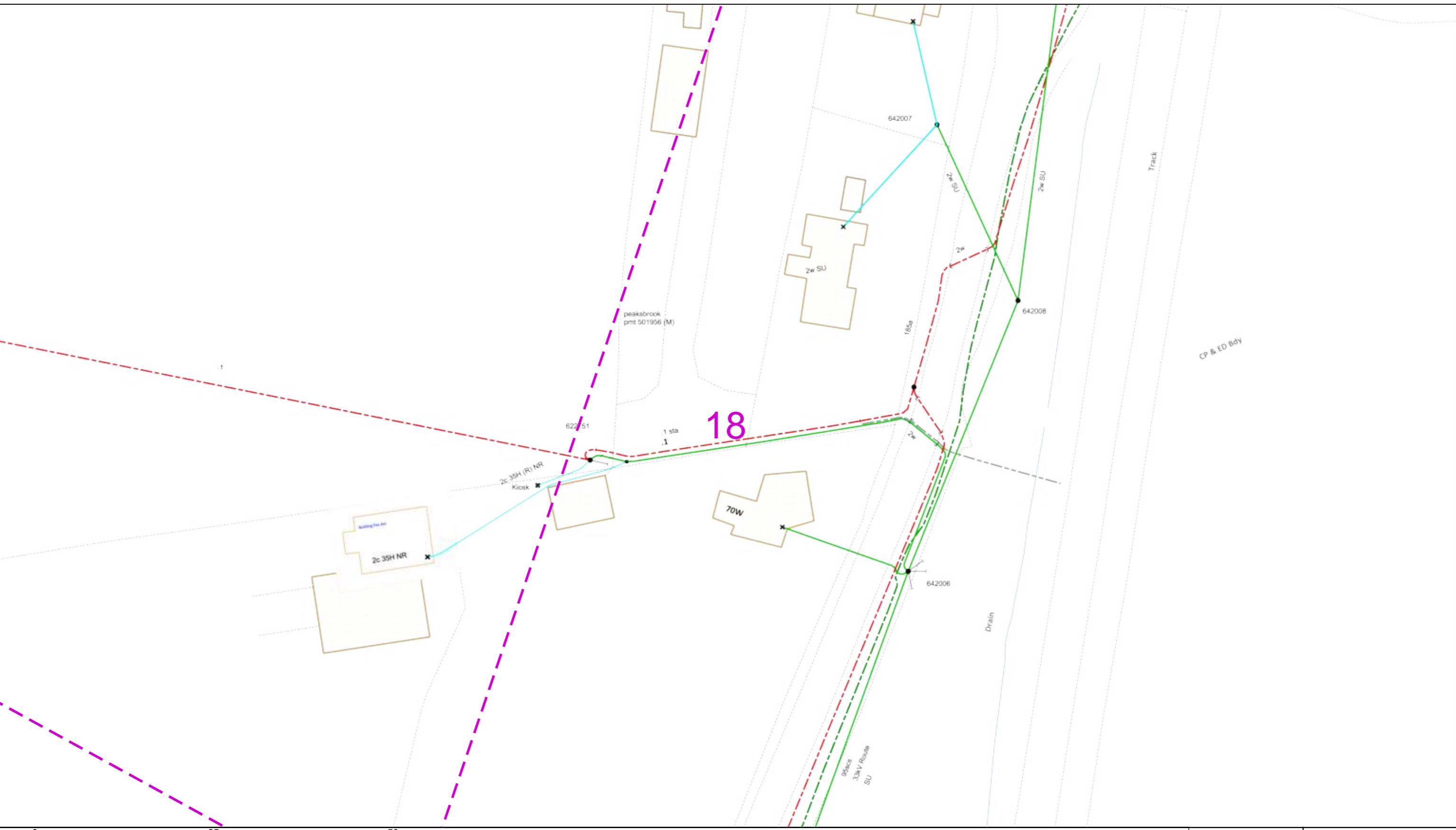


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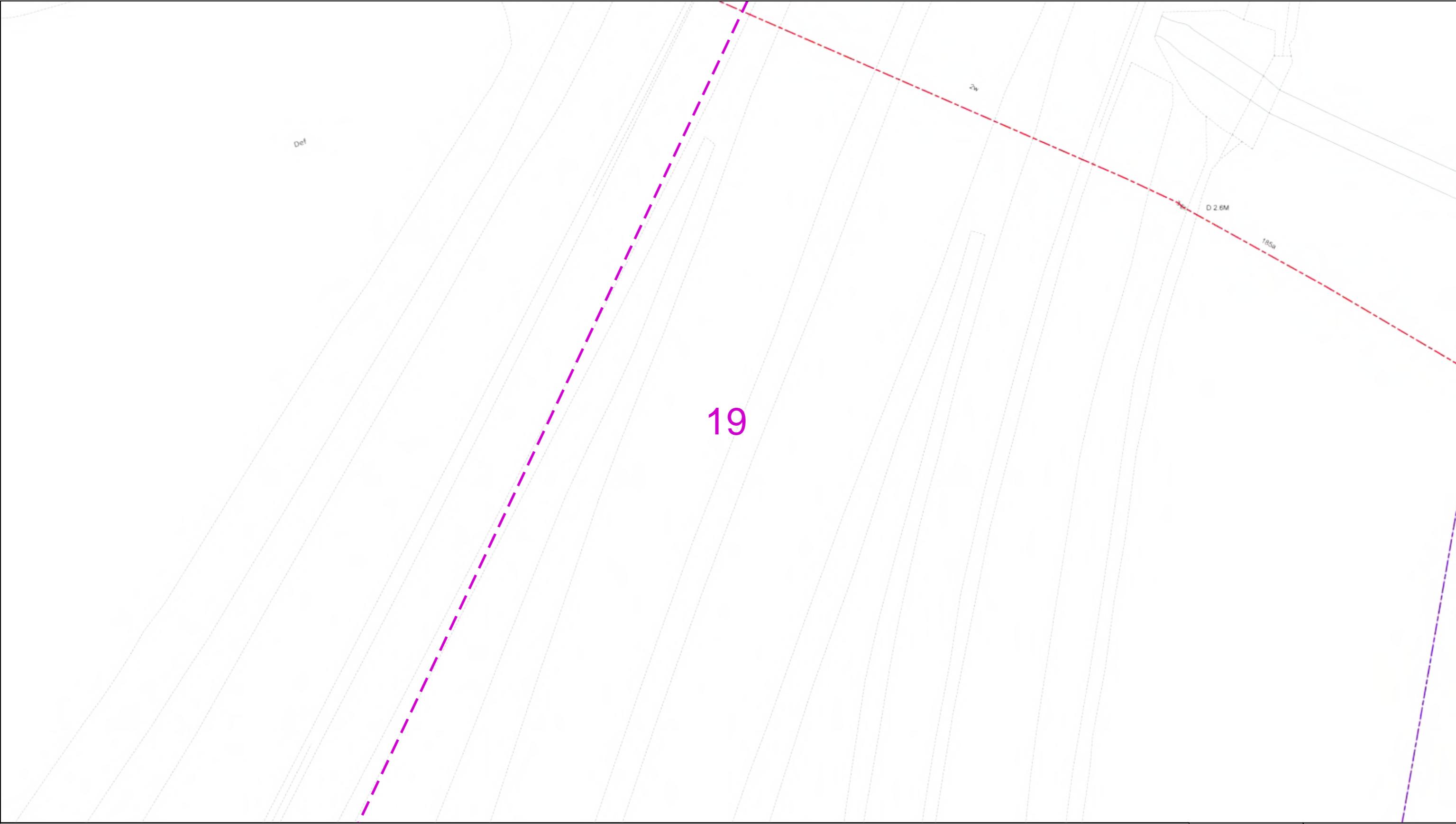
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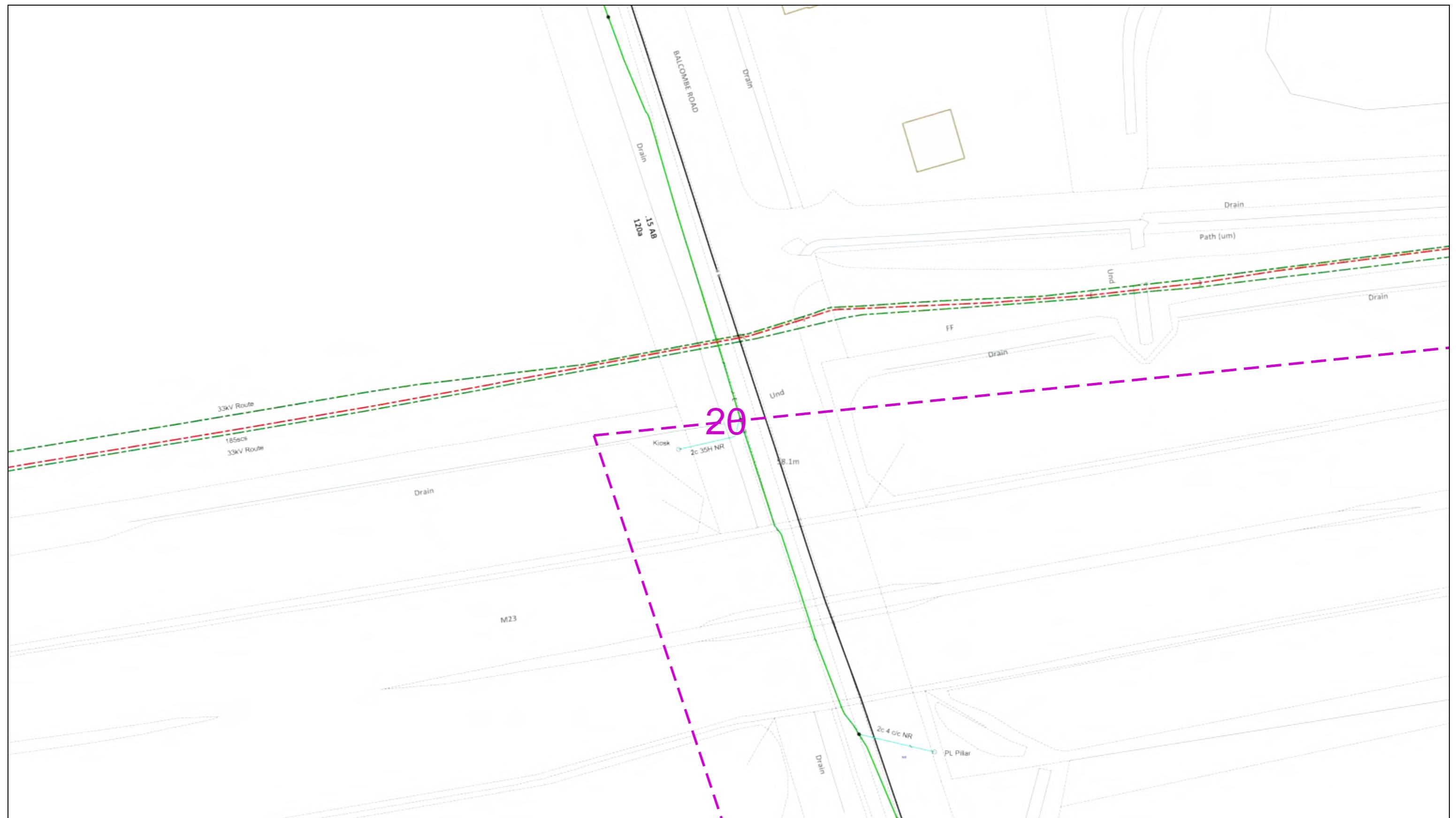


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19





0 25 50
metres

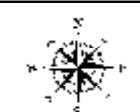
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Dig Sites Area: [] Line: []

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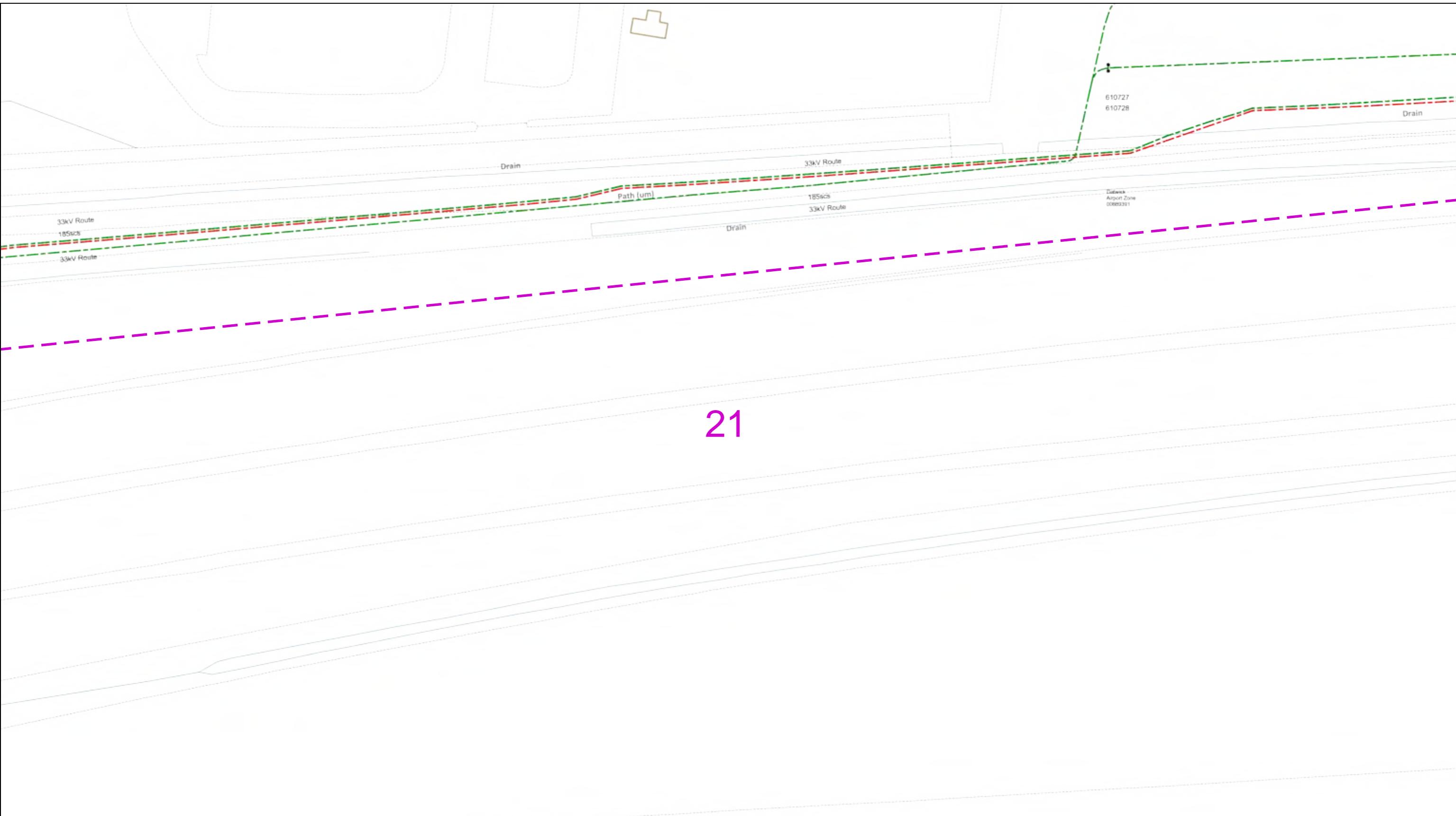


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Dig Sites

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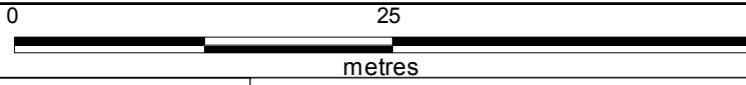
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22



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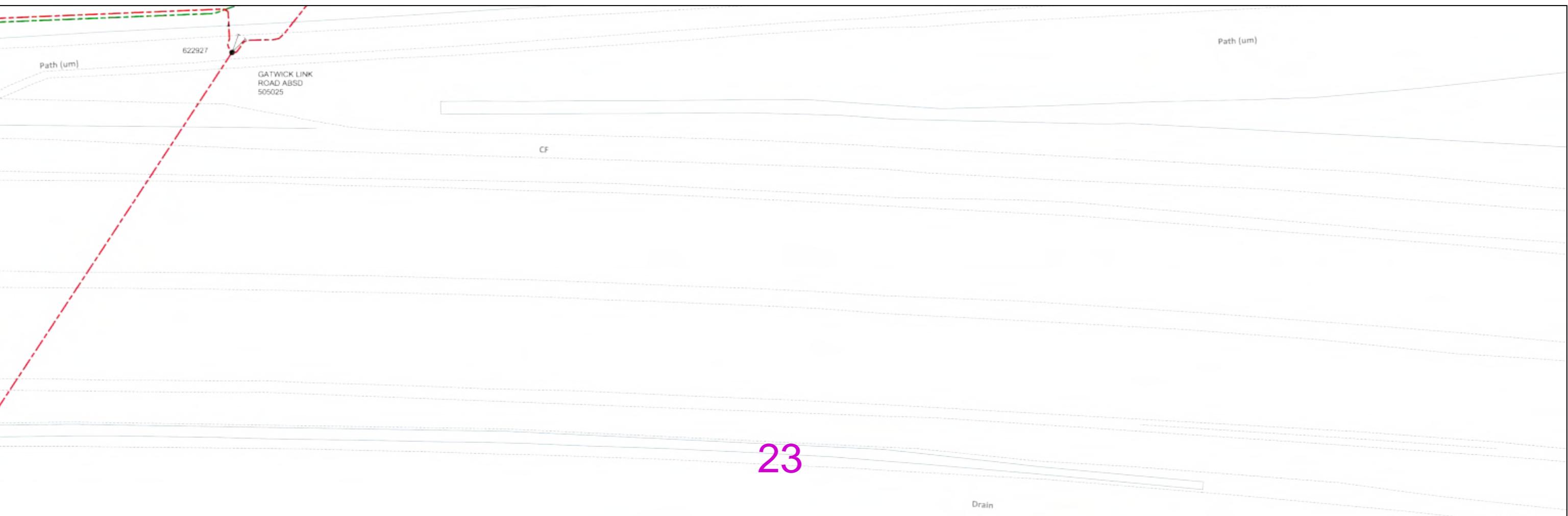


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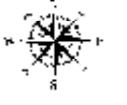
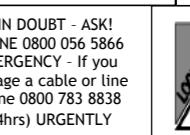
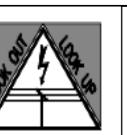


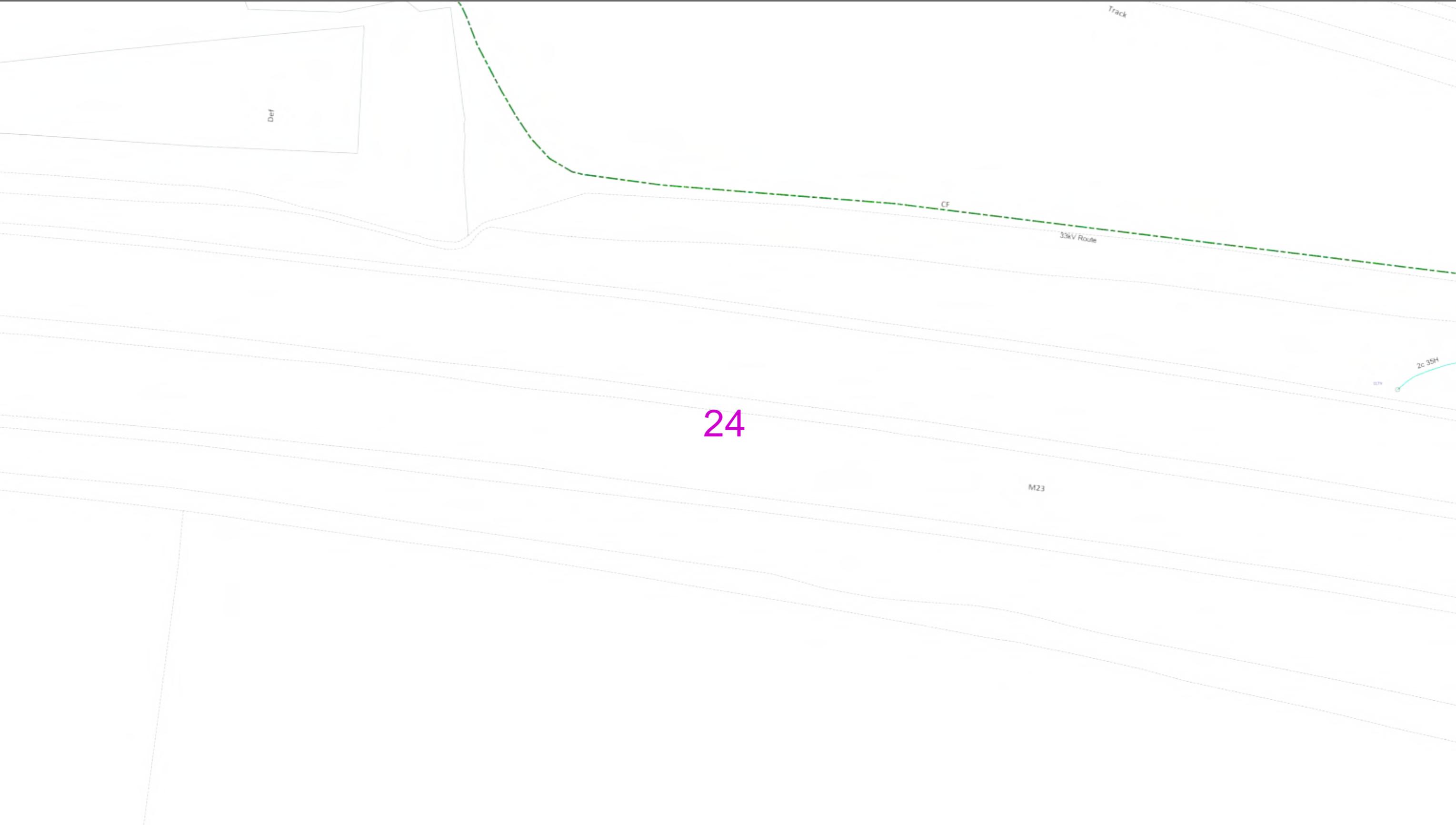
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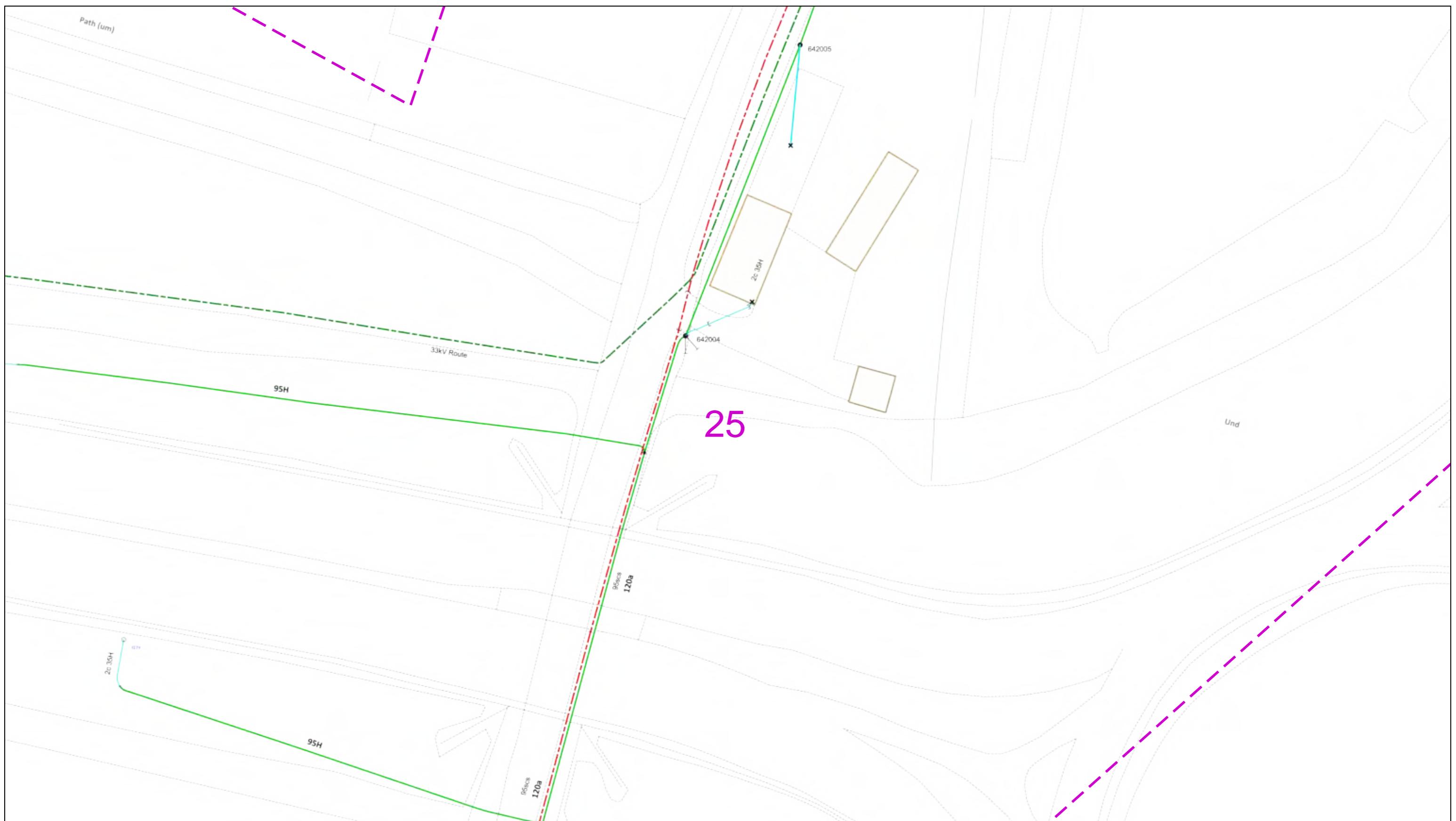


23

| | | | | | | | |
|--|----|----|---|---|---|--|---|
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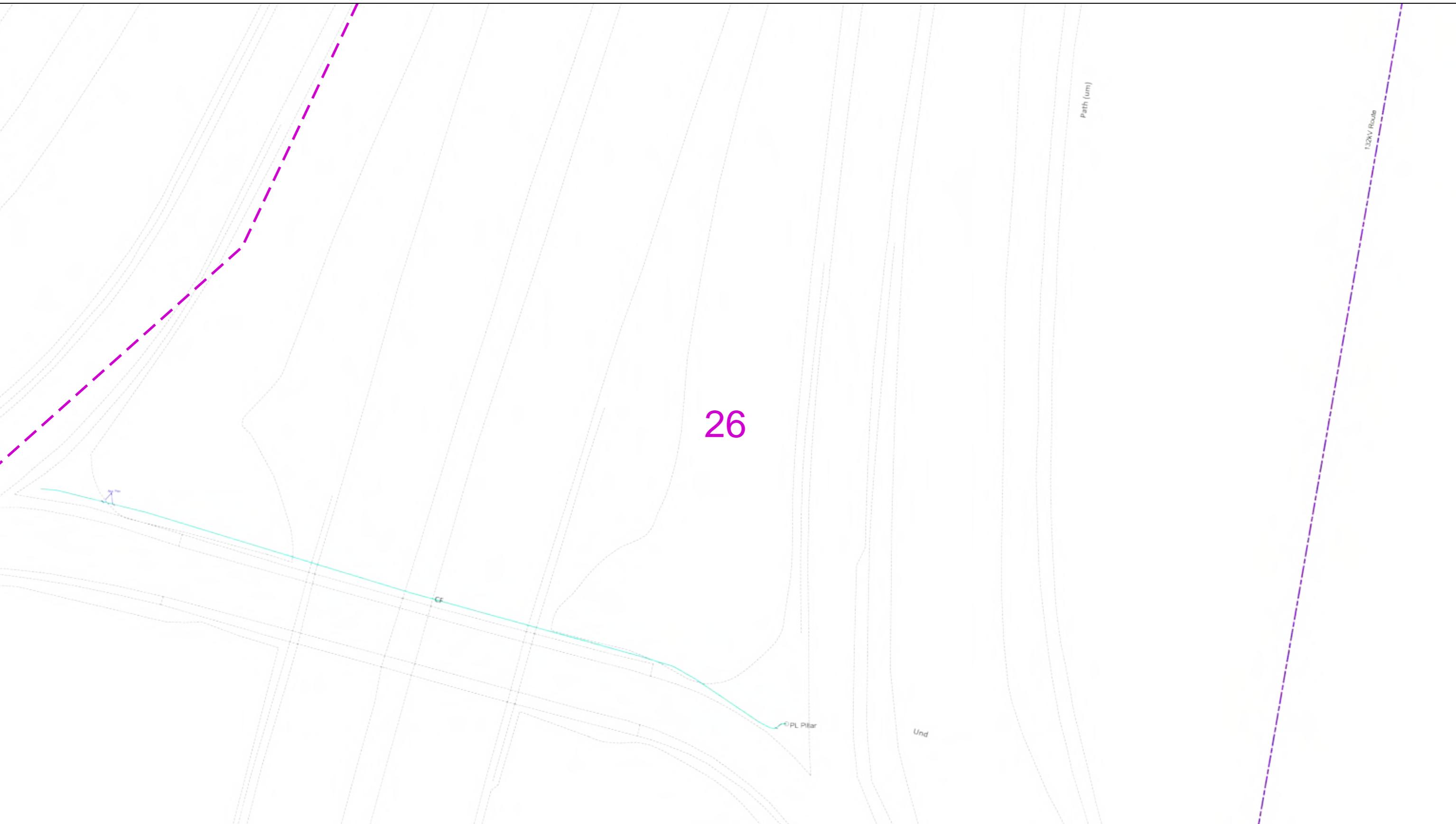
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26



0 25 50
metres

Dig Sites Area: Line:

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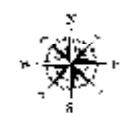
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Date Requested: 22/11/2019
Job Reference: 17059737
Site Location: 528280 140136
Requested by:
Miss Celeste Imthurn
Your Scheme/Reference: 606255 - Gatwick Green

Scale: 1:500 (When plotted at A3)

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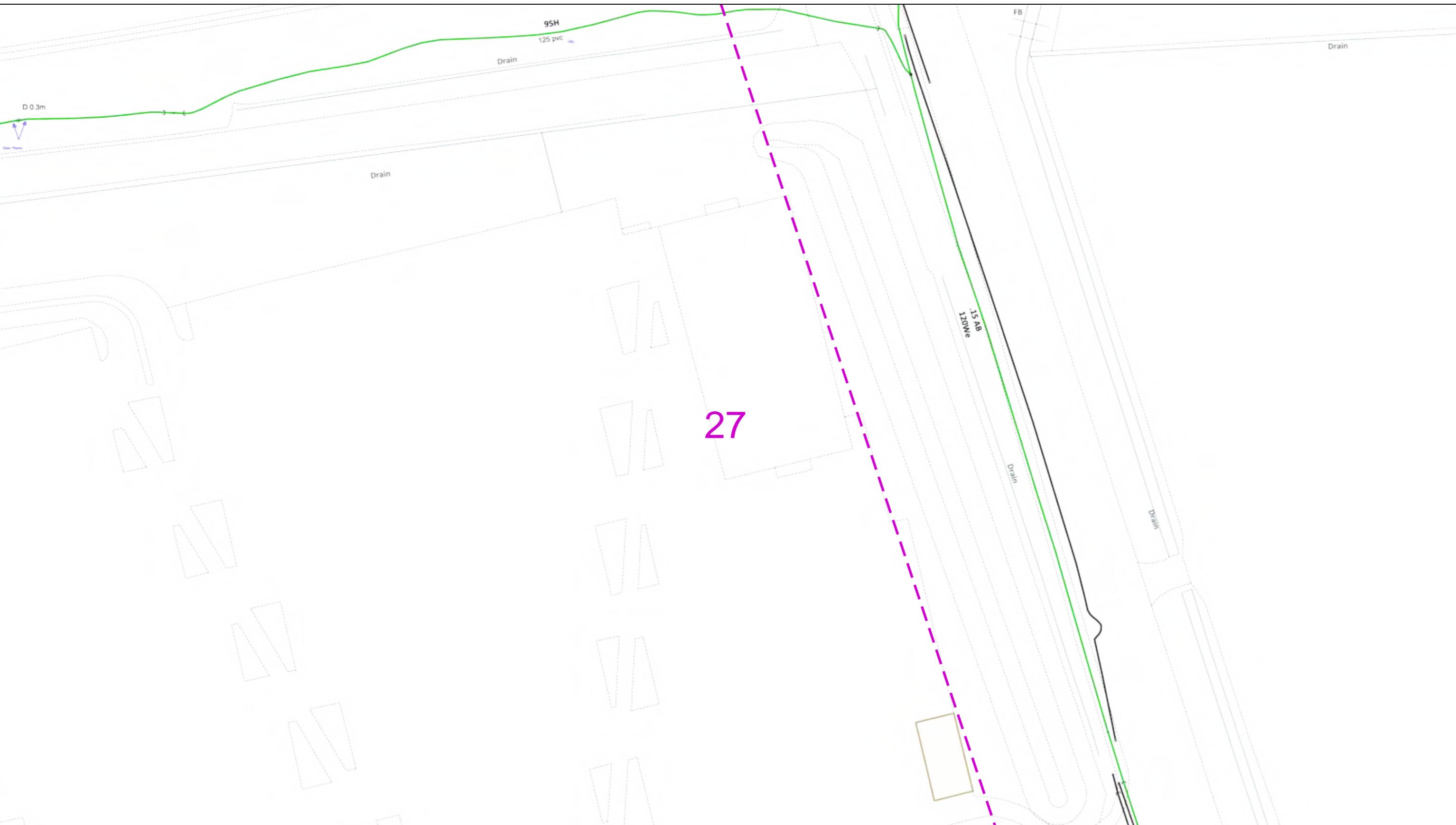


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0 25 50
metres

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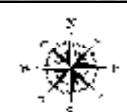
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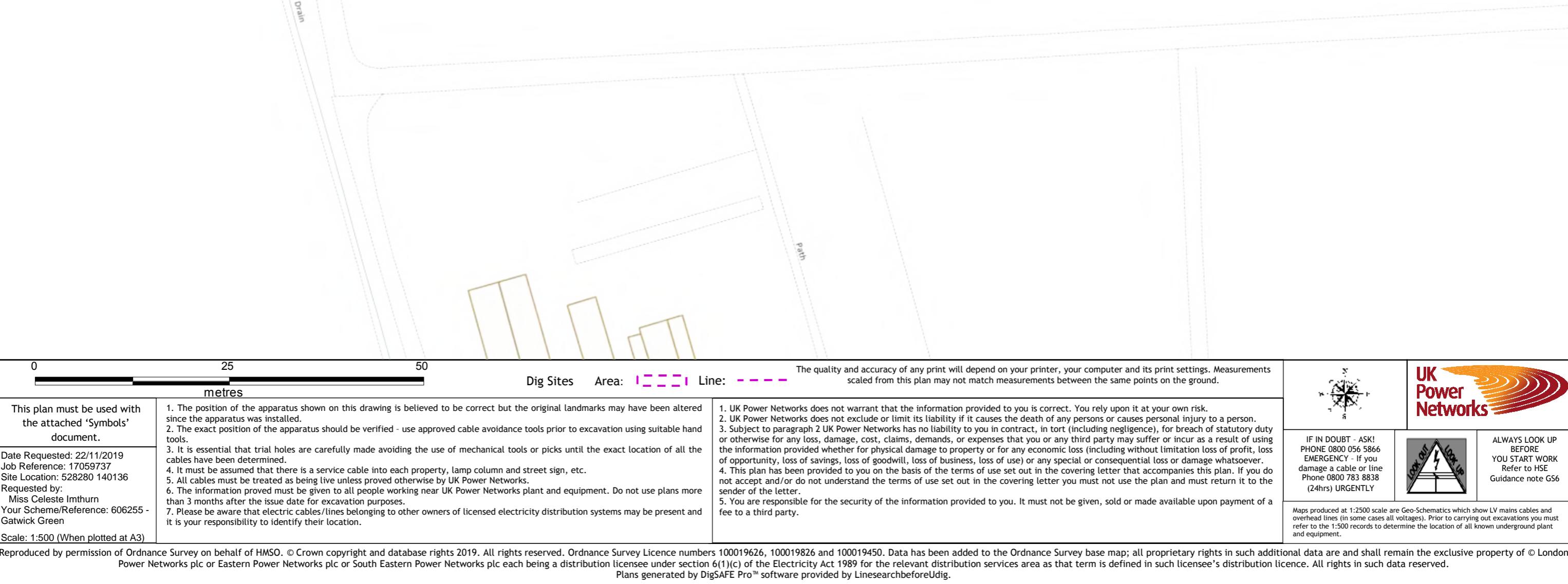
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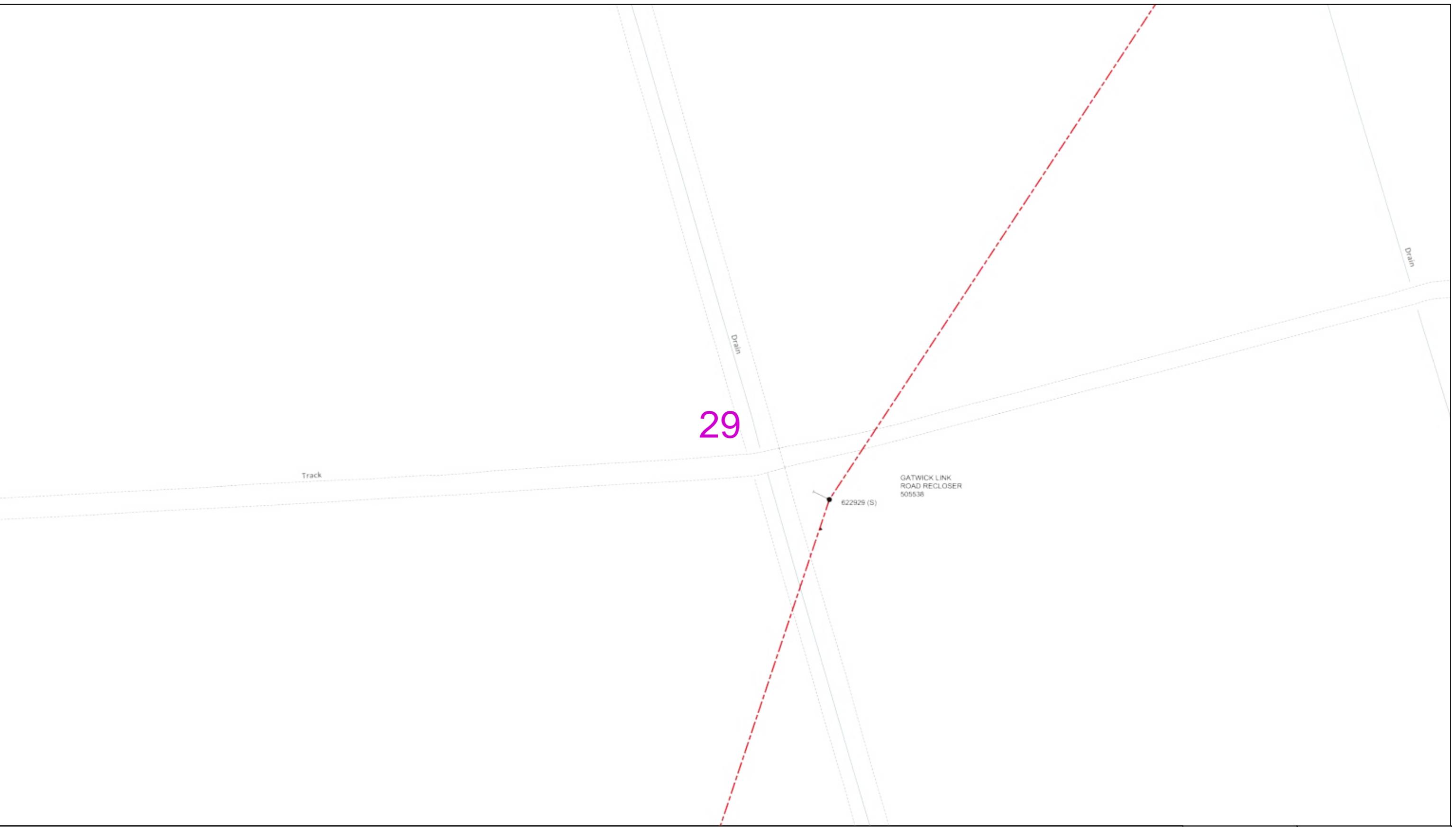


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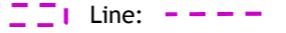
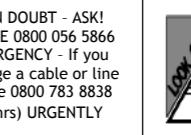
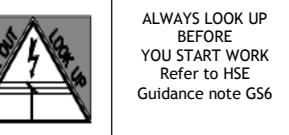
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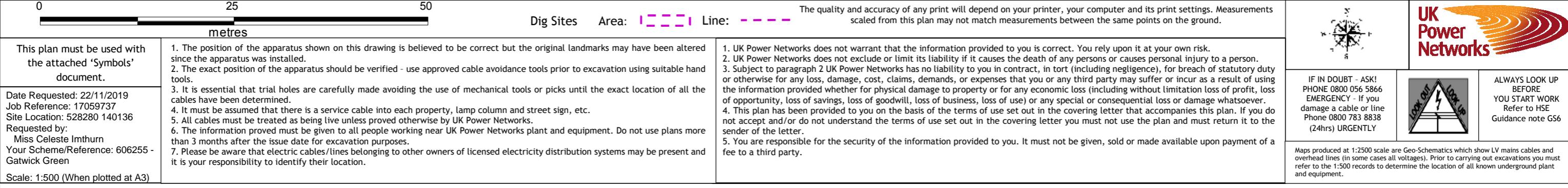


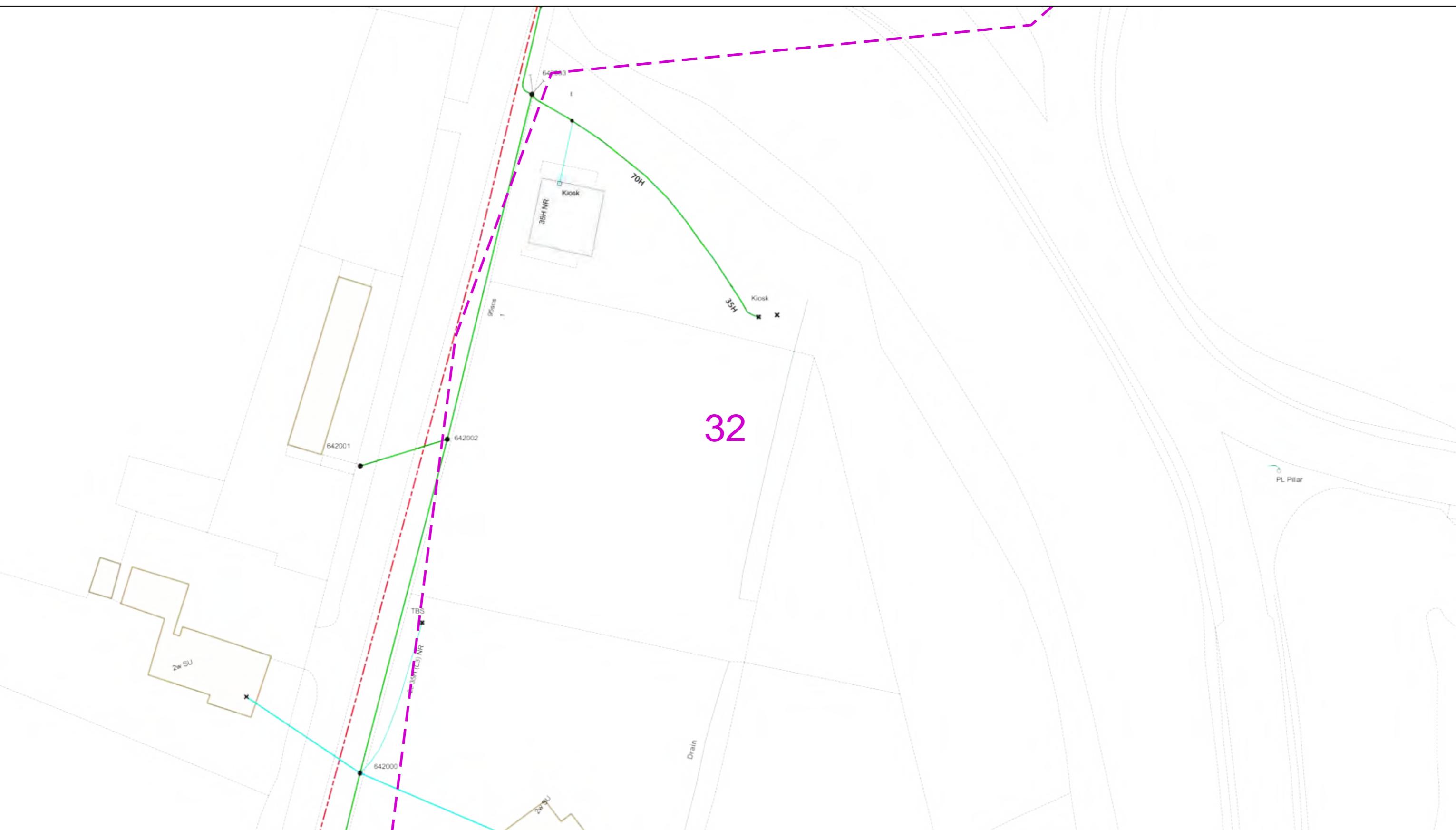


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|--|--|---|-----------|--|-----------------------------|---|--|--|
| 0 | 25 | 50 | Dig Sites | Area: [red dashed box] | Line: [dashed line segment] | The quality and accuracy of any print will depend on your printer, your computer and its print settings. Measurements scaled from this plan may not match measurements between the same points on the ground. | | |
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30

| | | | | | | | |
|--|----|----|---|---|---|--|--|
| 0 | 25 | 50 | Dig Sites | Area:  Line:  | The quality and accuracy of any print will depend on your printer, your computer and its print settings. Measurements scaled from this plan may not match measurements between the same points on the ground. |  |  |
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0 25 50
metres

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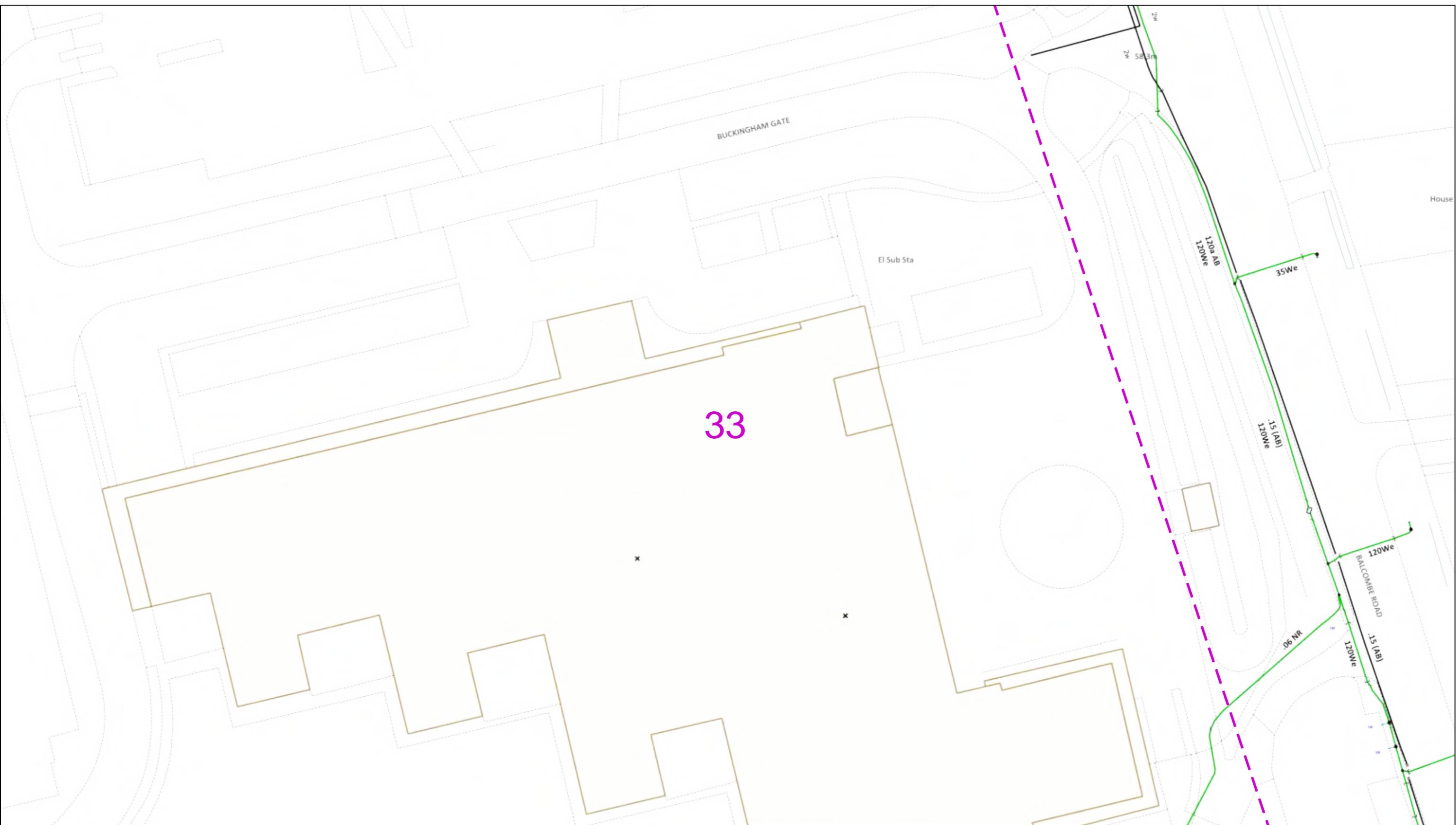


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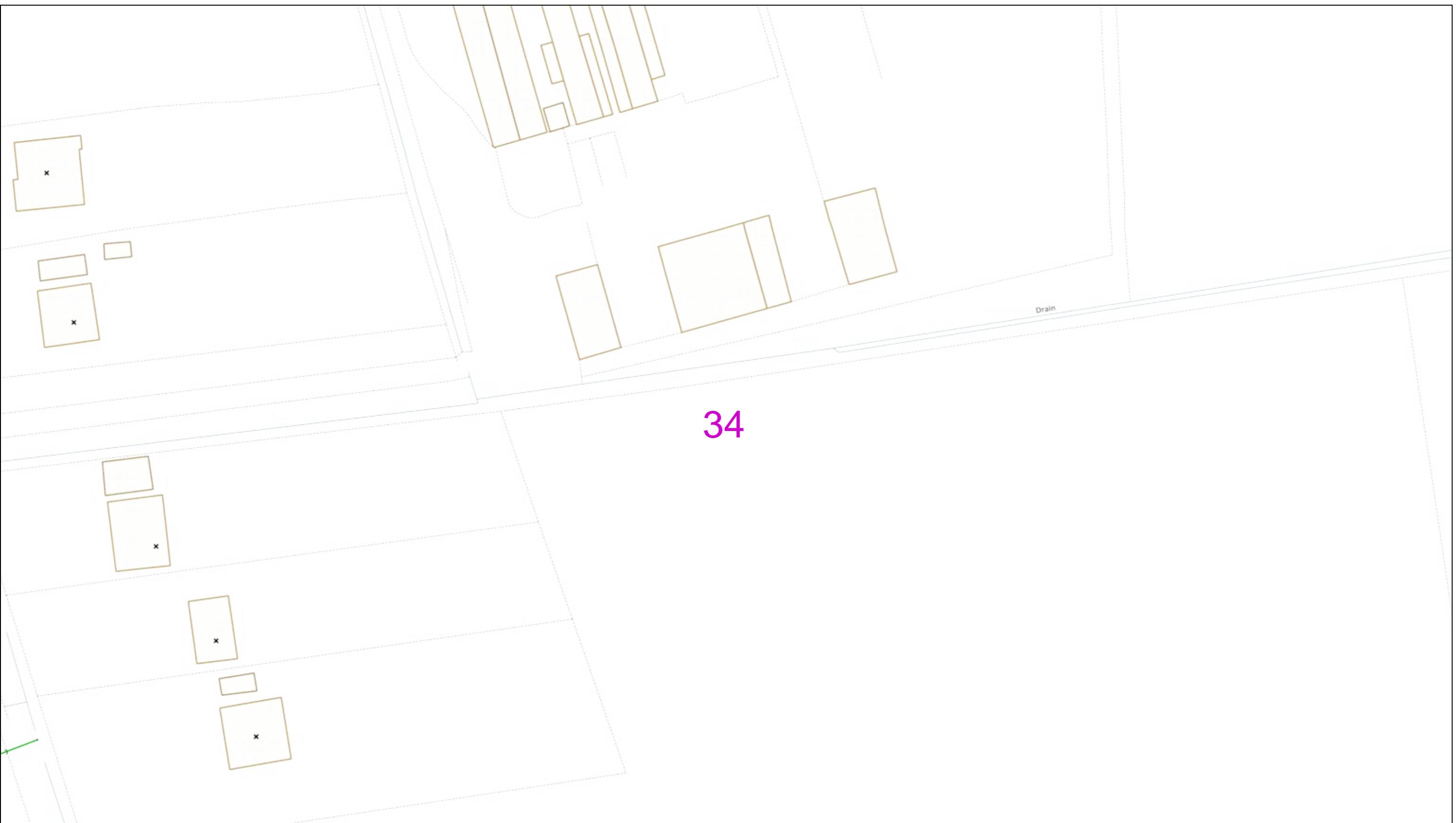
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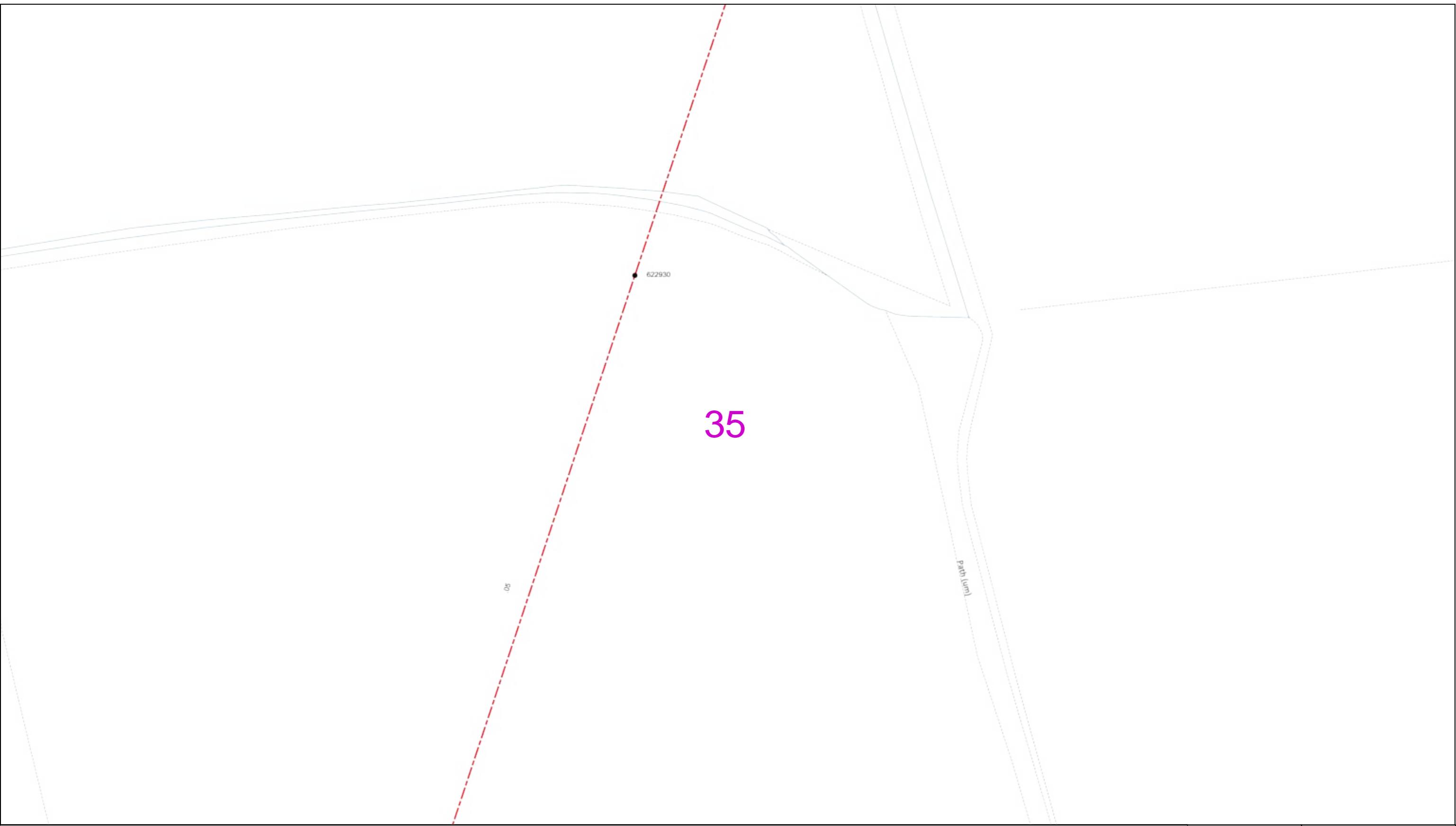
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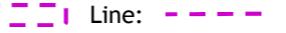
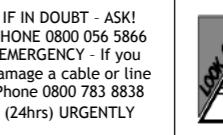
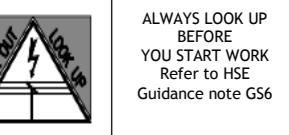


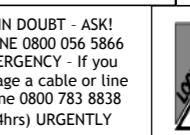
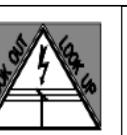
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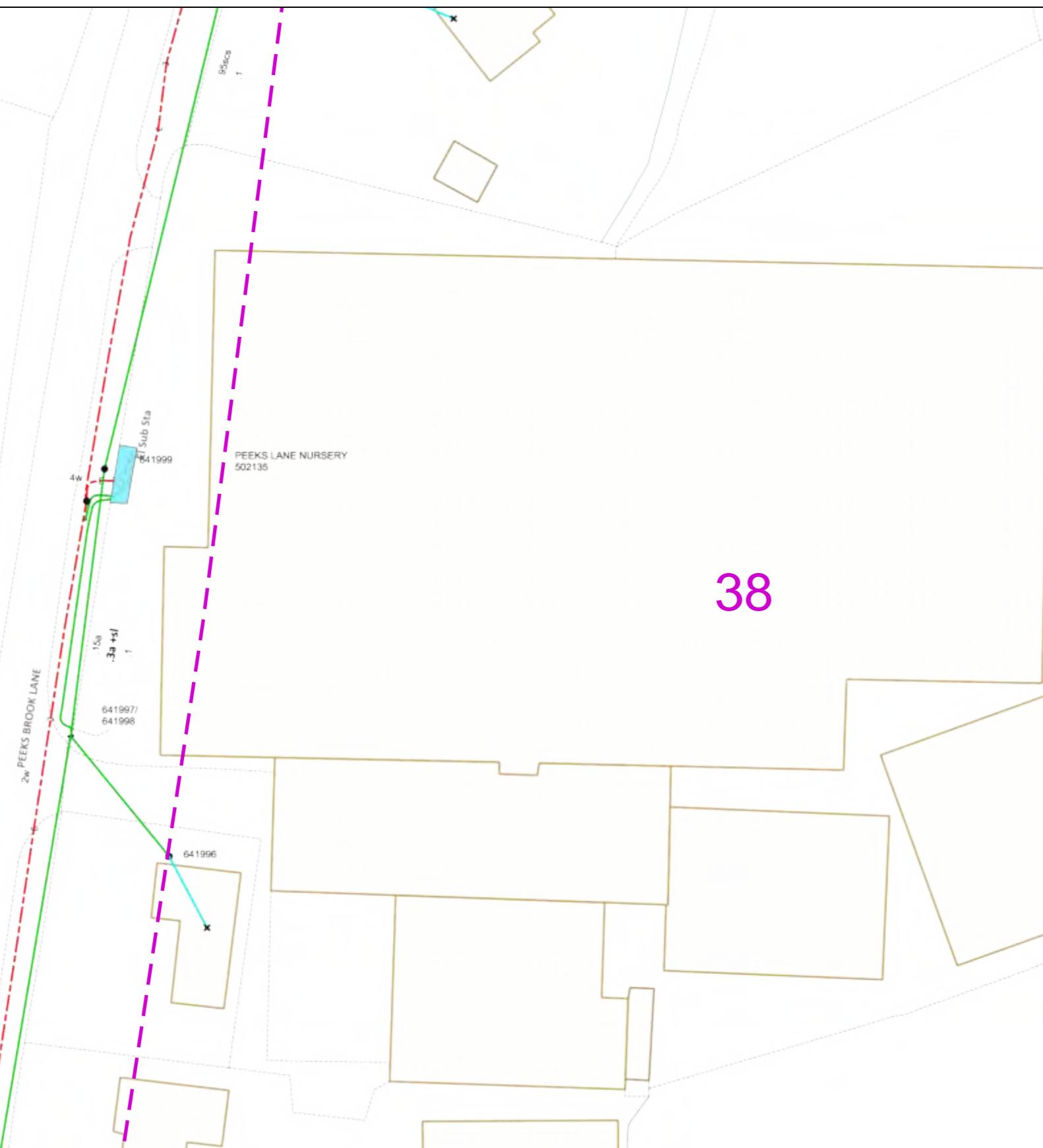
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| <p>metres</p> <p>This plan must be used with the attached 'Symbols' document.</p> <p>Date Requested: 22/11/2019 Job Reference: 17059737 Site Location: 528280 140136 Requested by: Miss Celeste Imthurn Your Scheme/Reference: 606255 - Gatwick Green Scale: 1:500 (When plotted at A3)</p> | | | <p>1. The position of the apparatus shown on this drawing is believed to be correct but the original landmarks may have been altered since the apparatus was installed. 2. The exact position of the apparatus should be verified - use approved cable avoidance tools prior to excavation using suitable hand tools. 3. It is essential that trial holes are carefully made avoiding the use of mechanical tools or picks until the exact location of all the cables have been determined. 4. It must be assumed that there is a service cable into each property, lamp column and street sign, etc. 5. All cables must be treated as being live unless proved otherwise by UK Power Networks. 6. The information proved must be given to all people working near UK Power Networks plant and equipment. Do not use plans more than 3 months after the issue date for excavation purposes. 7. Please be aware that electric cables/lines belonging to other owners of licensed electricity distribution systems may be present and it is your responsibility to identify their location.</p> <p>1. UK Power Networks does not warrant that the information provided to you is correct. You rely upon it at your own risk. 2. UK Power Networks does not exclude or limit its liability if it causes the death of any persons or causes personal injury to a person. 3. Subject to paragraph 2 UK Power Networks has no liability to you in contract, in tort (including negligence), for breach of statutory duty or otherwise for any loss, damage, cost, claims, demands, or expenses that you or any third party may suffer or incur as a result of using the information provided whether for physical damage to property or for any economic loss (including without limitation loss of profit, loss of opportunity, loss of savings, loss of goodwill, loss of business, loss of use) or any special or consequential loss or damage whatsoever. 4. This plan has been provided to you on the basis of the terms of use set out in the covering letter that accompanies this plan. If you do not accept and/or do not understand the terms of use set out in the covering letter you must not use the plan and must return it to the sender of the letter. 5. You are responsible for the security of the information provided to you. It must not be given, sold or made available upon payment of a fee to a third party.</p> | | |  PHONE 0800 056 5866 EMERGENCY - If you damage a cable or line Phone 0800 783 8838 (24hrs) URGENTLY |  Refer to HSE Guidance note GS6 |
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38



0 25 50
metres

Dig Sites Area: Line:

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Site Location: 528280 140136
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Your Scheme/Reference: 606255 -
Gatwick Green
Scale: 1:500 (When plotted at A3)

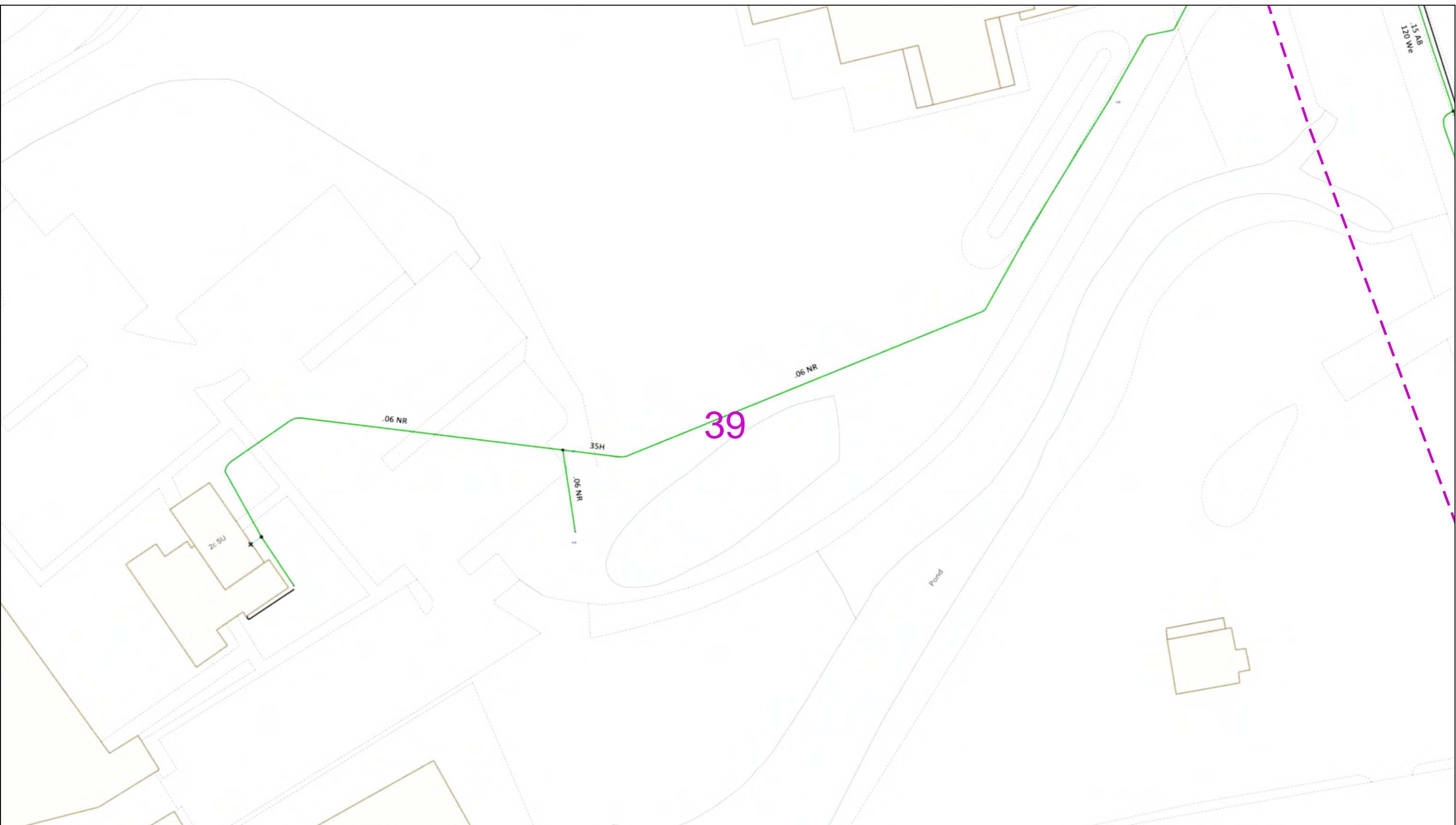


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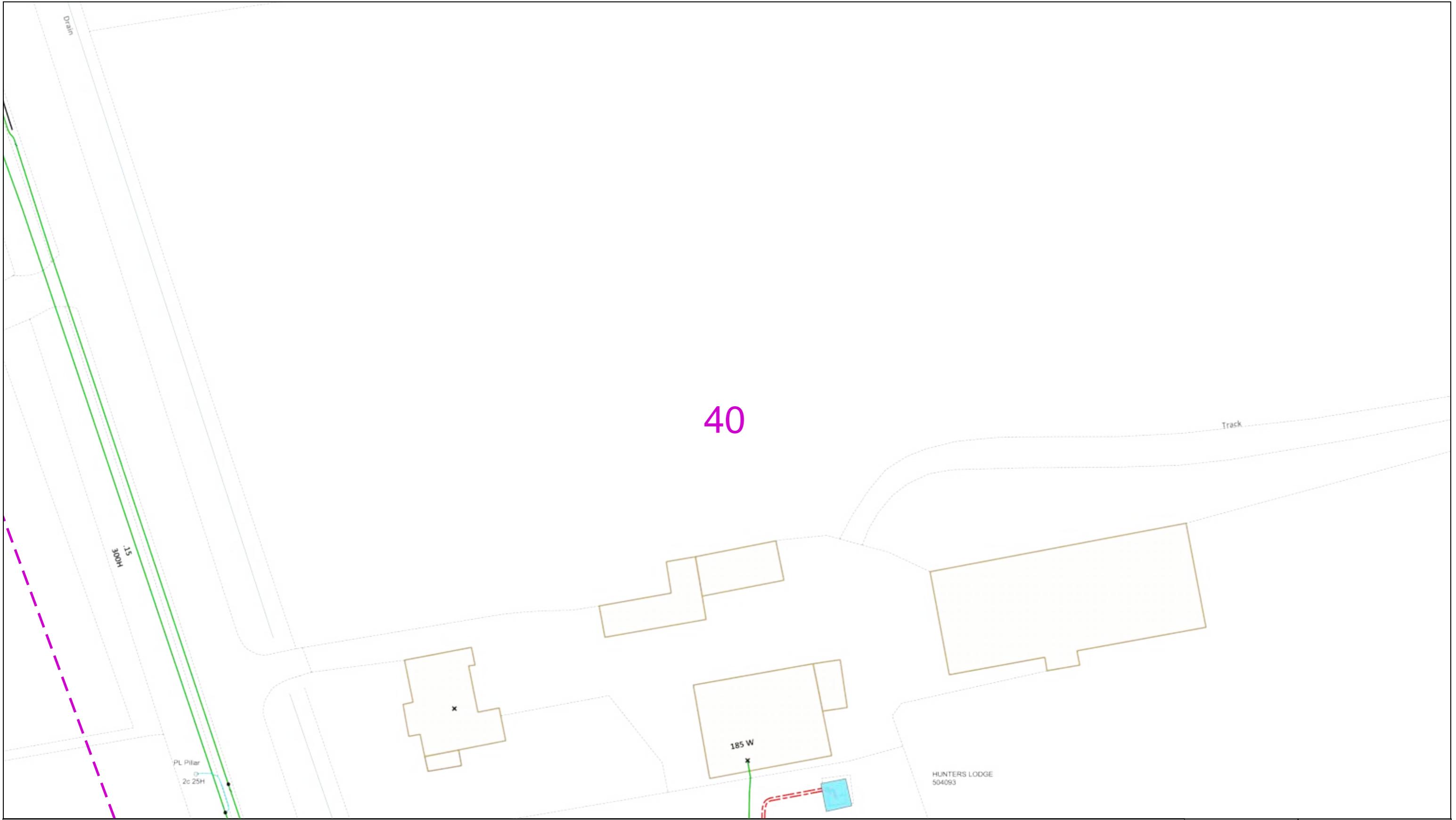


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0 25 50
metres

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Your Scheme/Reference: 606255 -
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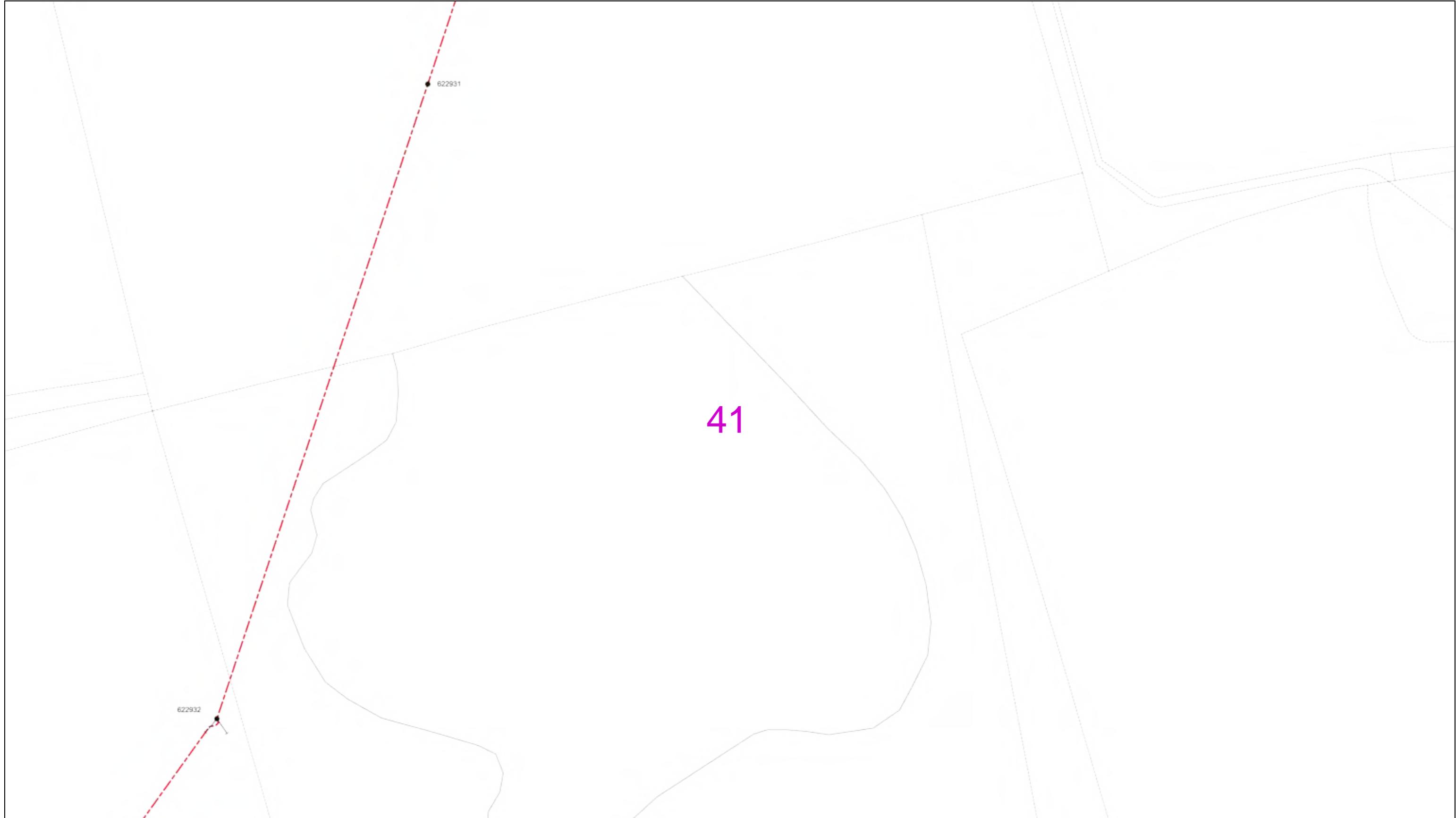
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41



0 25 50
metres

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Your Scheme/Reference: 606255 -
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Dig Sites

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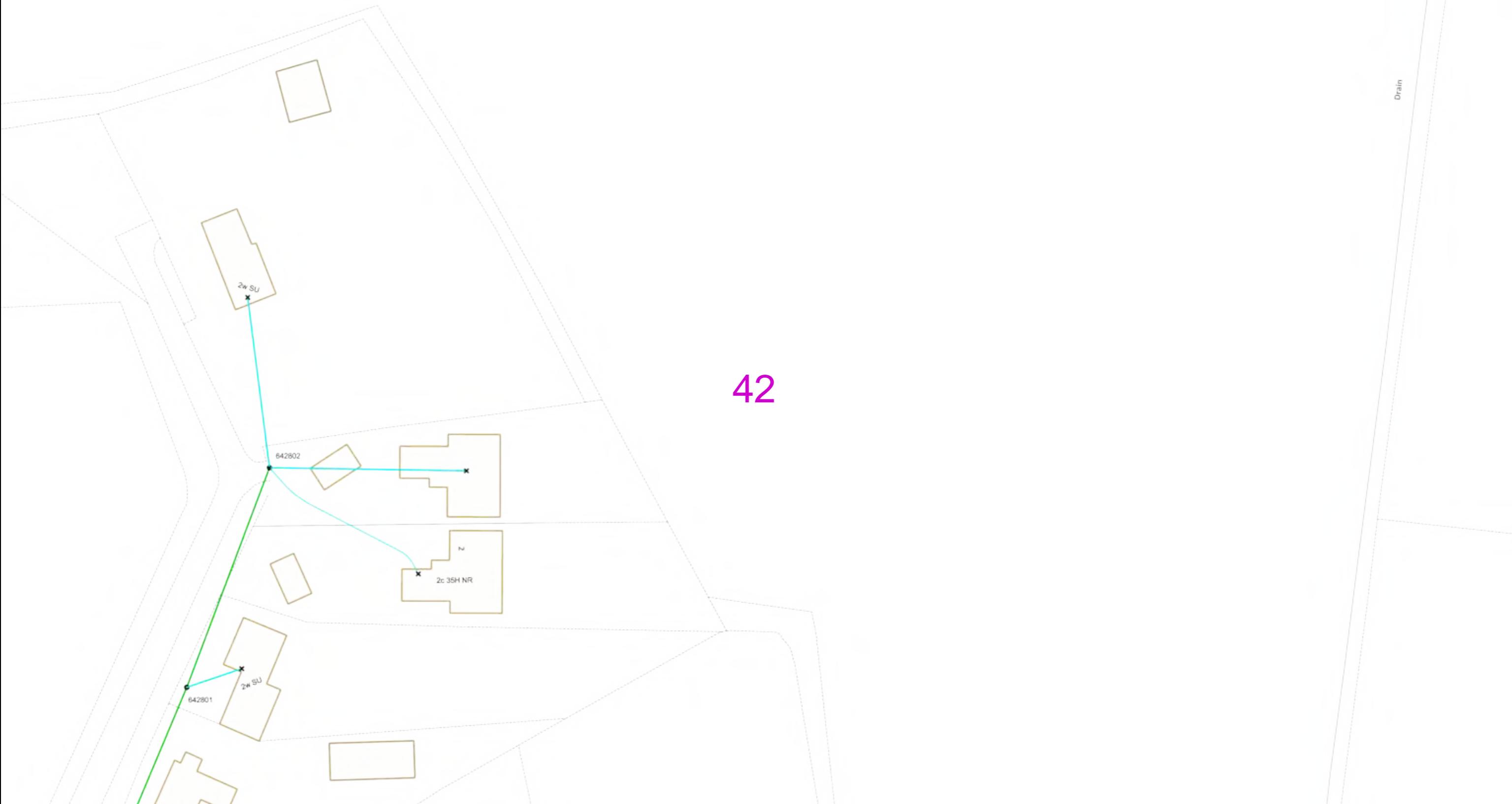
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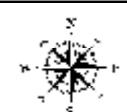
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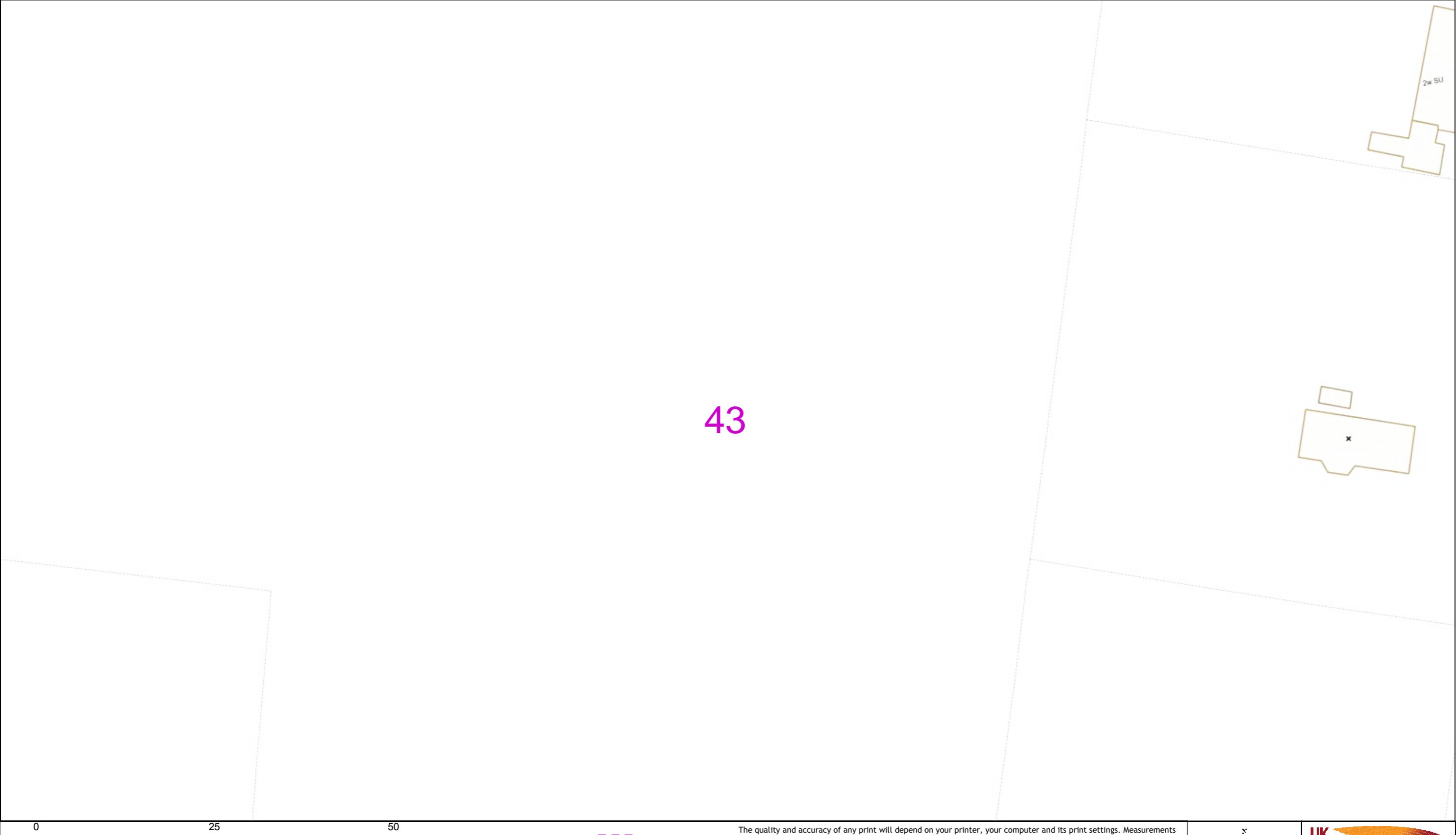
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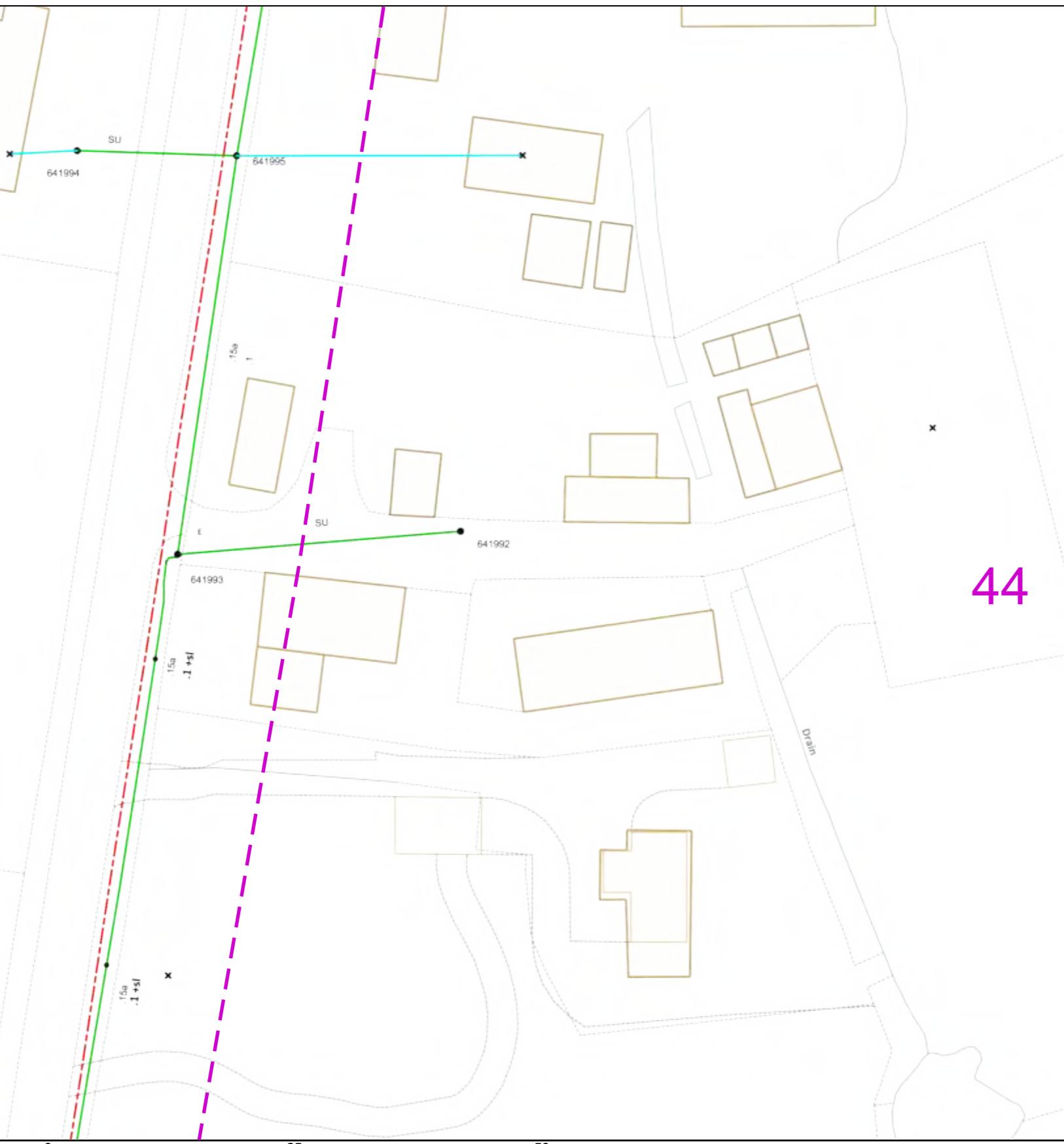


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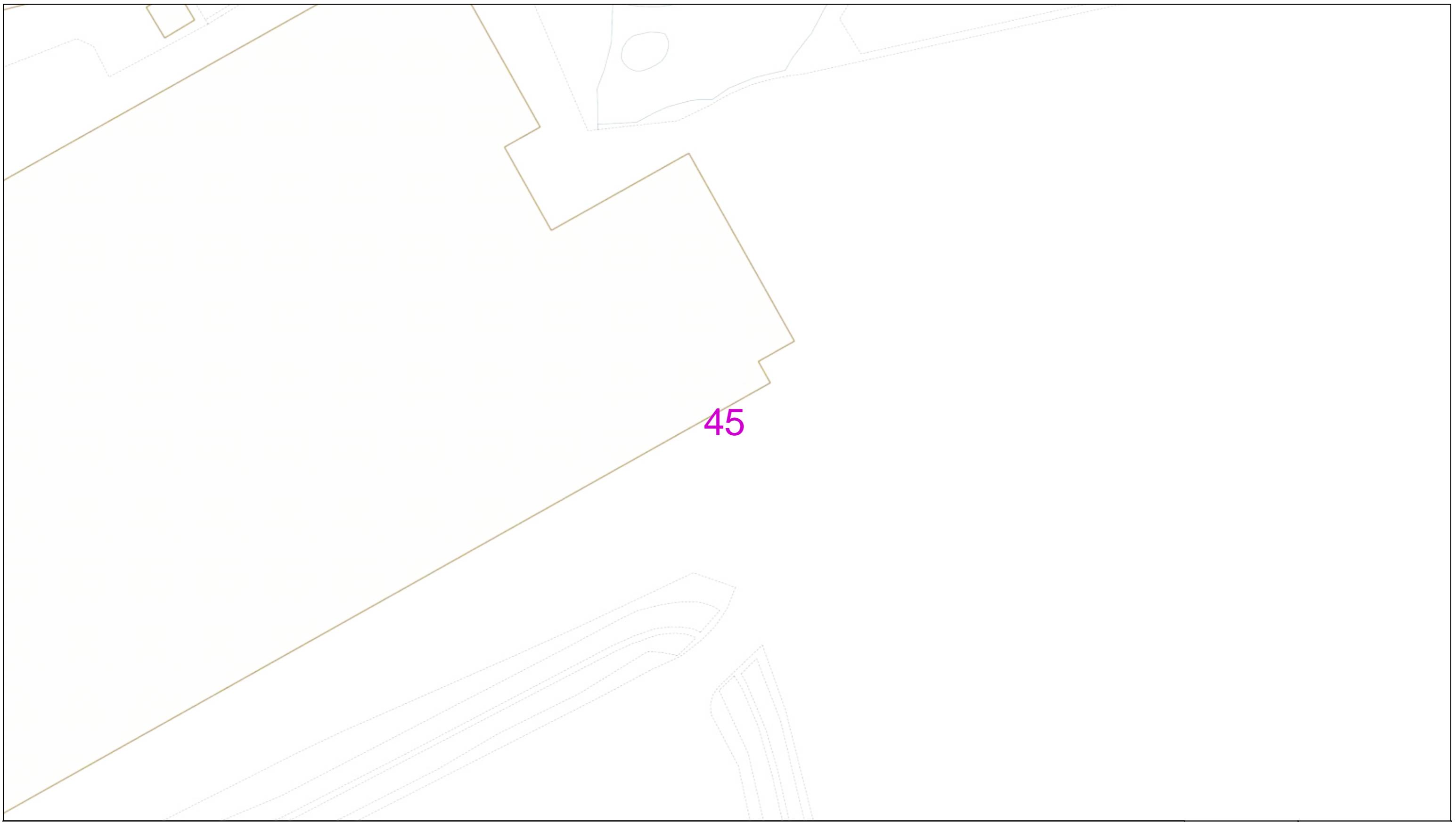


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 Job Reference: 17059737
 Site Location: 528280 140136
 Requested by:
 Miss Celeste Imthurn
 Your Scheme/Reference: 606255 -
 Gatwick Green

Scale: 1:500 (When plotted at A3)

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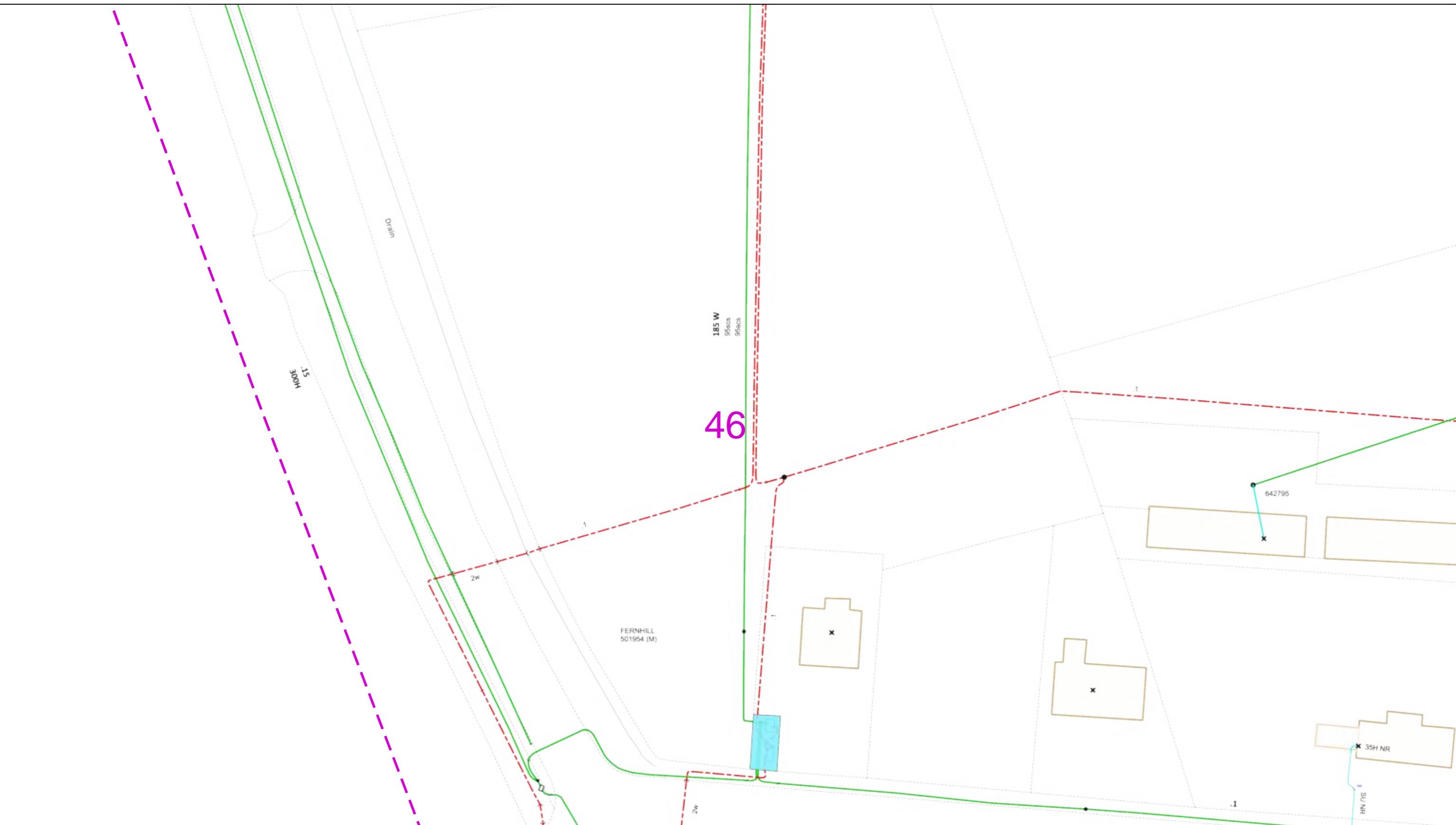


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0 25 50
metres

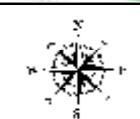
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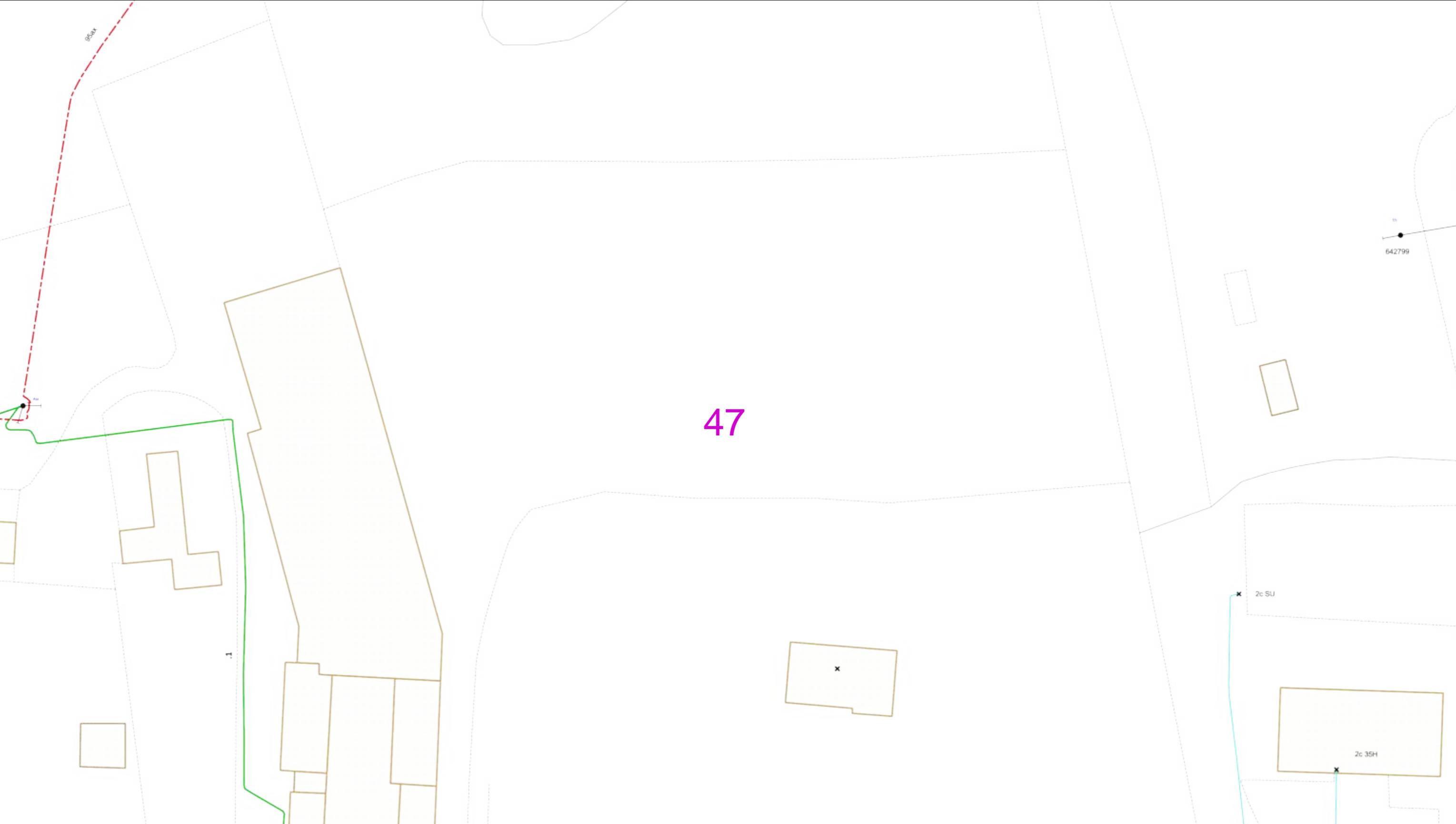


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0 25 50
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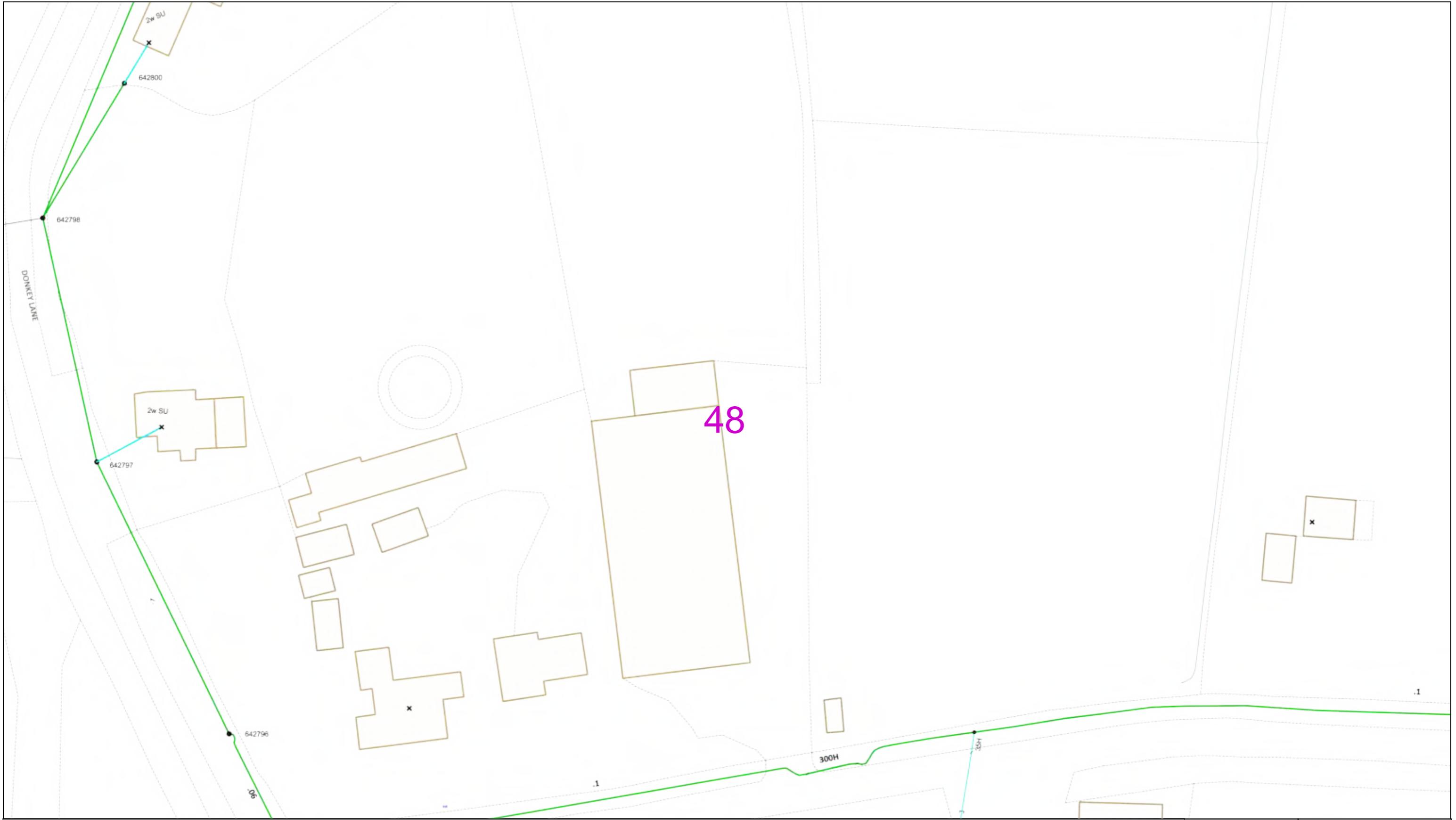
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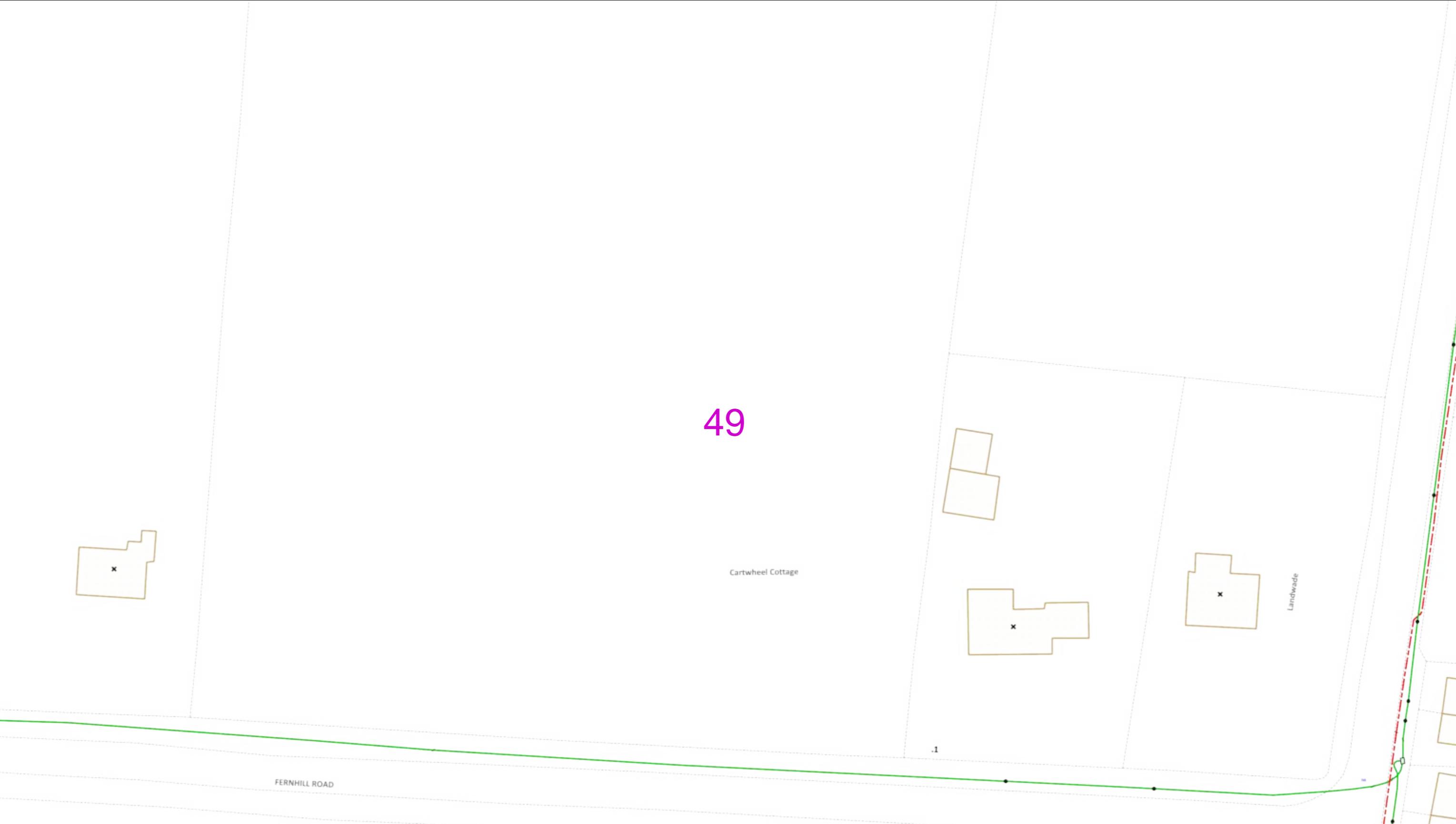
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49



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metres

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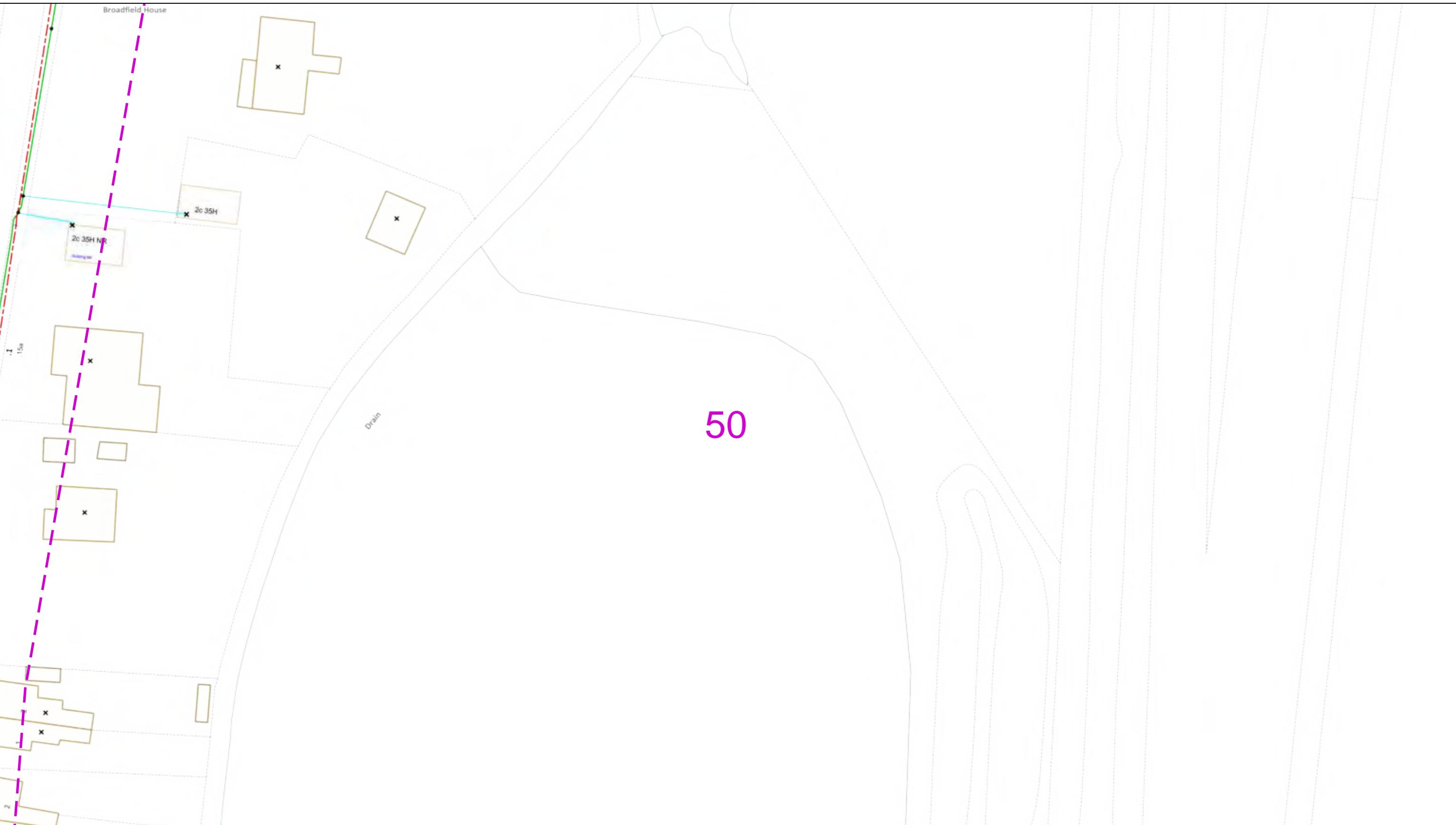
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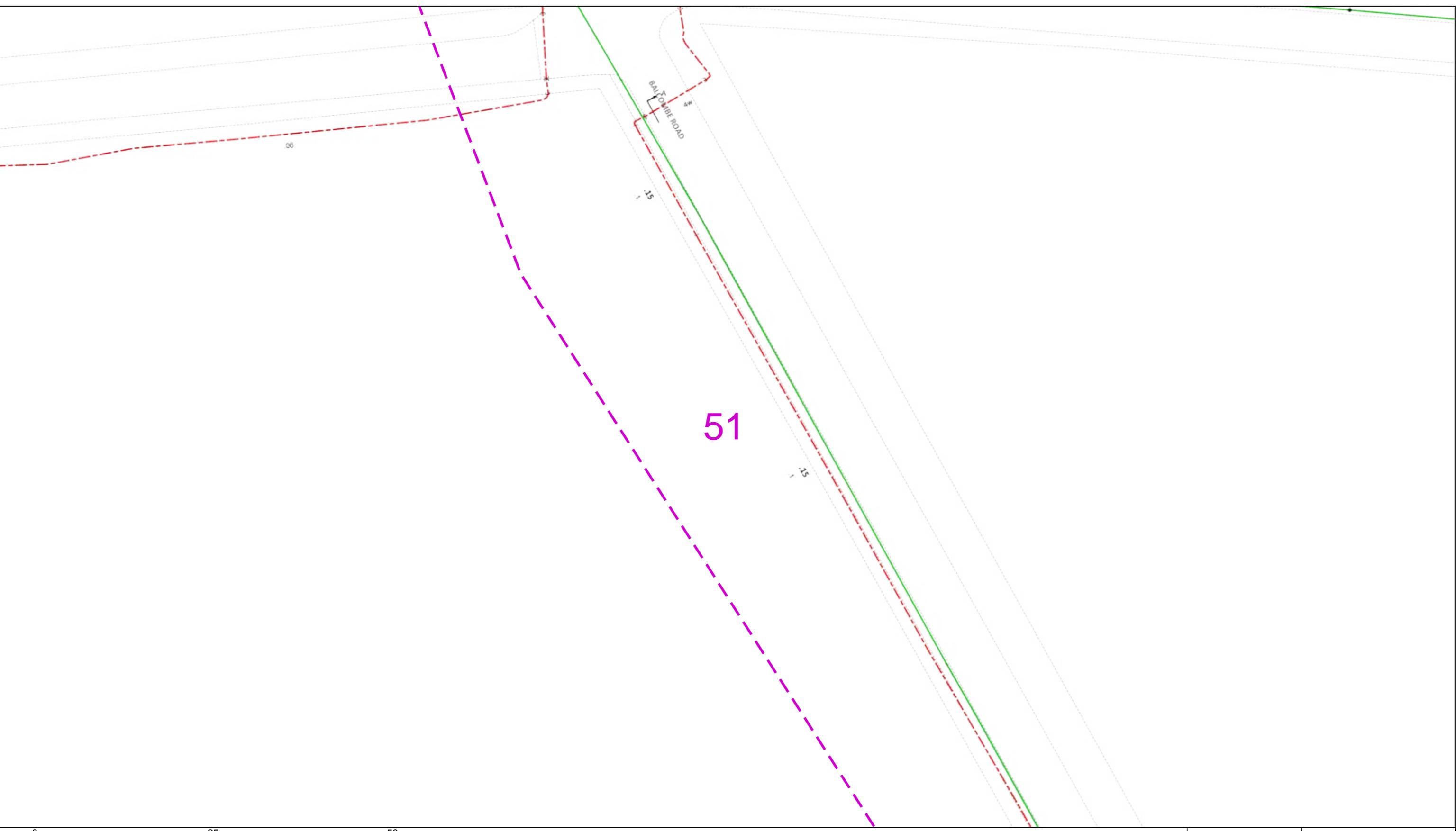
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metres

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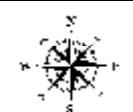
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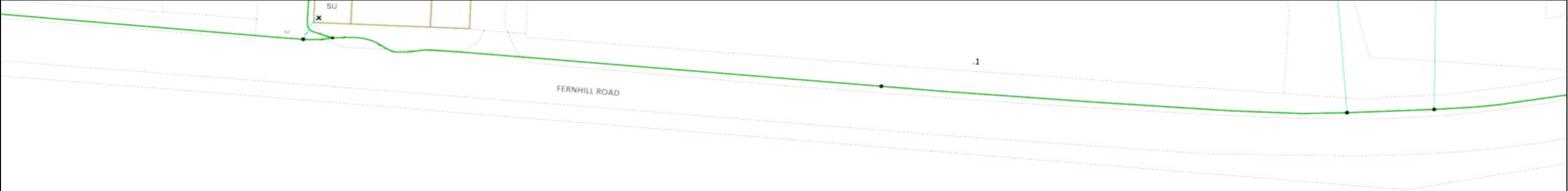


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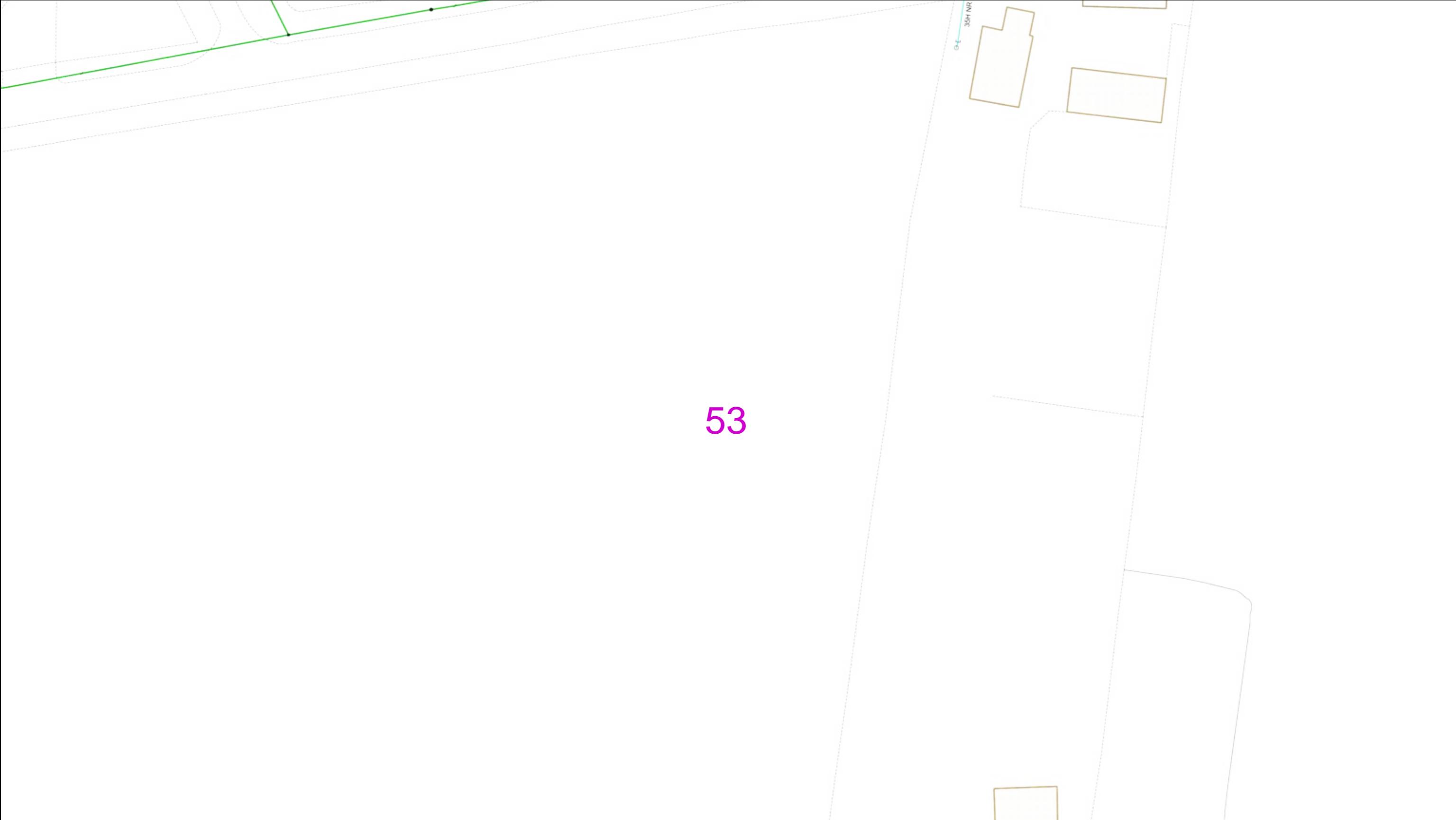
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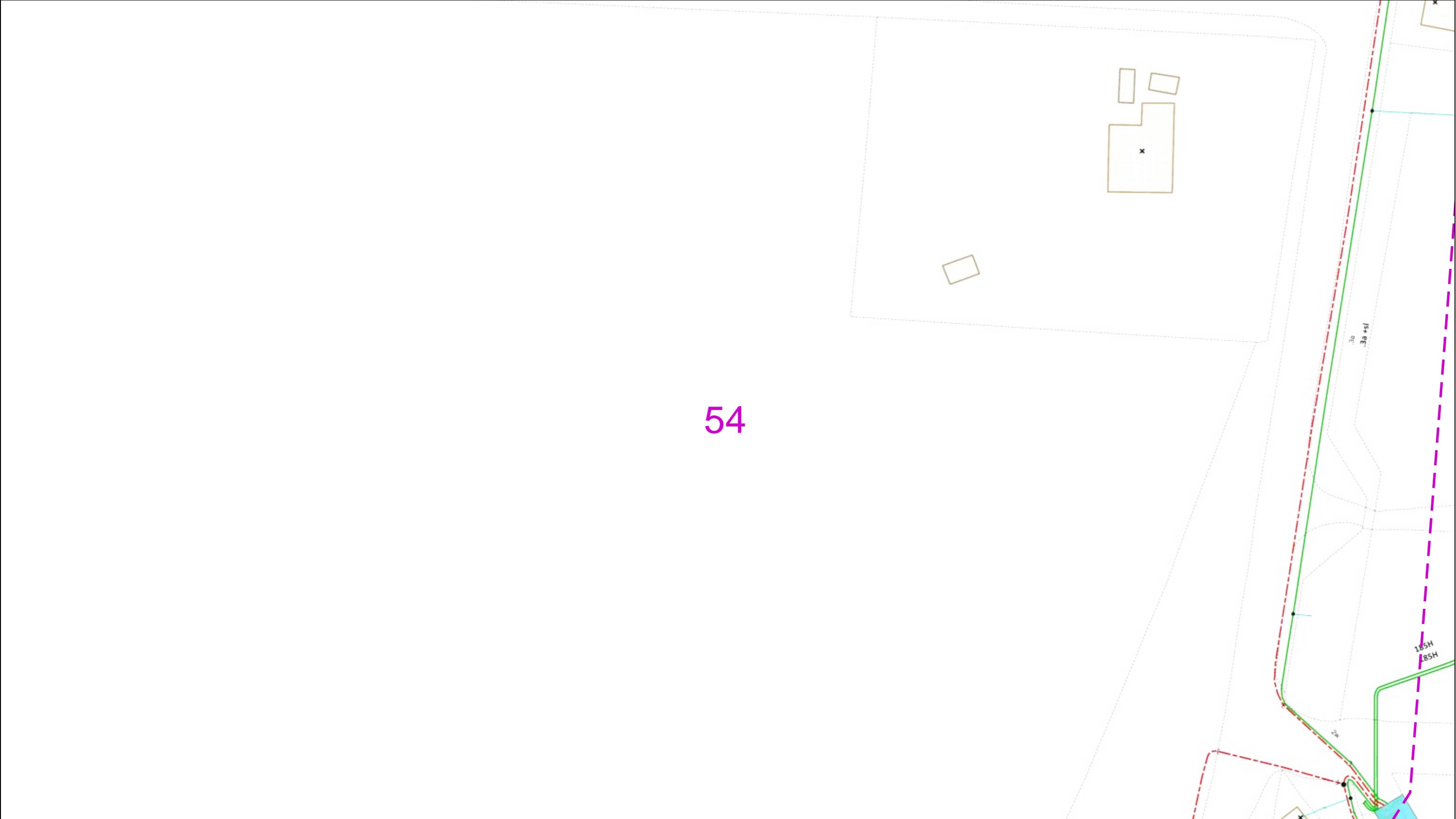


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metres

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This plan must be used with the attached 'Symbols' document.

Date Requested: 22/11/2019
Job Reference: 17059737
Site Location: 528280 140136
Requested by:
Miss Celeste Imthurn

Your Scheme/Reference: 606255 -
Gatwick Green
Scale: 1:500 (When plotted at A3)

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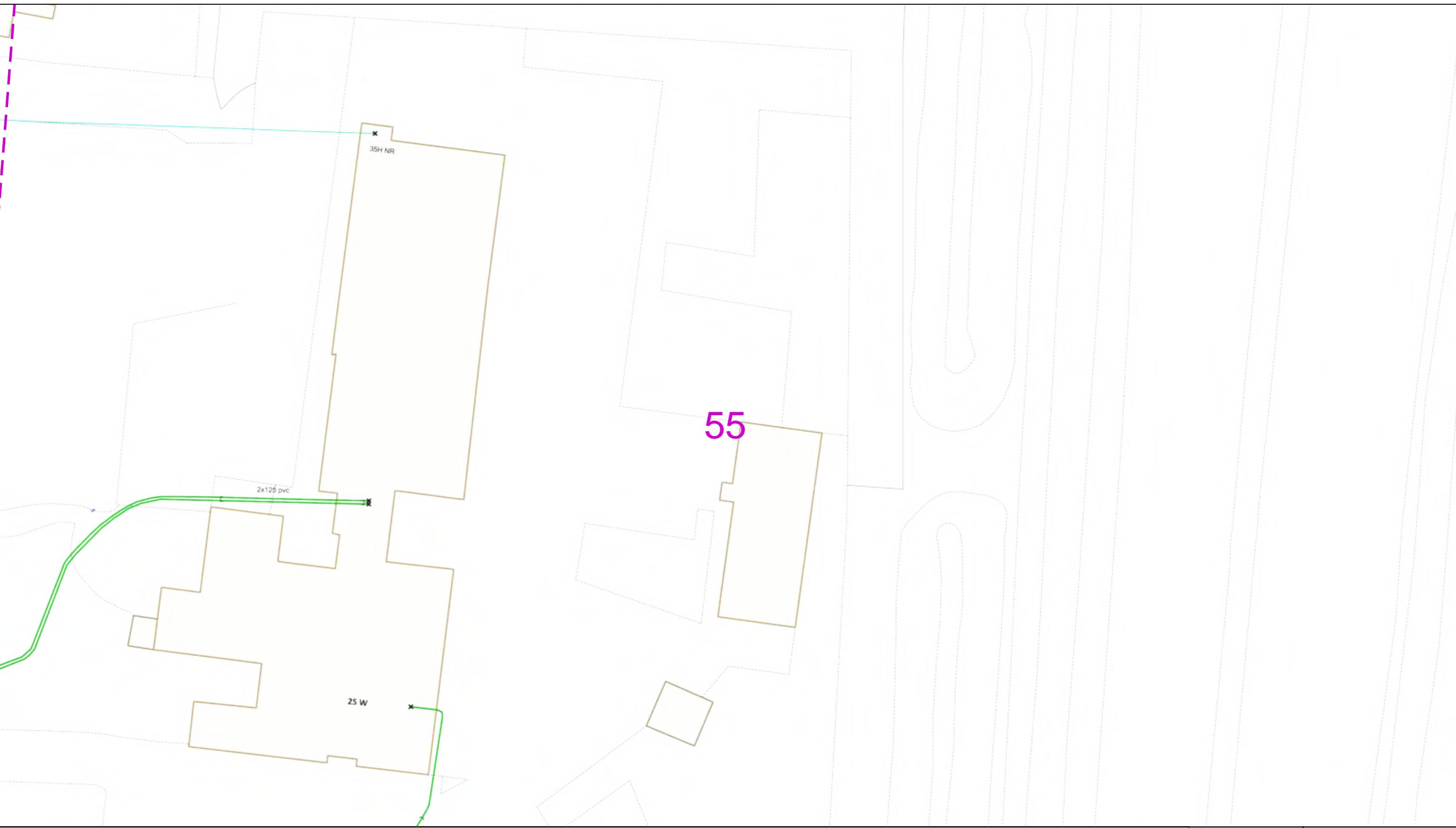
IF IN DOUBT - ASK!

PHONE 0800 056 5866
EMERGENCY - If you
damage a cable or line
Phone 0800 783 8838
(24hrs) URGENTLY



ALWAYS LOOK UP
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Guidance note GS6

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0 25 50
metres

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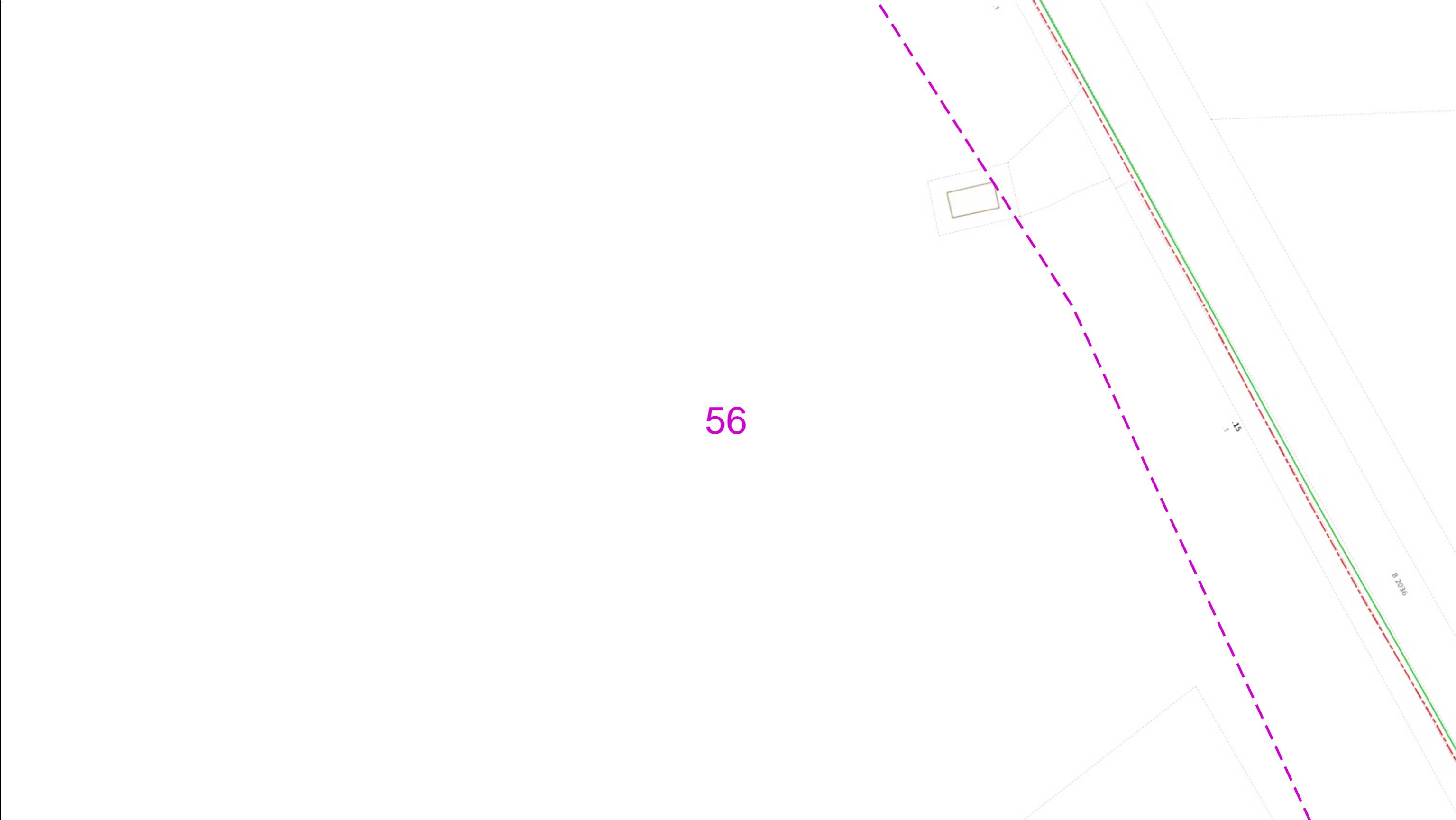
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56



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metres

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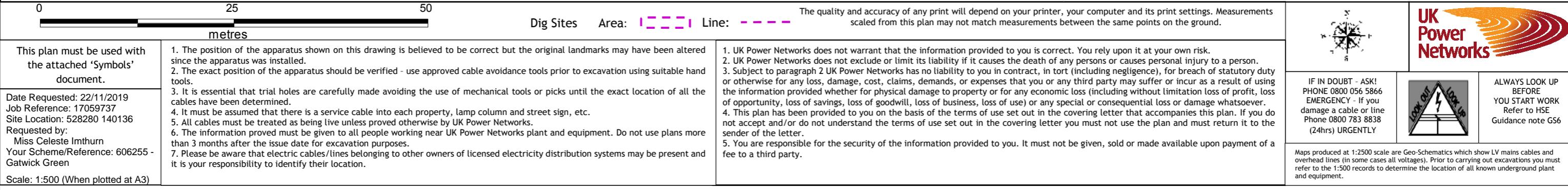


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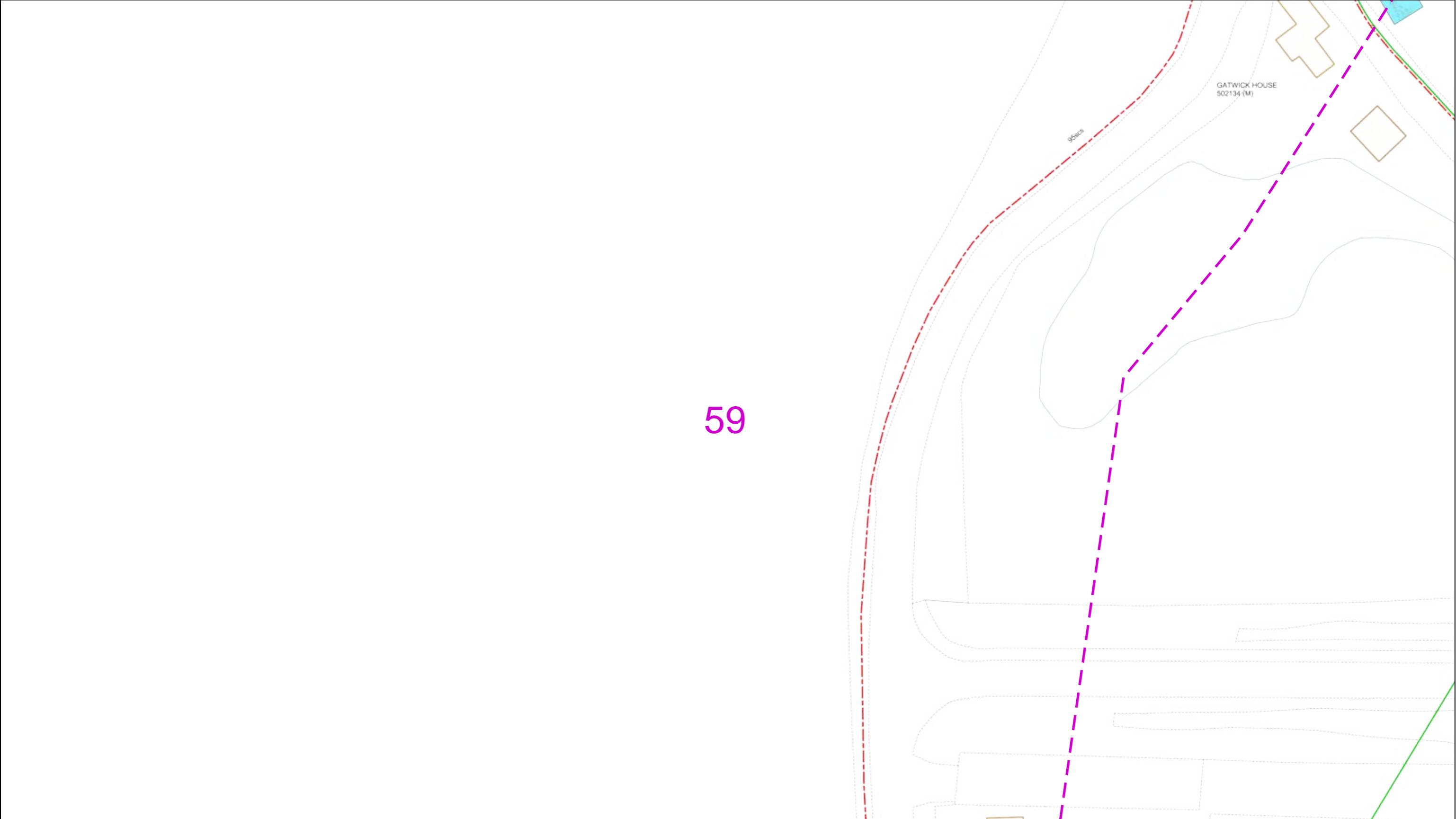
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| | | | | | | |
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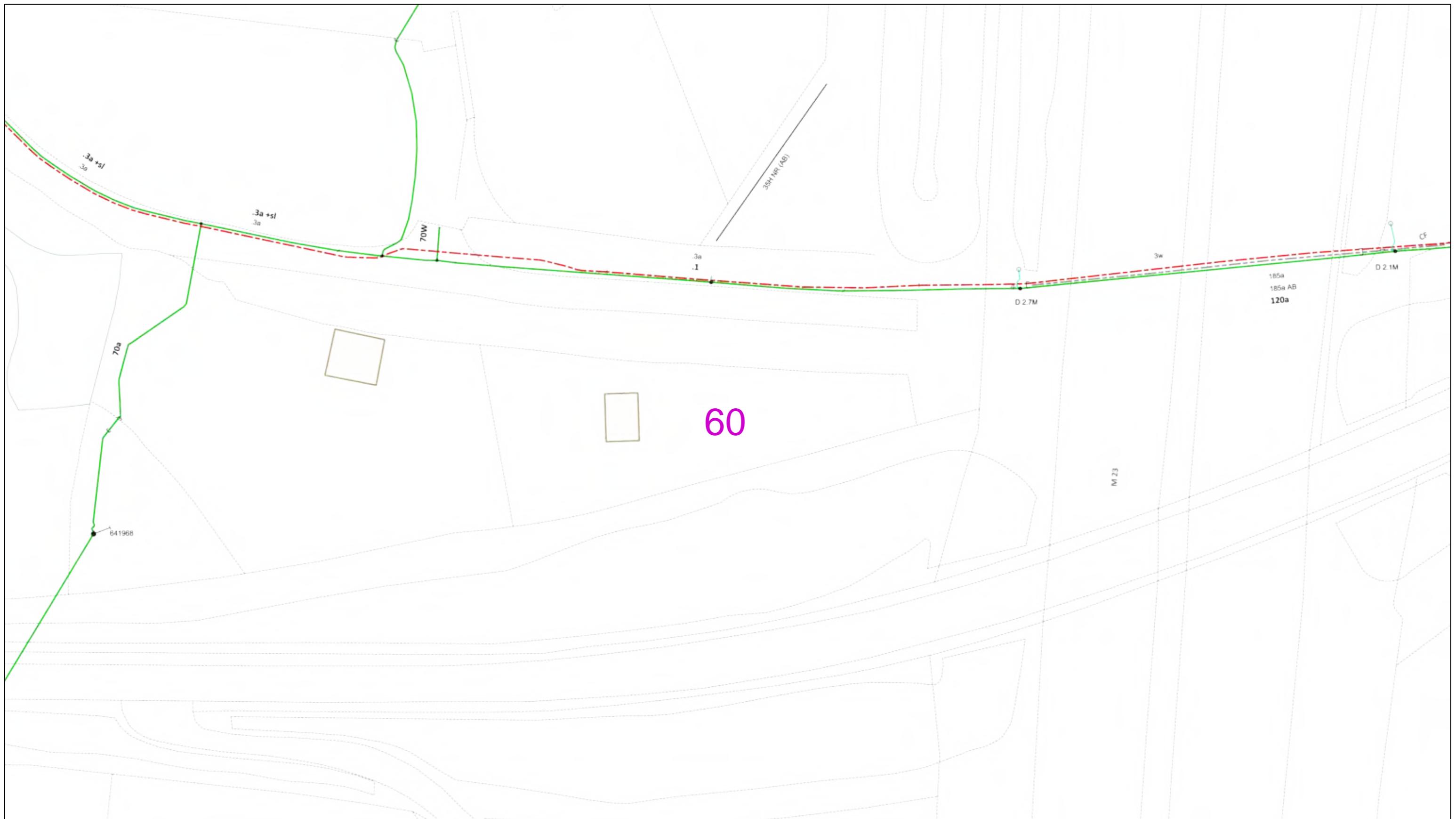
58



59



| | | | | | |
|---|--|---|--|--|---|
| 0  metres | 25  50 | Dig Sites Area:  Line:  | <p>The quality and accuracy of any print will depend on your printer, your computer and its print settings. Measurements scaled from this plan may not match measurements between the same points on the ground.</p> | | |
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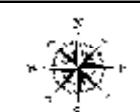
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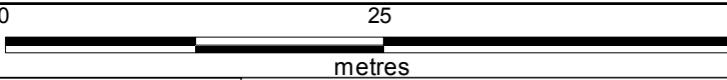
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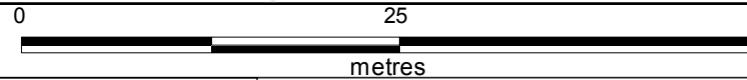
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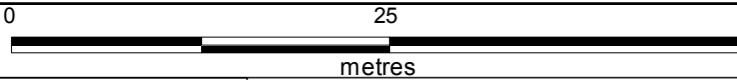
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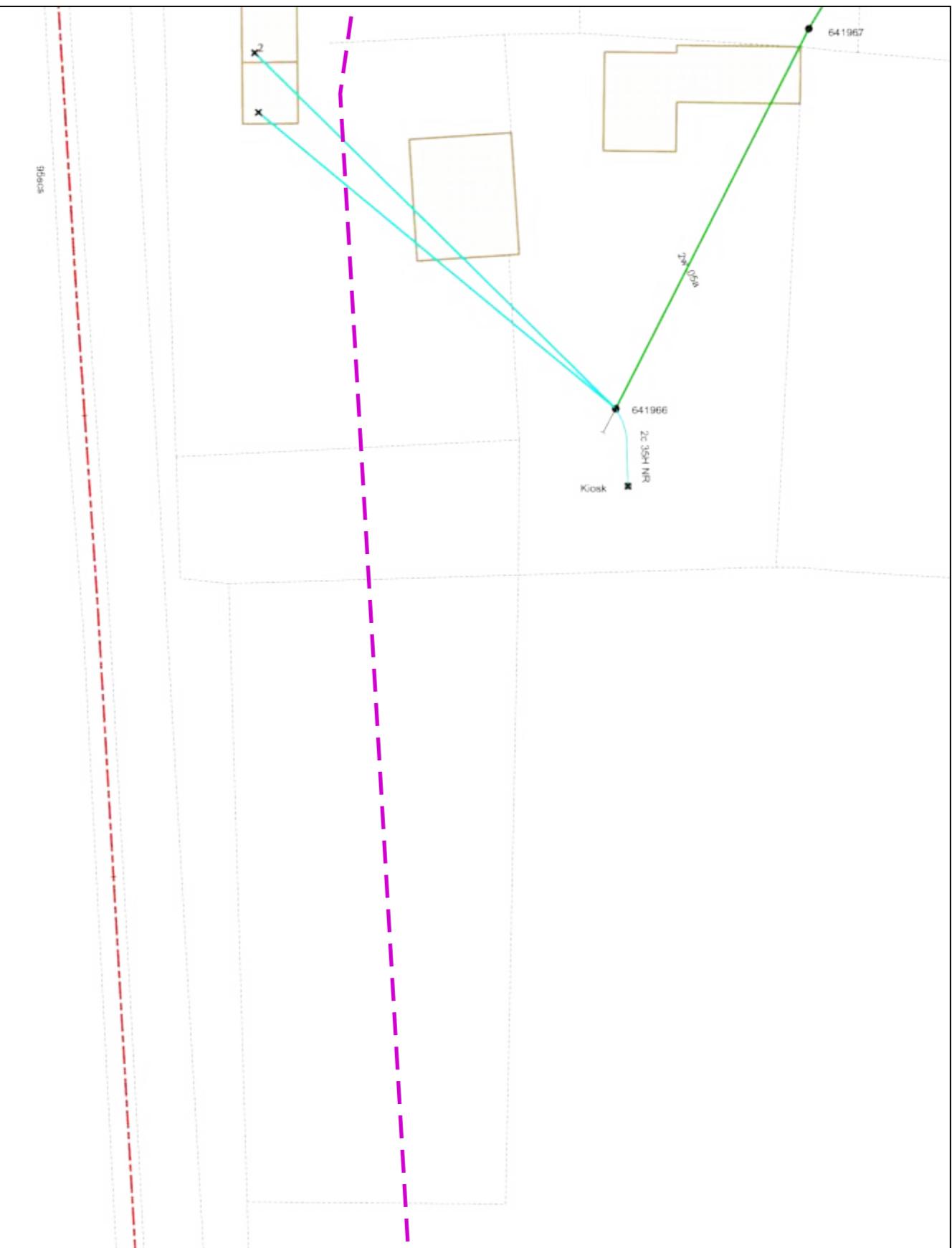
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64



0 25 50
metres

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Date Requested: 22/11/2019
Job Reference: 17059737
Site Location: 528280 140136
Requested by:
Miss Celeste Imthurn
Your Scheme/Reference: 606255 -
Gatwick Green

Scale: 1:500 (When plotted at A3)

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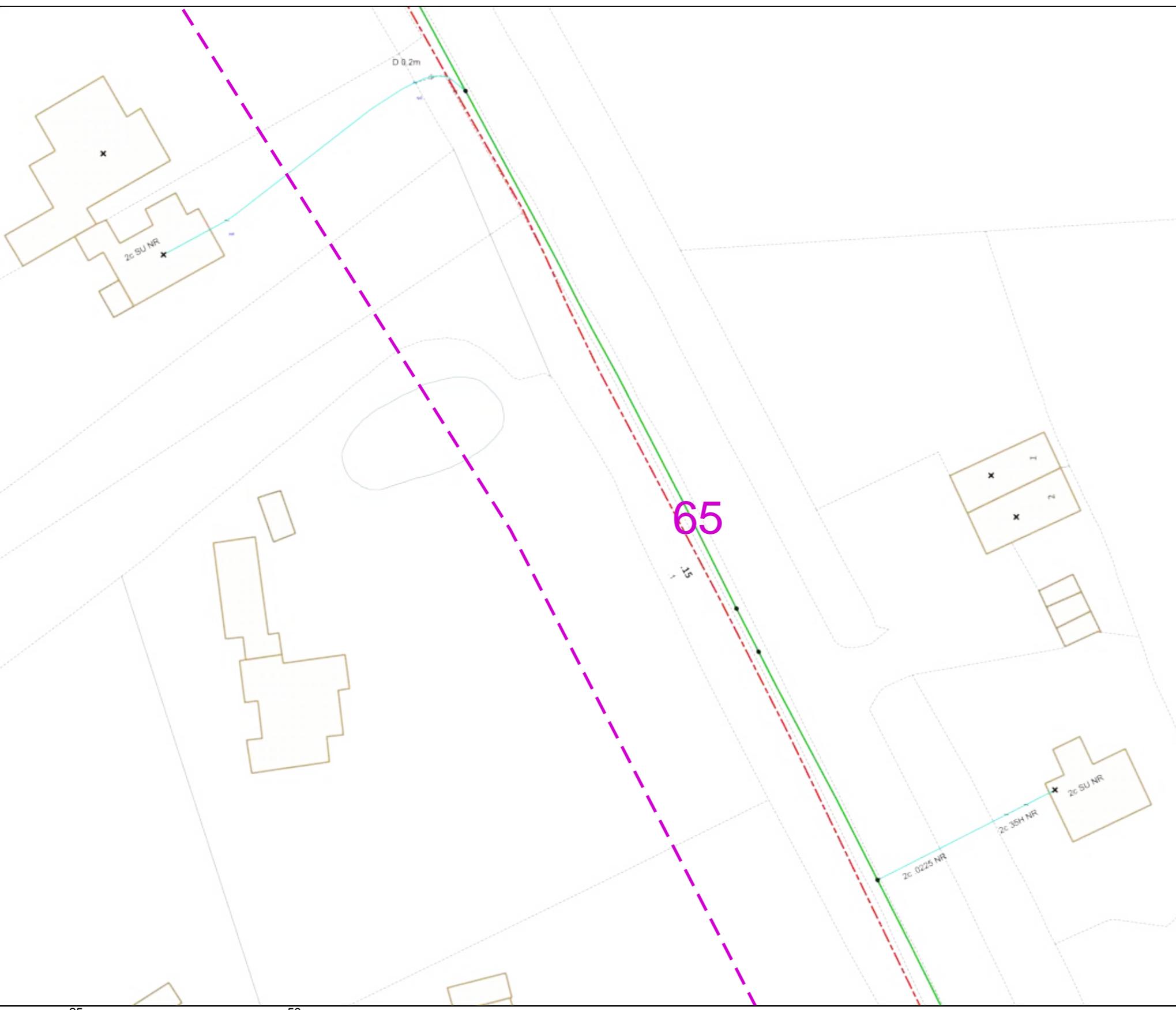


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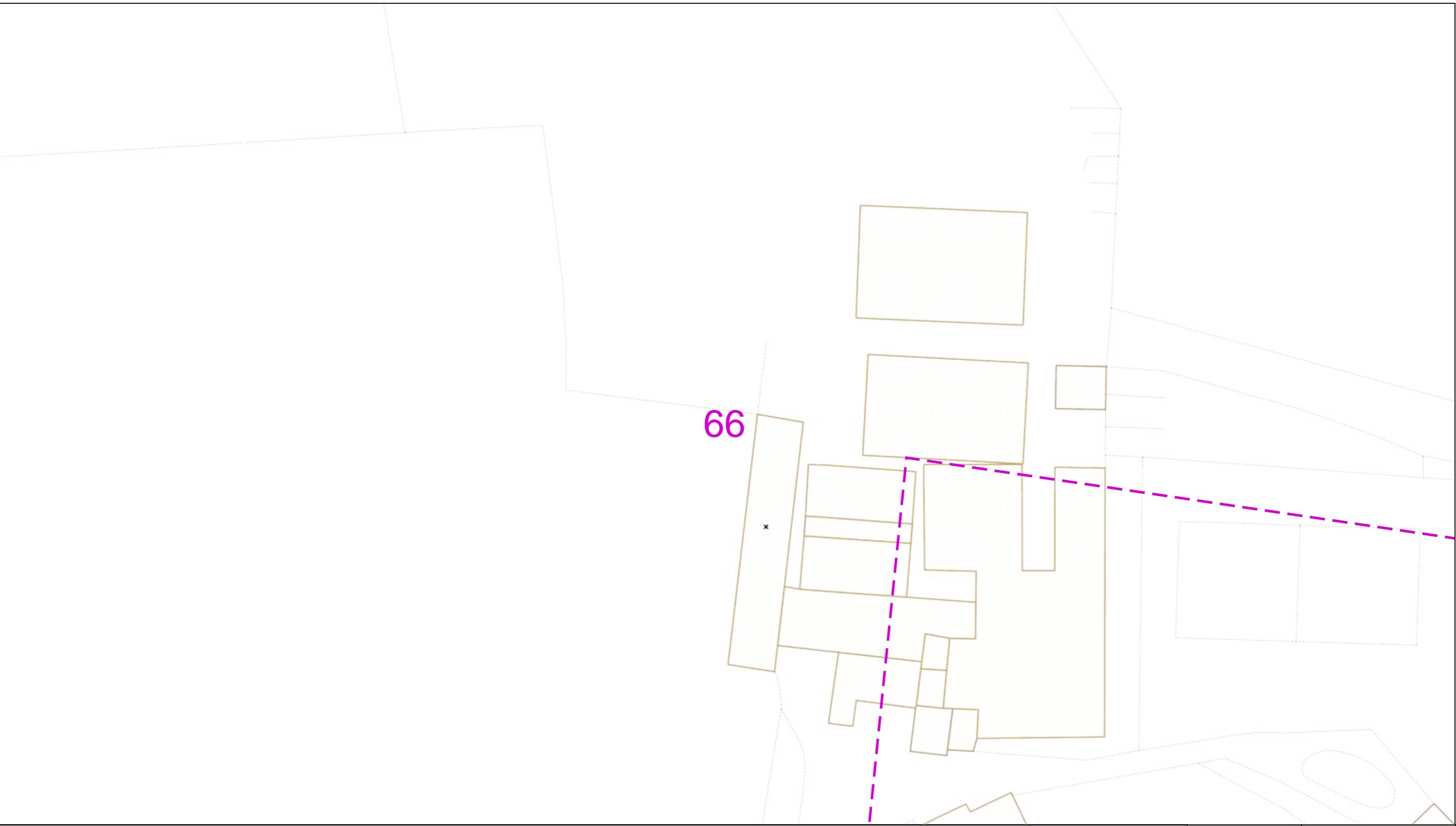


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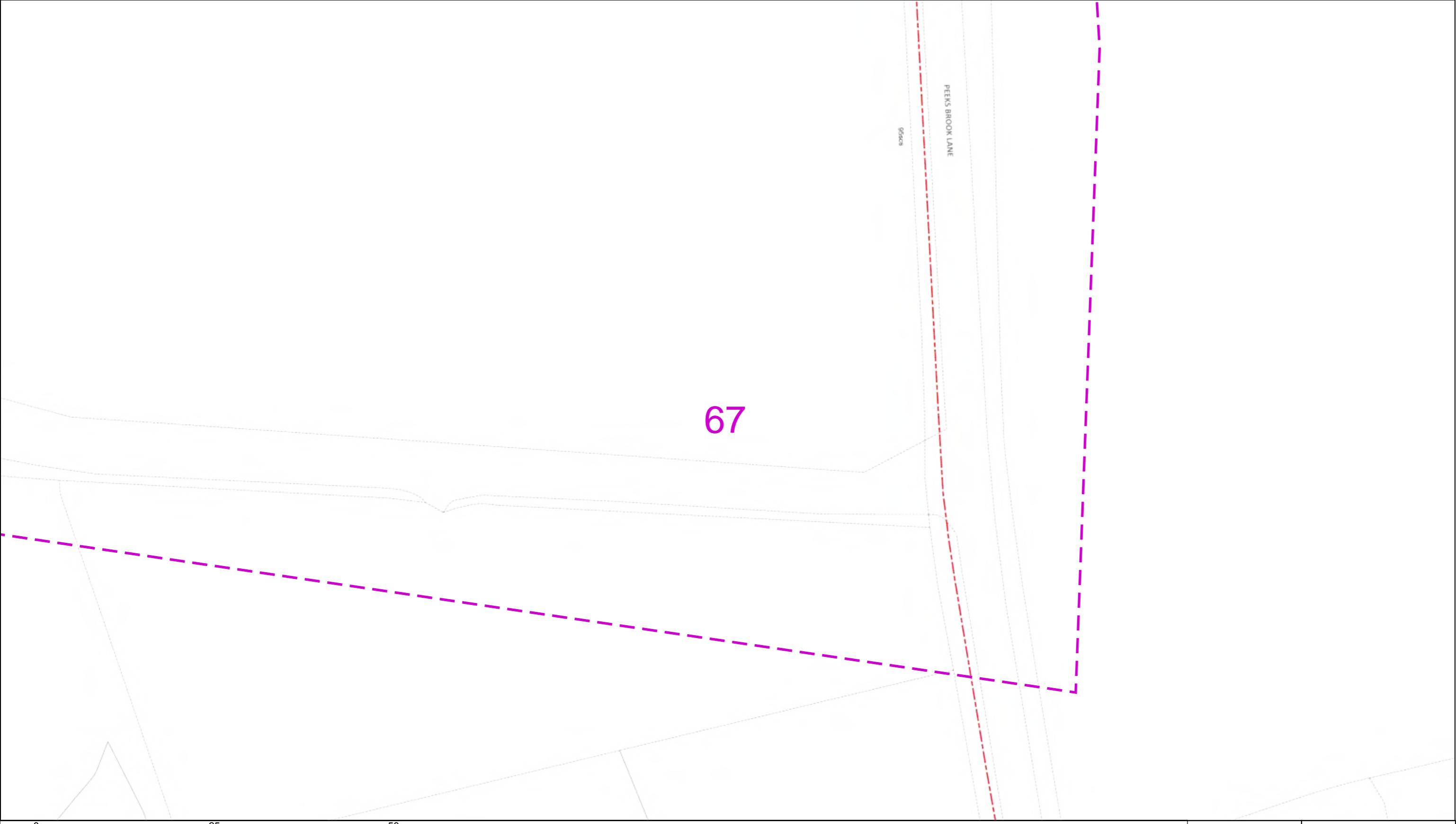
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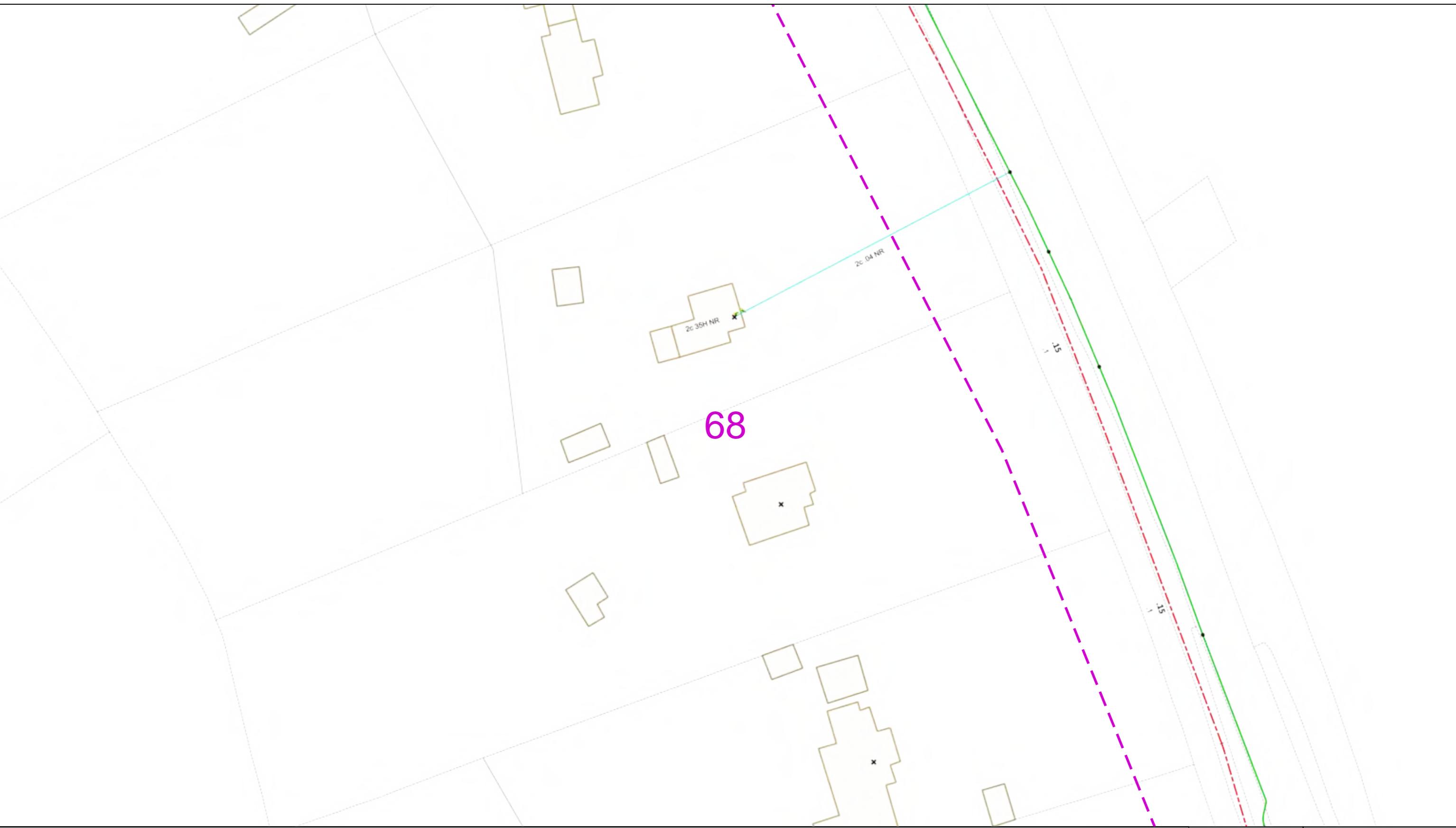
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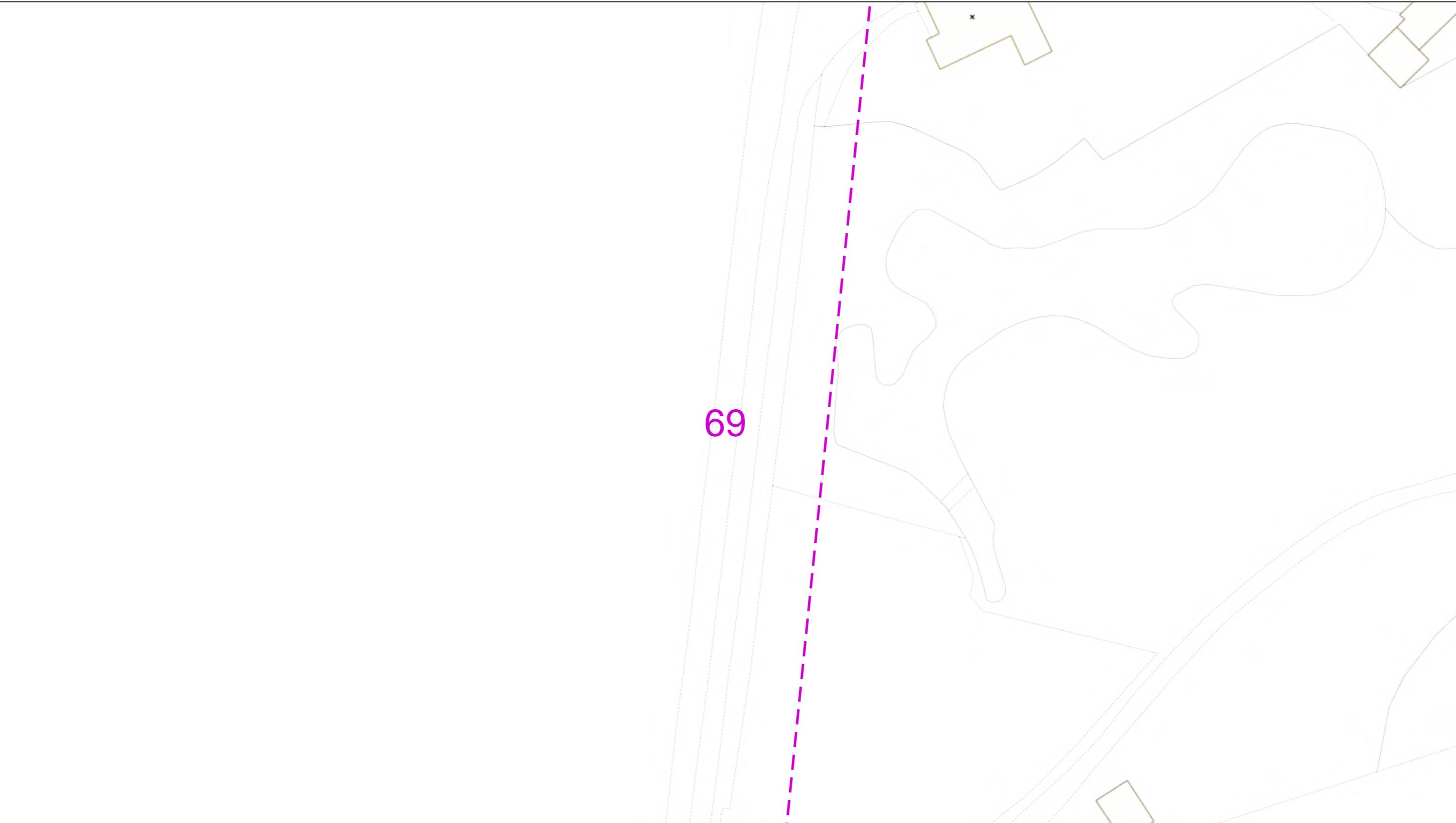


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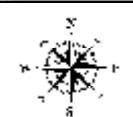
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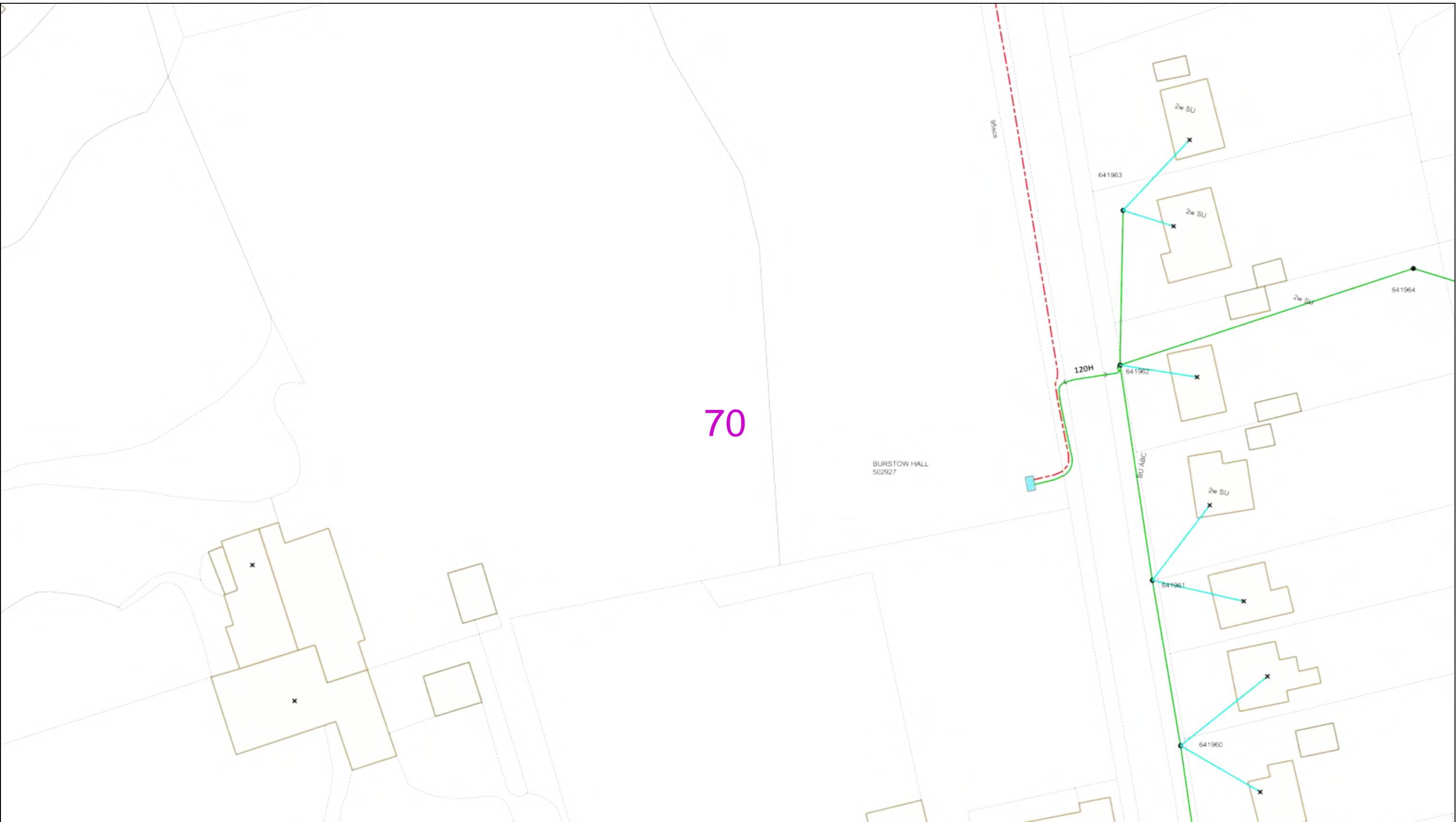
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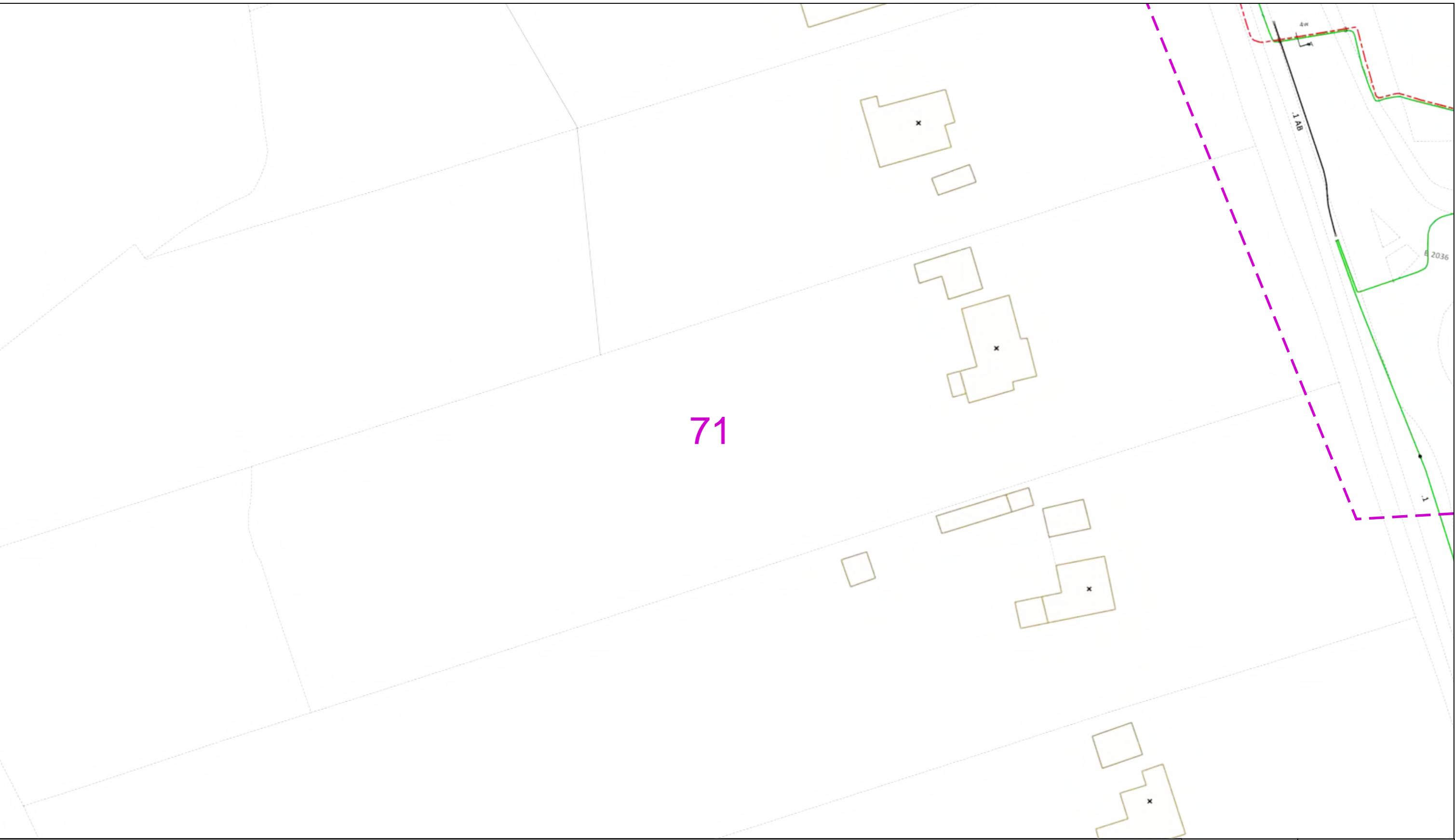
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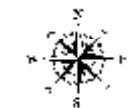
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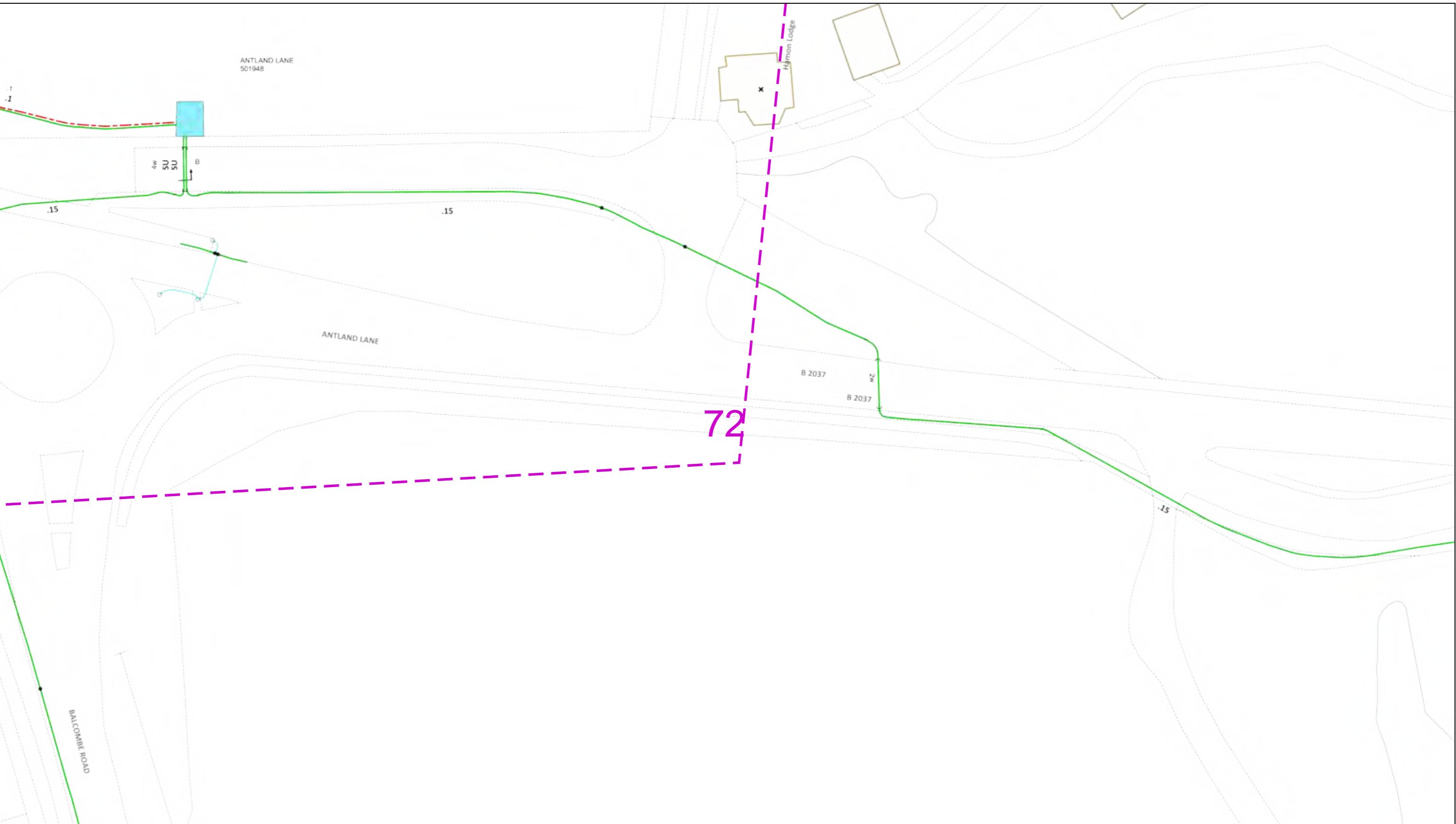


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Network Records

NetMAP Symbols

Booklet -

South East

England

Version 1.2

Released October 2010

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| 12 | Cable ducts. |
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| 14 | EHV, HV and LV sites. |
| 15 | Joints. |
| 16 | Street furniture |
| 17 | Miscellaneous. |
| 18 | Connectivity. |
| 19 | Abbreviations. |
| 20 | Cable phasing. |
| 21 | Operational status colours. |
| 22 <u>1:2500 view (UK Power Networks use only)</u> | |
| | Notes. |
| 23 | Primary distribution line route. |
| 24 | Secondary distribution cables. |
| 25 | Primary and secondary sites. |
| 27 | Switch types. |
| 28 <u>1:10000 view (UK Power Networks use only)</u> | |
| | Notes. |
| 29 | Secondary distribution cables. |
| 30 | Primary and secondary sites. |

(ii)

Guidance notes.

Important notice:

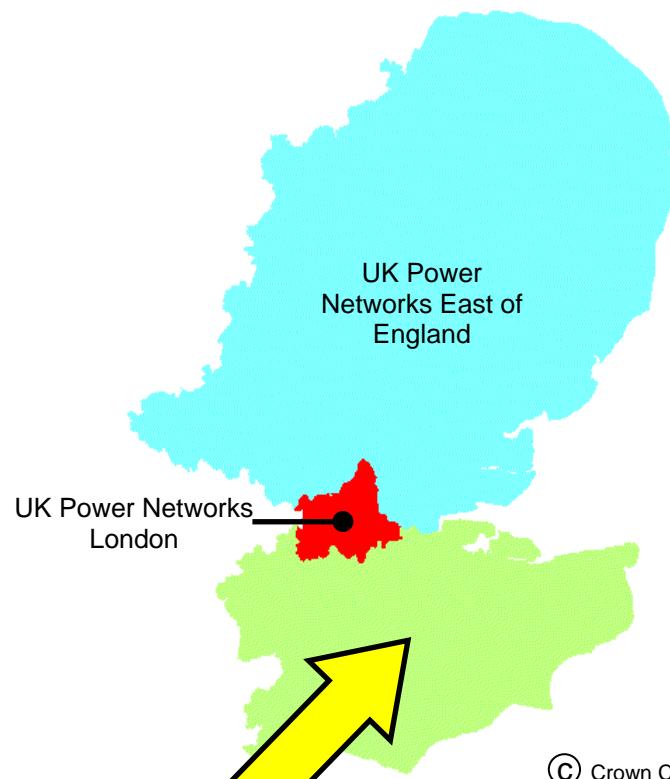
If you do not understand the NetMAP record that you are using, please contact the UK Power Networks Network Records team for guidance on
Tel: 08000 565866.

- The position of apparatus shown on NetMAP is believed to be correct, but the original landmarks may have altered since the apparatus was installed.
- It must be assumed that there is at least one service to each property, lamp column, street sign etc.
- Third party cables are not usually shown.
- When viewed in black and white, the line-style indicates the voltage.
- All LV cables are 4 core and all HV cables are 3 core – unless otherwise stated.
- All cables are copper – unless otherwise stated.



Plan Provision Team
and CableWatch
Fore Hamlet
Ipswich
Suffolk IP3 8AA
Tel: 08000 565866

The area covered by this guide:



**UK Power Networks
South East England.**
This is the only area
where this booklet
applies

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1:500 (& 1:1250) view

Scenery

| NetMAP system | Description |
|---------------|--|
| _____ | Secondary buildings and fence lines |
| _____ | Building line |
| ----- | Kerb line |
| _____ | UK Power Networks / SPN licence boundary (not visible unless selected) |

Scenery for UK Power Networks use only - boxed in red

| NetMAP system | Description |
|--|---|
| | Area of inset network - not the asset of UK Power Networks (only visible to UK Power Networks and their immediate contractors) |
| | Proposed Cross Rail route (only visible to UK Power Networks and their immediate contractors) |
| | High pressure pipelines in the general vicinity (only visible to UK Power Networks and their immediate contractors) |
| <p>Note: Pipelines are only viewable on NetMAP by UK Power Networks staff and their immediate contractors. Do not carry out any excavation without consent from the relevant agency - legally protected high pressure petroleum products pipeline route in the general vicinity - consult www.linewatch.co.uk for contacts and guidance. Pipeline contact numbers can also be found on the intranet – out of hours, contact our Control Centre.</p> | |
| | Water - surface water (only visible to UK Power Networks and their immediate contractors) |
| | Water - Source Protection Zone 1 (only visible to UK Power Networks and their immediate contractors) |
| | Water - Source Protection Zone 2 (only visible to UK Power Networks and their immediate contractors) |
| | Water - Source Protection Zone 3 (only visible to UK Power Networks and their immediate contractors) |
| section continued on next page | |

Scenery for UK Power Networks use only - boxed in red

| NetMAP system | Description |
|---|--|
|  | Historical - Scheduled Monuments (only visible to UK Power Networks and their immediate contractors) |
|  | Historical - Parks and Gardens (only visible to UK Power Networks and their immediate contractors) |
|  | Historical - Areas of Archaeological Potential (AAP) (only visible to UK Power Networks and their Immediate contractors) |
|  | Nature - Ramsar Wetlands of International Importance (only visible to UK Power Networks and their immediate contractors) |
|  | Nature - Special Area of Conservation (SAC) (only visible to UK Power Networks and their immediate contractors) |
|  | Nature - Special Protected Area (SPA) (only visible to UK Power Networks and their immediate contractors) |
|  | Nature - Site of Special and Scientific Interest (SSSI) (only visible to UK Power Networks and their immediate contractors) |
| section continued on next page | |

Scenery for UK Power Networks use only - boxed in red

| NetMAP system | Description |
|---|---|
|  | Nature - Local Nature Reserve (only visible to UK Power Networks and their immediate contractors) |
|  | Nature - National Nature Reserve (only visible to UK Power Networks and their immediate contractors) |
|  | Nature - Area of Outstanding Natural Beauty (AONB) (only visible to UK Power Networks and their immediate contractors) |
|  | Nature - National Park (only visible to UK Power Networks and their immediate contractors) |
|  | Fluid filled cables - very high sensitivity (only visible to UK Power Networks and their immediate contractors) |
|  | Fluid filled cables - high sensitivity (only visible to UK Power Networks and their immediate contractors) |
|  | Fluid filled cables - medium sensitivity (only visible to UK Power Networks and their immediate contractors) |
| | Fluid filled cables - low sensitivity (only visible to UK Power Networks and their immediate contractors) |

Primary distribution line route (1:500 view)

| NetMAP system | Description |
|---|-------------------------------|
| | 275–400kV National Grid route |
| | 132kV cable route |
| | 33kV cable route |
| Approximate routes only – see separate record | |

Secondary distribution cables (1:500 view)

| NetMAP system | Description |
|---------------|----------------------------|
| | 11kV underground cable |
| | 11kV overhead line |
| | 6.6kV underground cable |
| | 6.6kV overhead line |
| | <6.6kV underground cable |
| | <6.6kV overhead line |
| | LV underground cable |
| | LV overhead line |
| | Pilot cable |
| | LV street lighting (pl) |
| | Service overhead line |
| | Service underground |
| | Logical service connection |

Secondary distribution cable terminology (1:500 view)

HV underground

| | |
|------------------|--|
| sta (no text) | PILCSTA (paper insulated lead covered steel tape armour) PILCSWA (paper insulated lead covered steel wire armour) |
| XLPE | XLPE (cross linked polyethylene) insulation |
| bcs | CAS (corrugated aluminium sheath) belted construction |
| sca | CAS (corrugated aluminium sheath) with screened cores |
| ua | PILC (paper insulated lead covered) unarmoured |
| c/c | Concentric cores |
| Poly | Poly (polyethylene) insulation |
| BOTES of | BOTES - Board of Trade earth screen |
| 33 KV design | Constructed to 33 KV specification |
| ax | Triplex with aluminium conductor |
| cx | Triplex with copper conductor |

HV overhead

| | |
|-----------|---|
| (no text) | Bare open wire |
| pvc | Open wire PVC covered |
| cat | ABC (aerial bundled or bunched conductor) with supporting strain wire |
| +ew | Open wire with extra earth conductor |
| occ | Compact covered conductor |

Overhead line materials

| | |
|-----|-----------------------|
| sca | Steel cored aluminium |
| cc | Cadmium copper |
| st | Steel |
| sil | Simalex |
| cos | Copper covered steel |
| cpl | Compactol |

section continued on next page

Secondary distribution cable terminology continued

(1:500 view)

LV underground mains and services

| | |
|-----------|---|
| w | Waveform |
| We | Waveform with separate earth wire |
| H | Hybrid - copper neutral with aluminium phase conductor |
| He | Hybrid with separate earth wire |
| ua | PILC (paper insulated lead covered) unarmoured |
| (no text) | PILC (paper insulated lead covered) with/without armour |
| XLPE | XLPE (cross linked polyethylene) insulation |
| DISTR | PISTA (paper insulated steel tape armour) 4c SAC (solid aluminium core) with lead covered neutral |
| c/c | Concentric cores |
| s/c | Split concentric with separated neutral and earth wires |
| CONSAC | Paper insulated aluminium sheathed 3 core with solid aluminium cores |
| vb | Vulcanised bitumen/rubber insulation |
| Capothene | Capothene core insulation |
| tby | Tape braid and yarn |
| swa | PILSWA (paper insulated lead steel wire armour) |
| sac | PILSTA (paper insulated steel tape armour) solid aluminium core |
| Solidal | 4 sector SAC with solid aluminium cores |
| LSF | Low smoke and fume (orange cable) |
| Trough | Cable laid in filled trough |

LV overhead mains and services

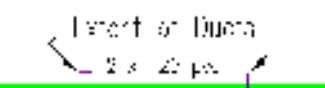
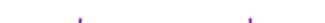
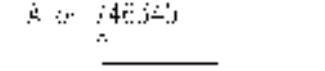
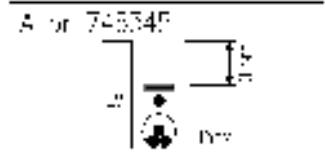
| | |
|-----------|---|
| (no text) | Bare open wire |
| ABC | Aerial bundled (or bunched) conductor |
| cat | ABC (aerial bundled or bunched conductor) with supporting strain wire |
| pvc | PVC covered open wire |
| c/c | Concentric cores |
| H | Hybrid - copper neutral with aluminium phase conductor |
| ue | Under eaves - hessian covered lead cable |
| vir | Vulcanised India rubber insulation |

section continued on next page

Secondary distribution cable terminology continued (1:500 view)

| Various annotation | |
|--------------------|--|
| .1 | Cable size (sq. inches) |
| 185 | Cable size (sq. millimetres) |
| a | Aluminium |
| ITC | Instrument traced cable or ITC - cable traced electronically using Cable Avoidance Tool (CAT) or similar |

Cable ducts (1:500 view)

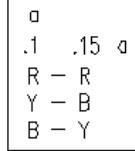
| NetMAP system | Description |
|---|---|
|  | 2 x 20 mm² |
|  | Multi-way (no text) |
|  | Spare cable |
|  | Cross section arrow |
|  | Cross section showing duct, cable depth, single LV cable and HV triplex cable |

Duct materials

| | |
|-----------|-----------------------|
| (no text) | Earthenware |
| pvc | PVC |
| st | Steel |
| asb | Asbestos |
| fbr | Fibre |
| ir | Iron |
| cp | Concrete pipe |
| t/e | Trenchless excavation |

| Poles (1:500 view) | |
|--|--------------------------------------|
| NetMAP system | Description |
| (S) ggggggg  | Section pole Pole number (unique) |
|   | Single leg H pole |
|   | 3 member 4 member |
|   | Strut Pole support (stay) |
|   | Flying stay Tower 33kV to 400kV |

| EHV, HV and LV sites (1:500 view) | |
|---|---|
| NetMAP system | Description |
| Note: EHV and HV sites are identified by a unique 6 digit number (SPENS) | |
|   | SITE NAME 33/11kV 003432 SITE NAME pmt 525123 |
|    | Ground mounted primary substation showing name, transformer voltage and SPENS number Pole mounted substation showing name and SPENS number |
|        | Ground mounted substation showing name and SPENS number 2 way link box 4 way link box Link box without busbar (options similar to 1:2500 view) LV distribution pillar Voltage regulator Voltage balancer Open point Open point – out of phase Overhead open point |
| Note: For LV linking, use the 1:2500 view | |

| Joints (1:500 view) | |
|---|------------------------|
| NetMAP system | Description |
|  | Straight (same for HV) |
|  | Pot end (same for HV) |
|  | Branch (same for HV) |
|  | Sleeve repair |
|  | Capped end |
|  | Service to LV main |
|  | Under eaves service |
|  | Jointing phase drawing |

| Street furniture (1:500 view) | |
|---|-----------------------------------|
| NetMAP system | Description |
|  | Pole mounted street light |
|  | Street light |
|  | Zebra crossing |
|  | Road sign |
|  | Bollard |
|  | Pelican crossing |
|  | Traffic controller |
|  | Advertising sign |
|  | Amplifier station |
|  | Control cubicle |
|  | <u>Text displayed/description</u> |
|  | Pay and display |
|  | Bus shelter |
|  | TBS |
|  | Kiosk |
|  | Water meter |
|  | PL pillar |
|  | TCB |
|  | Unknown |

| Miscellaneous (1:500 view) | |
|-----------------------------------|---------------------------------------|
| NetMAP system | Description |
| | Underground chamber or draw pit |
| | Earth conductor |
| | Earth pin |
| | Height marker |
| | Depth marker |
| | Supply point |
| | Missing data in or near this location |
| | Contaminated land reference |

| Connectivity (1:500 view) | |
|----------------------------------|---|
| NetMAP system | Description |
| | Edge node |
| | Node |
| | Connector |
| | Pole termination (nothing visible unless selected) |
| | Edge nodes, nodes, connectors and pole termination joints may not appear on screen unless turned on and selected. |

| Abbreviations (1:500 view) | |
|-----------------------------------|------------------------------------|
| NetMAP system | Description |
| NR | No record |
| SU | Size unknown |
| AB | Abandoned |
| (M) | PME available |
| V05 | Year LV linking verified |
| MS | Milestone |
| MP | Marker post |
| pmt | Pole mounted transformer |
| pl | Public lighting |
| TBS | Temporary builder's supply |
| TCB | Telephone call box |
| CET | Cable electronically traced |
| IT | Instrument traced (same as CET) |
| CAT | Cable avoidance tool (same as CET) |
| +sl | Street lighting |
| +sw | Switch wire |
| 2c | 2 core |
| PESL | Public Electricity Supply License |
| Added | Supplied by SPN |
| Excluded | Not supplied by SPN |
| IIP | Assumed open point |
| VSxxxx | Vacant site |
| CB | Callender box |

| Cable phasing (1:500 view) | | | |
|-----------------------------------|---------------------|-------------------------|-------|
| <u>Old core colours</u> | <u>Shown on map</u> | <u>New core colours</u> | |
| Neutral | Neutral | Neutral | Blue |
| Red | R | L1 | Brown |
| Yellow | Y | L2 | Black |
| Blue | B | L3 | Grey |

Note:- Scott is a different phasing system

Operational status colours (1:500 view)

| | |
|----------------|-------------------------------------|
| PROPOSAL | Symbols and cables appear in ORANGE |
| OUT OF SERVICE | Cable and joints appear in BLACK |
| ABANDONED | Cables and joints appear in GREY |

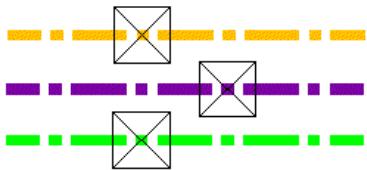
1:2500 view - for UK Power Networks use only - boxed red

Notes

1. No underground HV cables are shown on the 1:2500 view
2. Poles and joint details are similar to the 1:500 view
3. For cable/line information refer to the 1:500 view

Primary distribution line route (1:2500 view)

NetMAP system

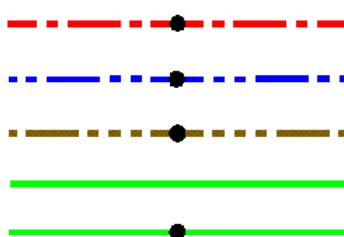


Description

- 275–400kV National Grid route
- 132kV cable route
- 33kV cable route

Secondary distribution cables (1:2500 view)

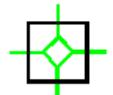
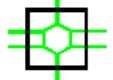
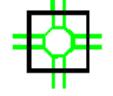
NetMAP system



Description

- 11kV overhead line
- 6.6kV overhead line
- <6.6kV overhead line
- LV underground cable
- LV overhead line

Primary and secondary sites (1:2500 view)

| NetMAP system | Description |
|---|--|
| Note: EHV and HV sites are identified by a unique 6 digit number (SPENS) | |
|  SITE NAME 521232 | Ground mounted substation showing capacity, phase, name and SPENS number |
|  SITE NAME pmt 522154 | Pole mounted substation showing capacity, phase, name and SPENS number |
| SITE NAME 008590 | Primary substation showing name and SPENS number (no site shown) |
|  | 2 way link box |
|  | 4 way link box |
| 4Jxxxx | Link box identifier |
|  | 4 way link box without busbar |
|  | 6 way link box without busbar |
|  | 8 way link box without busbar |
| section continued on next page | |

Primary and secondary sites continued (1:2500 view)

| NetMAP system | Description |
|---|---------------------------|
|  | LV distribution pillar |
|  | Voltage regulator |
|  | Voltage balancer |
|  | Open point |
|  | Open point – out of phase |
|  | Earth pin |

Switch types (1:2500 view)

| NetMAP system | Description |
|---------------|--------------------------------|
| ABSD | Air brake switch disconnector |
| A/R | Auto recloser |
| A/S | Sectionaliser |
| FUSE | Fuse |
| S/D | Surge diverter |
| PF | Pathfinder |
| ASL | Automatic sectionalising links |
| PMR | Pole mounted recloser |
| PMS | Pole mounted sectionaliser |
| GVR | Gas vacuum recloser |

1:10000 view - for UK Power Networks use only - boxed red

Notes

1. No EHV cables/overhead lines shown on 1:10000 view.
2. For congested areas print at 1:5000.
3. HV site used instead of branch joint on 1:10000 for connectivity purposes. The site is not displayed until it is selected.

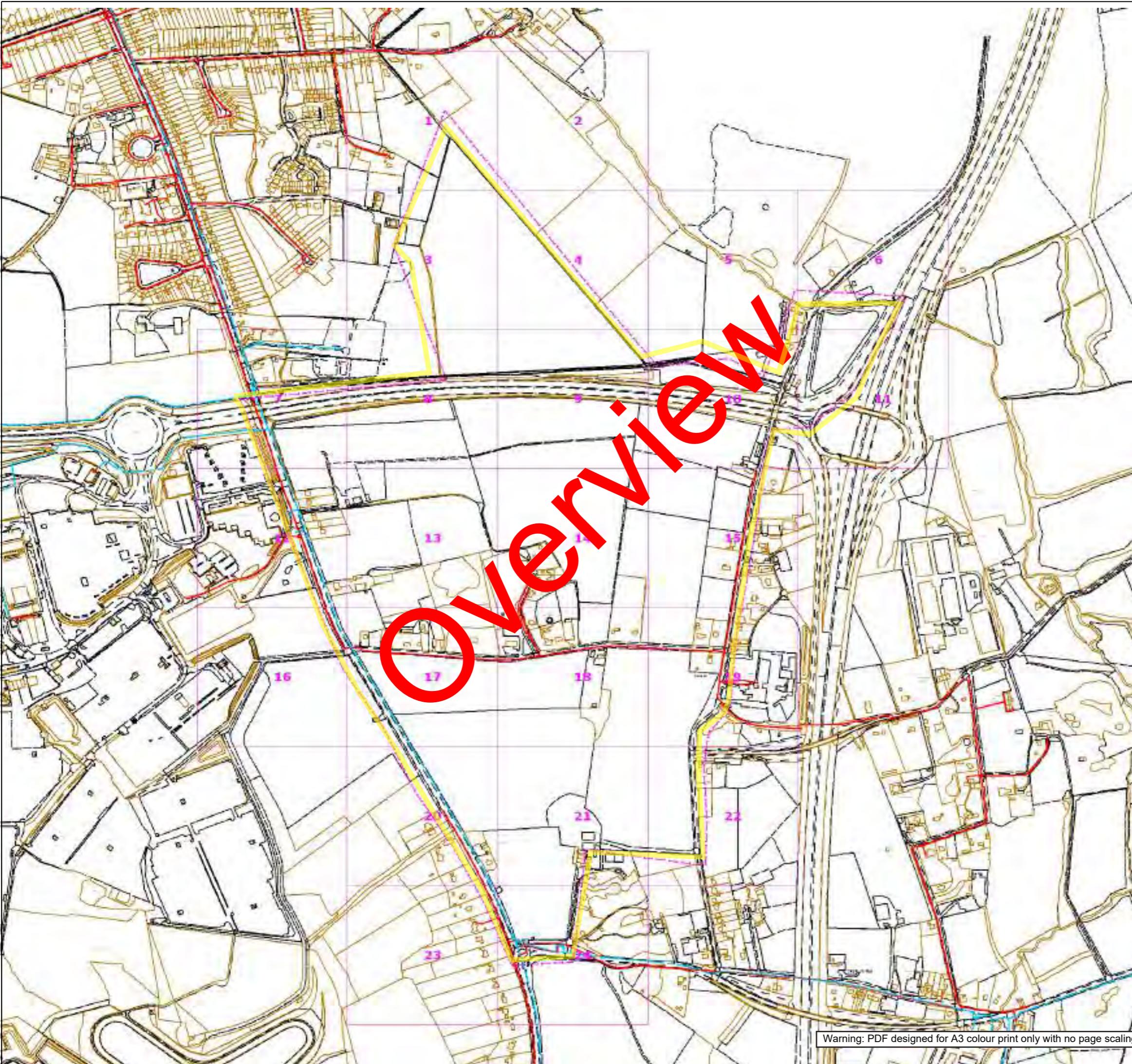
Secondary distribution cables (1:10000 view)

| NetMAP system | Description |
|-------------------|--------------------------|
| Red solid line | 11kV underground cable |
| Blue solid line | 6.6kV underground cable |
| Brown solid line | <6.6kV underground cable |
| Red dashed line | 11kV overhead line |
| Blue dashed line | 6.6kV overhead line |
| Brown dashed line | <6.6kV overhead line |

Primary and secondary sites (1:10000 view)

| NetMAP system | Description |
|--|---|
| Note: DHV and HV sites are identified by a unique 6 digit number (SPENS) | |
| SITE NAME 008590 | <input checked="" type="checkbox"/> Primary substation showing name and SPENS number |
| SITE NAME 521234 | <input type="checkbox"/> 11kV ground mounted substation showing name and SPENS number |
| SITE NAME 524514 | <input type="checkbox"/> 6.6kV ground mounted substation showing name and SPENS number |
| SITE NAME 523634 | <input type="checkbox"/> <6.6kV ground mounted substation showing name and SPENS number |
| SITE NAME pmt 527522 | <input checked="" type="checkbox"/> 11kV pole mounted substation showing name and SPENS number |
| SITE NAME pmt 525743 | <input checked="" type="checkbox"/> 6.6kV pole mounted substation showing name and SPENS number |
| SITE NAME pmt 526543 | <input type="checkbox"/> <6.6kV pole mounted substation showing name and SPENS number |
| SITE NAME 527238 | <input type="checkbox"/> Pole mounted switching substation showing name and SPENS number |

Appendix E – Local Gas Network



SGN

Your gas. Our network.

Contact Us

Mapping Enquiries:
All areas

General Enquiries:
All areas

Date Requested: 22/11/2019
Job Reference: 17059737
Site Location: 529987 141416
Requested by:
Miss Celeste Imthurn
Your Scheme/Reference:
606255 - Gatwick Green

This plan shows the location of those pipes owned by Scotia Gas Networks (SGN) by virtue of being a licensed Gas Transporter (GT). Gas pipes owned by other GTs or third parties may also be present in this area but are not shown on this plan. Information with regard to such pipes should be obtained from the relevant owners. No warranties are given with regard to the accuracy of the information shown on this plan. Service pipes, valves, siphons, sub-connections etc. are not shown but their presence should be anticipated. You should be aware that a small percentage of our pipes/assets may be undergoing review and will temporarily be highlighted in yellow. If your proposed works are close to one of these pipes, you should contact the SGN Safety Admin Team on 0800 912 1722 for advice. No liability of any kind whatsoever is accepted by SGN or its agents, servants or sub-contractors for any error or omission contained herein. Safe digging practices, in accordance with HS (G)47, must be used to verify and establish the actual position of mains, pipes, services and other apparatus on site before any mechanical plant is used. It is your responsibility to ensure that plant location information is provided to all persons (whether direct labour or sub-contractors) working for you on or near gas apparatus. Information included on this plan should not be referred to beyond a period of 28 days from the date of issue.

Report damage immediately – KEEP EVERYONE AWAY FROM THE AREA
0800 111 999

Low Pressure Mains
Medium Pressure Mains
Intermediate Pressure Mains
High Pressure Mains
LAs
GTs

SSSIs

Some Examples Of Plant Items

Valve

Syphon

Depth of Cover

Diameter Change

Material Change

Digsites: Line: Area:



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Contact Us

Mapping Enquiries:
All areas

General Enquiries:
All areas

Date Requested: 22/11/2019
Job Reference: 17059737
Site Location: 529987 141416
Requested by:
Miss Celeste Imthurn
Your Scheme/Reference:
606255 - Gatwick Green
Exact Scales:
1:1000 Area or Circle dig site
1:1000 Line dig site

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Report damage immediately – KEEP EVERYONE AWAY FROM THE AREA
0800 111 999

Low Pressure Mains
Medium Pressure Mains
Intermediate Pressure Mains
High Pressure Mains
LAs
GTs SSSIs

Some Examples Of Plant Items
Valve Syphon Depth of Cover Diameter Change Material Change

Digsites: Line: Area:



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Contact Us

 Mapping Enquiries:
 All areas

 General Enquiries:
 All areas

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Report damage immediately – KEEP EVERYONE AWAY FROM THE AREA
0800 111 999

| | |
|------------------------------|--|
| Low Pressure Mains | |
| Medium Pressure Mains | |
| Intermediate Pressure Mains | |
| High Pressure Mains | |
| Las | |
| Gts | |
| SSSIs | |
| Some Examples Of Plant Items | |
| Valve | |
| Syphon | |
| Depth of Cover | |
| Diameter Change | |
| Material Change | |
| Digsites: Line: | |
| Area: | |



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Contact Us

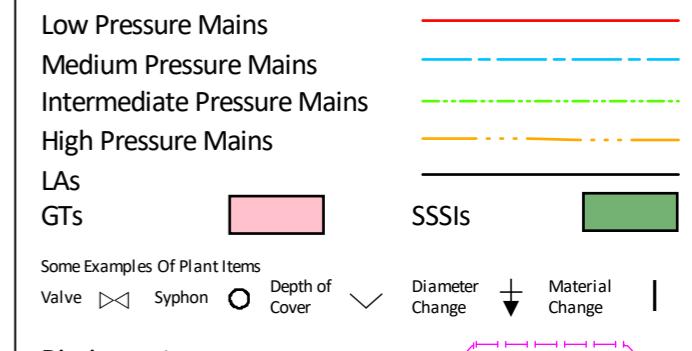
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 All areas

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 All areas

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 Exact Scales:
 1:1000 Area or Circle dig site
 1:1000 Line dig site

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Date Requested: 22/11/2019
 Job Reference: 17059737
 Site Location: 529987 141416
 Requested by:
 Miss Celeste Imthurn
 Your Scheme/Reference:
 606255 - Gatwick Green
 Exact Scales:
 1:1000 Area or Circle dig site
 1:1000 Line dig site

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Low Pressure Mains 
 Medium Pressure Mains 
 Intermediate Pressure Mains 
 High Pressure Mains 
 LAs 
 GTs 
 SSSIs 
 Some Examples Of Plant Items
 Valve  Syphon  Depth of Cover  Diameter Change  Material Change 

 Digsites: Line:  Area: 


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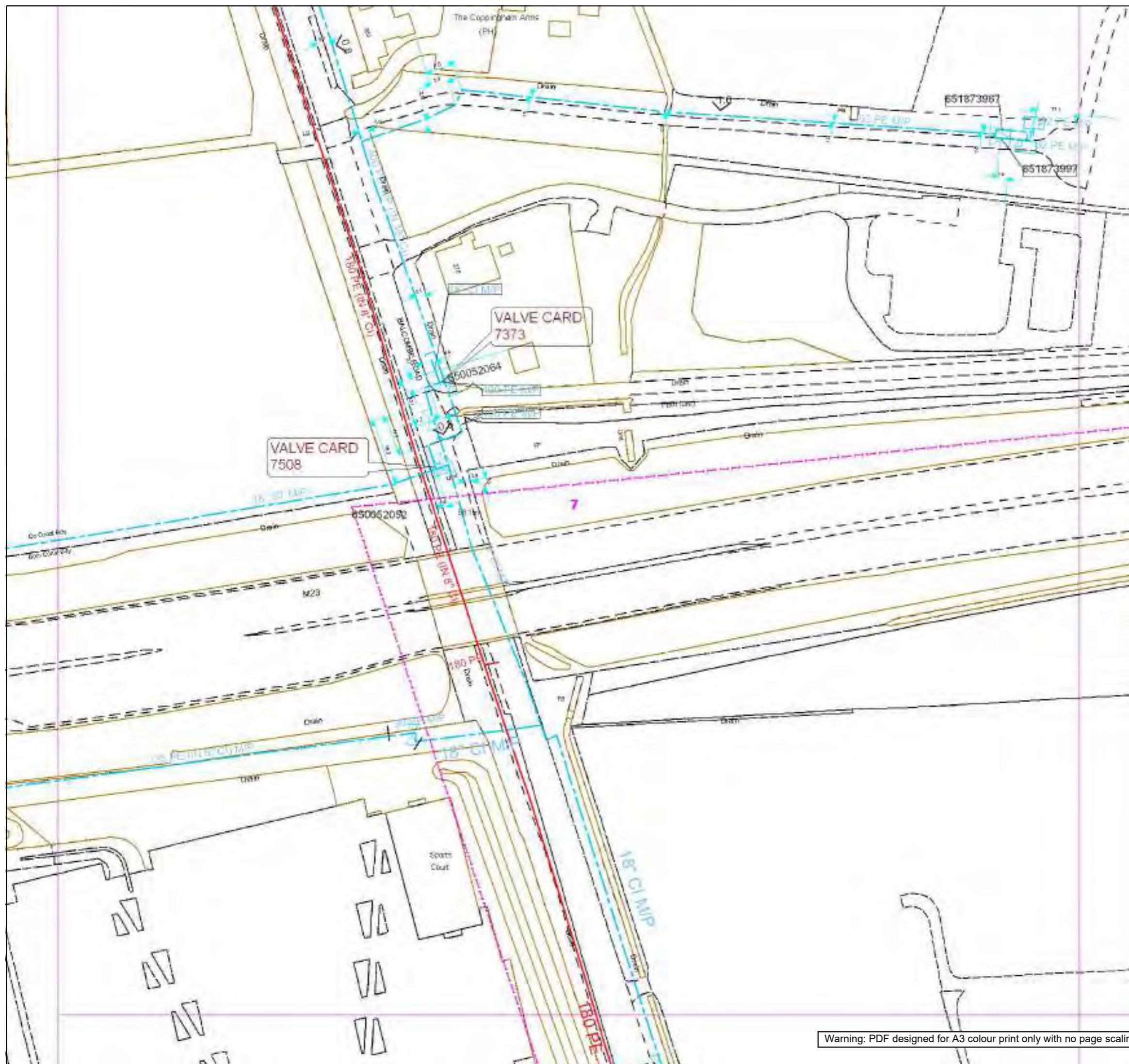
Low Pressure Mains
Medium Pressure Mains
Intermediate Pressure Mains
High Pressure Mains
LAs
GTs
SSSIs
Some Examples Of Plant Items
Valve Syphon Depth of Cover Diameter Change Material Change

Digsites: Line: Area:



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Low Pressure Mains

Medium Pressure Mains

Intermediate Pressure Mains

High Pressure Mains

LAs

GIs

— — — — —

A decorative horizontal bar at the bottom of the slide. It features two solid orange horizontal lines, each approximately 10 pixels thick, positioned side-by-side. Between these solid lines are three dashed orange horizontal lines, also approximately 10 pixels thick, creating a repeating pattern of solid-dashed-solid.

Page 1

Section Five: Summary Of Results

Some Examples of Plant Items

Cover

Digsit

SSSIs

Diameter + Material |

Change ▼ Change

Area:

Digsite. Little.

Algebraic expression



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| | |
|------------------------------|--|
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| Medium Pressure Mains | |
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| High Pressure Mains | |
| LAs | |
| GTs | |
| SSSIs | |
| Some Examples Of Plant Items | |
| Valve | |
| Syphon | |
| Depth of Cover | |
| Diameter Change | |
| Material Change | |
| Digsites: | |
| Line: | |
| Area: | |



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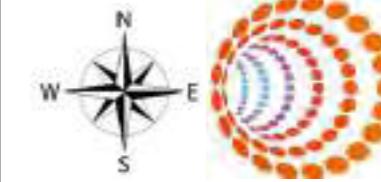
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Digsites: Line:  Area: 



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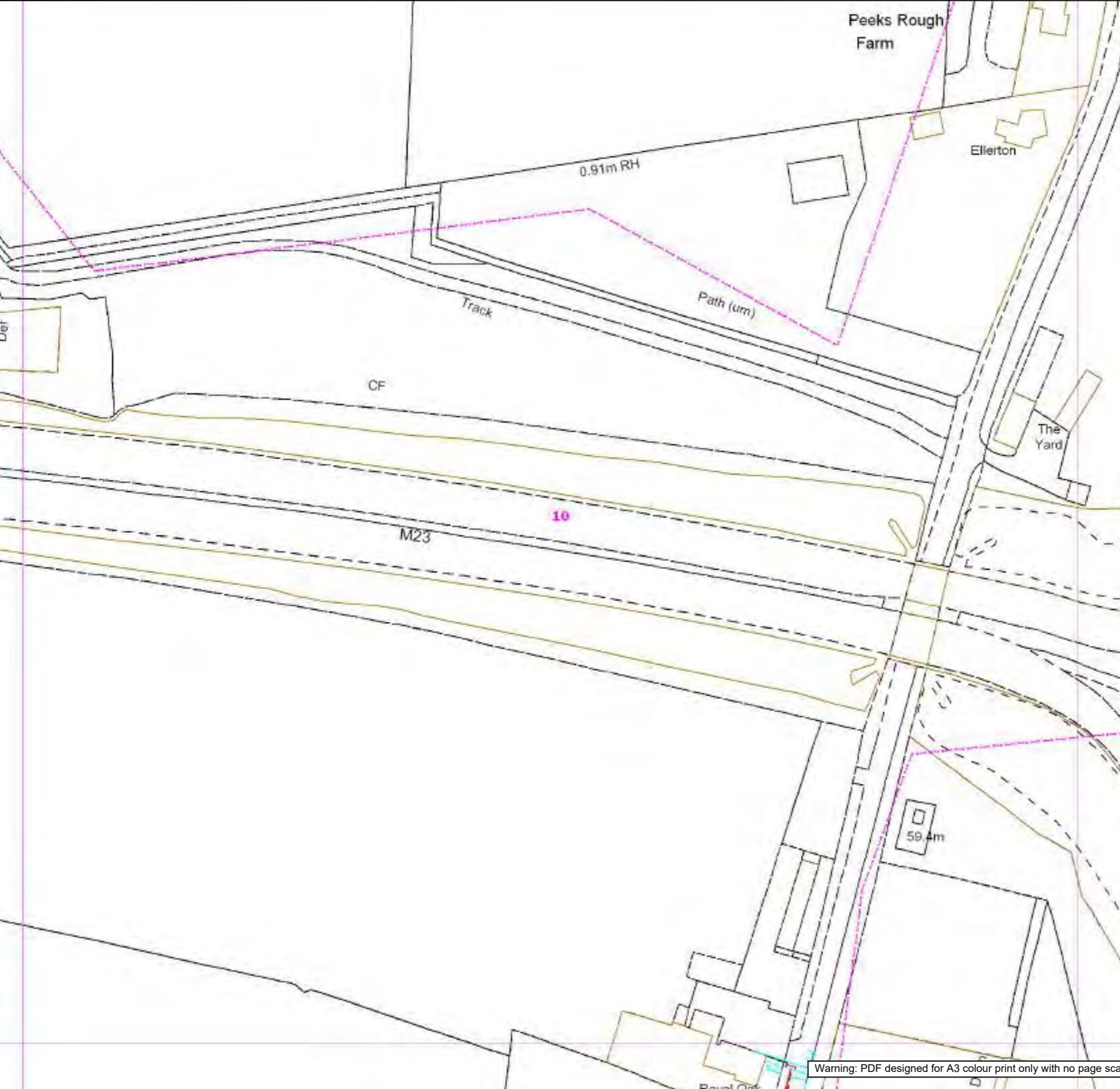
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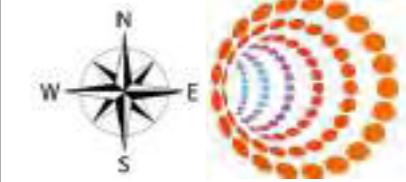
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|------------------------------|--|
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| Medium Pressure Mains | |
| Intermediate Pressure Mains | |
| High Pressure Mains | |
| Las | |
| Gts | |
| SSSIs | |
| Some Examples Of Plant Items | |
| Valve | |
| Syphon | |
| Depth of Cover | |
| Diameter Change | |
| Material Change | |
| Digsites: Line: | |
| Area: | |



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Intermediate Pressure Mains
High Pressure Mains
LAs
GTs
SSSIs

Some Examples Of Plant Items
Valve □ Syphon ○ Depth of Cover ▼ Diameter Change + Material Change

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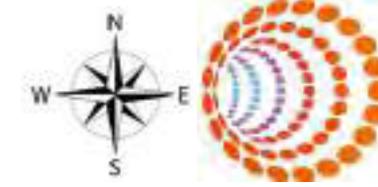
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Worth Park Business

14

8

The map illustrates a residential area with four distinct properties labeled: Elm Cottage, Foden's Cottage, Beech Cottage, and Hockliffe Cottage. The properties are outlined in black and contain internal building structures. A railway line runs diagonally across the top left of the map. A red line with blue markers indicates a path or route, starting from the bottom left and moving towards the center. Labels along this red line include '63 P.E.', '32.27', '32.27', and '0'. The map also shows property boundaries and roads.

Warning: PDF designed for A3 colour print only with no page scaling

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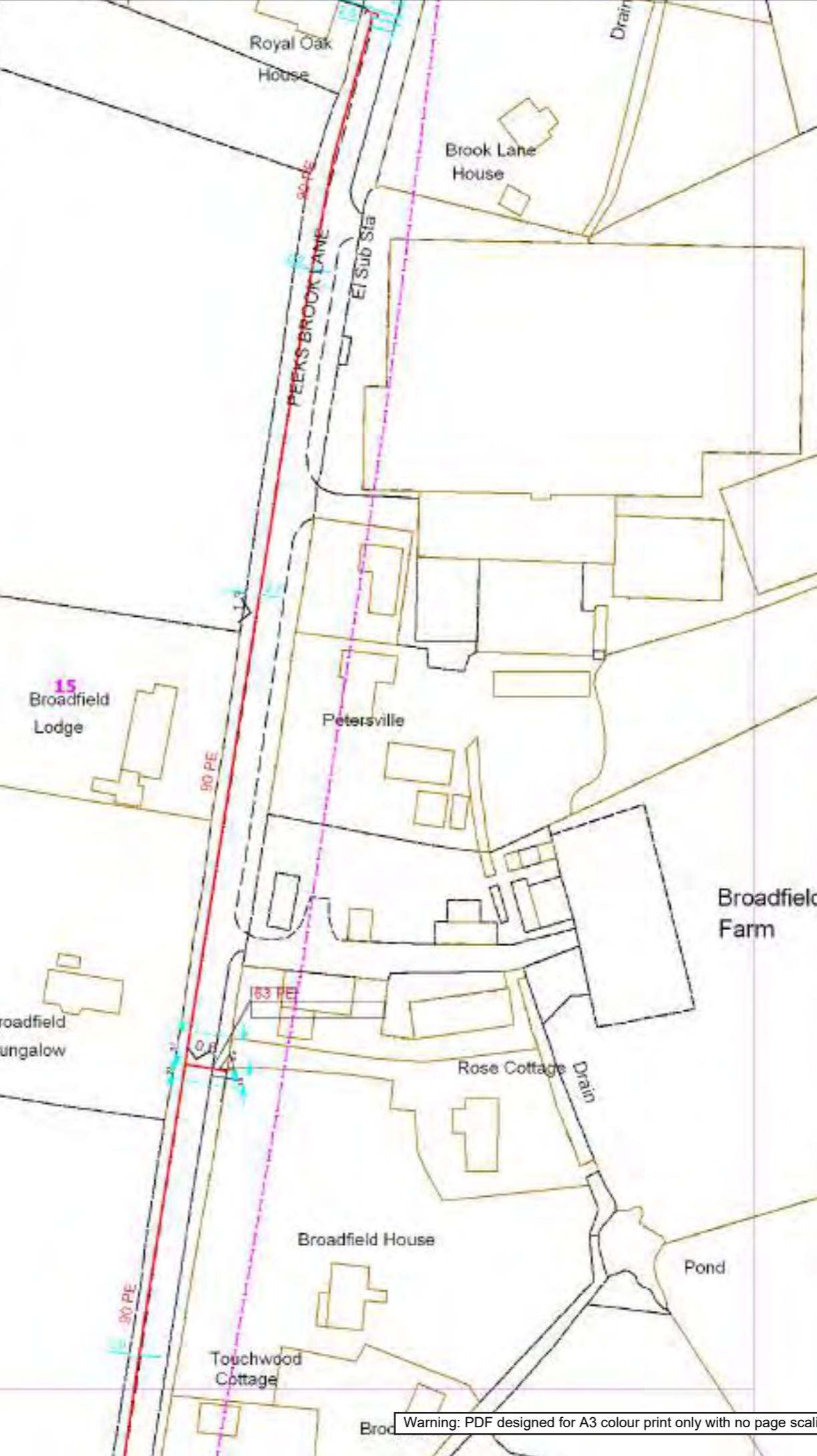
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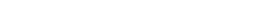
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 1:1000 Line dig site

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Report damage immediately – KEEP EVERYONE AWAY FROM THE AREA
0800 111 999

Low Pressure Mains 
 Medium Pressure Mains 
 Intermediate Pressure Mains 
 High Pressure Mains 
 LAs 
 GTs 
 SSSIs 
 Some Examples Of Plant Items
 Valve  Syphon  Depth of Cover  Diameter Change  Material Change 

Digsites: Line:  Area: 



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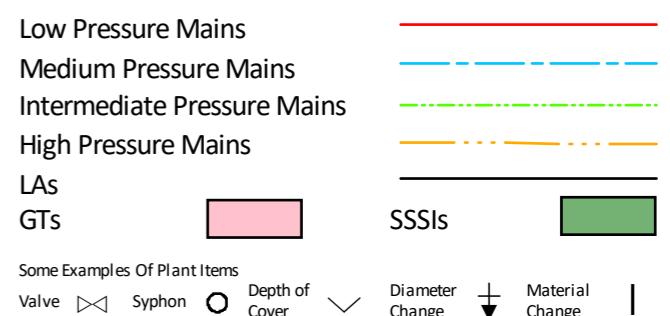
 Mapping Enquiries:
 All areas

 General Enquiries:
 All areas

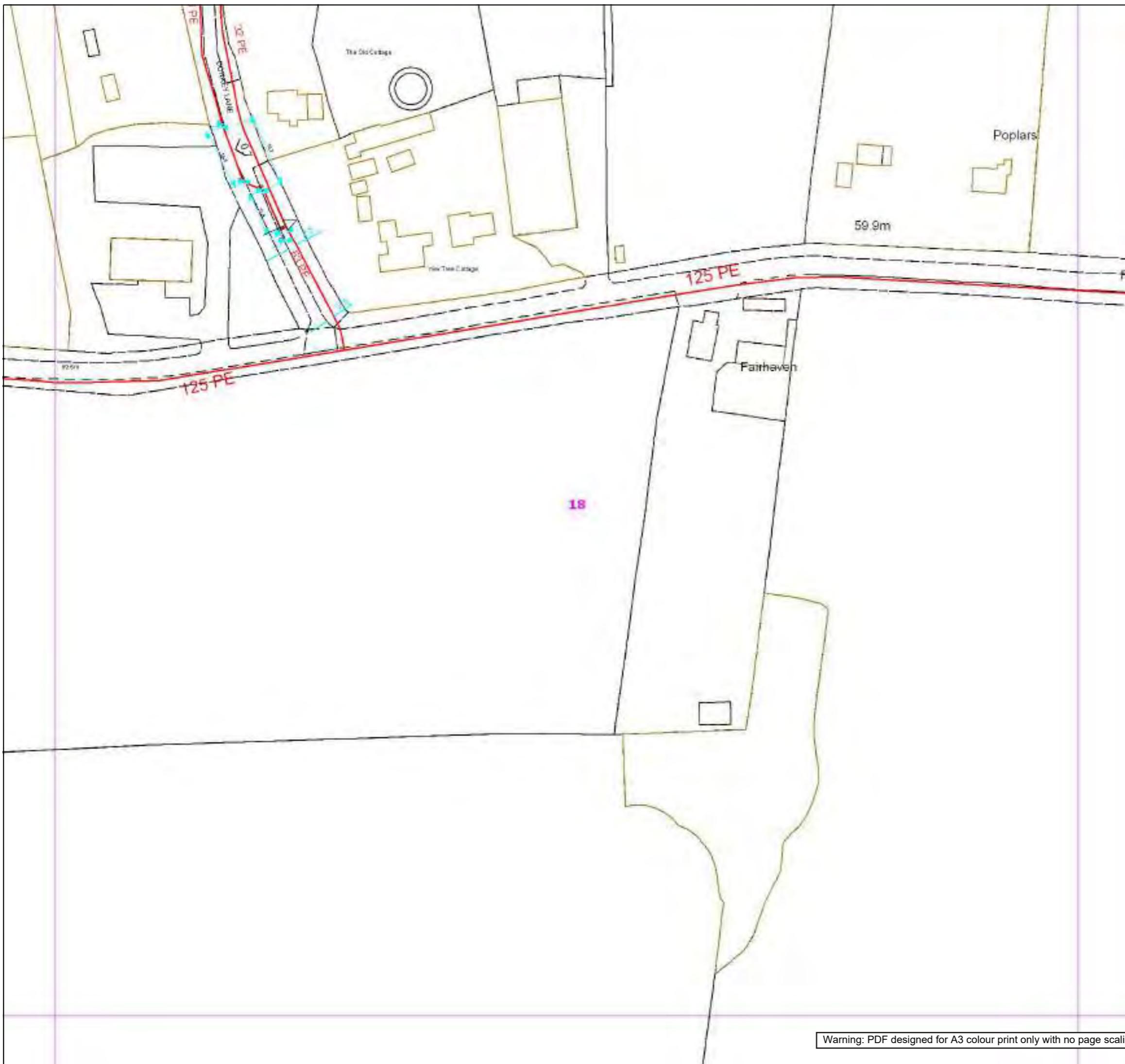
Date Requested: 22/11/2019
 Job Reference: 17059737
 Site Location: 529987 141416
 Requested by:
 Miss Celeste Imthurn
 Your Scheme/Reference:
 606255 - Gatwick Green
 Exact Scales:
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 1:1000 Line dig site

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| | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
|--|---------------------------------|-----------------|--------------------|-------|--|-----------------------|--|--|-----------------------------|--|--|---------------------|--|--|-----|--|--|-----|--|-------|--|------------------------------|--|--|--|-------|--|--------|--|----------------|--|-----------------|--|-----------------|--|--|--|-----------|--|-------|--|-------|--|
|  SGN Your gas. Our network. | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Contact Us Mapping Enquiries: All areas | General Enquiries: All areas | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Date Requested: 22/11/2019 Job Reference: 17059737 Site Location: 529987 141416 Requested by: Miss Celeste Imthurn Your Scheme/Reference: 606255 - Gatwick Green Exact Scales: 1:1000 Area or Circle dig site 1:1000 Line dig site | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
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| <table style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 33%;">Low Pressure Mains</td> <td style="width: 33%;"></td> <td style="width: 33%;"></td> </tr> <tr> <td>Medium Pressure Mains</td> <td></td> <td></td> </tr> <tr> <td>Intermediate Pressure Mains</td> <td></td> <td></td> </tr> <tr> <td>High Pressure Mains</td> <td></td> <td></td> </tr> <tr> <td>LAs</td> <td></td> <td></td> </tr> <tr> <td>GTs</td> <td></td> <td>SSSIs</td> <td></td> </tr> <tr> <td colspan="4">Some Examples Of Plant Items</td> </tr> <tr> <td>Valve</td> <td></td> <td>Syphon</td> <td></td> </tr> <tr> <td>Depth of Cover</td> <td></td> <td>Diameter Change</td> <td></td> </tr> <tr> <td>Material Change</td> <td></td> <td></td> <td></td> </tr> <tr> <td>Digsites:</td> <td></td> <td>Line:</td> <td></td> <td>Area:</td> <td></td> </tr> </table> | | | Low Pressure Mains | | | Medium Pressure Mains | | | Intermediate Pressure Mains | | | High Pressure Mains | | | LAs | | | GTs | | SSSIs | | Some Examples Of Plant Items | | | | Valve | | Syphon | | Depth of Cover | | Diameter Change | | Material Change | | | | Digsites: | | Line: | | Area: | |
| Low Pressure Mains | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Medium Pressure Mains | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Intermediate Pressure Mains | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| High Pressure Mains | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| LAs | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| GTs | | SSSIs | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Some Examples Of Plant Items | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Valve | | Syphon | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Depth of Cover | | Diameter Change | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Material Change | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Digsites: | | Line: | | Area: | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
|  | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
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 Mapping Enquiries:
 All areas

 General Enquiries:
 All areas

Date Requested: 22/11/2019
 Job Reference: 17059737
 Site Location: 529987 141416
 Requested by:
 Miss Celeste Imthurn
 Your Scheme/Reference:
 606255 - Gatwick Green
 Exact Scales:
 1:1000 Area or Circle dig site
 1:1000 Line dig site

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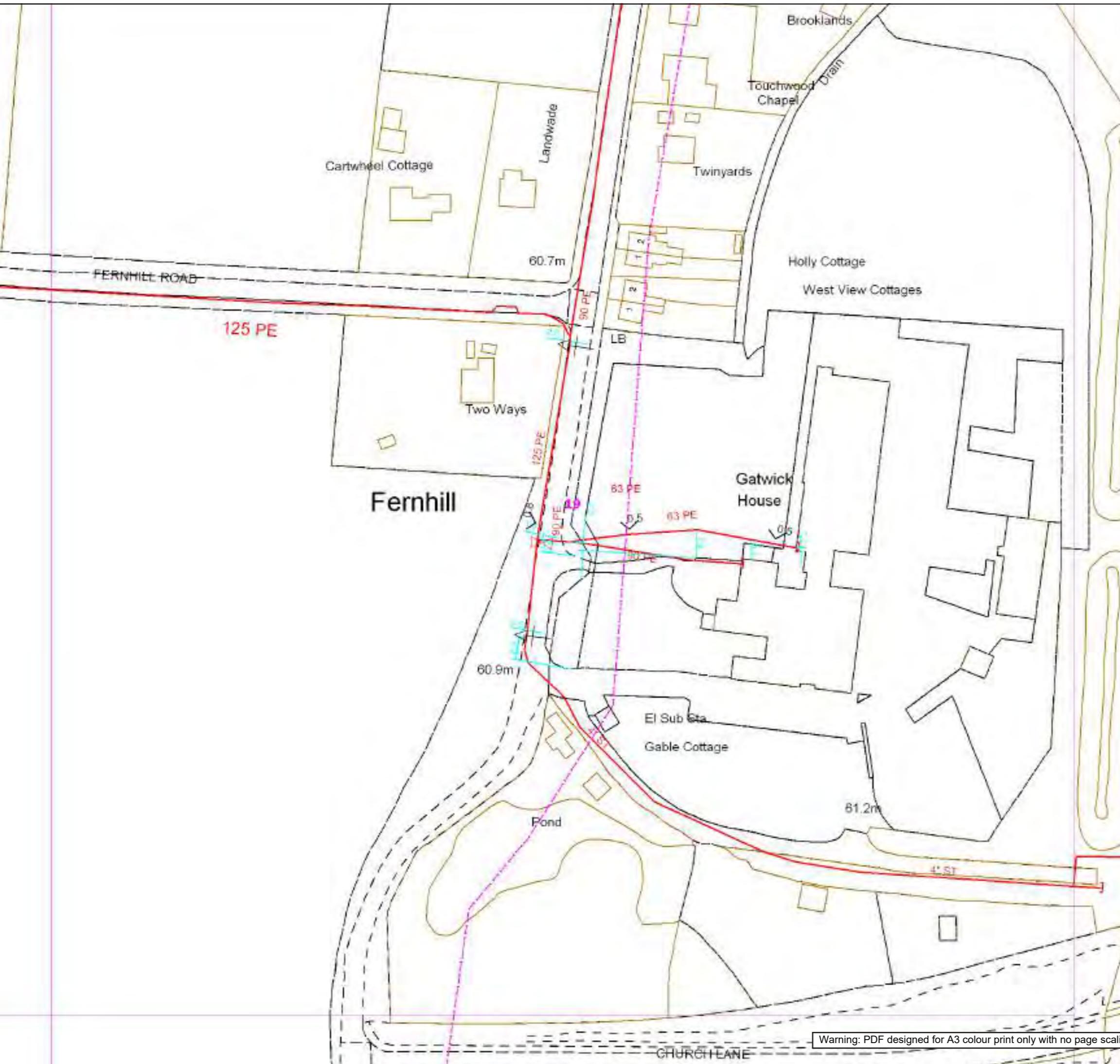
Report damage immediately – KEEP EVERYONE AWAY FROM THE AREA
0800 111 999

Low Pressure Mains 
 Medium Pressure Mains 
 Intermediate Pressure Mains 
 High Pressure Mains 
 LAs 
 GTs 
 SSSIs 
 Some Examples Of Plant Items
 Valve  Syphon  Depth of Cover  Diameter Change  Material Change 

Digsites: Line:  Area: 



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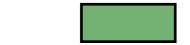
 Mapping Enquiries:
 All areas

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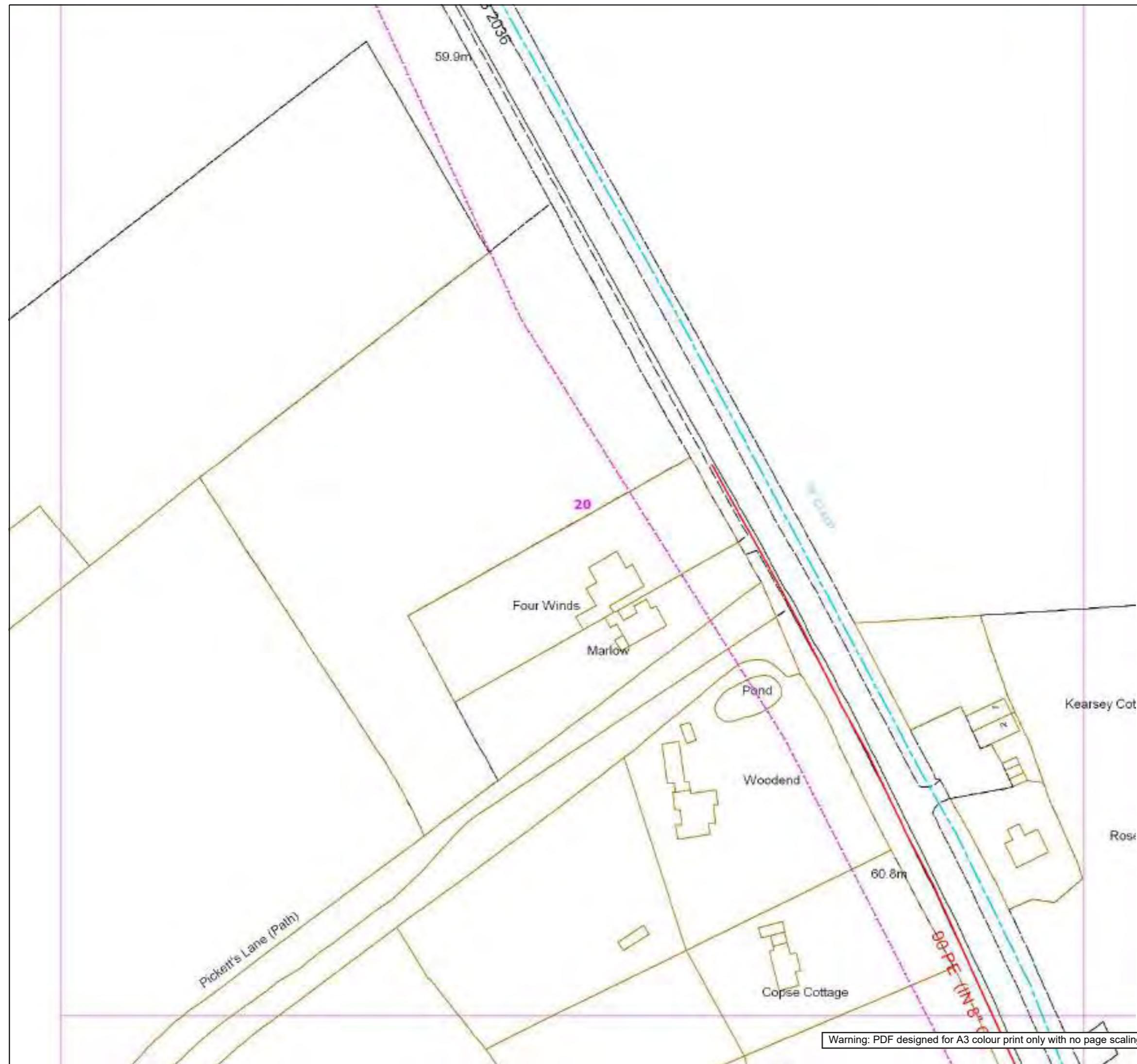
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Low Pressure Mains 
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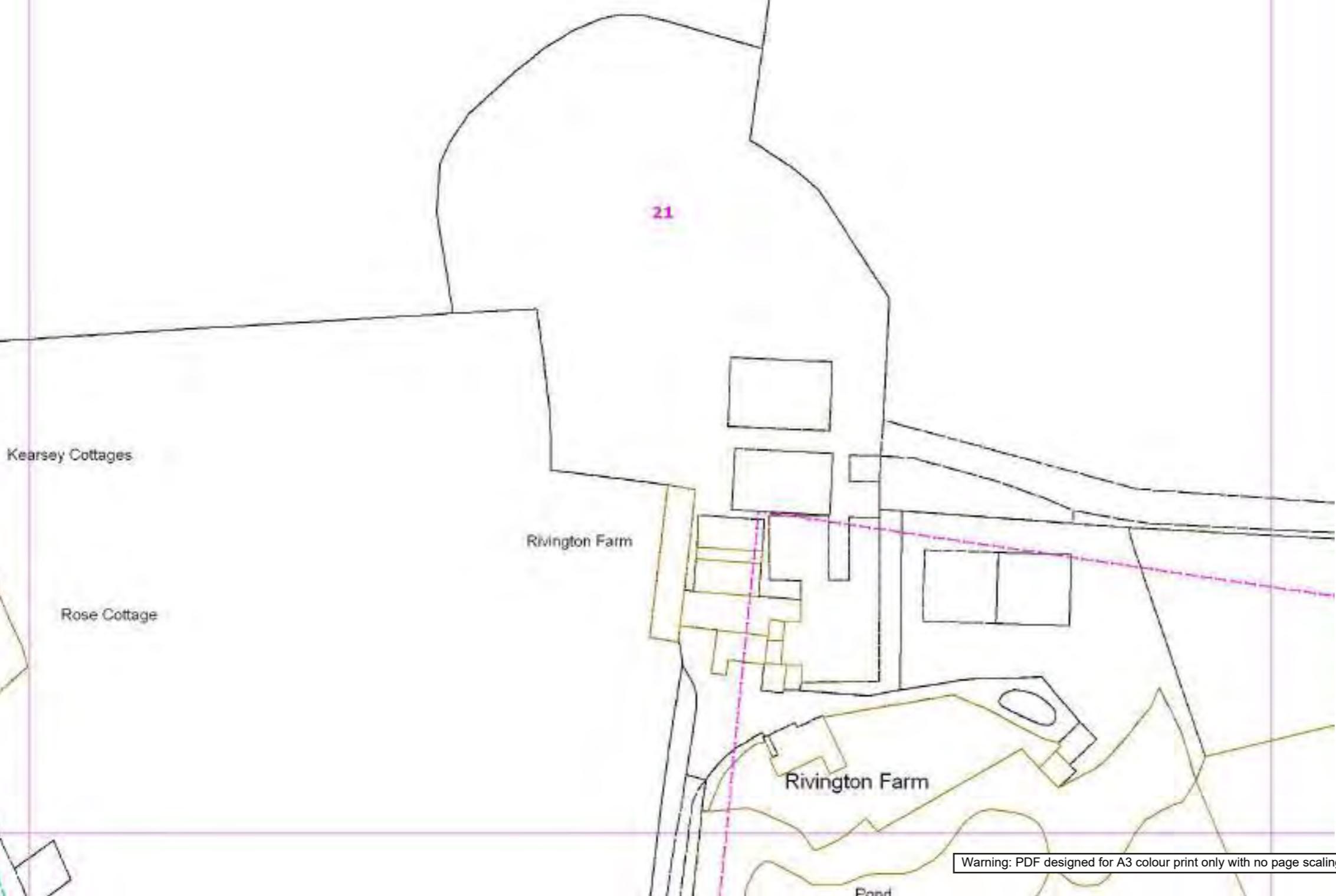
 Mapping Enquiries:
 All areas

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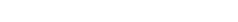
 Mapping Enquiries:
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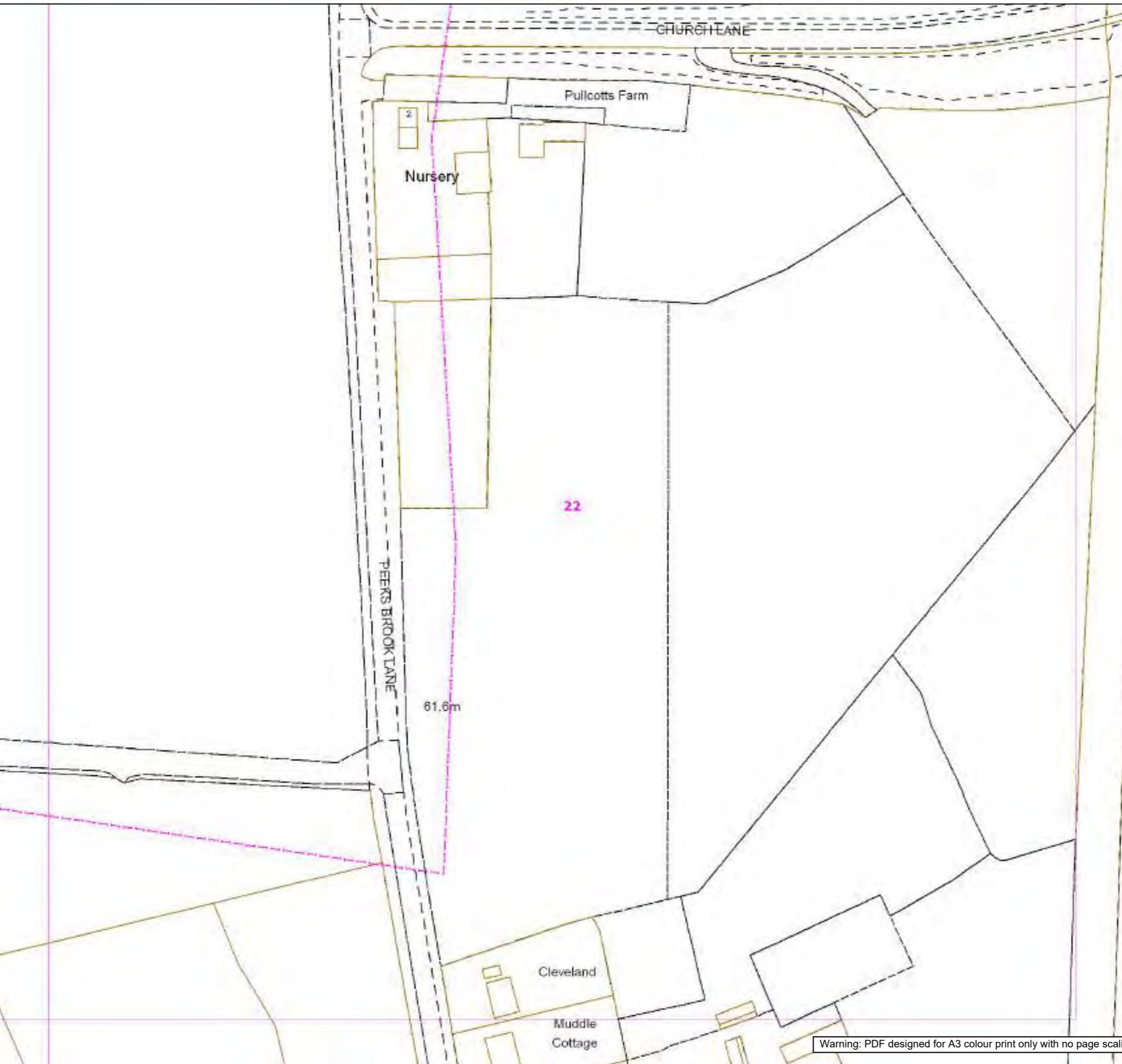
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 Valve  Syphon  Depth of Cover  Diameter Change  Material Change 
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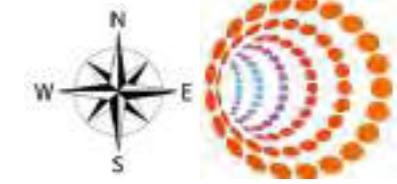
| | |
|-----------------------------|--|
| Low Pressure Mains | |
| Medium Pressure Mains | |
| Intermediate Pressure Mains | |
| High Pressure Mains | |
| Las | |
| Gts | |
| SSSIs | |

Some Examples Of Plant Items
 Valve Syphon Depth of Cover Diameter Change Material Change

Digsites: Line: Area:



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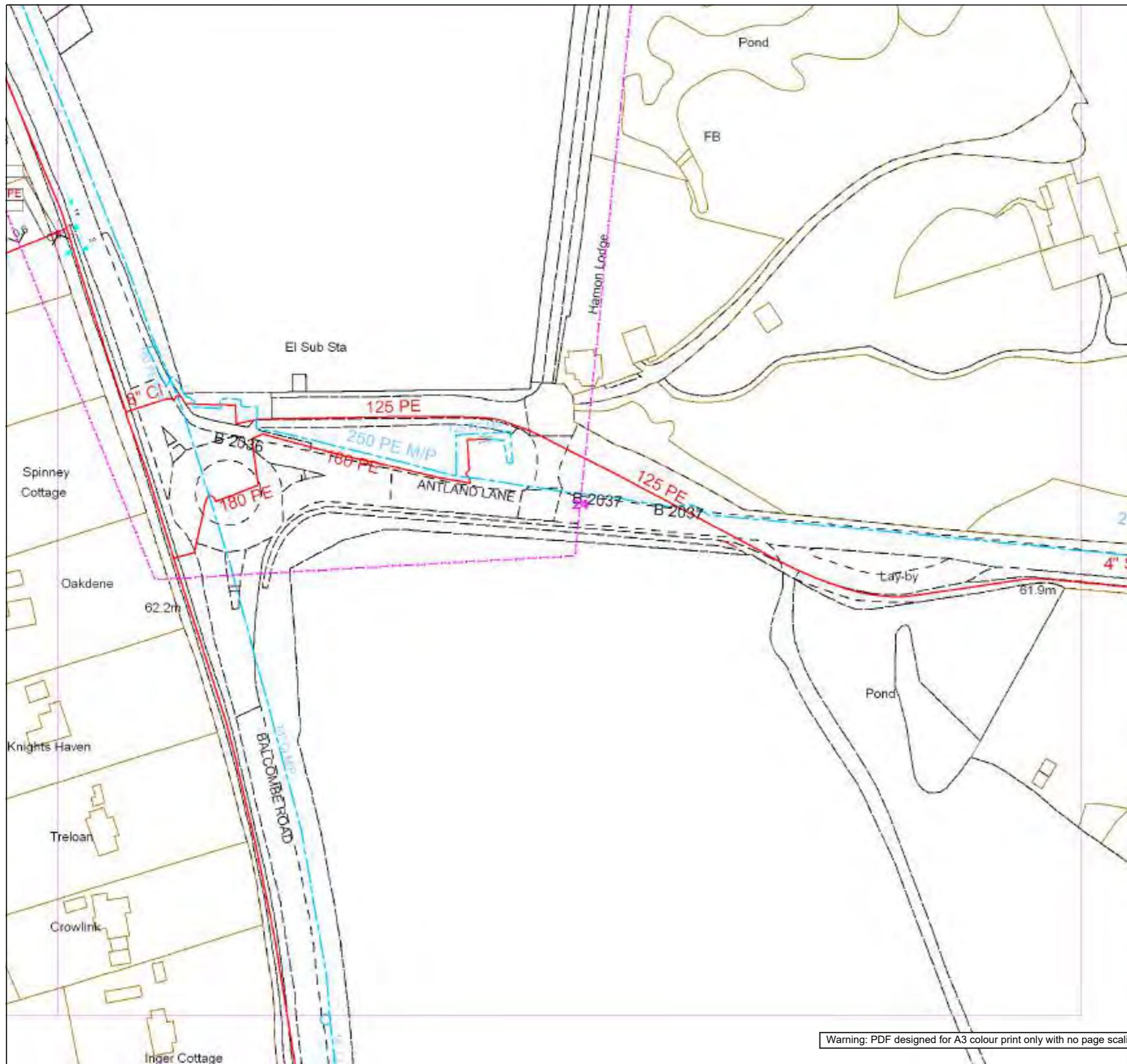
Mapping Enquiries:
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General Enquiries:
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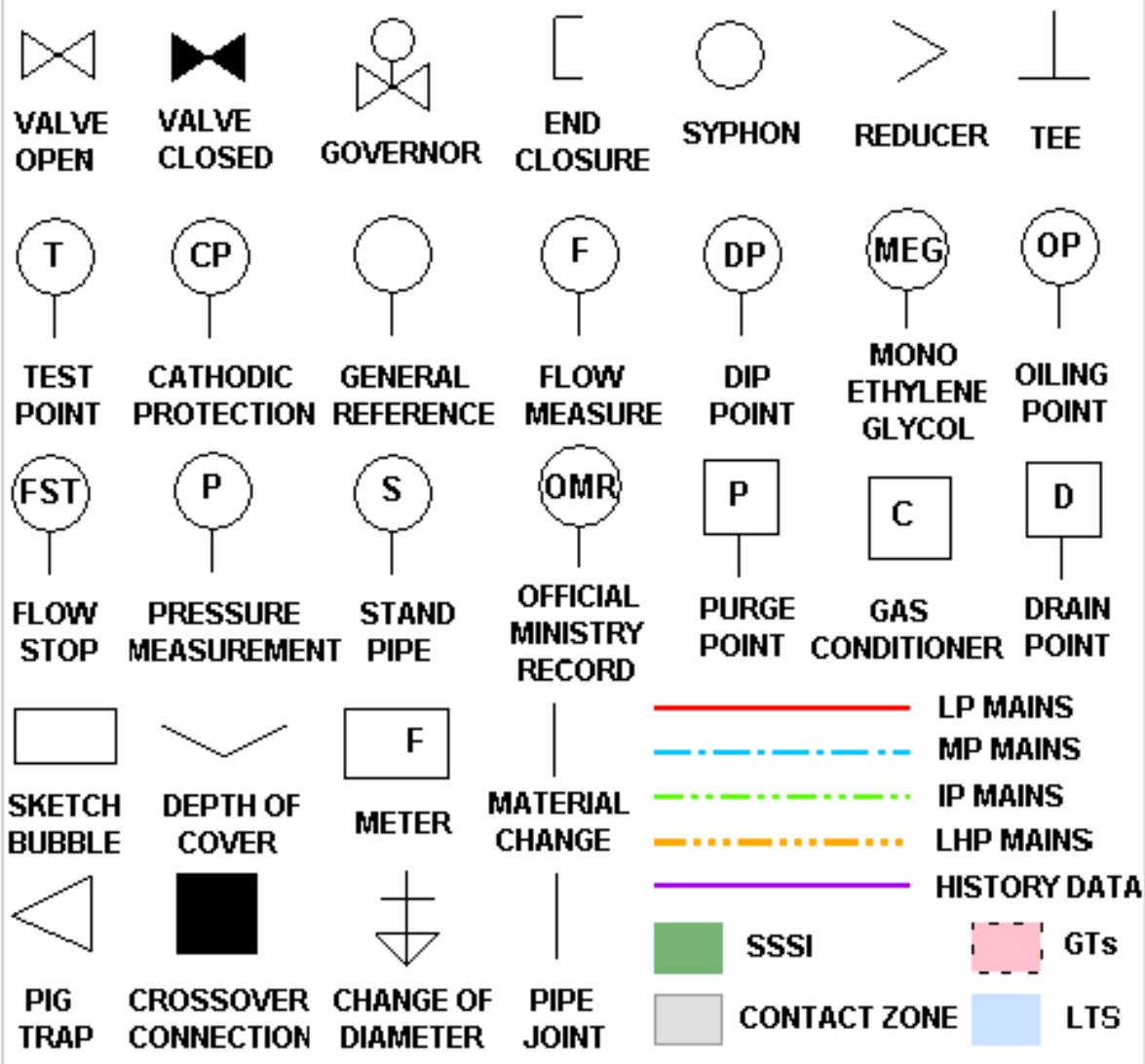


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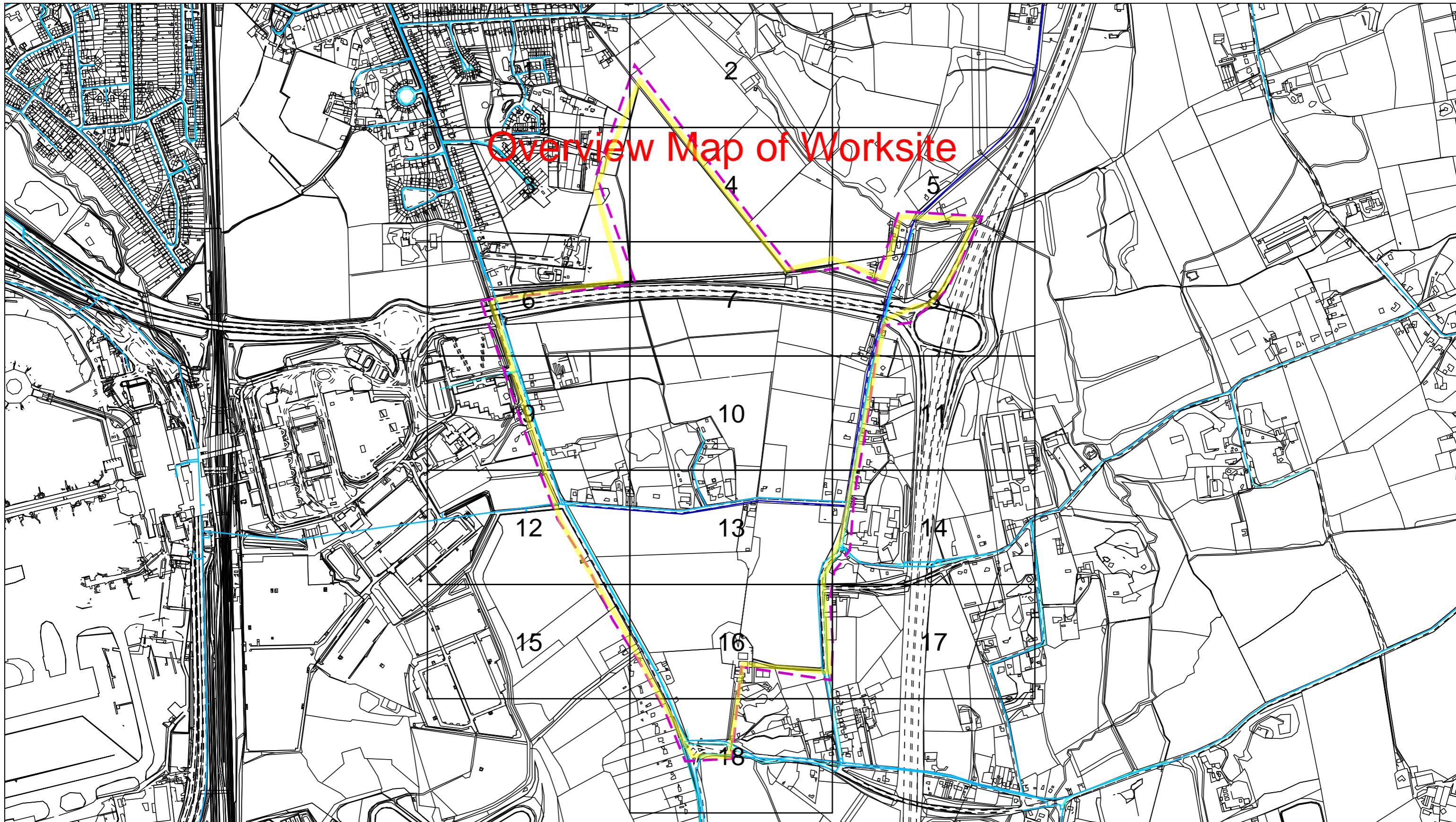


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Map Symbols



Appendix F – SES Water Network



Dig Sites

Area: Line: Measurements scaled from this plan may not match measurements between the same points on the ground.

ACCURACY OF PLANS WARNING

The information on this plan with regard to the company's underground apparatus is given in good faith but is NOT GUARANTEED to be free from errors or omissions and should be relied upon only as a general indication of the location and nature of such apparatus. The actual location of water pipes and communication pipes must be determined by hand excavation.

SECURITY & CONFIDENTIALITY OF INFORMATION

Documents and drawings are NOT to be disclosed to 3rd parties without prior agreement of SES Water.

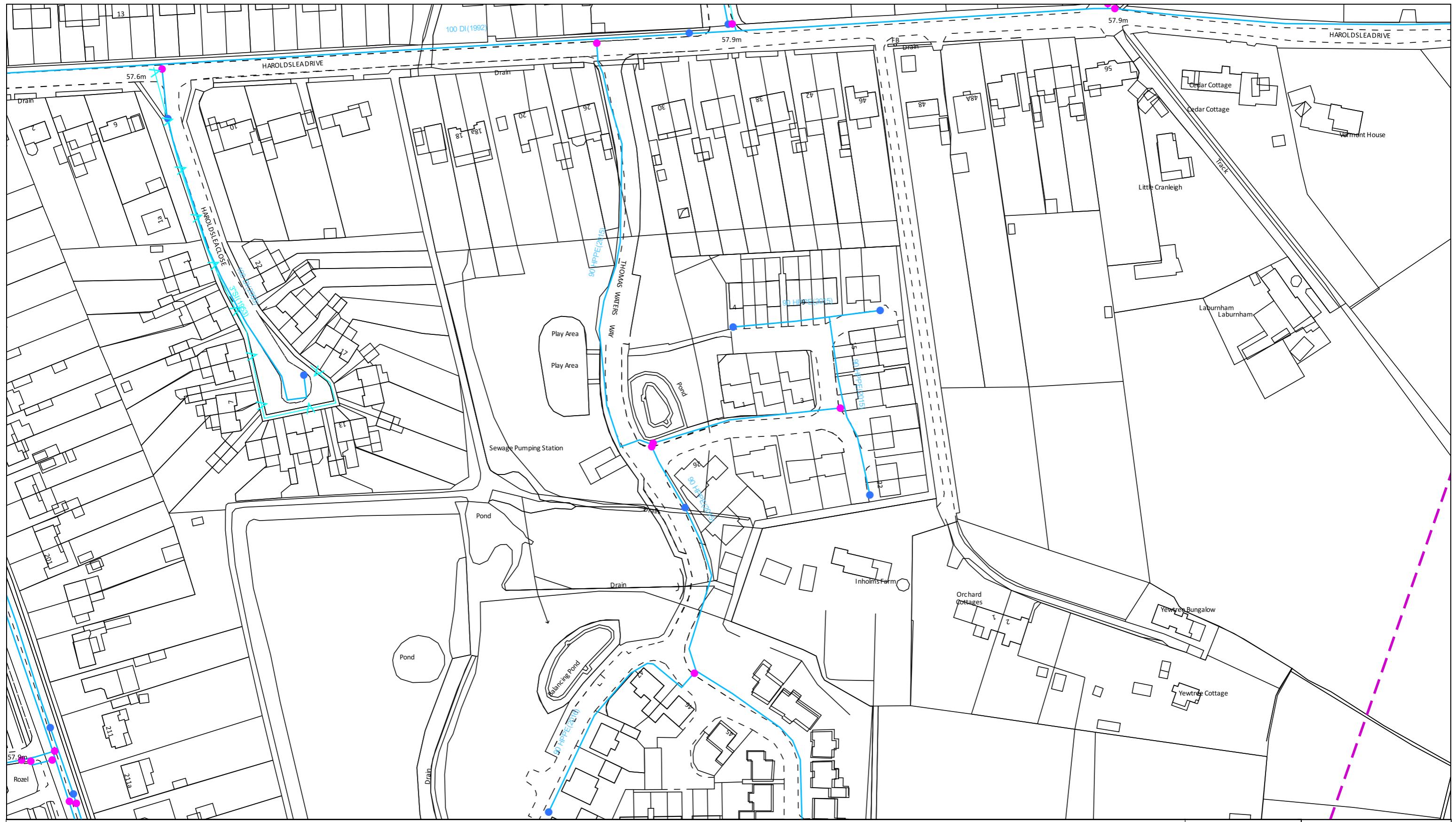
Date Requested: 22/11/2019
Job Reference: 17059737
Site Location: 528280 140136
Requested by:
Miss Celeste Imthurn
Your Scheme/Reference: 606255 -
Gatwick Green
Scale: 1:8969 (When plotted at A3)

Distribution Mains Abandoned Mains Planned Mains
 Private Mains Raw Mains Trunk Mains



SES Water
London Road Redhill
Surrey RH1 1LJ

Tel: 01737 772000 (24hr Control Room)
Fax: 01737 766807
Web: www.seswater.co.uk



0 100 m

Dig Sites Area: Line: Measurements scaled from this plan may not match measurements between the same points on the ground.

Date Requested: 22/11/2019

Job Reference: 17059737

Site Location: 528280 140136

Requested by:
Miss Celeste Imthurn

Your Scheme/Reference: 606255 -
Gatwick Green

Scale: 1:1250 (When plotted at A3)

ACCURACY OF PLANS WARNING

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SECURITY & CONFIDENTIALITY OF INFORMATION

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| | | |
|--------------------|-----------------|---------------|
| Distribution Mains | Abandoned Mains | Planned Mains |
| Private Mains | Raw Mains | Trunk Mains |



SES Water
London Road Redhill
Surrey RH1 1LJ

Tel: 01737 772000 (24hr Control Room)
Fax: 01737 766807
Web: www.seswater.co.uk



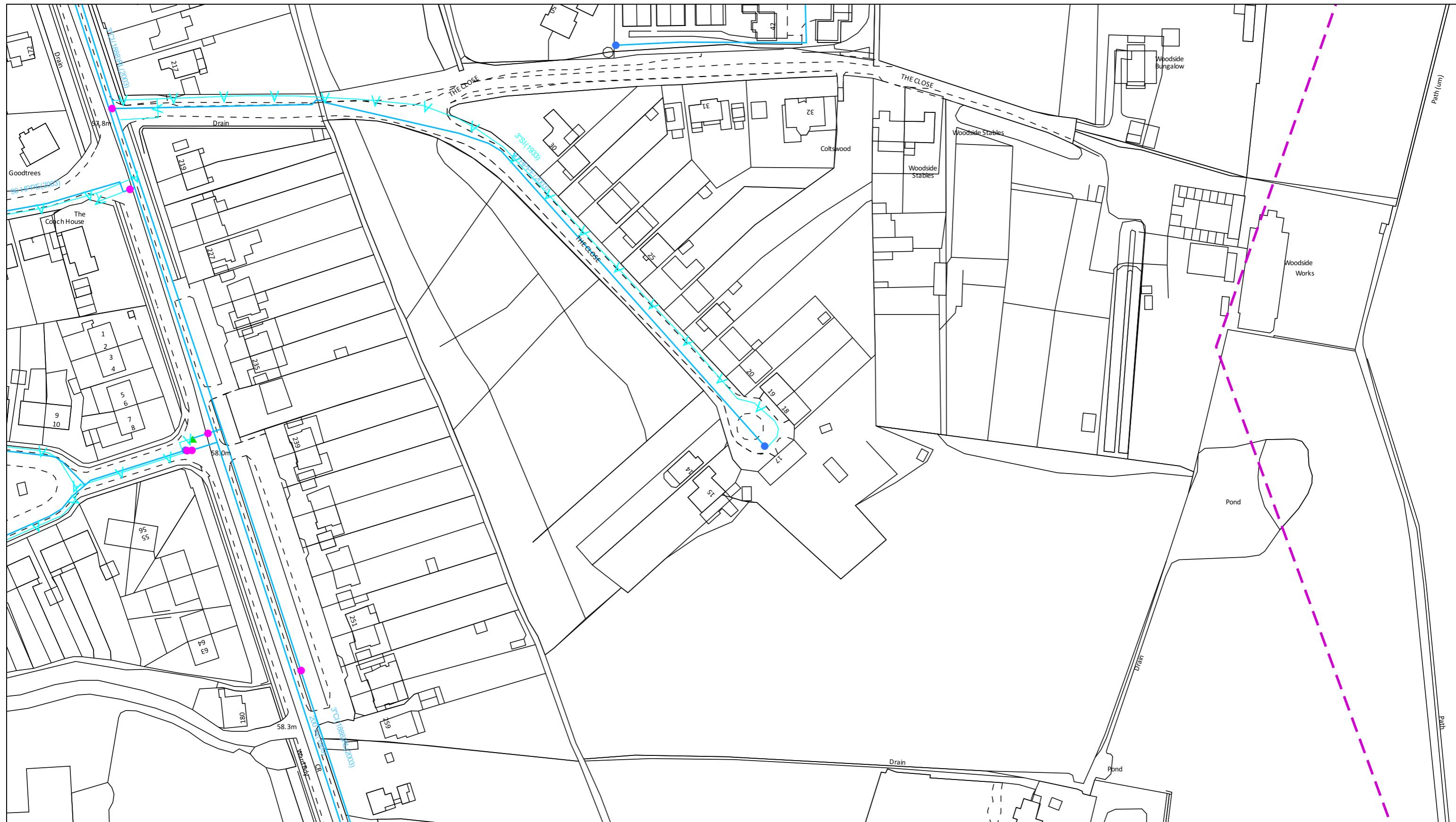
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Job Reference: 17059737
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Requested by:
Miss Celeste Imthurn
Your Scheme/Reference: 606255 -
Gatwick Green
Scale: 1:1250 (When plotted at A3)

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| | | |
|--------------------|-----------------|---------------|
| Distribution Mains | Abandoned Mains | Planned Mains |
| Private Mains | Raw Mains | Trunk Mains |

 
SES Water
London Road Redhill
Surrey RH1 1LJ
Tel: 01737 772000 (24hr Control Room)
Fax: 01737 766807
Web: www.seswater.co.uk



0 100 m

Dig Sites

Area:

Line:

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Date Requested: 22/11/2019
 Job Reference: 17059737
 Site Location: 528280 140136
 Requested by:
 Miss Celeste Imthurn
 Your Scheme/Reference: 606255 -
 Gatwick Green
 Scale: 1:1250 (When plotted at A3)

ACCURACY OF PLANS WARNING
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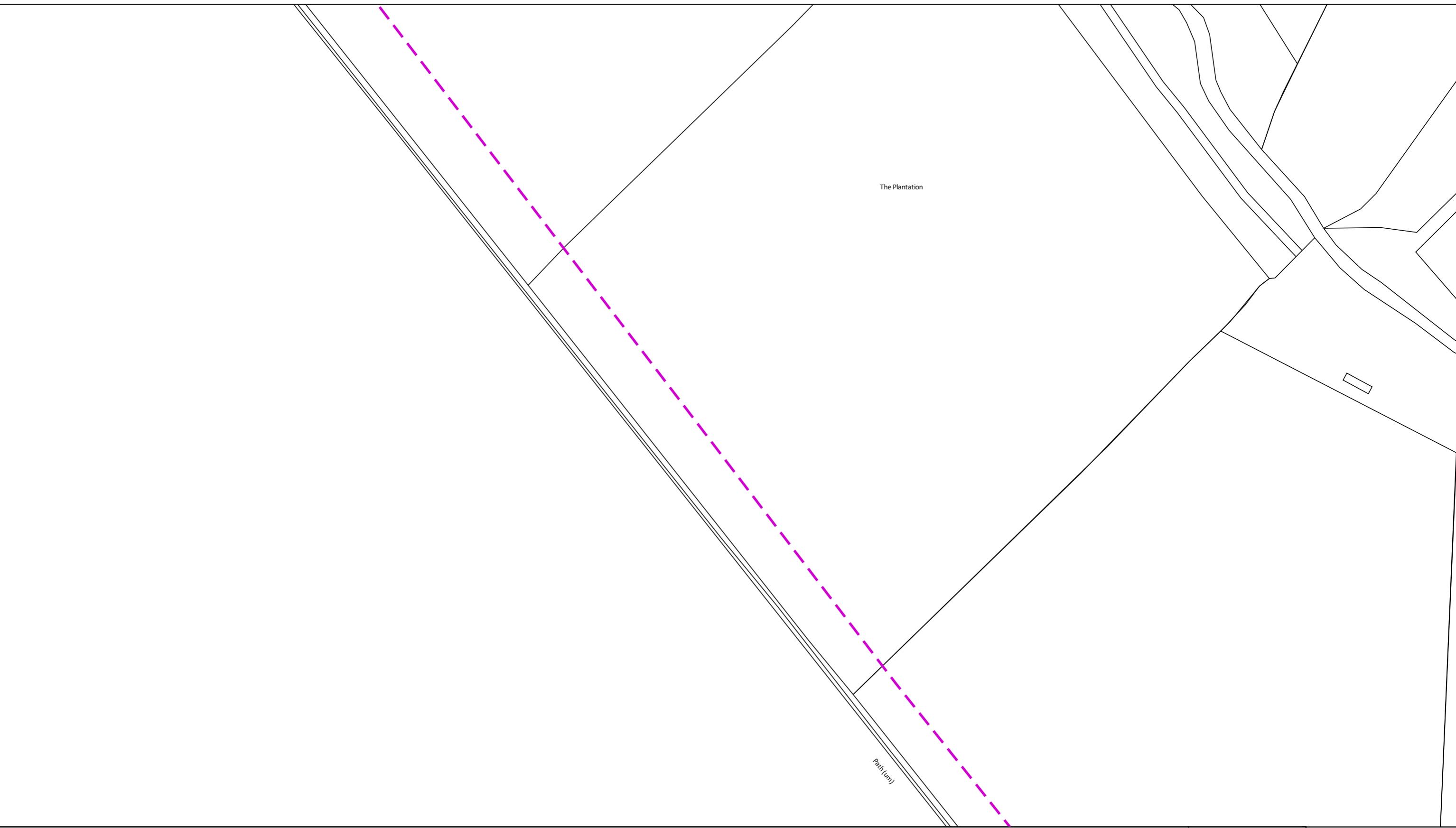
SECURITY & CONFIDENTIALITY OF INFORMATION
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| | | |
|--------------------|-----------------|---------------|
| Distribution Mains | Abandoned Mains | Planned Mains |
| Private Mains | Raw Mains | Trunk Mains |



SES Water
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 Surrey RH1 1LJ

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0 [REDACTED] 100 m

Dig Sites Area: [REDACTED] Line: [REDACTED] Measurements scaled from this plan may not match measurements between the same points on the ground.

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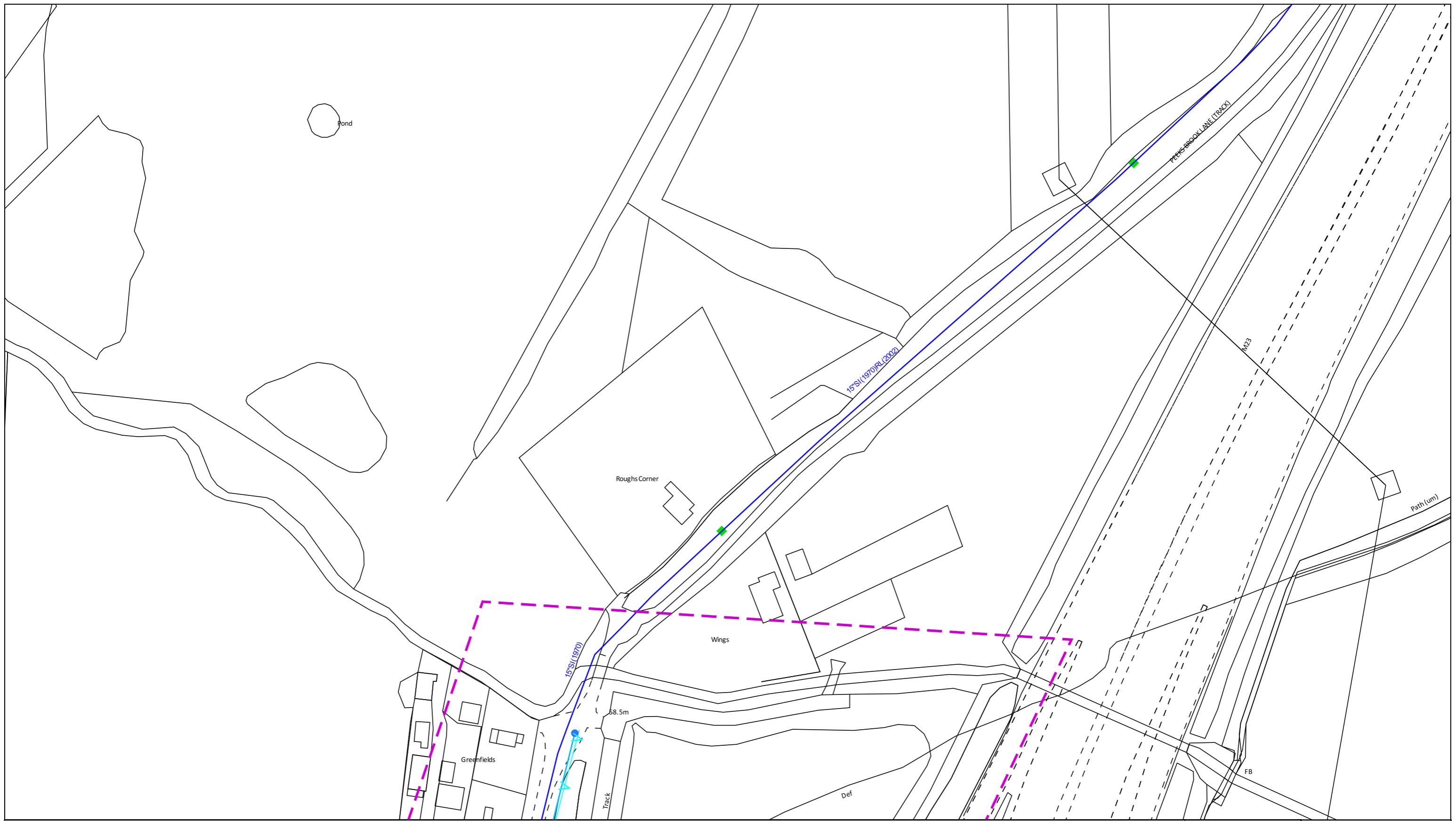
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— Distribution Mains A A A Abandoned Mains - - - Planned Mains
— Private Mains — Raw Mains — Trunk Mains



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0 100 m

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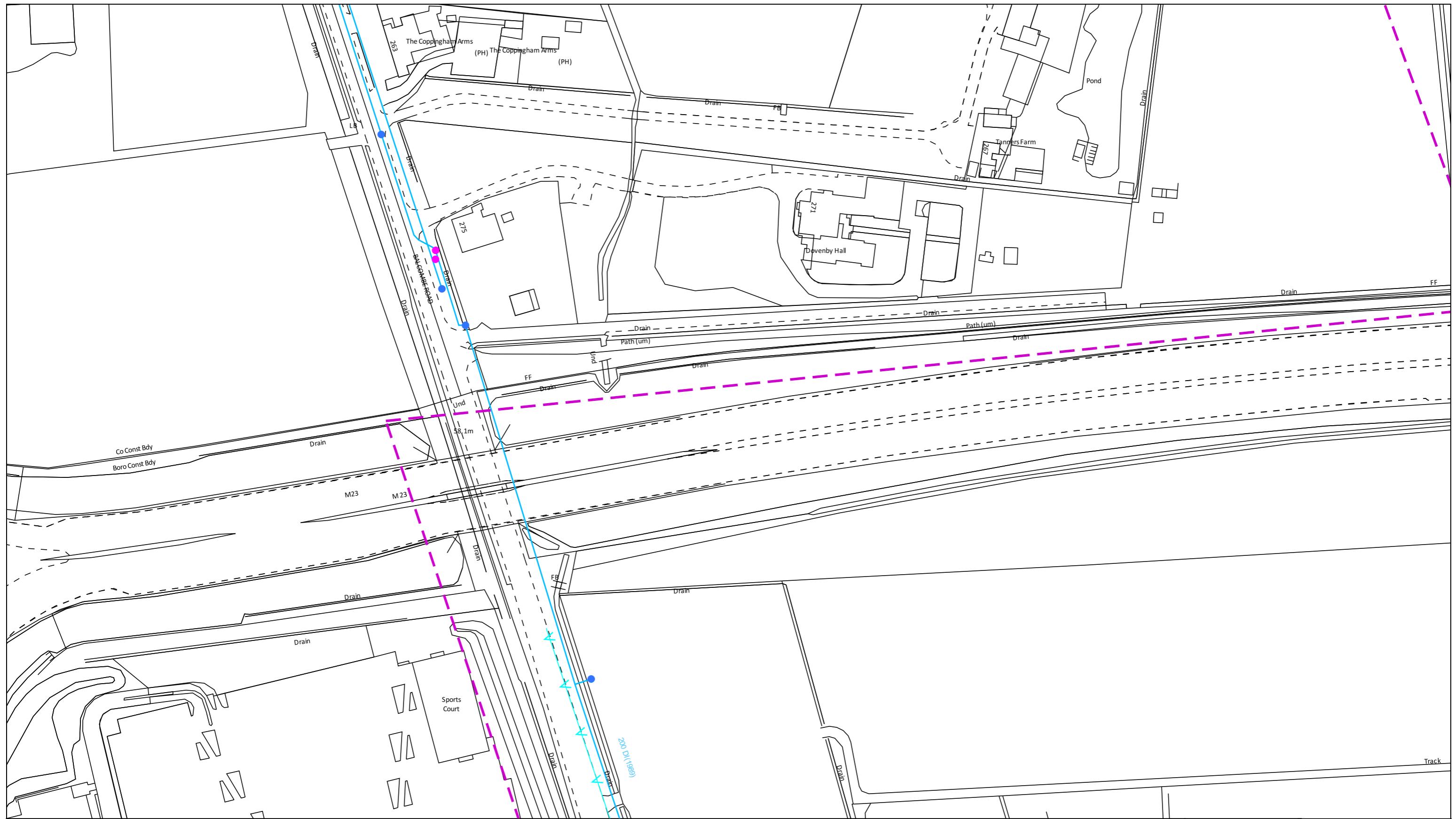
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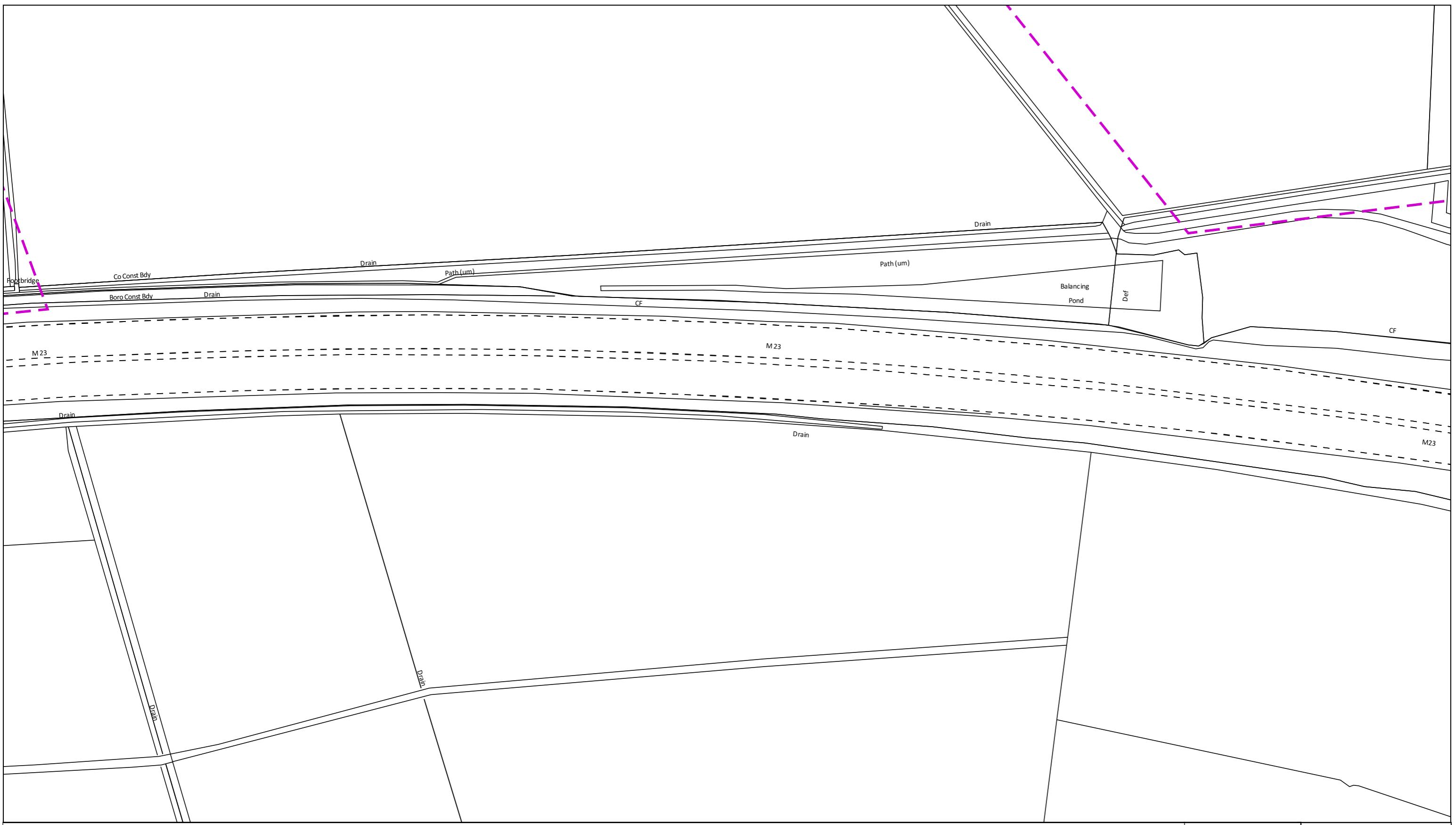
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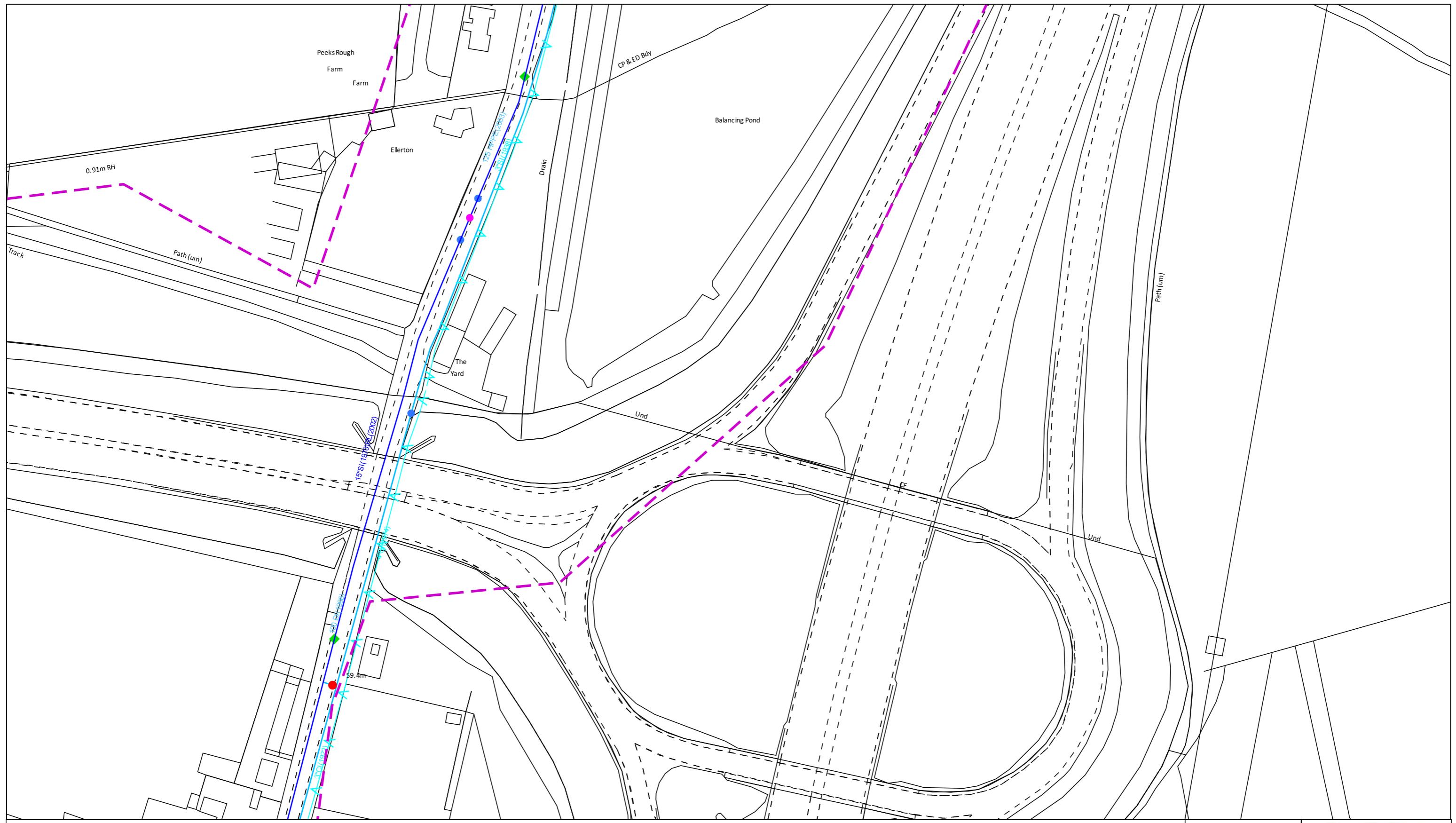
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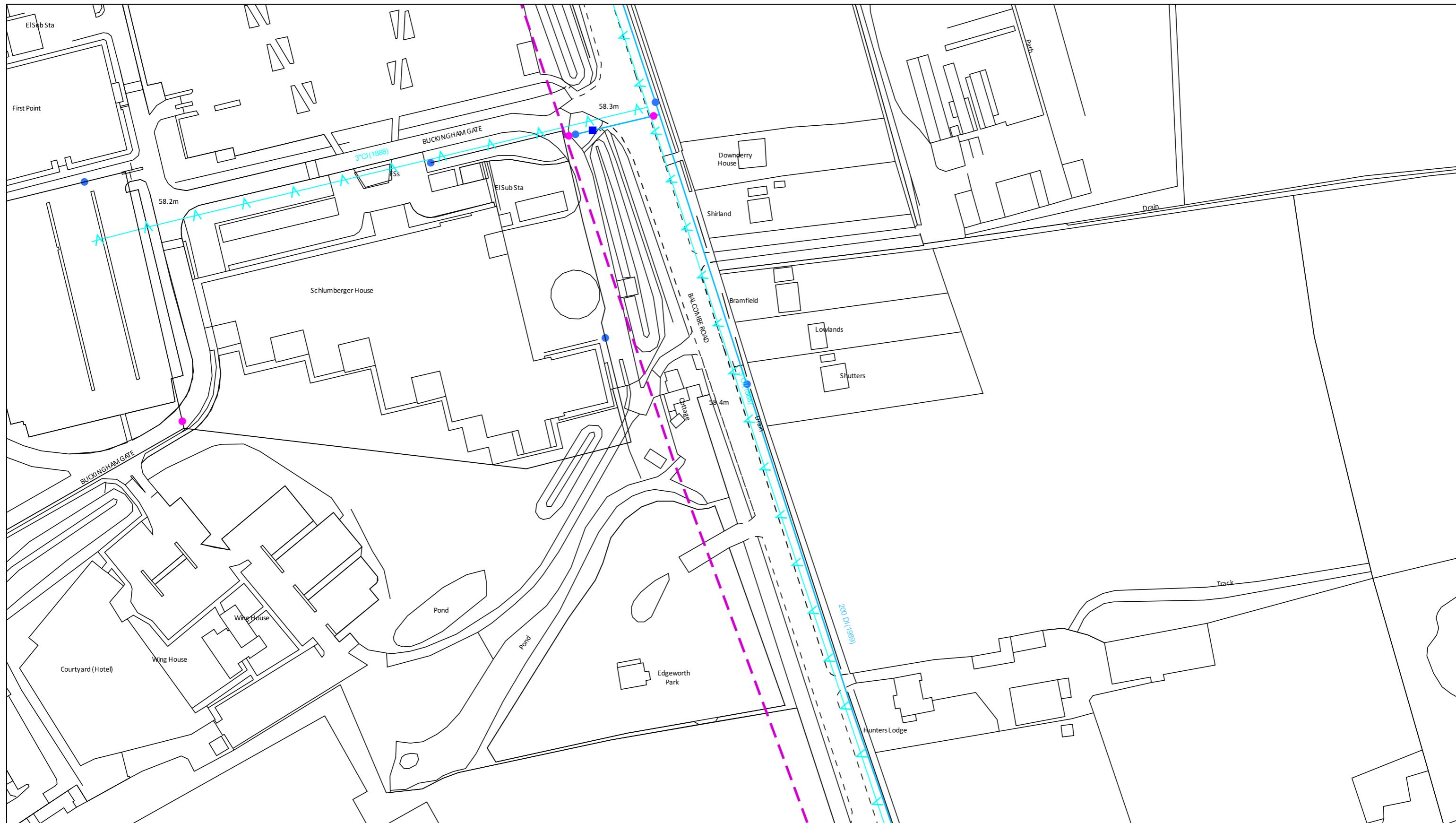
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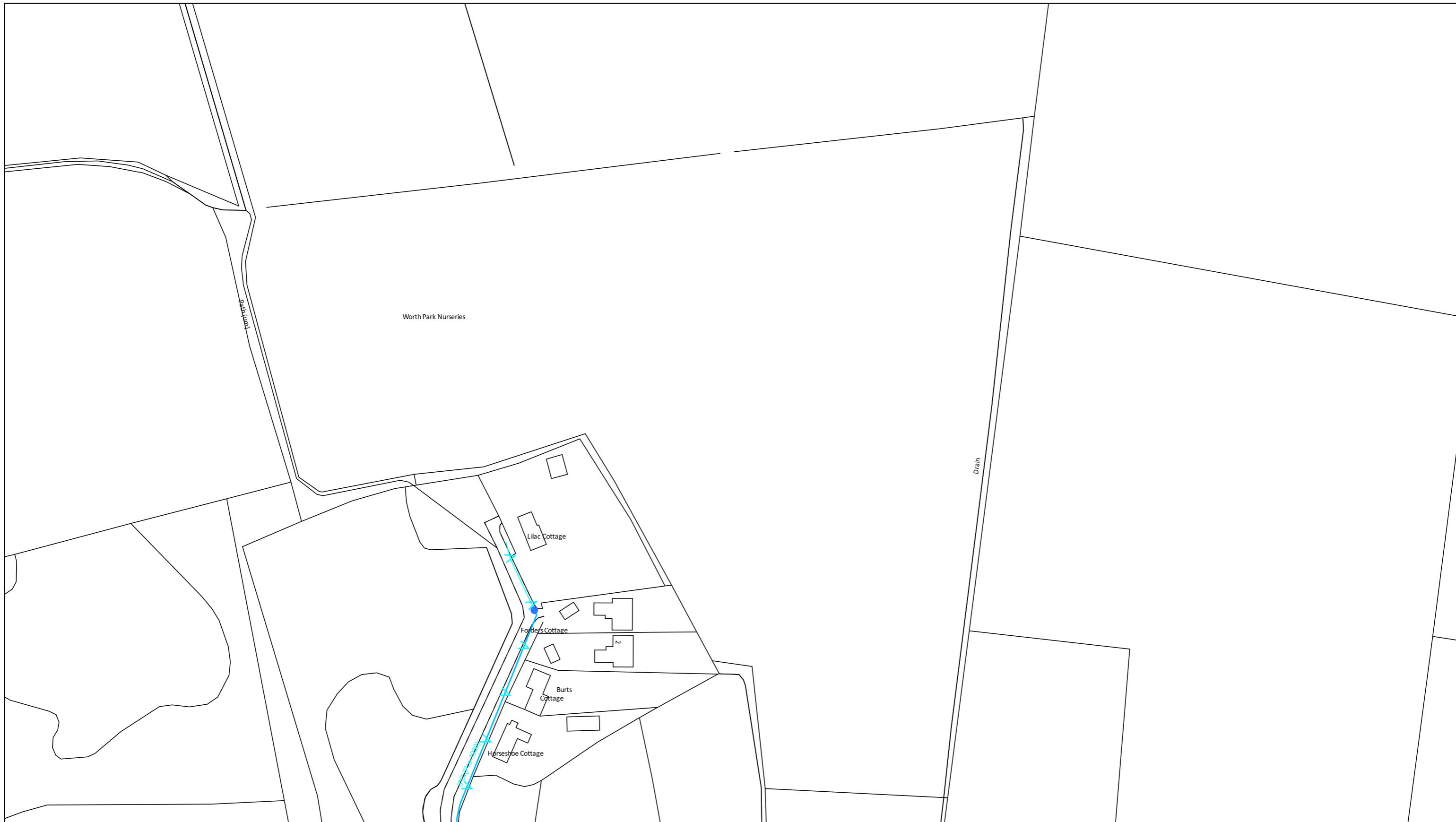
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0 100 m

Dig Sites

Area:

Line:

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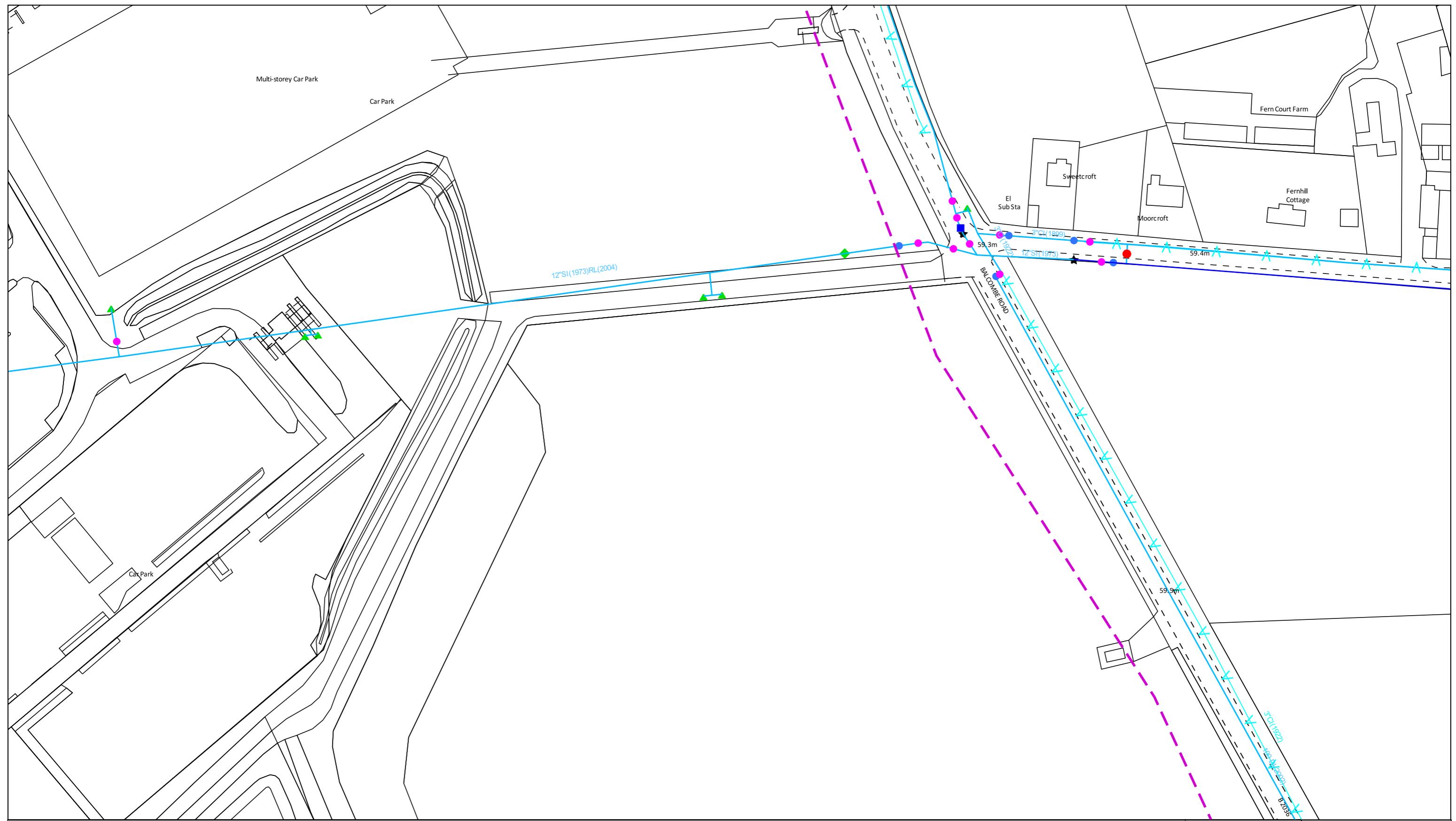
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| | | |
|----------------------|-------------------|-----------------|
| — Distribution Mains | — Abandoned Mains | — Planned Mains |
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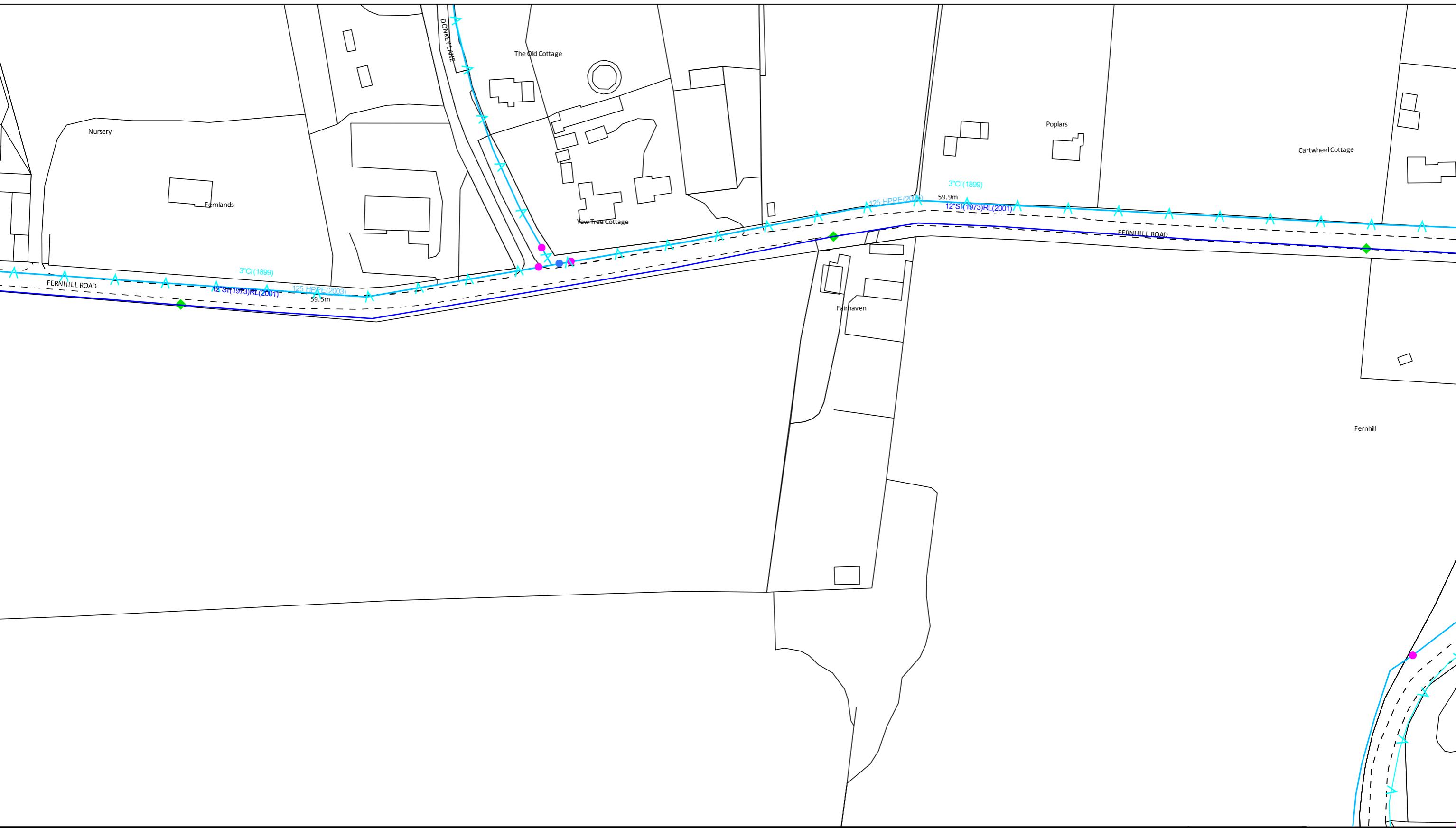
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|--------------------|-----------------|---------------|
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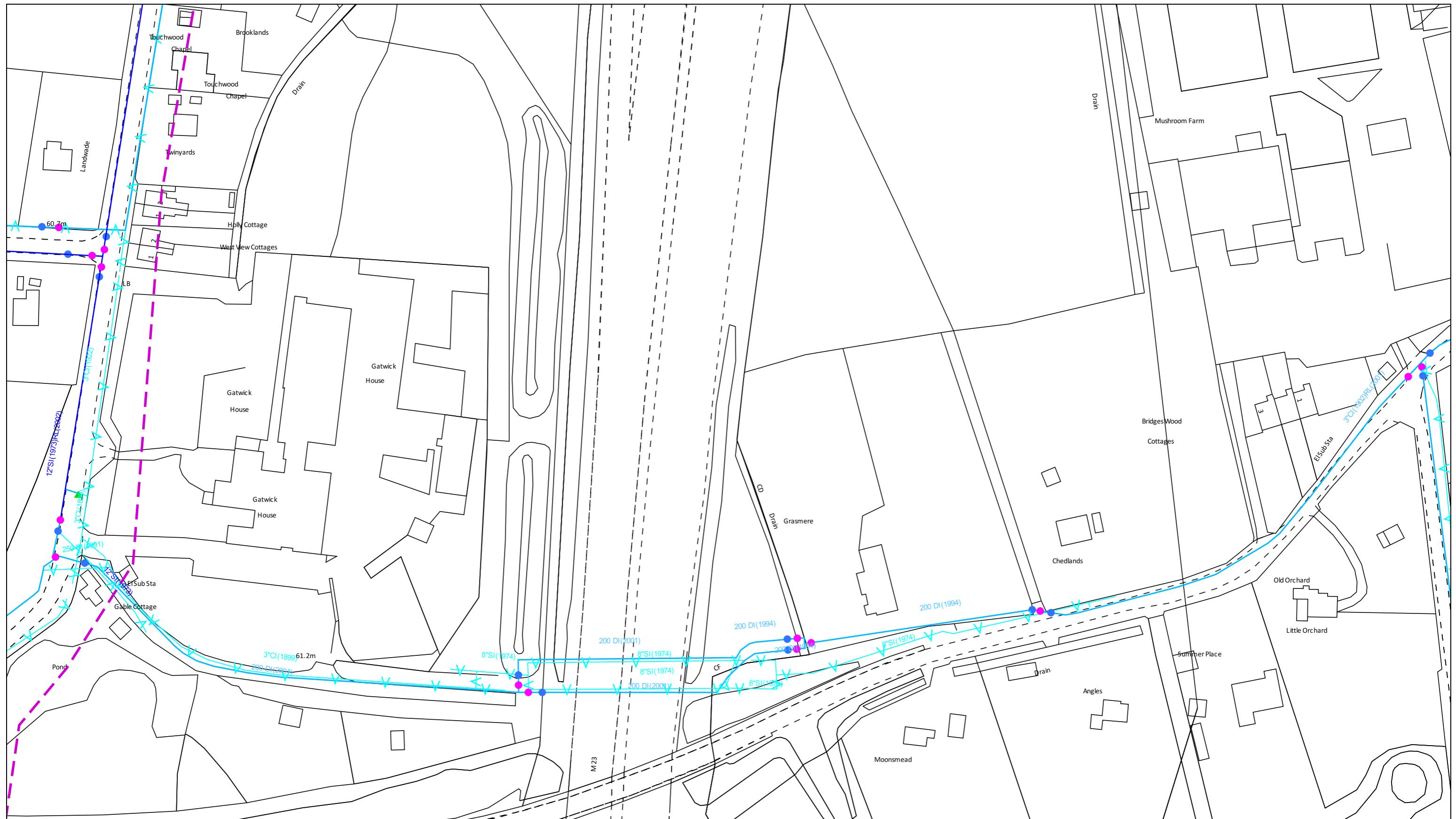
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0

100 m

Dig Sites

Area:

Line:

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- - -

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Dig Sites

Area:

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Distribution Mains

Abandoned Mains

Planned Mains

Private Mains

Raw Mains

Trunk Mains



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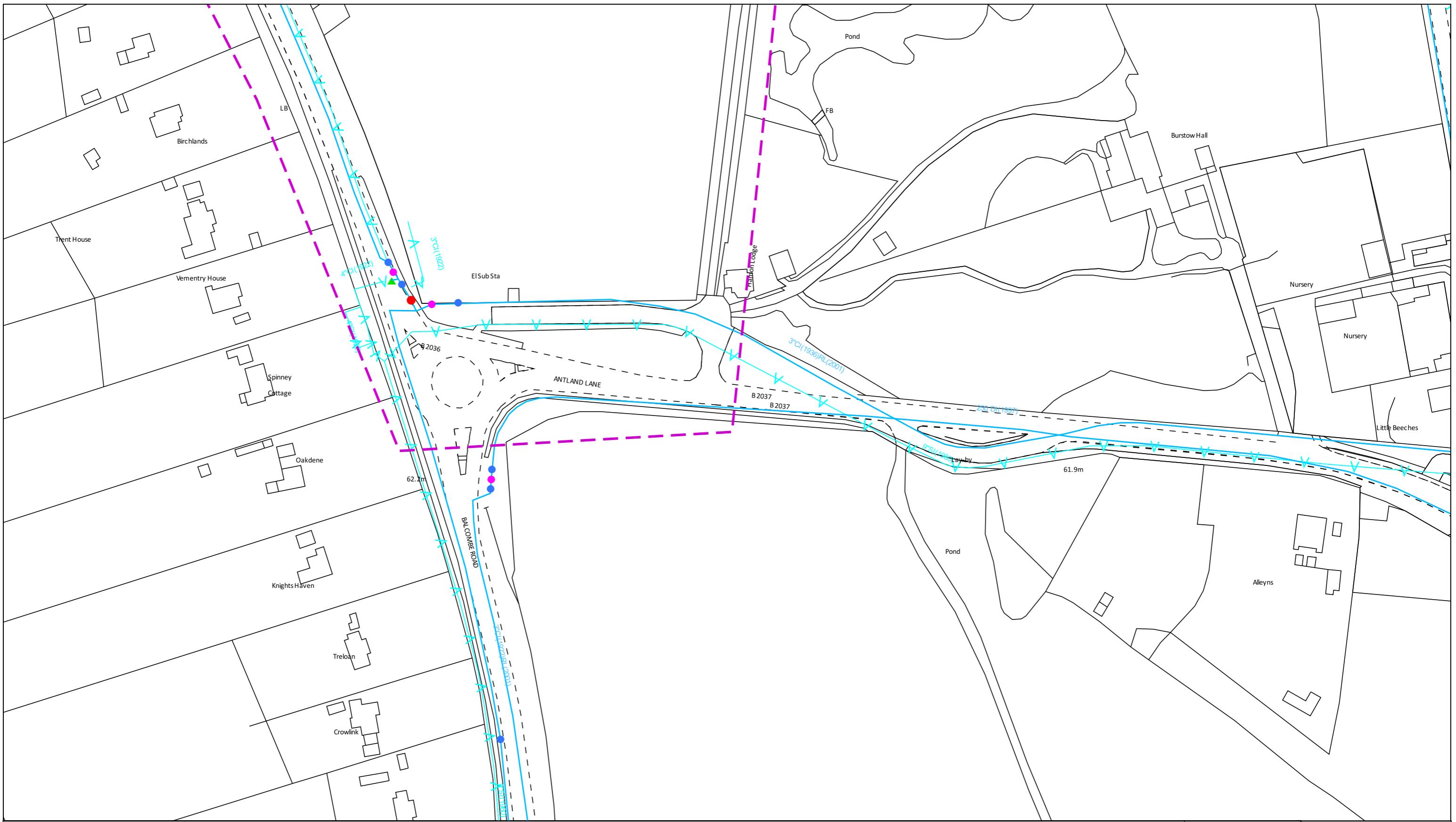
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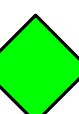
MAIN

-  Decommissioned
-  Distribution
-  Trunk
-  Raw
-  Sludge
-  Planned
-  Private
-  Compensation
-  Effluent



SES Water
London Road
Redhill
Surrey RH11LJ
Telephone 01737 772000
Facsimile 01737 766807
Website www.seswater.co.uk
Email gis@waterplc.com

FITTING

-  Blank Tee
-  Cap End
-  Air Scouring Point
-  Correlation Point
-  Sampling Point
-  Anode
-  Cable Test Pit
-  Anode Test Point
-  Air Valve
-  Air Cock

COMPANY METER

-  District
-  Bulk
-  Trunk
-  Waste
-  Small Area Monitor

VALVE

-  Non-Distribution
-  Boundary
-  Control
-  PRV
-  PSV
-  Reflux
-  Emptying
-  Spade

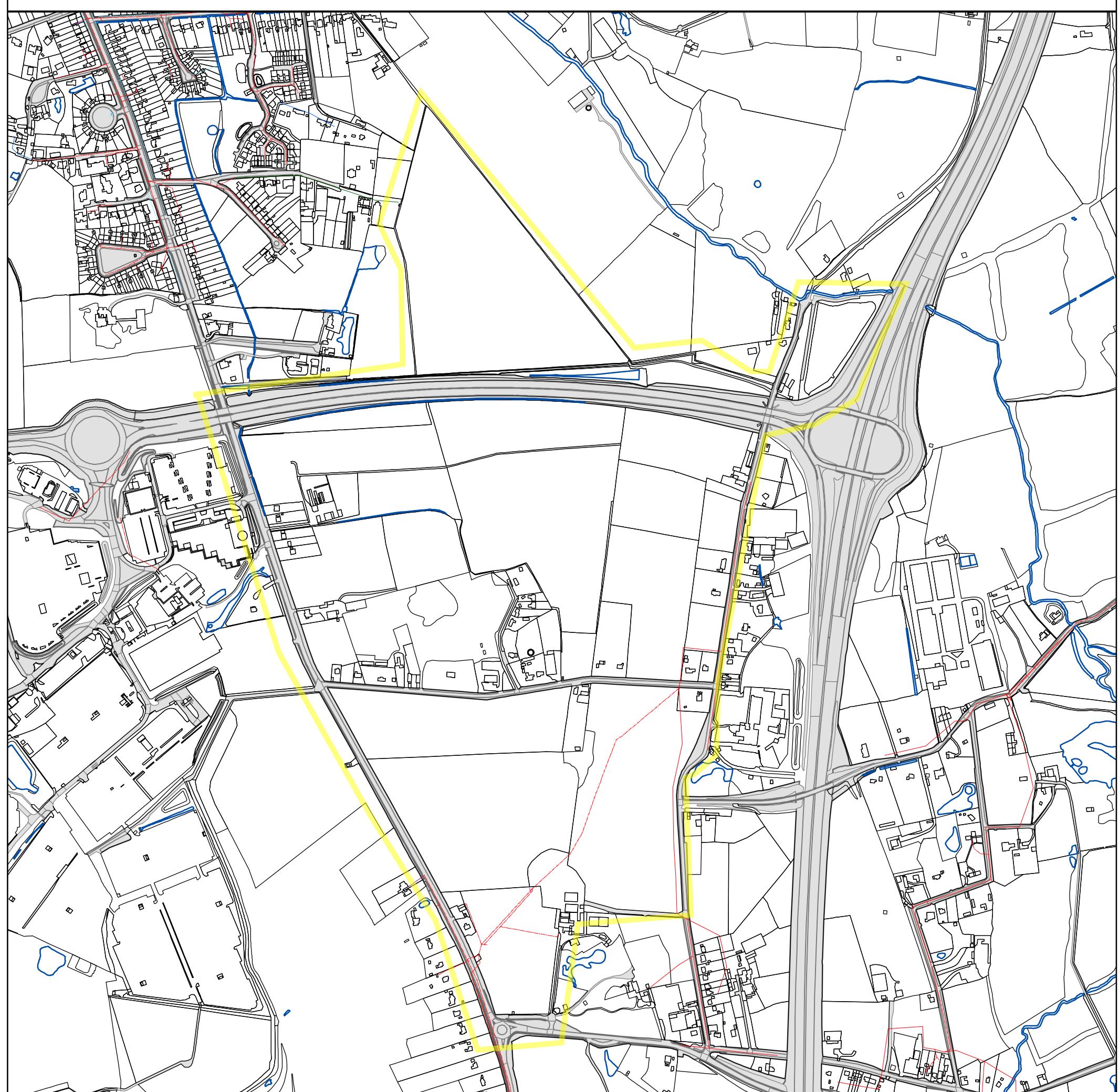
HYDRANT

-  Washout
-  Fire
-  Small Washout

BOUNDARY

-  Company

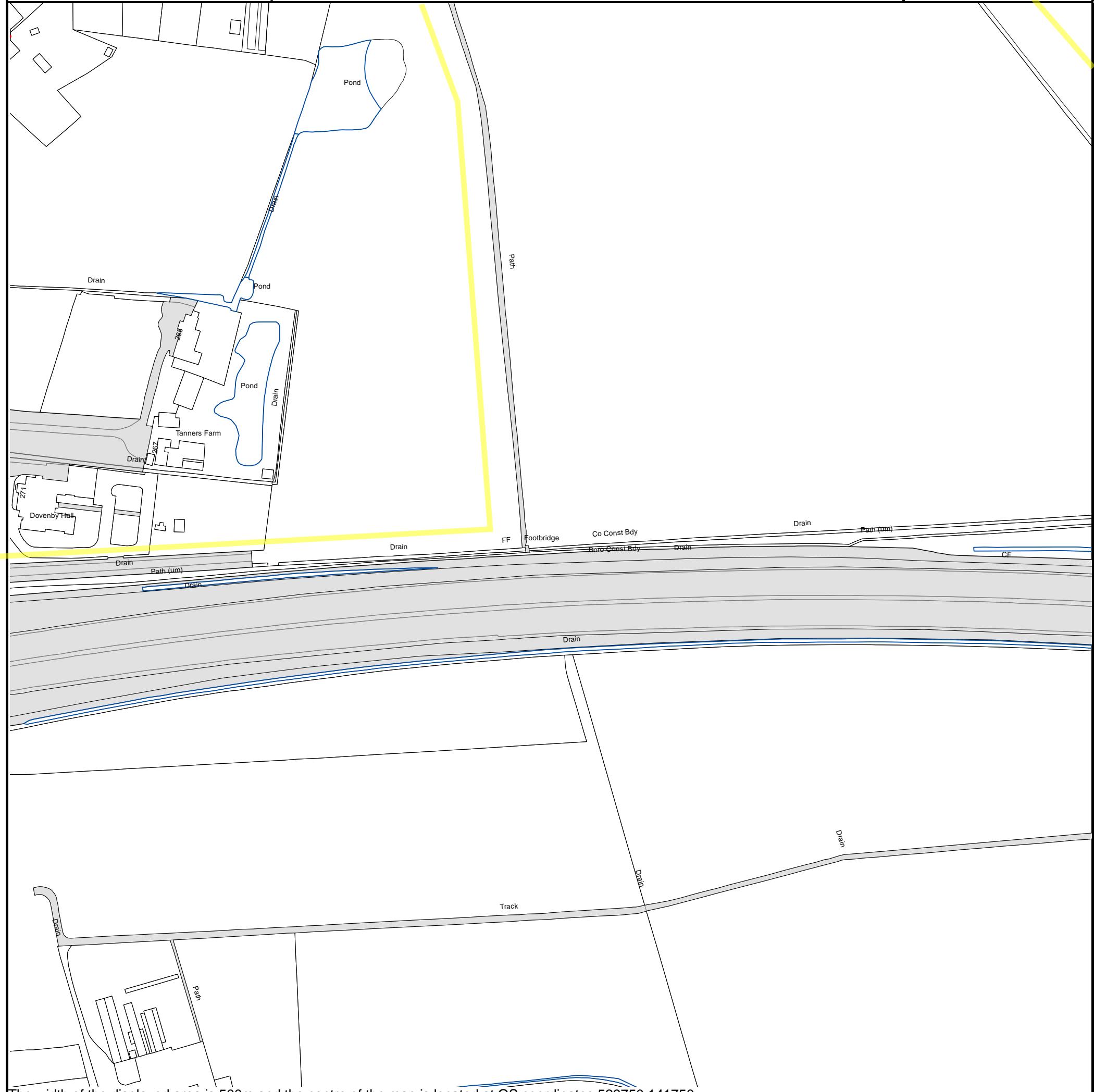
Appendix G – Thames Sewer Maps



0 45 90 180 270 360
Meters

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| | |
|----------------------------------|------------------|
| Scale: 1:7158 | Comments: |
| Width: 2000m | |
| Printed By: G1KANAGA | |
| Print Date: 25/11/2019 | |
| Map Centre: 530000,141403 | |
| Grid Reference: TQ3041SW | |

Asset Location Search Sewer Map - ALS/ALS Standard/2019_4115515**TQ2941NE**

The width of the displayed area is 500m and the centre of the map is located at OS coordinates 529750,141750

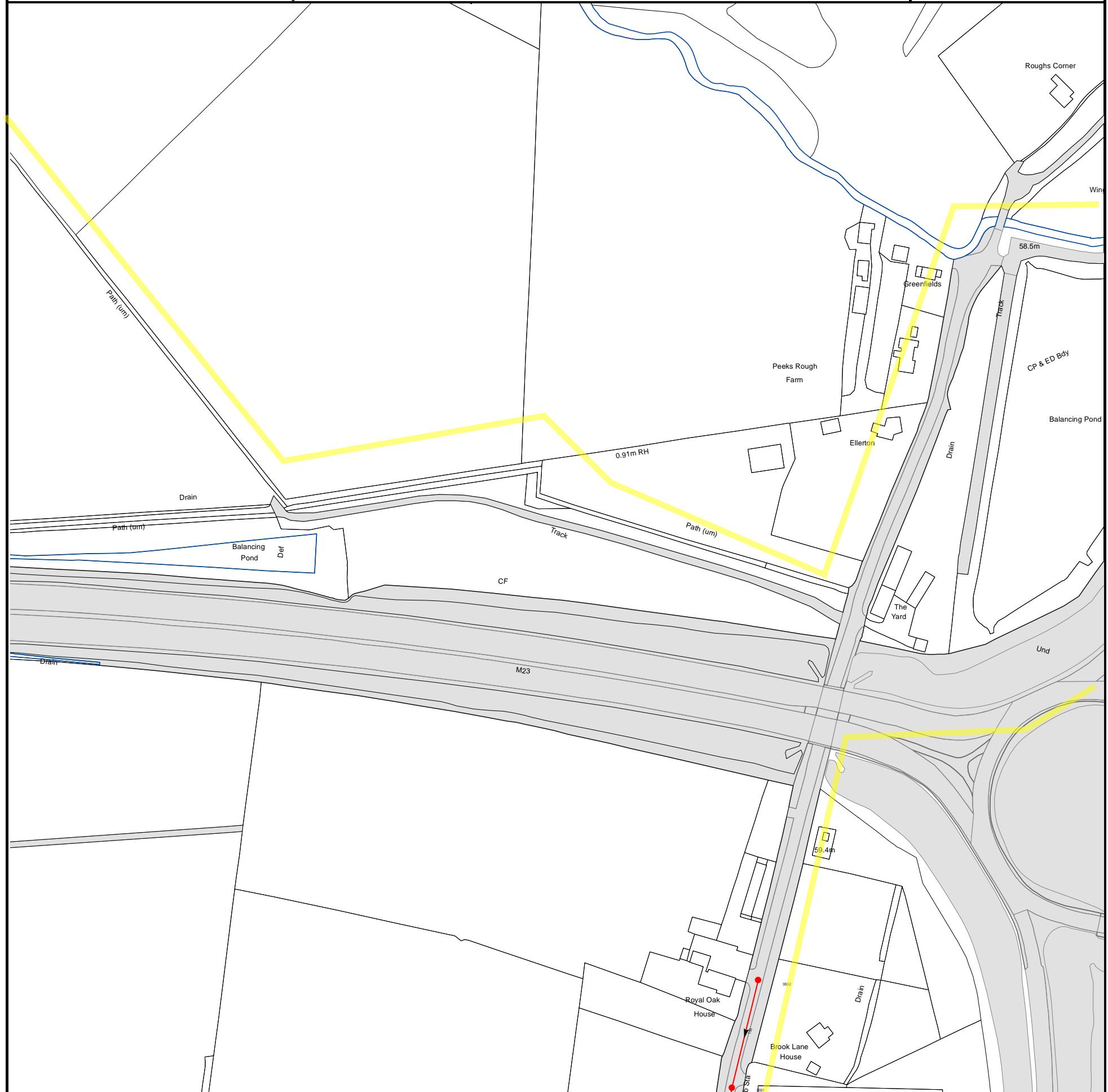
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Based on the Ordnance Survey Map with the Sanction of the controller of H.M. Stationery Office, License no. 100019345 Crown Copyright Reserved.

NB. Levels quoted in metres Ordnance Newlyn Datum. The value -9999.00 indicates that no survey information is available

| Manhole Reference | Manhole Cover Level | Manhole Invert Level |
|-------------------|---------------------|----------------------|
| n/a | n/a | n/a |

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The width of the displayed area is 500m and the centre of the map is located at OS coordinates 530250, 141750

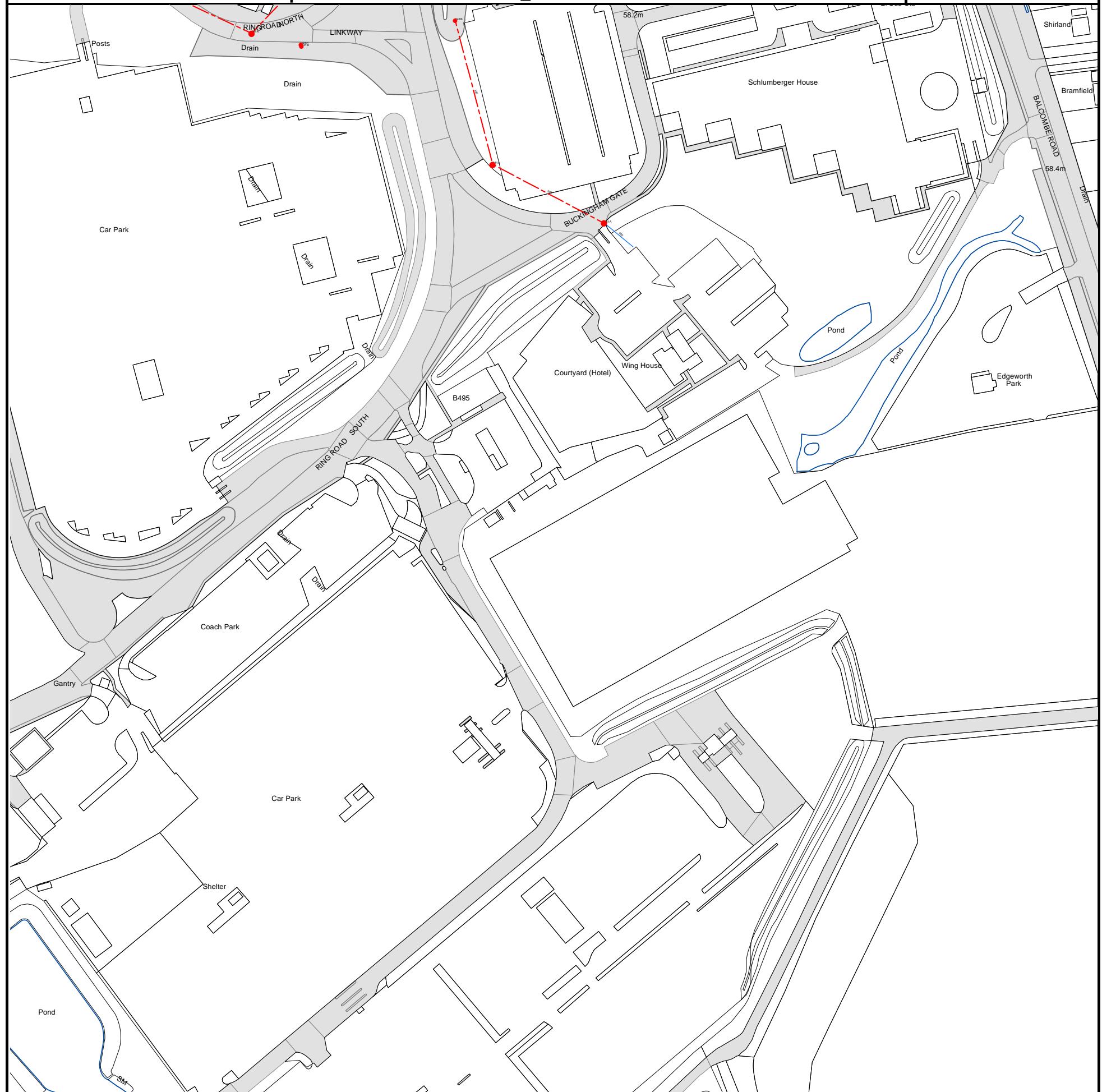
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NB. Levels quoted in metres Ordnance Newlyn Datum. The value -9999.00 indicates that no survey information is available

| Manhole Reference | Manhole Cover Level | Manhole Invert Level |
|-------------------|---------------------|----------------------|
| 3501 | 59.58 | 57.57 |
| 3502 | 59.51 | 57.89 |

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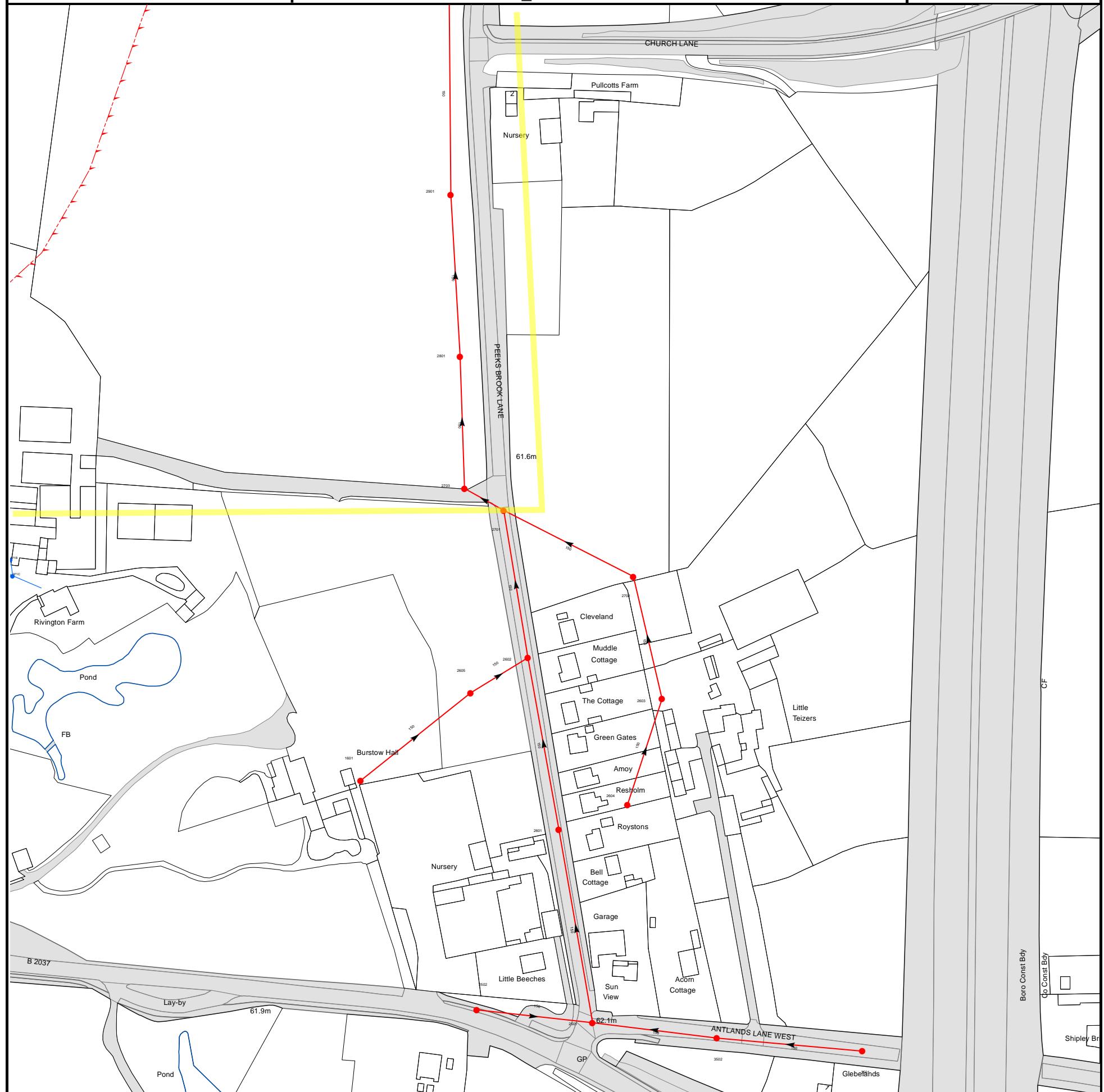
Asset Location Search Sewer Map - ALS/ALS Standard/2019_4115515**TQ2941SW**

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NB. Levels quoted in metres Ordnance Newlyn Datum. The value -9999.00 indicates that no survey information is available

| Manhole Reference | Manhole Cover Level | Manhole Invert Level |
|-------------------|---------------------|----------------------|
| 231A | n/a | n/a |
| 241A | n/a | n/a |
| 141B | n/a | n/a |
| 141C | n/a | n/a |
| 141A | n/a | n/a |
| 241B | n/a | n/a |

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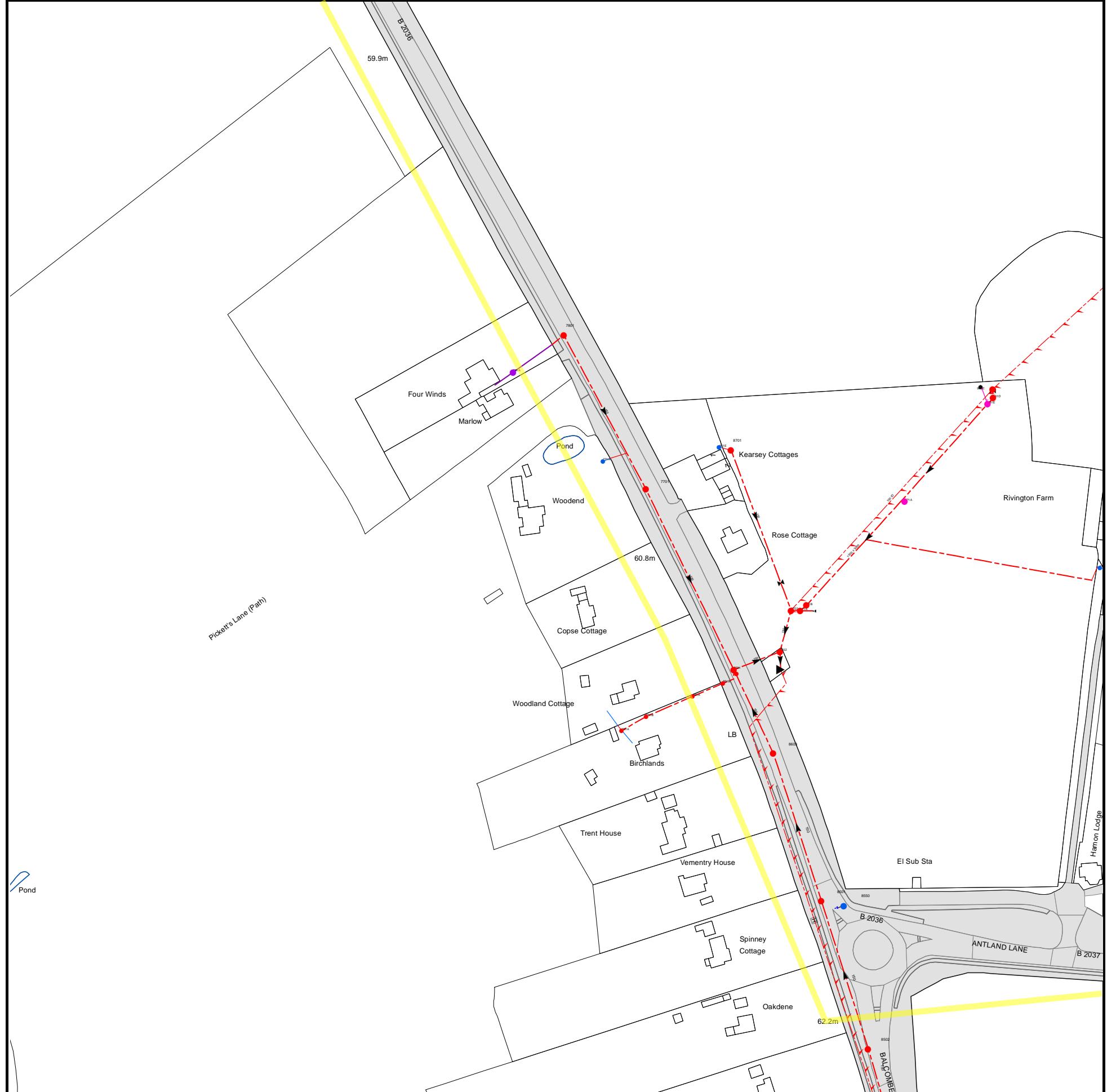


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NB. Levels quoted in metres Ordnance Newlyn Datum. The value -9999.00 indicates that no survey information is available

| Manhole Reference | Manhole Cover Level | Manhole Invert Level |
|-------------------|---------------------|----------------------|
| 971C | n/a | n/a |
| 1601 | 61.83 | 60.19 |
| 2901 | 61.19 | 56.89 |
| 2801 | 61.35 | 57.39 |
| 2703 | 61.63 | 57.8 |
| 2605 | 61.98 | 59.42 |
| 2502 | 62.64 | 60.46 |
| 2701 | 61.54 | 57.95 |
| 2602 | 61.91 | 58.43 |
| 2601 | 62.13 | 59.18 |
| 2501 | 62.95 | 60 |
| 2604 | 62.21 | 61.07 |
| 2702 | 61.87 | 59.03 |
| 2603 | 59.88 | 57.83 |
| 3502 | 62.08 | 60.51 |
| 3501 | 62.52 | 61.17 |
| 971B | n/a | n/a |

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The width of the displayed area is 500m and the centre of the map is located at OS coordinates 529750, 140750

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NB. Levels quoted in metres Ordnance Newlyn Datum. The value -9999.00 indicates that no survey information is available

| Manhole Reference | Manhole Cover Level | Manhole Invert Level |
|-------------------|---------------------|----------------------|
| 781A | n/a | n/a |
| 7801 | 60.72 | 57.54 |
| 771A | n/a | n/a |
| 761A | n/a | n/a |
| 7701 | 60.76 | 57.97 |
| 761B | n/a | n/a |
| 861A | n/a | n/a |
| 871E | n/a | n/a |
| 861B | n/a | n/a |
| 8701 | 59.9 | 58.54 |
| 8601 | 61.31 | 57.38 |
| 8603 | 61.58 | 58.42 |
| 8602 | 61.35 | 57.2 |
| 8702 | 60.57 | 57.51 |
| 871A | 60.908 | 57.65 |
| 871B | 60.837 | n/a |
| 8501 | 61.83 | 58.89 |
| 8550 | 61.71 | n/a |
| 8502 | 62.23 | 59.34 |
| 971A | 60.427 | n/a |
| 981E | 61.23 | n/a |
| 981C | 61.16 | 59.08 |
| 981D | 61.217 | 58.39 |
| 971D | n/a | n/a |

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Asset Location Search Sewer Map - ALS/ALS Standard/2019_4115515

TQ2942SE



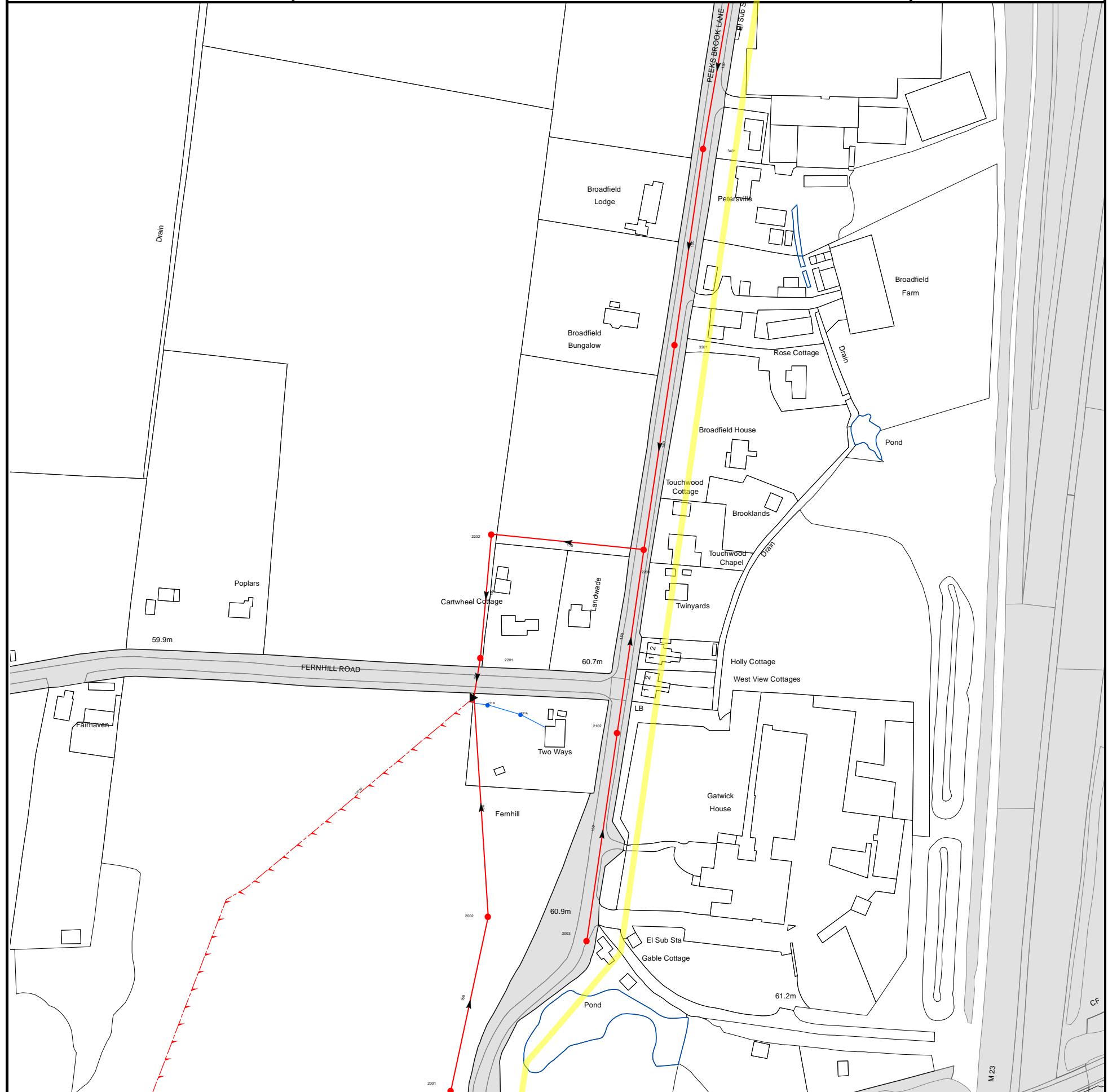
NB. Levels quoted in metres Ordnance Newlyn Datum. The value -9999.00 indicates that no survey information is available

| Manhole Reference | Manhole Cover Level | Manhole Invert Level |
|-------------------|---------------------|----------------------|
| 521D | 57.71 | 55.95 |
| 521A | n/a | n/a |
| 531A | 57.54 | 56.22 |
| 521C | 57.59 | 56.06 |
| 541A | n/a | n/a |
| 521B | 57.72 | 56.26 |
| 6401 | 57.84 | 56.73 |
| 641A | n/a | n/a |
| 641C | n/a | n/a |
| 6402 | 59.84 | 57.19 |
| 741A | n/a | n/a |
| 701A | n/a | n/a |
| 601A | n/a | n/a |
| 511A | n/a | n/a |
| 511B | 58.83 | 56.92 |
| 511C | 58.68 | 56.4 |

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Asset Location Search Sewer Map - ALS/ALS Standard/2019_4115515

TQ3041SW



The width of the displayed area is 500m and the centre of the map is located at OS coordinates 530250, 141250

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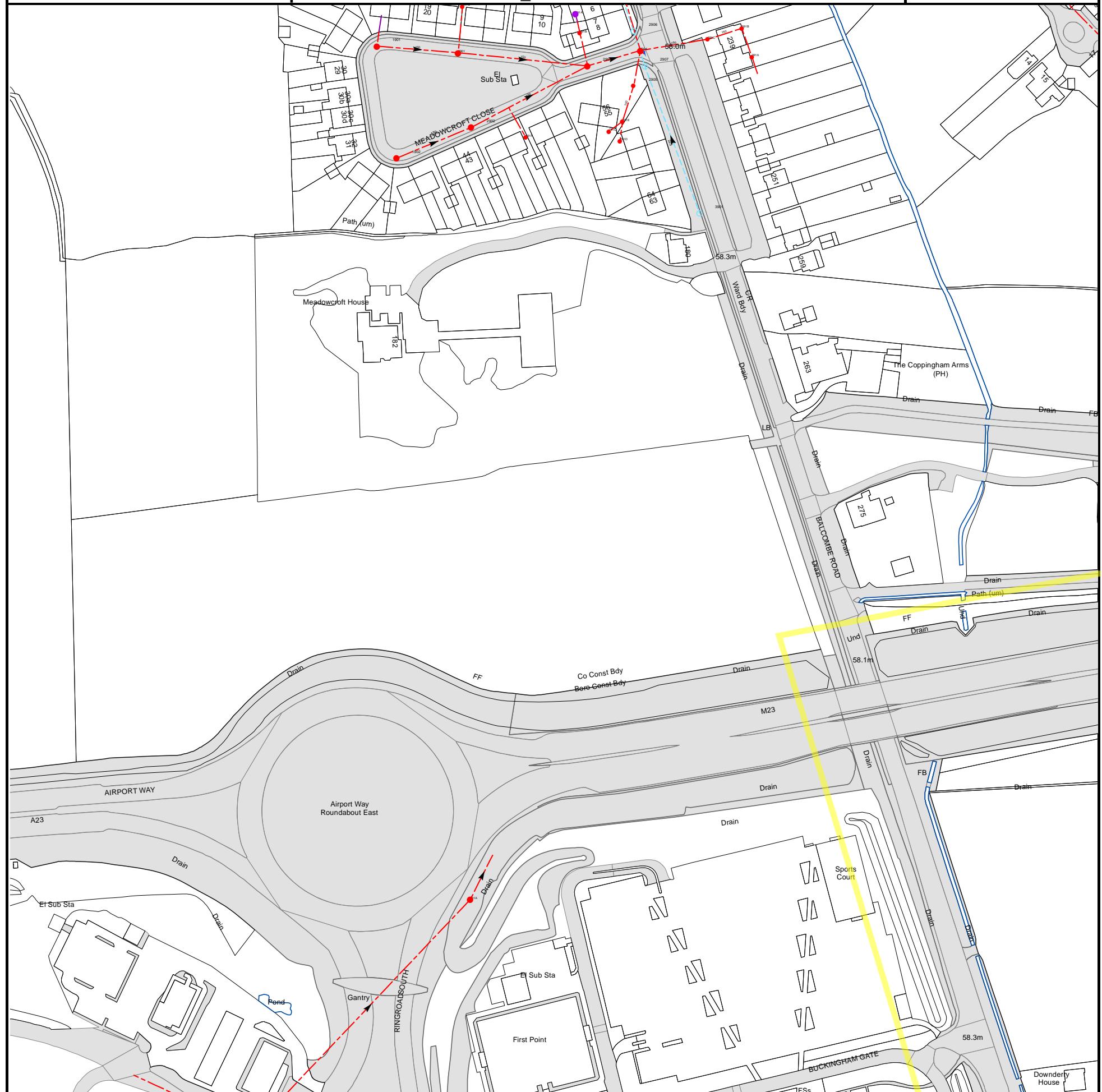
NB. Levels quoted in metres Ordnance Newlyn Datum. The value -9999.00 indicates that no survey information is available

| Manhole Reference | Manhole Cover Level | Manhole Invert Level |
|-------------------|---------------------|----------------------|
| 211B | n/a | n/a |
| 2201 | 60.43 | 55.17 |
| 2203 | 60.28 | 55.93 |
| 2202 | 60.11 | 55.56 |
| 3301 | 59.72 | 56.46 |
| 3401 | 59.65 | 57.06 |
| 2001 | 61.05 | 56.26 |
| 2002 | 60.77 | 55.72 |
| 211A | n/a | n/a |
| 2003 | 61 | 58.99 |
| 2102 | 60.74 | 56.85 |

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Asset Location Search Sewer Map - ALS/ALS Standard/2019_4115515

TQ2941NW



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NB. Levels quoted in metres Ordnance Newlyn Datum. The value -9999.00 indicates that no survey information is available

| Manhole Reference | Manhole Cover Level | Manhole Invert Level |
|-------------------|---------------------|----------------------|
| 1901 | 57.96 | 56.57 |
| 1902 | 57.93 | 56.56 |
| 2901 | 57.82 | 56.13 |
| 291G | n/a | n/a |
| 2902 | 57.81 | 56.11 |
| 291F | n/a | n/a |
| 3901 | 57.95 | 57.26 |
| 291D | n/a | n/a |
| 291C | n/a | n/a |
| 291E | n/a | n/a |
| 2905 | n/a | n/a |
| 2907 | 57.95 | 56.86 |
| 2903 | 57.72 | 55.43 |
| 391A | n/a | n/a |
| 2904 | 57.9 | 55.12 |
| 391C | n/a | n/a |
| 4901 | 57.506 | 56.846 |
| 291B | n/a | n/a |
| 2906 | 57.92 | 56.77 |
| 391B | n/a | n/a |
| 291A | n/a | n/a |
| 251A | n/a | n/a |

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ALS Sewer Map Key

Public Sewer Types (Operated & Maintained by Thames Water)

| | |
|--|---|
| | Foul: A sewer designed to convey waste water from domestic and industrial sources to a treatment works. |
| | Surface Water: A sewer designed to convey surface water (e.g. rain water from roofs, yards and car parks) to rivers or watercourses. |
| | Combined: A sewer designed to convey both waste water and surface water from domestic and industrial sources to a treatment works. |
| | Trunk Surface Water |
| | Trunk Foul |
| | Storm Relief |
| | Trunk Combined |
| | Vent Pipe |
| | Bio-solids (Sludge) |
| | Proposed Thames Surface Water Sewer |
| | Proposed Thames Water Foul Sewer |
| | Gallery |
| | Foul Rising Main |
| | Surface Water Rising Main |
| | Combined Rising Main |
| | Sludge Rising Main |
| | Vacuum |

Notes:

- 1) All levels associated with the plans are to Ordnance Datum Newlyn.
- 2) All measurements on the plans are metric.
- 3) Arrows (on gravity fed sewers) or flecks (on rising mains) indicate direction of flow.
- 4) Most private pipes are not shown on our plans, as in the past, this information has not been recorded.
- 5) 'na' or '0' on a manhole level indicates that data is unavailable.

Sewer Fittings

A feature in a sewer that does not affect the flow in the pipe. Example: a vent is a fitting as the function of a vent is to release excess gas.

| | |
|--|-------------|
| | Air Valve |
| | Dam Chase |
| | Fitting |
| | Meter |
| | Vent Column |

Operational Controls

A feature in a sewer that changes or diverts the flow in the sewer. Example: A hydrobrake limits the flow passing downstream.

| | |
|--|---------------|
| | Control Valve |
| | Drop Pipe |
| | Ancillary |
| | Weir |

End Items

End symbols appear at the start or end of a sewer pipe. Examples: an Undefined End at the start of a sewer indicates that Thames Water has no knowledge of the position of the sewer upstream of that symbol. Outfall on a surface water sewer indicates that the pipe discharges into a stream or river.

| | |
|--|---------------|
| | Outfall |
| | Undefined End |
| | Inlet |

Other Symbols

Symbols used on maps which do not fall under other general categories

| | |
|--|---|
| | ▲/▲ Public/Private Pumping Station |
| | * Change of characteristic indicator (C.O.C.I.) |
| | ☒ Invert Level |
| | <1 Summit |

Areas

Lines denoting areas of underground surveys, etc.

| | |
|--|------------------|
| | Agreement |
| | Operational Site |
| | Chamber |
| | Tunnel |
| | Conduit Bridge |

Other Sewer Types (Not Operated or Maintained by Thames Water)

| | | | |
|--|-----------------------|--|---------------------|
| | Foul Sewer | | Surface Water Sewer |
| | Combined Sewer | | Gully |
| | Culverted Watercourse | | Proposed |
| | Abandoned Sewer | | |



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**GATWICK GREEN, CRAWLEY,
WEST SUSSEX**

**UPDATED PRELIMINARY ECOLOGICAL
APPRAISAL**

A Report to: Savills

Report No: RT-MME-151186-01

Date: February 2020



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REPORT VERIFICATION AND DECLARATION OF COMPLIANCE

This study has been undertaken in accordance with British Standard 42020:2013 “Biodiversity, Code of practice for planning and development”.

| Report Version | Date | Completed by: | Checked by: | Approved by: |
|----------------|------------|--|---|--|
| DRAFT | 23/01/2020 | Sophie Moy MSc GradCIEEM (Senior Ecological Consultant), Margarita Smoldareva BSc (Hons) (Ecological Project Officer) and Stephanie Bradbury BSc (Hons) (Senior Ecological Consultant) | Paul Roebuck MSc MCIEEM (South East Manager) | Colin Bundy MCIEEM (Associate Director) |
| Final | 27/02/2020 | Sophie Moy MSc GradCIEEM (Senior Ecological Consultant) | Paul Roebuck MSc MCIEEM (South East Manager) | Colin Bundy MCIEEM (Associate Director) |

The information which we have prepared is true, and has been prepared and provided in accordance with the Chartered Institute of Ecology and Environmental Management's Code of Professional Conduct. We confirm that the opinions expressed are our true and professional bona fide opinions.

DISCLAIMER

The contents of this report are the responsibility of Middlemarch Environmental Ltd. It should be noted that, whilst every effort is made to meet the client's brief, no site investigation can ensure complete assessment or prediction of the natural environment.

Middlemarch Environmental Ltd accepts no responsibility or liability for any use that is made of this document other than by the client for the purposes for which it was originally commissioned and prepared.

VALIDITY OF DATA

The findings of this study are valid for a period of 24 months from the date of survey. If works have not commenced by this date, an updated site visit should be carried out by a suitably qualified ecologist to assess any changes in the habitats present on site, and to inform a review of the conclusions and recommendations made.

NON-TECHNICAL SUMMARY

Middlemarch Environmental Ltd was commissioned by Savills, on behalf of Wilky Group, to carry out a Preliminary Ecological Appraisal at the site of a proposed development at Gatwick Green in Crawley, West Sussex. To fulfil this brief an ecological desk study and a walkover survey (in accordance with Phase 1 Habitat Survey methodology) were undertaken.

The ecological desk study identified no European statutory sites within 5 km of the survey area, no UK statutory sites within 2 km, 32 ancient woodland sites within 2 km, and five non-statutory sites within 1 km. The site is not located within 10 km of a statutory site designated for bats. ‘Gatwick Woods’ Biodiversity Opportunity Area was partially located within the development site. The desk study revealed records of protected/notable species within 1 km of the survey area, including bats, terrestrial mammals, birds and herpetofauna.

The walkover survey was undertaken on 20th November 2019 and 25th November 2019 by Sophie Moy (Senior Ecological Consultant) and Margarita Smoldareva (Ecological Project Officer). At the time of the survey, the site comprised multiple fields of improved and semi-improved grassland, which were bound by a network of hedgerows, ditches and trees. Small areas of semi-natural broad-leaved woodland and scrub were also present. The site was bisected by Fernhill Road and bordered by the M23 airport spur to the north, Peeks Brook Lane to the east, the B2037 to the south, and the B2036 to the west. The wider landscape was dominated by further farmland. Gatwick Airport was located to the west, and the urban fringes of Crawley and Horley were located to the south and north respectively.

The key ecological features on or surrounding the site in relation to the future development of the site include the ‘Gatwick Green’ Biodiversity Opportunity Area, ancient woodland sites, Habitats of Principal Importance for Nature Conservation in England (woodland and suitable hedgerows), and intrinsically valuable habitats (semi-mature and mature trees, ditches and hedgerows). The habitats on site have the potential to support a range of protected/notable species, and invasive plants have also been recorded on site.

In order to ensure compliance with wildlife legislation and relevant planning policy, the following recommendations are made:

- R1 SSSI:** The site lies within a SSSI Risk Impact Zone for Hedgecourt SSSI. SSSI Impact Zones are utilised by Local Planning Authorities to assess planning applications for likely impacts on SSSIs. As such the Local Planning Authority and/or Natural England should be consulted prior to any works commencing.
- R2 Ancient Woodland:** As no detailed development proposals have been produced to date, the ancient woodland and veteran trees standing advice (Natural England and Forestry Commission, 2018) should be consulted in order to avoid negative effects on local ancient woodland sites.
- R3 Non-Statutory Sites:** The proposed works could potentially directly or indirectly impact upon several non-statutory conservation sites. As such, the Local Planning Authority ecologist and / or the local Wildlife Trust should be consulted prior to any works commencing to determine how works may proceed without adversely impacting these sites.
- R4 Biodiversity Enhancement Opportunities:** In order to provide a contribution towards local biodiversity targets for the ‘Gatwick Green’ BOA, the proposed development should seek to enhance biodiversity. Examples of enhancement measures are provided in Chapter 7.
- R5 Habitat Retention and Protection:** The development proposals should be designed (where feasible) to allow for the retention of existing notable habitats including woodland, trees, hedgerows and ditches. Any retained woodland/trees/hedgerows on or overhanging the site should be protected prior to the commencement of any works on site. For ditches, the Environment Agency Pollution Prevention Guidelines should be adhered to throughout the works. PPG5 (Environment Agency et al, 2007), relating to works and maintenance in or near water, is considered to be of relevance to the proposed project.
- R6 Lighting:** Any new lighting should be carefully designed to minimise potential disturbance and fragmentation impacts on sensitive receptors, such as bat species. Examples of good practice are provided in Chapter 7.
- R7 Additional Survey Work:** The following additional survey works are recommended prior to a planning application being submitted for the site: Great Crested Newt Habitat Suitability Index Assessment, Breeding Bird Survey, Wintering Bird Survey, Badger Survey, Bat Surveys (including a

Preliminary Ground Level Bat Roost Assessment of Trees, Dusk Emergence and Dawn Re-Entry Surveys if required, and Bat Activity Surveys), Dormouse Survey, and Reptile Survey. All further ecological surveys should be undertaken in accordance with best practice methodologies, during the appropriate survey windows.

- R8 **Nesting Birds:** Any vegetation clearance required as part of future development activities should be undertaken outside the nesting bird season. If this is not possible then any vegetation to be removed or disturbed should be checked by an experienced ecologist for nesting birds immediately prior to works commencing.
- R9 **Terrestrial Mammals:** Any excavations that need to be left overnight should be covered or fitted with mammal ramps to ensure that any animals that enter can safely escape. Any open pipework with an outside diameter of greater than 120 mm must be covered at the end of each workday to prevent animals entering/becoming trapped.
- R10 **Invasive Species Method Statement:** A Method Statement must be developed for the proposed works to ensure that they do not result in the spread of any invasive non-native species. The method statement should be informed by an updated site walkover survey to identify any changes in the status of invasive species on site.

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1. INTRODUCTION

1.1 PROJECT BACKGROUND

In November 2019 Savills, on behalf of Wilky Group, commissioned Middlemarch Environmental Ltd to undertake an updated Preliminary Ecological Appraisal of the site of a proposed development at Gatwick Green in Crawley, West Sussex. It is understood that Savills are promoting the site for future development, and that the Crawley Local Plan identifies the site as part of an 'Area of Search' for a strategic employment site. The land is also part of an area safeguarded for future airport use. The current survey is required to identify possible biodiversity constraints and opportunities associated with any future development of the site. At the time of writing, no detailed development proposals have been produced.

Middlemarch Environmental Ltd has previously carried out a Preliminary Ecological Assessment for Wilky Group at this site in 2015. The findings of this survey are detailed in Report RT-MME-118885.

Due to the amount of time that has elapsed since the previous assessment was completed, an updated survey was required. To assess the existing ecological interest of the site an ecological desk study was carried out, and a walkover survey was undertaken on 20th November 2019 and 25th November 2019.

In addition, Middlemarch Environmental Ltd has been commissioned to undertake a Hedgerow Regulations (1997) Assessment at this site, the findings of which are detailed in Report RT-MME-151186-02.

1.2 SITE DESCRIPTION AND CONTEXT

The site is located to the east of Gatwick Airport, in Crawley, West Sussex, and is centered at National Grid Reference TQ 299 411. The site is low-lying and generally flat in topography, situated on a largely undeveloped greenfield site. It is an irregular shaped parcel of land that measures approximately 48 ha in size.

At the time of the survey, the site comprised multiple fields of improved and semi-improved grassland, which were bound by a network of hedgerows, ditches and trees. Small areas of semi-natural broadleaved woodland and scrub were also present. The site was bisected by Fernhill Road and bordered by the M23 airport spur to the north, Peeks Brook Lane to the east, the B2037 to the south, and the B2036 to the west.

The wider landscape was dominated by further farmland. Gatwick Airport was located to the west, and the urban fringes of Crawley and Horley were located to the south and north respectively.

2. METHODOLOGIES

2.1 DESK STUDY

An ecological desk study was undertaken to determine the presence of any designated nature conservation sites and protected species in proximity to the site. This involved contacting appropriate statutory and non-statutory organisations which hold ecological data relating to the survey area. Middlemarch Environmental Ltd then assimilated and reviewed the desk study data provided by these organisations.

The consultees for the desk study were:

- Natural England - MAGiC website for statutory conservation sites;
- Sussex Biodiversity Record Centre; and,
- Surrey Biodiversity Information Centre.

The desk study included a search for European statutory nature conservation sites within a 5 km radius of the site (extended to 10 km for any statutory site designated for bats), UK statutory sites within a 2 km radius and non-statutory sites and protected/notable species records within a 1 km radius.

The data collected from the consultees is discussed in Chapter 4. Selected raw data are provided in Appendix 1. In compliance with the terms and conditions relating to its commercial use, the full desk study data is not provided within this report.

The desk study also included a review of relevant local planning policy with regard to biodiversity and nature conservation (see Chapter 3).

2.2 PHASE 1 HABITAT SURVEY

The walkover survey was conducted following the Phase 1 Habitat Survey methodology of the Joint Nature Conservation Committee (JNCC, 2010) and the Institute of Environmental Assessment (IEA, 1995). Phase 1 Habitat Survey is a standard technique for classifying and mapping British habitats. The aim is to provide a record of habitats that are present on site. During the survey, the presence, or potential presence, of protected species was noted.

Whilst every effort is made to notify the client of any plant species listed on Schedule 9 of the Wildlife and Countryside Act (1981, as amended) present on site, it should be noted that this is not a specific survey for these species.

Data recorded during the field survey are discussed in Chapter 5.

3. LEGISLATION AND POLICY

This chapter provides an overview of the framework of legislation and policy which underpins nature conservation and is a material consideration in the planning process in England. The reader should refer to the original legislation for the definitive interpretation.

3.1 GENERAL BIODIVERSITY LEGISLATION AND POLICY

Conservation of Habitats and Species Regulations 2017 (The Habitats Regulations 2017)

The Habitats Regulations 2017 consolidate and update the Habitats Regulations 2010 (as amended). The Habitat Regulations 2017 are the principal means by which the EEC Council Directive 92/43 (The Habitats Directive) as amended is transposed into English and Welsh law.

The Habitats Regulations 2017 place duty upon the relevant authority of government to identify sites which are of importance to the habitats and species listed in Annexes I and II of the Habitats Directive. Those sites which meet the criteria are, in conjunction with the European Commission, designated as Sites of Community Importance, which are subsequently identified as Special Areas of Conservation (SAC) by the European Union member states. The regulations also place a duty upon the government to maintain a register of European protected sites designated as a result of EC Directive 79/409/EEC on the Conservation of Wild Birds (The Birds Directive). These sites are termed Special Protection Areas (SPA) and, in conjunction with SACs, form a network of sites known as Natura 2000. The Habitats Directive introduces for the first time for protected areas, the precautionary principle; that is that projects can only be permitted having ascertained no adverse effect on the integrity of the site. Projects may still be permitted if there are no alternatives, and there are imperative reasons of overriding public interest.

The Habitats Regulations 2017 also provide for the protection of individual species of fauna and flora of European conservation concern listed in Schedules 2 and 5 respectively. Schedule 2 includes species such as otter and great crested newt for which the UK population represents a significant proportion of the total European population. It is an offence to deliberately kill, injure, disturb or trade these species. Schedule 5 plant species are protected from unlawful destruction, uprooting or trade under the regulations.

The Wildlife and Countryside Act (WCA) 1981 (as amended)

The WCA, as amended, consolidates and amends pre-existing national wildlife legislation in order to implement the Bern Convention and the Birds Directive. It complements the Habitat Regulations 2017, offering protection to a wider range of species. The Act also provides for the designation and protection of national conservation sites of value for their floral, faunal or geological features, termed Sites of Special Scientific Interest (SSSIs).

Schedules of the act provide lists of protected species, both flora and fauna, and detail the possible offences that apply to these species.

The Countryside and Rights of Way (CRoW) Act 2000

The CRoW Act, introduced in England and Wales in 2000, amends and strengthens existing wildlife legislation detailed in the WCA. It places a duty on government departments and the National Assembly for Wales to have regard for biodiversity, and provides increased powers for the protection and maintenance of SSSIs. The Act also contains lists of habitats and species (Section 74) for which conservation measures should be promoted, in accordance with the recommendations of the Convention on Biological Diversity (Rio Earth Summit) 1992.

The Natural Environment and Rural Communities (NERC) Act 2006

Section 40 of the NERC Act places a duty upon all local authorities and public bodies in England and Wales to promote and enhance biodiversity in all of their functions. Sections 41 (England) and 42 (Wales) list habitats and species of principal importance to the conservation of biodiversity. These lists superseded Section 74 of the CRoW Act 2000.

The Hedgerow Regulations 1997

The Hedgerow Regulations make provision for the identification of important hedgerows which may not be removed without permission from the Local Planning Authority.

UK Post-2010 Biodiversity Framework

The UK Biodiversity Action Plan (BAP), published in 1994, was the UK Government's response to signing the Convention on Biological Diversity (CBD) at the 1992 Rio Earth Summit. The new UK Post-2010 Biodiversity Framework replaces the previous UK level BAP. The UK Post-2010 Biodiversity Framework covers the period 2011-2020 and forms the UK Government's response to the new strategic plan of the United Nations Convention on Biological Diversity (CBD), published in 2010 at the CBD meeting in Nagoya, Japan. This includes five internationally agreed strategic goals and supporting targets to be achieved by 2020. The five strategic goals agreed were:

- Address the underlying causes of biodiversity loss by mainstreaming biodiversity across government and society;
- Reduce the direct pressures on biodiversity and promote sustainable use;
- To improve the status of biodiversity by safeguarding ecosystems, species and genetic diversity;
- Enhance the benefits to all from biodiversity and ecosystem services; and,
- Enhance implementation through participatory planning, knowledge management and capacity building.

The Framework recognises that most work which was previously carried out under the UK BAP is now focused on the four individual countries of the United Kingdom and Northern Ireland, and delivered through the countries' own strategies. Following the publication of the new Framework the UK BAP partnership no longer operates but many of the tools and resources originally developed under the UK BAP still remain of use and form the basis of much biodiversity work at country level. In England the focus is on delivering the outcomes set out in the Government's 'Biodiversity 2020: a Strategy for England's Wildlife and Ecosystem Services' (DEFRA, 2011). This sets out how the quality of our environment on land and at sea will be improved over the next ten years and follows on from policies contained in the Natural Environment White Paper.

Species and Habitats of Material Consideration for Planning in England

Previous planning policy (and some supporting guidance which is still current, e.g. ODPM Circular 06/2005, now under revision), refers to UK BAP habitats and species as being a material consideration in the planning process. Equally many local plans refer to BAP priority habitats and species. Both remain as material considerations in the planning process but such habitats and species are now described as Species and Habitats of Principal Importance for Conservation in England, or simply priority habitats and priority species under the UK Post-2010 Biodiversity Framework. The list of habitats and species remains unchanged and is still derived from Section 41 list of the Natural Environmental and Rural Communities (NERC) Act 2006. As was previously the case when it was a BAP priority species hen harrier continues to be regarded as a priority species although it does not appear on the Section 41 list.

3.2 NATIONAL PLANNING POLICY FRAMEWORK AND PRACTICE GUIDANCE

In February 2019, the National Planning Policy Framework (NPPF) was updated, replacing the previous framework published in 2012 and revised in 2018. The government circular 06/05: Biodiversity and Geological Conservation - Statutory Obligations and Their Impact within the Planning System, which accompanied PPS9, still remains valid. A presumption towards sustainable development is at the heart of the NPPF. This presumption does not apply however where developments require appropriate assessment under the Birds or Habitats Directives.

Chapter 15, on conserving and enhancing the natural environment, sets out how the planning system should contribute to and enhance the natural and local environment by:

- protecting and enhancing existing sites of biodiversity value;
- minimising impacts on and providing net gains for biodiversity; and,
- establishing coherent ecological networks.

If a proposed development would result in significant harm to the natural environment which cannot be avoided (through the use of an alternative site with less harmful impacts), mitigated or compensated for (as a last resort) then planning permission should be refused. With respect to development on land within or outside of a Site of Special Scientific Interest (SSSI) which is likely to have an adverse effect (either alone or in-combination with other developments) would only be permitted where the benefits of the proposed development clearly outweigh the impacts on the SSSI itself, and the wider network of SSSIs. Development resulting in the loss of deterioration of irreplaceable habitats (such as ancient woodland and ancient or

veteran trees) should be refused unless there are wholly exceptional reasons for the development, and a suitable compensation strategy is provided.

Chapter 15 identifies that development whose primary objective is to conserve or enhance biodiversity should be supported and opportunities to incorporate biodiversity improvements in and around development should be encouraged, especially where this can secure measurable net gains for biodiversity.

Chapter 11, making effective use of the land, sets out how the planning system should promote use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions. Substantial weight should be given to the value of using suitable brownfield land within settlements for homes and other identified needs. Opportunities for achieving net environmental gains, including new habitat creation, are encouraged.

In March 2014 the Department for Communities and Local Government released guidance to support the National Planning Policy Framework (NPPF), known as the National Planning Practice Guidance (NPPG). This has been produced to provide guidance for planners and communities which will help deliver high quality development and sustainable growth in England.

The guidance includes a section entitled 'Natural Environment: Biodiversity, geodiversity and ecosystems and green infrastructure', which was updated in July 2019. This document sets out information with respect to the following:

- the statutory basis for seeking to conserve and enhance biodiversity;
- the local planning authority's requirements for planning for biodiversity;
- what local ecological networks are and how to identify and map them;
- how plan-making bodies identify and safeguard Local Wildlife Sites, including Standard Criteria for Local Wildlife Sites;
- the sources of ecological evidence;
- the legal obligations on local planning authorities and developers regarding statutory designated sites and protected species;
- definition of green infrastructure;
- where biodiversity should be taken into account in preparing a planning application;
- how policy should be applied to avoid, mitigate or compensate for significant harm to biodiversity and how mitigation and compensation measures can be ensured;
- definitions of biodiversity net gain including information on how it can be achieved and assessed; and,
- the consideration of ancient woodlands and veteran trees in planning decisions and how potential impacts can be assessed.

The NPPG July 2019 issue also includes a section entitled 'Appropriate assessment: Guidance on the use of Habitats Regulations Assessment' which provides information in relation to Habitats Regulations Assessment processes, contents and approaches in light of case law. This guidance will be relevant to those projects and plans which have the potential to impact on European Sites and European Offshore Marine Sites identified under the Conservation of Habitats and Species Regulations 2017 (as amended).

3.3 LOCAL PLANNING POLICY – CRAWLEY BOROUGH

Local Plan: Crawley 2030

Crawley's Local Plan, Crawley 2030, was adopted on the 16th December 2015. It forms the council's development plan and sets the planning policies under which development control decisions will be taken. The policies of relevance to ecology are:

Policy ENV1: Green Infrastructure

Crawley's multi-functional green infrastructure network will be conserved and enhanced through the following measures:

- i. Development which protects and enhances green infrastructure will be supported;
- ii. Development proposals should take a positive approach to designing green infrastructure, utilising the council's supplementary planning documents to integrate and enhance the green infrastructure network;

- iii. Proposals which reduce, block or harm the functions of green infrastructure will be required to be adequately justified, and mitigate against any loss or impact or as a last resort compensate to ensure the integrity of the green infrastructure network is maintained;
- iv. The strategic green infrastructure network is afforded the highest protection due to its high value from existing or identified potential multiple functions, for example as recreation, routeways, access to the countryside, wildlife and climate mitigation;
- v. Proposals should maximise the opportunity to maintain and extend green infrastructure links to form a multi-functional network of open space, providing opportunities for walking and cycling, and connecting to the urban/rural fringe and the wider countryside beyond;
- vi. Large proposals will be required to provide new and/or create links to green infrastructure where possible.

Policy ENV2: Biodiversity

All development proposals will be expected to incorporate features to encourage biodiversity where appropriate, and where possible enhance existing features of nature conservation value within and around the development.

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 based on past ecological surveys.

Hierarchy of Biodiversity Sites

To ensure a net gain in biodiversity, the following areas will be conserved and enhanced where possible and the council will support their designation and management:

1. Nationally designated sites:

- Sites of Special Scientific Interest (SSSI)

SSSI will receive the highest level of protection for habitat conservation value in line with national legislation, policy and guidance.

2. National Planning Policy Framework Sites:

- Ancient Woodland, and aged or veteran trees

Planning permission will not be granted for development that results in the loss or deterioration of ancient woodland and aged or veteran trees unless the need for, and benefits of, the development in that location clearly outweigh the loss. A buffer zone between development and ancient woodland will be required in line with Natural England Standing Advice.

3. Locally designated sites, and habitats and species outside designated sites:

- Local Nature Reserves
- Sites of Nature Conservation Importance
- Nature Improvement Areas
- Habitats of Principle Importance identified in S41 of the Natural Environment and Rural Communities Act 2006 or Biodiversity Action Plans
- Biodiversity Opportunity Areas
- Where Protected Species are present
- Where Species of Principal Importance are present, as identified in S41 of the Natural Environment and Rural Communities Act 2006.

Proposals which would result in significant harm to biodiversity will be refused unless:

- i. this can be avoided by locating on an alternative site with less harmful impact; or
- ii. the harm can be adequately mitigated, or, as a last resort, compensated for.

4. DESK STUDY RESULTS

4.1 INTRODUCTION

The data search was carried out in December 2019 by Sussex Biodiversity Record Centre and Surrey Biodiversity Information Centre. All relevant ecological data provided by the consultees was reviewed and the results from these investigations are summarised in Sections 4.2 to 4.4. Selected data are provided in Appendix 1.

4.2 NATURE CONSERVATION SITES

The desk study revealed no statutory sites within the search areas. Non-statutory nature conservation sites located in proximity to the survey area are summarised in Table 4.1.

| Site Name | Designation | Proximity to Survey Area | Description |
|----------------------------|-------------|--------------------------|--|
| Non-statutory Sites | | | |
| Bridges Wood | pSNCI | 290 m east | On the basis of information available at the time, this site has been identified as a potential site of importance as it is considered likely to contain flora or fauna of county or regional importance. However, it has not yet been surveyed to confirm this. |
| The Roughs | SNCI | 370 north-east | Ancient semi-natural woodland and damp, semi-improved grassland. Selected as ancient semi-natural woodland supporting at least 18 ancient woodland indicator species. Fine-leaved water-dropwort <i>Oenanthe aquatica</i> , a species shown as Locally Rare on the Surrey Rare Plant Register, is present. |
| Bridges Fields | pSNCI | 390 m north-east | On the basis of information available at the time, this site has been identified as a potential site of importance as it is considered likely to contain flora or fauna of county or regional importance. However, it has not yet been surveyed to confirm this. |
| Horleyland Wood | LWS | 590 m south-west | This is a good example of an ancient coppice-with-standards Bluebell Wood. Although frequent in West Sussex, this woodland type is virtually confined to Britain, so remaining areas are of considerable importance. The site also includes a recently constructed pond. |
| Kiln Heath | pSNCI | 960 m south-east | On the basis of information available at the time, this site has been identified as a potential site of importance as it is considered likely to contain flora or fauna of county or regional importance. However, it has not yet been surveyed to confirm this. |

Key:

LWS: Local Wildlife Site.

SNCI: Site of Nature Conservation Importance.

pSNCI: Potential Site of Nature Conservation Importance.

Table 4.1: Summary of Nature Conservation Sites

Although no Sites of Special Scientific Interest (SSSIs) are located within a 2 km radius of the survey area, the survey area does fall within a SSSI Impact Risk Zone for Hedgecourt SSSI which is located 4.64 km to the south-east.

The desk study revealed 32 parcels of ancient woodland within a 2 km radius of the survey area. The nearest of these was an unnamed woodland (ID 1476396) located 135 m to the south-west.

4.3 BIODIVERSITY OPPORTUNITY AREA

The survey area forms a part of the ‘Gatwick Woods’ Biodiversity Opportunity Area (BOA). BOAs are a non-statutory landscape-scale designation, designed as a mechanism through which the targets of the Sussex Biodiversity Action Plan (BAP) can be achieved. BOA sites in Sussex are designated by Sussex Biodiversity Partnership and are areas of land where it is considered that the greatest opportunities for habitat creation and restoration lie. The sites were allocated based of a review of existing areas of biodiversity value in Sussex, e.g. BAP habitat types and mapped data. BOAs do not represent a constraint to development activities but indicate where there may be opportunities to make positive changes for biodiversity.

The ‘Gatwick Woods’ BOA covers approximately 133 ha and forms part of the Gatwick Airport landscape. It is designated as it supports areas of woodland. The BOA also contains Horleyland Wood LWS (see Table 4.1).

4.4 PROTECTED / NOTABLE SPECIES

Table 4.2 and the following text provide a summary of protected and notable species records within a 1 km radius of the study area. It should be noted that the absence of records should not be taken as confirmation that a species is absent from the search area.

| Species | No. of Records | Most Recent Record | Proximity of Nearest Record to Study Area | Species of Principal Importance? | Legislation / Conservation Status |
|--|----------------|--------------------|---|----------------------------------|-----------------------------------|
| Mammals – bats | | | | | |
| Common pipistrelle <i>Pipistrellus pipistrellus</i> | 113 | 2017 | 260 m south-west | - | ECH 4, WCA 5, WCA 6 |
| Noctule <i>Nyctalus noctula</i> | 16 | 2016 | 260 m south-west | ✓ | ECH 4, WCA 5, WCA 6 |
| Unidentified bat <i>Chiroptera</i> sp. | 19 | 2016 | 300 m south-west | # | ECH 2 #, ECH 4, WCA 5, WCA 6 |
| Soprano pipistrelle <i>Pipistrellus pygmaeus</i> | 17 | 2016 | 300 m south-west | ✓ | ECH 4, WCA 5, WCA 6 |
| Unidentified Myotis <i>Myotis</i> sp. | 22 | 2014 | 300 m south-west | # | ECH 2 #, ECH 4, WCA 5, WCA 6 |
| Pipistrelle species <i>Pipistrellus</i> sp. | 20 | 2011 | 300 m south-west | # | ECH 4, WCA 5, WCA 6 |
| Long-eared bat species <i>Plecotus</i> sp. | 3 | 2011 | 490 m south-west | # | ECH 4, WCA 5, WCA 6 |
| Brandt's bat <i>Myotis brandtii</i> | 2 | 2011 | 530 m south-west | - | ECH 4, WCA 5, WCA 6 |
| Brown long-eared bat <i>Plecotus auritus</i> | 5 | 2016 | 630 m south-west | ✓ | ECH 4, WCA 5, WCA 6 |
| Daubenton's bat <i>Myotis daubentonii</i> | 1 | 2005 | 630 m south-west | - | ECH 4, WCA 5, WCA 6 |
| Natterer's bat <i>Myotis nattereri</i> | 4 | 2010 | 910 m south-west | - | ECH 4, WCA 5, WCA 6 |
| Barbastelle bat <i>Barbastella barbastellus</i> | 1 | 2004 | Potentially within 1 km* | ✓ | ECH 2, ECH 4, WCA 5, WCA 6 |
| Vesper bat <i>Vespertilionidae</i> sp. | 1 | 2000 | Potentially within 1 km* | # | ECH 2 #, ECH 4, WCA 5, WCA 6 |
| Whiskered bat <i>Myotis mystacinus</i> | 1 | 1992 | Potentially within 1 km* | - | ECH 4, WCA 5, WCA 6 |
| Bechstein's bat <i>Myotis bechsteinii</i> | 1 | 2008 | Potentially within 1 km** | ✓ | ECH 2, ECH 4, WCA 5, WCA 6 |
| Mammals – other | | | | | |
| Dormouse <i>Muscardinus avellanarius</i> | 6 | 2016 | 170 m south-west | ✓ | ECH 4, WCA 5, WCA 6 |
| Hedgehog <i>Erinaceus europaeus</i> | 5 | 2015 | 400 m south | ✓ | WCA 6 |

Table 4.2: Summary of Protected/Notable Species Records Within 1 km of Survey Area (cont)

| Species | No. of Records | Most Recent Record | Proximity of Nearest Record to Study Area | Species of Principal Importance? | Legislation / Conservation Status |
|--|----------------|--------------------|---|----------------------------------|-----------------------------------|
| Amphibians | | | | | |
| Common frog <i>Rana temporaria</i> | 22 | 2017 | 330 m south-west | - | WCA 5 S9(5) |
| Common toad <i>Bufo bufo</i> | 14 | 2017 | 350 m south-west | ✓ | WCA 5 S9(5) |
| Great crested newt <i>Triturus cristatus</i> | 33 | 2019 | 400 m south-west | ✓ | ECH 2, ECH 4, WCA 5 |
| Palmate newt <i>Lissotriton helveticus</i> | 8 | 2017 | 410 m south-west | - | WCA 5 S9(5) |
| Smooth newt <i>Lissotriton vulgaris</i> | 11 | 2017 | 410 m south-west | - | WCA 5 S9(5) |
| Reptiles | | | | | |
| Grass snake <i>Natrix natrix</i> | 79 | 2017 | 310 m south-west | ✓ | WCA 5 S9(1) WCA 5 S9(5) |
| Common lizard <i>Zootoca vivipara</i> | 1 | 2006 | 770 m south-east | ✓ | WCA 5 S9(1) WCA 5 S9(5) |
| Slow worm <i>Anguis fragilis</i> | 2 | 2016 | 780 m south-west | ✓ | WCA 5 S9(1) WCA 5 S9(5) |
| Birds | | | | | |
| Barn owl <i>Tyto alba</i> | 3 | 2018 | 290 m south-west | - | WCA1i |
| Kingfisher <i>Alcedo atthis</i> | 11 | 2017 | 290 m south-west | - | WCA1i |
| Hobby <i>Falco subbuteo</i> | 4 | 2017 | 620 m west | - | WCA1i |
| Red kite <i>Milvus milvus</i> | 4 | 2019 | 630 m south-west | - | WCA1i |
| Little ringed plover <i>Charadrius dubius</i> | 1 | 2004 | 660 m south-west | - | WCA1i |
| Fieldfare <i>Turdus pilaris</i> | 1 | 2008 | Potentially within 1 km* | - | WCA1i |
| Redwing <i>Turdus iliacus</i> | 1 | 2008 | Potentially within 1 km* | - | WCA1i |
| Fish | | | | | |
| Bullhead <i>Cottus gobio</i> | 1 | 2015 | 990 m south-west | - | ECH 2 |
| Invertebrates | | | | | |
| Brown hairstreak butterfly <i>Thecla betulae</i> | 5 | 2018 | 270 m south-west | ✓ | WCA 5 S9(5) |
| White-letter hairstreak butterfly <i>Satyrium w-album</i> | 1 | 1997 | 320 m north-west | ✓ | WCA 5 S9(5) |
| Jersey tiger moth <i>Euplagia quadripunctaria</i> | 1 | 2015 | 630 m south-west | - | ECH 2 |
| Plants | | | | | |
| Bluebell <i>Hyacinthoides non-scripta</i> | 53 | 2016 | On site | - | WCA 8 S13(2) |
| Pennyroyal <i>Mentha pulegium</i> | 3 | 2019 | 620 m west | ✓ | WCA 8 |

Table 4.2 (cont'd): Summary of Protected/Notable Species Records Within 1 km of Survey Area (cont)

Key:

#: Dependent on species.

*: Grid reference provided was four figures only.

**: Grid reference provided was two figures only.

ECH 2: Annex II of the European Communities Council Directive on the Conservation of Natural Habitats and Wild Fauna and Flora. Animal and plant species of community interest whose conservation requires the designation of Special Areas of Conservation.

ECH 4: Annex IV of the European Communities Council Directive on the Conservation of Natural Habitats and Wild Fauna and Flora. Animal and plant species of community interest in need of strict protection.

WCA 1i: Schedule 1 Part 1 of Wildlife and Countryside Act 1981 (as amended). Birds protected by special penalties at all times.

WCA 5: Schedule 5 of Wildlife and Countryside Act 1981 (as amended). Protected animals (other than birds).

WCA 5 S9(1): Schedule 5 Section 9(1) of Wildlife and Countryside Act 1981 (as amended). Protected animals (other than birds). Protection limited to intentional killing, injury or taking.

WCA 5 S9(5): Schedule 5 Section 9(5) of Wildlife and Countryside Act 1981 (as amended). Protected animals (other than birds). Protection limited to selling, offering for sale, processing or transporting for purpose of sale, or advertising for sale, any live or dead animal, or any part of, or anything derived from, such animal.

WCA 6: Schedule 6 of Wildlife and Countryside Act 1981 (as amended). Animals which may not be killed or taken by certain methods.

WCA 8: Schedule 8 of Wildlife and Countryside Act 1981 (as amended). Protected plants and fungi.

WCA 8 S13(2): Schedule 8 Section 13(2) of Wildlife and Countryside Act 1981 (as amended). Protection limited to selling, offering for sale, possessing or transporting for purpose of sale, or advertising for sale, any live or dead plant, or any part of, or anything derived from, such plant.

Species of Principal Importance: Species of Principal Importance for Nature Conservation in England.

Note. This table does not include reference to the Berne Convention (Convention on the Conservation of European Wildlife and Natural Habitats), the Bonn Convention on the Conservation of Migratory Species of Wild Animals or the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES).

Table 4.2 (cont'd): Summary of Protected/Notable Species Records Within 1 km of Survey Area

In addition, the desk study revealed records of the following notable species within 1 km of the survey area:

Birds

Species of Principal Importance

Thirteen bird species, comprising bullfinch *Pyrrhula pyrrhula*, dunnock *Prunella modularis*, hawfinch *Coccothraustes coccothraustes*, herring gull *Larus argentatus*, house sparrow *Passer domesticus*, lapwing *Vanellus vanellus*, lesser spotted woodpecker *Dendrocopos minor*, linnet *Linaria cannabina*, marsh tit *Poecile palustris*, skylark *Alauda arvensis*, song thrush *Turdus philomelos*, starling *Sturnus vulgaris* and yellowhammer *Emberiza citronella*.

Red List

Two bird species, comprising grey wagtail *Motacilla cinerea* and mistle thrush *Turdus viscivorus*,

Amber List

Twelve bird species, including common gull *Larus canus*, house martin *Delichon urbicum*, kestrel *Falco tinnunculus*, lesser black-backed gull *Larus fuscus*, mallard *Anas platyrhynchos*, mute swan *Cygnus olor*, redshank *Tringa tetanus*, redstart *Phoenicurus phoenicurus*, stock dove *Columba oenas*, swift *Apus apus*, tawny owl *Strix aluco* and willow warbler *Phylloscopus trochilus*.

Invertebrates

Records of multiple notable invertebrates, including Araneae (spiders), Coleoptera (beetles), Diptera (flies), Hemiptera (true bugs), Hymenoptera (ants, bees and wasps), Lepidoptera (butterflies and moths), Odonata (dragonflies and damselflies) and Orthoptera (grasshoppers and crickets).

Plants

Species of Principal Importance

One record of eyebright *Euphrasia pseudokerneri*, which is also listed as Endangered on the IUCN Red List.

Sussex Rare Species Inventory

Records of two plants listed on the Sussex Rare Species Inventory, comprising floating club-rush *Eleogiton fluitans* and greater burnet-saxifrage *Pimpinella major*.

Fungi

Records of seven fungi listed on the Sussex Rare Species Inventory, comprising common porecrust *Schizophyllum commune*, false chanterelle *Hygrophoropsis aurantiaca*, leafy brain *Tremella foliacea*, oak toothcrust *Radulomyces molaris*, pipe club *Macrotyphula fistulosa*, rusty crust *Skeletocutis amorphia* and white knight *Tricholoma album*.

4.5 INVASIVE SPECIES

Table 4.3 provides a summary of invasive species records within a 1 km radius of the study area. It should be noted that the absence of records should not be taken as confirmation that a species is absent from the search area.

| Species | No. of Records | Most Recent Record | Proximity of Nearest Record to Study Area | Legislation / Conservation Status |
|--|----------------|--------------------|---|-----------------------------------|
| Himalayan balsam <i>Impatiens glandulifera</i> | 11 | 2017 | On site (south-west) | WCA 9 |
| Least duckweed <i>Lemna minuta</i> | 3 | 2013 | On site (south-west) | INNS |
| Spanish bluebell <i>Hyacinthoides hispanica</i> | 2 | 2005 | On site (south-west) | INNS |
| Cherry laurel <i>Prunus laurocerasus</i> | 11 | 2013 | 170 m south-west | INNS |
| Variegated yellow archangel <i>Lamiastrum galeobdolon</i> subsp. <i>argentatum</i> | 3 | 2013 | 170 m south-west | WCA 9 |
| New Zealand pygmyweed <i>Crassula helmsii</i> | 2 | 2012 | 430 m south-west | WCA 9 |
| Rhododendron <i>Rhododendron ponticum</i> | 9 | 2016 | 480 m south-west | WCA 9 |
| False virginia creeper <i>Parthenocissus inserta</i> | 2 | 2003 | 480 m south-west | WCA 9 |
| Montbretia <i>Crocosmia x crocosmiiflora</i> | 4 | 2014 | 530 m east | WCA 9 |
| Japanese rose <i>Rosa rugosa</i> | 2 | 2014 | 720 m east | WCA 9 |
| Floating pennywort <i>Hydrocotyle ranunculoides</i> | 1 | 2004 | 740 m east | WCA 9 |
| Nuttall's waterweed <i>Elodea nuttallii</i> | 1 | 2016 | Potentially within 1 km* | WCA 9 |
| Hybrid bluebell <i>Hyacinthoides x massartiana</i> | 1 | 2013 | Potentially within 1 km** | INNS |
| Himalayan cotoneaster <i>Cotoneaster simonsii</i> | 1 | 2007 | Potentially within 1 km** | WCA 9 |
| Japanese knotweed <i>Fallopia japonica</i> | 1 | 2005 | Potentially within 1 km** | WCA 9 |
| American skunk-cabbage <i>Lysichiton americanus</i> | 1 | 2004 | Potentially within 1 km* | INNS |
| Winter heliotrope <i>Petasites fragrans</i> | 1 | 2004 | Potentially within 1 km** | INNS |

Key:

*: Grid reference provided was four figures only.

**: Grid reference provided was two figures only.

WCA 9: Schedule 9 of Wildlife and Countryside Act 1981 (as amended). Invasive, non-native, plants and animals.

INNS: Sussex Invasive Non-Native Species.

Table 4.3: Summary of Invasive Species Records Within 1 km of Survey Area

4.6 PREVIOUS SURVEY DATA

Previous ecological surveys have been undertaken on the land to the north-east of Gatwick Airport, West Sussex and north and south of M23 in 2019. The results of these surveys are within the Preliminary Environmental Information Report provided by Your London Gatwick Airport (February 2020). The majority of this land surveyed is outside of the current survey area for these proposed works. Only a small section of the survey area for the previous ecological surveys was Wilky owned land, which is the area of land to the north-west of the site, located directly to the south of the M23 spur road and to the east of Balcombe Road. The rest of the Wilky owned land has not been previously surveyed.

These previous surveys were conducted to inform a Preliminary Environmental Information Report (PEIR) and the results for the Wilky Land: Fields North and South of M23, east of B2036 were provided in February 2020. The following surveys were conducted on the Wilky owned land: Phase 1 Habitat survey, hedgerow survey, breeding bird surveys, reptile surveys, dormouse surveys and badger surveys.

During these surveys conducted on site no hedgerows surveyed comprised important hedgerows. A total of three bird species which qualify as being of interest were confirmed to be breeding within the Wilky owned land: Song Thrush, Bullfinch and Dunnock. No evidence of reptiles, badger or dormouse was identified within this small section of the survey area. A pond located to the north of the M23 spur road was identified as having average habitat suitability score for Great Crested Newts.

5. PHASE 1 HABITAT SURVEY

5.1 INTRODUCTION

The results of the Phase 1 Habitat Survey are presented in the following sections. An annotated Phase 1 Habitat Survey Drawing (Drawing C151186-01-01) is provided in Chapter 8. This drawing illustrates the location and extent of all habitat types recorded on site. Any notable features or features too small to map are detailed using target notes. Photographs taken during the field survey are presented in Chapter 9.

The survey was carried out over two visits conducted on 20th November 2019 and 25th November 2019 by Sophie Moy (Senior Ecological Consultant) and Margarita Smoldareva (Ecological Project Officer). Table 5.1 details the weather conditions at the time of the survey.

| Parameter | Condition | |
|------------------|------------|------------|
| | 20/11/2019 | 25/11/2019 |
| Temperature (°C) | 7 | 12 |
| Cloud (%) | 90 | 100 |
| Wind (Beaufort) | F2 | F0 |
| Precipitation | Nil | Light rain |

Table 5.1: Weather Conditions During Field Survey

5.2 SURVEY CONSTRAINTS AND LIMITATIONS

December is not an optimal time for completing botanical assessments however, given the nature of the habitats present, this was not considered to be a significant constraint to a robust initial site assessment.

Due to the presence of electric fencing and livestock within the fields located in the north-east and north-west of the site, it was considered unsafe to access these fields. Therefore, they were not fully assessed.

5.3 HABITATS

The following habitat types were recorded on site during the field survey:

- Bare ground;
- Dense scrub;
- Dry ditch;
- Ephemeral / short perennial vegetation;
- Fencing;
- Improved grassland;
- Other habitat: earth bund;
- Poor semi-improved grassland;
- Scattered scrub;
- Scattered trees;
- Semi-natural broad-leaved woodland;
- Species-poor hedgerow; and,
- Species-rich hedgerow.

These habitats are described below. They are ordered alphabetically, not in order of ecological importance.

Bare ground

A bare ground access path was located in the north-western corner of the site. It entered the site from the west and crossed the site towards the east. It also branched off and headed south towards some agricultural buildings located off site.

Dense scrub

Small areas of dense scrub were located within the fields (Plate 9.1). These areas were dominated by bramble, with occasional blackthorn *Prunus spinosa*, hawthorn *Crataegus monogyna*, holly *Ilex aquifolium*, ivy *Hedera helix*, thistle *Cirsium* sp. and traveller's-joy *Clematis vitalba*. Within the scrub there was occasional oak and ash saplings.

Dry ditch

A network of ditches ran alongside hedgerows within the site boundary (Plate 9.2). Some of these ditches were inundated with water during the site visit (Plate 9.3). Whilst water is expected to be present in these ditches at times of high rainfall, it is anticipated these ditches are generally dry for the majority of the year.

Ephemeral / short perennial vegetation

This habitat comprised short, patchy plant associations typical of disturbed ground. The vegetation typically lacked a clear dominant species, but consisted of a mixture of low-growing plants, often less than 25 cm in height. Ephemeral / short perennial vegetation was situated in the north-western part of the site. Species included Canadian fleabane *Conyza canadensis*, greater plantain *Plantago major*, hedge mustard *Sisymbrium officinale*, ragwort *Senecio* sp. and thistle.

Fencing

Sections of the site were delineated by wooden, chain-link, barbed wire and heras fencing measuring approximately 1-2 m in height. This habitat was generally clear of vegetation.

Improved grassland

The site was dominated by heavily grazed fields of improved grassland, with only a very limited range of grasses and a few common forbs present, mainly those demanding of nutrients and resistant to grazing (Plate 9.4). Dominant species included Yorkshire fog *Holcus lanatus*, annual meadow-grass *Poa annua*, crested dog's-tail *Cynosurus cristatus*, perennial rye-grass *Lolium perenne*, clover *Trifolium* sp., creeping buttercup *Ranunculus repens*, dandelion *Taraxacum officinale* agg., sorrel *Rumex* sp. and vetch *Vicia* sp., with occasional common nettle *Urtica dioica*, dock *Rumex* sp. and thistle present around the edges of the fields. Many of the fields were damp at the time of the survey. In these damper areas, soft rush *Juncus effusus* was present (Plate 9.5).

Other habitat: earth bund

A landscaped bund at Rivington Farm abuts the southern part of the survey area (Plate 9.6). The bund generally comprised piles of earth devoid of vegetation, with occasional scrub and ephemeral species such as buddleia and thistle. A large log pile was located immediately to the north of this bund, situated on the western edge of the woodland.

Poor semi-improved grassland

Areas of poor semi-improved grassland were located in the north-western and southern parts of the site. This habitat was not as heavily affected by grazing as the improved grassland fields (Plate 9.7). There was a low sward which included cock's-foot *Dactylis glomerata*, Yorkshire fog, crested dog's-tail, meadow foxtail *Alopecurus pratensis*, yarrow *Achillea millefolium*, creeping buttercup, daisy *Bellis perennis*, dandelion, greater plantain, pineappleweed *Matricaria discoidea*, red clover *Trifolium pratense*, ribwort plantain *Plantago lanceolata*, cut-leaved cranesbill *Geranium dissectum*, cinquefoil *Potentilla reptans*, stitchwort *Stellaria* sp. and shepherd's purse *Capsella bursa-pastoris*. Bristly oxtongue *Picris echioides*, broadleaved dock *Rumex obtusifolius* and redshank *Persicaria maculosa* were also present at the fringes of the fields. Many of the fields were damp at the time of the survey. In these damper areas, soft rush was present.

Scattered scrub

Scattered scrub was encroaching in areas of poor semi-improved grassland which had not been grazed, most notably in the north-western part of the site. Dominant species included bramble *Rubus fruticosus* agg. and hawthorn with occasional non-scrub species such as burdock *Arctium* sp., common nettle, fat-hen *Chenopodium album*, gorse *Ulex europaeus*, mallow *Malva sylvestris*, teasel *Dipsacus* sp., thistle, cleavers *Galium aparine* and traveller's-joy.

Scattered trees

Individual scattered trees were located within the site boundary (Plate 9.8). Five mature oaks were situated in the southern part of site, to the west of Rivington Farm, and two mature oaks were located within the eastern field, to the south of Fernhill Road. These trees were considered to provide potential features that

could be exploited by fauna including bats and birds (Plate 9.9). Other species included beech *Fagus sylvatica*, hawthorn, silver birch *Betula pendula* and sycamore *Acer pseudoplatanus*. In general, these trees were semi-mature to mature in age, measured between 5-10 m in height and were in good condition.

Semi-natural broad-leaved woodland

Two small areas of semi-natural broad-leaved woodland were present on site (Plate 9.10). The first was a linear area of woodland located between two fields to the south of Fernhill Road. This woodland comprised hawthorn, horse chestnut *Aesculus hippocastanum*, oak *Quercus* sp. and sycamore, with bramble and common nettle dominating the ground flora. The second woodland was located along the southern boundary adjacent to the B2037. This woodland comprised horse chestnut, oak, silver birch and sycamore, with an understorey of blackthorn, hazel *Corylus avellana* and holly.

Patches of cotoneaster *Cotoneaster* sp. were growing within the northern extent of the first woodland and along its western edge.

Species-poor hedgerow

A Hedgerow Regulations (1997) Assessment has recently been carried out at the site, the findings of which are detailed in Report RT-MME-151186-02. The majority of the hedgerows on site were identified as being species-poor due to their limited diversity of native woody species (Plate 9.11). For further details, please refer to Report RT-MME-151186-02.

Species-rich hedgerow

A Hedgerow Regulations (1997) Assessment has recently been carried out at the site, the findings of which are detailed in Report RT-MME-151186-02. A small number of species-rich hedgerows were present on site. For further details, please refer to Report RT-MME-151186-02.

5.4 FAUNA

During the survey field signs of faunal species were recorded. The time of year at which the survey is undertaken will affect species or field signs directly recorded during the survey.

Birds

The following bird species were observed on site during the field survey: blackbird *Turdus merula*, great tit *Parus major*, robin *Erithacus rubecula* and woodpigeon *Columba palumbus*.

Mammals

Small mammal burrows were present alongside one of the hedgerows and ditches in the southern half of the site. in addition, rabbit droppings were present within the woodland on site.

5.5 INVASIVE PLANT SPECIES

Patches of cotoneaster were growing within the northern extent of the woodland and along the western edge at the southern end of the woodland. This cotoneaster could not be identified to species level, and therefore it is possible that it might be a hybrid. Many cotoneaster species and their hybrids are considered to be invasive under Schedule 9 of the Wildlife and Countryside Act 1981 (as amended).

6. DISCUSSIONS AND CONCLUSIONS

6.1 SUMMARY OF PROPOSALS

The site is identified in the Crawley Local Plan as being part of an ‘Area of Search’ for strategic employment land and is also part of an area safeguarded for future airport use. Savills are currently promoting the site for future development, although at the time of writing no detailed development proposals have been produced.

The following discussion identifies potential biodiversity opportunities and constraints that could apply to any future development of the site. The discussion, conclusions and recommendations should be reviewed as design proposals for the site evolve.

6.2 NATURE CONSERVATION SITES

The desk study exercise identified no European statutory sites within 5 km of the survey area, no UK statutory sites within 2 km, 32 ancient woodland sites within 2 km, and five non-statutory sites within 1 km. The site is not located within 10 km of a statutory site designated for bats. The significance of these sites to the proposed development is discussed below.

UK Statutory Sites

No Sites of Special Scientific Interest (SSSIs) are located within a 2 km radius of the survey area, however the survey area does fall within a SSSI Impact Risk Zone for Hedgecourt SSSI which is located 4.64 km to the south-east. If the proposals for the site are for airport use, then the development will fall within the ‘Infrastructure’ risk category as detailed in Appendix 1, which relates to airports, helipads and other aviation proposals. In order to establish the likely risks to this SSSI, a recommendation is made in Section 7.1.

Ancient Woodland Sites

The desk study revealed 32 parcels of ancient woodland within a 2 km radius of the survey area. The nearest of these was an unnamed woodland (ID 1476396) located 135 m to the south-west. Whilst no direct impacts on these ancient woodland sites are anticipated as a result of future development at Gatwick Green, there is the potential for indirect impacts by reducing the amount of semi-natural habitats next to the ancient woodland, increasing the amount of pollution (including, dust, light, air and water), and increasing disturbance from additional traffic and visitors. As no detailed development proposals have been produced to date, the ancient woodland and veteran trees standing advice (Natural England and Forestry Commission, 2018) should be consulted in order to avoid negative effects on ancient woodland sites. A recommendation is made in Section 7.1.

Non-Statutory Sites

The desk study revealed five non-statutory sites within a 1 km radius of the survey area. The nearest of these was Bridges Wood, which is designated as a Potential Site of Nature Conservation Importance (pSNCI) and is located 290 m to the east. Whilst no direct impacts on these non-statutory sites are anticipated as a result of future development at Gatwick Green, there is the potential for indirect impacts by reducing the amount of semi-natural habitats next to the sites, increasing the amount of pollution (including, dust, light, air and water), and increasing disturbance from additional traffic and visitors. As no detailed development proposals have been produced to date, the Local Planning Authority should be consulted in order to avoid negative effects on non-statutory sites. A recommendation is made in Section 7.1.

6.3 HABITATS

The ecological importance of the habitats present on site is determined by their presence on the list of Habitats of Principal Importance in England and on the Local BAP. It also takes into account the intrinsic value of the habitat. Those habitats which are considered to be of intrinsic importance and have the potential to be impacted by the site proposals are highlighted as notable considerations.

A discussion of the implications of the site proposals with regard to the habitats present on site is provided in the text below. A separate discussion of the value of the habitats on site to protected or notable species is provided in Section 6.4.

Ditches

The site currently supports a network of field boundary ditches, which are considered to be of intrinsic value as they contribute to the permeability of the site to wildlife. It is understood that any future development of the site will require the provision of drainage features as part of a Sustainable Urban Drainage System (SUDS) for the scheme, however it is not known whether the existing ditches will be retained. Recommendations regarding the retention or reinstatement of ditch habitats are made in Section 7.2.

Hedgerows

'Hedgerows' are a Habitat of Principal Importance for Nature Conservation in England if they measure over 20 m in length and less than 5 m in width, consist predominantly of at least one woody UK native species, and any gaps measure less than 5 m in width. The hawthorn-dominated hedgerows on site fulfill these criteria, however the Leyland cypress hedgerows do not as they comprise a non-native species. Nevertheless, all of the hedgerows on site are of intrinsic value as they provide habitat connectivity within the survey area.

Any net loss of hedgerow resource on site has the potential to adversely impact on the permeability of the site to wildlife, and also the connectivity of the site to other notable habitat areas outside of the survey area but within the wider 'Gatwick Woods' BOA. It is understood, however, that future design aspirations for any development will be informed by the need to maintain features of biodiversity value, including maintaining a network of hedgerow features. Recommendations regarding the retention, protection and enhancement of the existing hedgerow network are made in Section 7.2. It is also recommended that the site is subject to a Hedgerow Regulations (1997) survey to allow any 'important' hedgerow features to be identified.

Scattered trees

The mature and semi-mature trees on site are of intrinsic value as they cannot be easily replaced in the short to medium term. Any net loss of scattered trees as a result of future development could have an adverse impact on local biodiversity. Recommendations regarding the retention, protection and enhancement of the scattered tree resource on site are made in Section 7.2.

Semi-natural broad-leaved woodland

The survey area supports small pockets of semi-natural broad-leaved woodland. 'Lowland mixed deciduous woodland' is a Habitat of Principal Importance for Nature Conservation in England, and woodland is also listed as a reason for the designation of the 'Gatwick Woods' BOA. This habitat type is of intrinsic value as it is not readily replaced if lost or damaged.

Any future development of the site has the potential to cause the loss, damage or fragmentation of areas of existing woodland habitat; however, it is understood that future design aspirations for any development will be informed by the need to maintain features of biodiversity value. Recommendations regarding the retention, protection and enhancement of woodland habitats are made in Section 7.2.

Remaining habitats

The remainder of the site is dominated by grazed improved pasture and other habitat types that are generally well represented in the local area and easily replicated if lost to future development.

Habitats considered to be of relevance to any future development of the site are summarised in Table 6.1.

| Habitat Type | Habitat of Principal Importance? | Summary of Potential Impacts |
|------------------------------------|----------------------------------|---|
| Ditches | - | Habitat loss, degradation, fragmentation. |
| Hedgerows | # | Habitat loss, damage, fragmentation. |
| Scattered trees | - | Habitat loss, damage. |
| Semi-natural broad-leaved woodland | ✓ | Habitat loss, damage, fragmentation. |

Key:
#: Dependent on hedgerow.

Table 6.1: Summary of Potential Impacts on Notable Habitats

6.4 PROTECTED/NOTABLE SPECIES

The following paragraphs consider the likely impact of the site proposals on protected or notable species. This is based on those species highlighted in the desk study exercise (Chapter 4) and other species for which potentially suitable habitat occurs within or adjacent to the survey area.

Mammals – bats

The desk study revealed records of ten species of bat, as well as records of five unidentified species of bat, within a 1 km radius of the survey area. The nearest records were of common pipistrelle and noctule located 260 m to the south-west. Although the majority of the trees on site were observed to be in good condition, the woodland areas and the scattered mature oaks in the southern region of the site all provided potential features that could be exploited by roosting bats. In addition, the network of hedgerows and ditches, the woodland areas and the scattered trees are all likely to provide features of potential value to foraging and commuting bats, especially as much of the site is currently unlit. The site also has connectivity to areas of habitat beyond the boundaries that are likely to be of value to bats, particularly mature woodland areas.

Any future development of the site has the potential to impact upon bats through the loss of potential roosting habitat and loss or fragmentation of foraging and commuting habitats. Indirect fragmentation as a result of inappropriate lighting could also be detrimental to bat species. It is considered that, with appropriate design, the value of the site to bat species could be maintained despite any future development. The detailed design for the site should be informed by bat surveys, to include both daytime and dusk/dawn assessments for bat roosts and overall activity surveys to assess the usage of the site by bats. The results of these surveys should inform the site layout and identify any mitigation that may be required. A recommendation is made in Section 7.3.

Mammals – other

Badger

The desk study did not provide any records of badger within a 1 km radius of the survey area. During the 2015 Preliminary Ecological Assessment, a potential historical badger sett was identified within an adjacent area of woodland located to the north of Fernhill Road. Whilst the site itself is mostly unsuitable for sett creation due to its predominantly flat topography, micro topographical changes (i.e. smaller areas of spoil heaps, slopes and landscaped bunds) may provide opportunities for the excavation of setts, particularly within wooded areas. In addition, it is considered that the mosaic of habitats on site provide a suitable foraging resource for badgers. No evidence of badger activity was recorded on site during the 2019 survey.

Any future development of the site could impact upon badgers by causing loss of or disturbance to setts, and also through loss or fragmentation of foraging areas. It is understood that the future design aspirations propose to retain features of greatest ecological value, including the adjacent area of woodland containing the potential historical badger sett. Recommendations regarding the retention and protection of areas of badger habitat are made in Section 7.3. General recommendations regarding the protection of terrestrial mammals during the construction phase of any development works are also made in Section 7.3.

Brown hare

The desk study did not provide any records of brown hare within a 1 km radius of the survey area. The woodland edges, hedgerows and farmland on site provide potential habitat for brown hare. It is understood that any future development on site will reduce the availability of suitable habitat for brown hare. Suitable farmland habitat is, however, widespread in the local area, and therefore it is not considered that development would have a significant impact on the favourable conservation status of this species. A recommendation regarding the protection of terrestrial mammals is made in Section 7.3.

Dormouse

The desk study revealed six records of dormouse within a 1 km radius of the survey area, the nearest of which was located 170 m to the south-west. The hedgerows on site are generally species-poor, with a low diversity of native woody species and limited hedgerow bottom flora. However, the network of these habitats, along with small areas of semi-natural woodland, may provide suitable habitat and food sources for dormouse. More suitable habitat (e.g. pockets of woodland and further hedgerows) is located in close proximity to the site and habitat connectivity in the local area is generally good, although the site is surrounded by roads which could provide barriers to dormouse dispersal.

Overall the potential for dormouse to occur within the site cannot be discounted, although the level of risk is considered to be low. Any development of the site could impact upon dormouse, if present, as a result of habitat loss and fragmentation, although as detailed above it is understood that future design aspirations propose to retain a network of green connectivity through the site. Prior to the detailed design of a development layout for the site, it is recommended that a survey for evidence of this species be undertaken. The results of this survey will allow potential impacts to be assessed, and any mitigation required to be designed. A recommendation is made in Section 7.3.

Harvest mouse

The desk study did not provide any records of harvest mouse within a 1 km radius of the survey area. The woodland edges and hedgerows on site provide potentially suitable habitat for harvest mouse, and therefore the future development of the site could impact this species through habitat loss and fragmentation. By retaining areas of key habitat and ensuring a strong green network through the site, however, it should be possible to ensure that the favourable conservation status of this species, if present, is maintained. Recommendations regarding habitat retention and protection are made in Section 7.2.

Hedgehog

The desk study provided four records of hedgehog within a 1 km radius of the survey area, the nearest of which was located 400 m to the south. The woodland edges, hedgerows and scrub provide good quality habitat for hedgehog. Therefore, it is considered that the loss of areas of habitat to future development could have an adverse impact on this species. It is understood, however, that the future design aspirations propose to retain valuable habitat features, and as such it should be possible to ensure that the site remains of value to hedgehogs during any future development. Recommendations regarding the retention of habitats are made in Section 7.2, and a recommendation regarding the protection of terrestrial mammals is made in Section 7.3.

Otter and water vole

The desk study did not provide any records of otter or water vole within a 1 km radius of the survey area. Whilst there is a network of ditches across the site, not all of these contained water at the time of the survey, and it is anticipated that the majority temporarily dry out. Furthermore, the ditches did not contain any marginal vegetation or provide any feeding opportunities for either otter or water vole. Reference to Ordnance Survey mapped data indicates that the site is isolated from watercourses that are likely to support these species, and therefore neither are considered likely to occur on site. No recommendations are made with regard to either species.

Amphibians

The desk study revealed 33 records of great crested newt within a 1 km radius of the survey area, the nearest of which was located 400 m to the south-west. There were also multiple records of common frog, common toad, palmate newt and smooth newt within 1 km of the survey area. There are no ponds on site, although the site does support a network of drainage ditches that could provide potential breeding habitat for amphibians. Reference to Ordnance Survey mapped data indicates the presence of a small number of ponds within a 500 m radius of the site, although some of these are fragmented from the site by the local motorway network and are therefore unlikely to be of significance. The site largely offers little habitat for amphibians during the terrestrial phase of their annual cycle; however, suitable terrestrial habitat is present in the form of the boundary hedgerow network, woodland areas and scrub.

Any future development of the site has the potential to have an adverse impact on amphibians; however, there is the opportunity to ensure the long-term provision of suitable habitat for amphibians. Prior to the detailed design of a development layout for the site, further survey work will be required to allow the status of amphibians on site to be assessed and to allow the extent of any impacts to be determined and mitigation to be incorporated into the design. A recommendation is made in Section 7.3.

Reptiles

The desk study revealed multiple records of common lizard, grass snake and slow worm within a 1 km radius of the survey area, the nearest of which was grass snake located 310 m to the south-west. The site is largely unsuitable for reptiles as it is dominated by grazed pasture. However, in the northern part of the site (i.e. where the fields are less heavily grazed, the semi-improved grassland has a longer sward and there are sections of scrub) the habitat is more suitable for reptiles.

Any development of these areas could adversely impact on any reptiles present through direct harm during construction and habitat loss/fragmentation. Future development could, however, have a favourable impact on local reptile populations through creation of new areas of higher quality habitat. Prior to the detailed design of a development layout for the site, a targeted survey of areas of suitable reptile habitat should be undertaken to assess the status of this species group on site, and to inform any mitigation that may be required. A recommendation is made in Section 7.3.

Birds

The desk study revealed records of multiple bird species within a 1 km radius of the site, including protected species such as hobby and notable species such as dunnock and house sparrow. The woodland, trees, hedgerow and scrub on site provide suitable nesting habitat, as well as foraging resources, for a range of bird species. Any future development of the site has the potential to impact upon the availability of nesting and wintering habitat for bird species; however, conversely the development also has the potential to retain existing features of potential value and to provide additional bird habitat. Prior to the detailed design of a development layout for the site, breeding and wintering bird surveys should be undertaken to allow the existing value of the site to birds to be assessed. The results of this survey work should inform the design of any mitigation required. A recommendation is made in Section 7.3. A recommendation is also made regarding the avoidance of disturbance to nesting birds through appropriate timing of works.

Fish

The desk study revealed one record of bullhead within a 1 km radius of the survey area; this was located 990 m to the south-west. Whilst there is a network of ditches across the site, not all of these contained water at the time of the survey, and it is anticipated that the majority temporarily dry out. Reference to Ordnance Survey mapped data indicates that the site is isolated from watercourses that are likely to support fish, and therefore fish are considered unlikely to occur on site. No recommendations are made with regard to fish.

Invertebrates

The desk study revealed records of numerous terrestrial invertebrate species within a 1 km radius of the survey area. This included several butterflies and moths that are listed as Species of Principal Importance. Woodland, ephemeral/short perennial vegetation and areas of semi-improved grassland and scrub are likely to be of value to a range of invertebrates, and the site could feasibly support small heath butterfly. However, the majority of the site is likely to be of low value to invertebrate species.

Overall it is considered that any development of the site should not have an adverse impact on local invertebrate populations provided that existing habitat features of value are retained and areas of new habitat are designed to be of value to invertebrates. Recommendations regarding habitat retention and enhancement are provided in Section 7.2.

Plants

The desk study revealed records of six protected/notable plant species within a 1 km radius of the survey area. Bluebell is protected from sale only and as such, it is not a notable consideration in relation to the proposed development. The current survey was undertaken in November, which is outside of the peak season for recording botanical diversity. The improved grassland habitat is considered highly unlikely to support notable plant species. Therefore, provided that woodland areas and hedgerows are retained and enhanced, no impacts on notable plant species are anticipated. Future development has the potential to improve botanical diversity through creation of diverse native habitats, and habitat recommendations are made in Section 7.2.

Fungi

The desk study revealed records of three notable fungi species within a 1 km radius of the site. No notable fungi were recorded on site, although due to the timing of the survey not all fungal species would have been apparent. The majority of the site is likely to be of negligible value to fungi. Therefore, provided that the woodland areas on site are maintained, it is considered that any future development is unlikely to be of detriment to local populations of fungi.

Other Species

The following protected species are not considered to be material considerations due to the lack of desk study records and absence of suitable habitats within the development site and its surroundings:

- Pine marten *Martes martes*;
- Polecat *Mustela putorius*;
- Red squirrel *Sciurus vulgaris*; and,
- Notable aquatic invertebrates including white-clawed crayfish *Austropotamobius pallipes*.

Summary

Species considered to be of relevance to the proposed development are summarised in Table 6.2.

| Species / Species Group | Species of Principal Importance? | Summary of Potential Impacts |
|-------------------------|----------------------------------|---|
| Bats | # | Potential loss of suitable roosting and foraging/commuting habitat, harm/injury, habitat fragmentation as a result of habitat removal and increased lighting. |
| Badger | - | Potential loss of suitable sett building and foraging/commuting habitat, harm/injury, habitat fragmentation as a result of habitat removal. |
| Brown hare | ✓ | Potential loss of suitable refuge and foraging/commuting habitat, harm/injury, habitat fragmentation as a result of habitat removal. |
| Dormouse | ✓ | Potential loss of suitable refuge and foraging/commuting habitat, harm/injury, habitat fragmentation as a result of habitat removal. |
| Harvest mouse | ✓ | Potential loss of suitable refuge and foraging/commuting habitat, harm/injury, habitat fragmentation as a result of habitat removal. |
| Hedgehog | ✓ | Potential loss of suitable refuge and foraging/commuting habitat, harm/injury, habitat fragmentation as a result of habitat removal. |
| Amphibians | # | Potential loss of suitable terrestrial habitat, harm/injury, habitat fragmentation as a result of habitat removal. |
| Reptiles | ✓ | Potential loss of suitable habitat (e.g. refuge, basking, foraging, commuting), harm/injury, habitat fragmentation as a result of habitat removal. |
| Birds | # | Potential loss of suitable nesting and foraging habitat, harm/injury, disturbance. |

Key:
#: Dependent on species.

Table 6.2: Summary of Potential Impacts on Notable Species

6.5 INVASIVE PLANT SPECIES

The desk study revealed records of multiple invasive plant species within a 1 km radius of the survey area, the nearest of which were located on site (records of Himalayan balsam, least duckweed and Spanish bluebell were located along the ditch/hedgerow in the south-western part of the site which extends from the earth bund to the B2036). None of these species were recorded on site during the survey. However, the current survey was undertaken in November, which is outside of the peak season for recording botanical diversity. An unidentified cotoneaster species was recorded within the woodland on site. This cotoneaster could not be identified to species level, and therefore it is possible that it might be a hybrid. Many cotoneaster species and their hybrids are considered to be invasive under Schedule 9 of the Wildlife and Countryside Act 1981 (as amended).

Any future development of the site has the potential to cause invasive plant species to spread. Prior to the detailed design of a development layout for the site, further survey work will be required to allow the status of invasive plants on site to be assessed and to allow the extent of eradication to be determined. A recommendation for a walkover survey during the spring/summer to identify invasive plant species is made in Section 7.4. There is also a recommendation for a method statement to ensure that any development does not cause invasive plant species to grow or spread.

6.6 GATWICK WOODS BIODIVERSITY OPPORTUNITY AREA

As highlighted in Section 4.3, the survey area forms part of the 'Gatwick Woods' BOA, although it is noted that the most ecologically valuable features of the BOA (e.g. Horleyland Wood and other ancient woodland areas) are located outside of the survey area. The most notable habitats within the survey area are the

broadleaved woodland, hedgerows, scattered trees and ditches, all of which make the site permeable to wildlife despite the dominance of low-value improved grassland habitat. The area surrounding the site also has good habitat connectivity despite the presence of a network of major roads and the nearby Gatwick Airport.

The BOA designation provides a non-statutory mechanism for contributing towards local BAP habitat and species targets, although it is stated in the explanatory text provided on the Sussex Biodiversity Partnership website (<http://www.biodiversitysussex.org.uk/landscapes/>) that designation as a BOA does not represent a constraint to development. It is clear, therefore, that the opportunities and constraints presented by the future development aspirations for the site are a key driver in designing biodiversity enhancement contributions for the survey area. As described in Section 1.1 Savills are promoting the land as a site for development, and the recently submitted Crawley Local Plan (Crawley 2030) identifies the site as part of an 'Area of Search' for a strategic employment site. The land is also part of an area safeguarded for future airport use. The following constraints to biodiversity enhancement have therefore been identified:

- The need to deliver a strategic employment site within the land limits the area of the site that is available for achieving biodiversity gain.
- The future safeguarding of the site for airport use further limits the area available for achieving biodiversity gain.
- The proximity of the site to Gatwick Airport means that aerodrome safeguarding must be taken into account when considering biodiversity enhancement proposals for the site. The need to avoid increasing the risk of bird strike with aircraft means that the creation of large expanses of bird-attracting habitat such as woodland, open water and reedbed should be avoided.

Despite these constraints, the future development of the site also presents opportunities for biodiversity enhancement. These include:

- Retention and protection of existing features of biodiversity value, including the woodland, hedgerows and scattered trees.
- Enhancement of the existing hedgerow network on site through new native species planting, in order to ensure the site remains permeable to wildlife and continues to provide connectivity to areas of greenspace in the local area.
- Creation of pockets of greenspace within the development to provide 'stepping stones' for wildlife. These should include native habitat types of local biodiversity value, including wildflower rich grassland, native trees and shrubs and native orchard planting.
- Implementation of a SUDS scheme, comprising features designed to minimise bird strike risk. Low-risk features of biodiversity value include provision of a network of drainage swales (either retaining or replacing the existing ditch network), creation of small ponds or scrapes designed to be of wildlife value but not large enough to attract significant groups of birds, and design of any culverts to include ledges to allow the passage of wildlife.
- Design of a wildlife-friendly lighting scheme for any development to ensure that the site remains permeable to nocturnal fauna such as bats. This may include, for example, the use of low-level and directional lighting.
- Implementation of a long term programme of habitat management to ensure that the value of retained and newly created habitats is maximised in the medium to long term.
- Provision of a programme of signage along footpaths within the development to communicate the ecological value of habitat features and contribute to education and community engagement targets.

It is considered that, despite the constraints presented by the proposed allocation of the site for employment use and proximity to Gatwick Airport, there are still a wide range of achievable biodiversity contributions that can be included within a well-designed development scheme and can provide a positive contribution towards national and local biodiversity targets.

The site and habitat recommendations made in Chapter 6 are informed by the BOA designation and need to provide a positive biodiversity contribution. Chapter 6 also includes recommendations about additional ecological survey and assessment works that will be required to inform a future planning application for development.

7. RECOMMENDATIONS

All recommendations provided in this section are based on Middlemarch Environmental Ltd's current understanding of the site proposals, correct at the time the report was compiled. Should the proposals alter, the conclusions and recommendations made in the report should be reviewed to ensure that they remain appropriate.

The ecological mitigation hierarchy should be applied when considering development which may have a significant effect on biodiversity. The ecological mitigation hierarchy, as set out in the National Planning Policy Framework (NPPF), and the National Planning Practice Guidance (NPPG) should follow these principles:

- **Avoidance** – development should be designed to avoid significant harm to valuable wildlife habitats and species.
- **Mitigation** – where significant harm cannot be wholly or partially avoided, it should be minimised by design or through the use of effective mitigation measures.
- **Compensation** – where, despite whatever mitigation would be effective, there would still be significant residual harm, as a last resort, compensation should be used to provide an equivalent value of biodiversity.

7.1 NATURE CONSERVATION SITES

The following recommendations are made regarding nature conservation sites:

- R1** **SSSI:** The site lies within a SSSI Risk Impact Zone for Hedgecourt SSSI. SSSI Impact Zones are utilised by Local Planning Authorities to assess planning applications for likely impacts on SSSIs. As such the Local Planning Authority and/or Natural England should be consulted prior to any works commencing.
- R2** **Ancient Woodland:** As no detailed development proposals have been produced to date, the ancient woodland and veteran trees standing advice (Natural England and Forestry Commission, 2018) should be consulted in order to avoid negative effects on local ancient woodland sites.
- R3** **Non-Statutory Sites:** The proposed works could potentially directly or indirectly impact upon several non-statutory conservation sites. As such, the Local Planning Authority ecologist and / or the local Wildlife Trust should be consulted prior to any works commencing to determine how works may proceed without adversely impacting these sites.

7.2 HABITATS

The following recommendations are made regarding the habitats present on site:

- R4** **Biodiversity Enhancement Opportunities:** In order to provide a contribution towards local biodiversity targets for the 'Gatwick Green' BOA, and in accordance with the provision of Chapter 15 of the National Planning Policy Framework (Conserving and Enhancing the Natural Environment) and Local Planning Policy, the proposed development should seek to:
- Retain and protect existing features of biodiversity value on site, specifically woodland, hedgerows and scattered trees.
 - Enhance the existing hedgerow network in order to provide a strong, coherent green network through the site. New native species hedgerow planting should be incorporated into any development design.
 - Retain existing ditch features or replace ditches with drainage swales as part of a SUDS for the site. Any SUDS should be designed to be of wildlife value, including native species planting and creation of small scrapes and ponds (if possible within aerodrome safeguarding restrictions).
 - Create pockets of greenspace within the development supporting a mosaic of notable habitat types including wildflower grassland, native tree planting and native orchard planting.
 - Maximise the opportunity to include additional habitat creation features, such as bird boxes, bat boxes and deadwood piles, within any soft landscaping proposed.

- Ensure that any lighting strategy for the site is designed sensitively so that the site remains permeable to nocturnal species, particularly bats.
- Produce a Landscape and Ecological Management Plan (LEMP) detailing medium and long-term site management and monitoring proposals to ensure that the site continues to be of value to biodiversity.
- Implement a programme of signage/interpretation boards to communicate the ecological value and sensitivity of various habitat types and receptors, to provide a positive contribution to education and community engagement.

R5 Habitat Retention and Protection: The development proposals should be designed (where feasible) to allow for the retention of existing notable habitats including woodland, trees, hedgerows and ditches. Protection measures comprise:

- Woodland/Trees/Hedgerows: Any woodland/trees/hedgerows on or overhanging the site, which are retained as a part of any proposed works should be protected in accordance with British Standard 5837: 2012 "Trees in relation to design, demolition and construction - recommendations". Protection should be installed on site prior to the commencement of any works on site. If retention is not possible, appropriate replacement planting should be incorporated into the soft landscape scheme in accordance with the ecological mitigation hierarchy. Only native and/or wildlife attracting species should be planted.
- Ditches: Environment Agency Pollution Prevention Guidelines should be adhered to throughout the works. Although formerly withdrawn in December 2015, the guidelines provide a framework for the design of working practices to avoid pollution and siltation. PPG5 (Environment Agency et al, 2007), relating to works and maintenance in or near water, is considered to be of relevance to the proposed project.

R6 Lighting: In accordance with best practice guidance relating to lighting and biodiversity (Miles et al, 2018; Gunnell et al, 2012), any new lighting should be carefully designed to minimise potential disturbance and fragmentation impacts on sensitive receptors, such as bat species. Examples of good practice include:

- Avoiding the installation of new lighting in proximity to key ecological features, such as hedgerows and woodland edges.
- Using modern LED fittings rather than metal halide or sodium fittings, as modern LEDs emit negligible UV radiation.
- The use of directional lighting to reduce light spill, e.g. by installing bespoke fittings or using hoods or shields. For example, downlighting can be used to illuminate features such as footpaths whilst reducing the horizontal and vertical spill of light.
- Where the use of bollard lighting is proposed, columns should be designed to reduce horizontal light spill.
- Implementing controls to ensure lighting is only active when needed, e.g. the use of timers or motion sensors.
- Use of floor surface materials with low reflective quality. This will ensure that bats using the site and surrounding area are not affected by reflected illumination.
- For internal lights, recessed light fittings cause significantly less glare than pendant type fittings. The use of low-glare glass may also be appropriate where internal lighting has the potential to influence sensitive ecological receptors.

7.3 PROTECTED / NOTABLE SPECIES

To ensure compliance with wildlife legislation and relevant planning policy, the following recommendations are made:

R7 Additional Survey Work: In order to provide an assessment of the ecological impacts of any future development of the site, and to inform the design of any development layout, the following additional survey works are recommended prior to a planning application being submitted for the site:

- Great Crested Newt Habitat Suitability Index Assessment.
- Breeding Bird Survey.
- Wintering Bird Survey.
- Badger Survey.

- Bat Roost Surveys (including a Preliminary Ground Level Bat Roost Assessment of Trees, and Dusk Emergence and Dawn Re-Entry Surveys if required).
- Bat Activity Surveys (including manual and automated surveys).
- Dormouse Survey (to include habitat assessment, nut search and full presence/absence survey if required).
- Reptile Survey.

All further ecological surveys should be undertaken in accordance with best practice methodologies, during the appropriate survey windows.

- R8 Nesting Birds:** Any vegetation clearance required as part of future development activities should be undertaken outside the nesting bird season. The nesting bird season is weather dependent but generally extends between March and September inclusive (peak period March-August). If this is not possible then any vegetation to be removed or disturbed should be checked by an experienced ecologist for nesting birds immediately prior to works commencing. If birds are found to be nesting any works which may affect them would have to be delayed until the young have fledged and the nest has been abandoned naturally, for example via the implementation of an appropriate buffer zone (species dependent) around the nest in which no disturbance is permitted until the nest is no longer in use.
- R9 Terrestrial Mammals:** Any excavations that need to be left overnight should be covered or fitted with mammal ramps to ensure that any animals that enter can safely escape. Any open pipework with an outside diameter of greater than 120 mm must be covered at the end of each workday to prevent animals entering/becoming trapped.

7.4 INVASIVE PLANT SPECIES

The following recommendation is made regarding invasive plant species:

- R10 Invasive Species Method Statement:** A Method Statement must be developed for the proposed works to ensure that they do not result in the spread of any invasive non-native species. This method statement should be discussed with the Environment Agency. The method statement should be informed by an updated site walkover survey to identify any changes in the status of invasive species on site.

8. DRAWINGS

Drawing C151186-01-01 – Phase 1 Habitat Map



Legend

- - - Site boundary
- Scattered scrub
- Scattered broad-leaved tree
- - - Dry ditch
- ||||| Fence
- Species-poor intact hedgerow
- Species-rich intact hedgerow
- Bare ground
- Dense scrub
- Ephemeral/short perennial
- Improved grassland
- Inaccessible due to A21
- SI Poor semi-improved grassland
- Semi-natural broad-leaved woodland

Target note

- 1 Line of mature oak trees
- 2 Ditch with high water
- 3 Cotoneaster sp.
- 4 Log piles
- 5 Small mammal burrows
- 6 Boggy grassland
- 7 Rabbit droppings

| | | |
|---|----------------------------|--------------------|
| Project | Gatwick Green, West Sussex | |
| Drawing | Phase 1 Habitat Map | |
| Client | Savills | |
| Drawing Number | C151186-01-01 | Revision 00 |
| Scale @ A3 | 1:4,000 | Date December 2019 |
| Approved By | SM | Drawn By GT |
| MIDDLEMARCH ENVIRONMENTAL | | |
| Triumph House, Birmingham Road, Allesley, Coventry CV5 9AZ T:01676 525880 F:01676 521400 E:admin@middlemarch-environmental.com | | |
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C151186-01-01

9. PHOTOGRAPHS



Plate 9.1: Dense scrub



Plate 9.2: Dry ditch



Plate 9.3: Ditch inundated with water



Plate 9.4: Grazed improved grassland



Plate 9.5: Rushes growing in damper area of grassland



Plate 9.6: Earth bund at Rivington Farm, adjacent to survey area



Plate 9.7: Ungrazed area of poor semi-improved grassland



Plate 9.8: Scattered trees



Plate 9.9: Potential roosting features



Plate 9.10: Semi-natural broad-leaved woodland



Plate 9.11: Species-poor hedgerow

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APPENDICES

APPENDIX 1: Summary of Statutory Nature Conservation Sites

APPENDIX 2: Overview of Relevant Species-Specific Legislation

APPENDIX 1

Summary of Statutory Nature Conservation Sites

Site Check Report

Report generated on Mon Dec 16 2019.

Centroid Grid Ref: TQ29884114.

The following features have been found in your search area:

Ramsar Sites (England)

No Features found

Proposed Ramsar Sites (England)

No Features found

Special Areas of Conservation (England)

No Features found

Possible Special Areas of Conservation (England)

No Features found

Special Protection Areas (England)

No Features found

Potential Special Protection Areas (England)

No Features found

Ancient Woodland (England)

Wood Name

Theme Name: Ancient & Semi-Natural Woodland

Theme ID: 1476369

Area (Ha): 1.245167

Wood Name

Theme Name: Ancient & Semi-Natural Woodland

Theme ID: 1476372

Area (Ha): 1.711795

Wood Name

Theme Name: Ancient & Semi-Natural Woodland

Theme ID: 1476396

Area (Ha): 2.268457

Wood Name

Theme Name: Ancient & Semi-Natural Woodland

Theme ID: 1476397

Area (Ha): 6.38026

Wood Name

Theme Name: Ancient & Semi-Natural Woodland

Theme ID: 1476398

Area (Ha): 0.624934

Wood Name

Theme Name: Ancient & Semi-Natural Woodland

Theme ID: 1476400

Area (Ha): 1.612809

Wood Name

Theme Name: Ancient & Semi-Natural Woodland

Theme ID: 1476401

Area (Ha): 7.356459

Wood Name

Theme Name: Ancient & Semi-Natural Woodland

Theme ID: 1476405

Area (Ha): 1.541474

Wood Name

Theme Name: Ancient & Semi-Natural Woodland

Theme ID: 1476423

Area (Ha): 0.488632

Wood Name

Theme Name: Ancient & Semi-Natural Woodland

Theme ID: 1493088

Area (Ha): 0.810318

Wood Name

Theme Name: Ancient & Semi-Natural Woodland

Theme ID: 1493089

Area (Ha): 1.16028

Wood Name

Theme Name: Ancient & Semi-Natural Woodland

Theme ID: 1493090

Area (Ha): 5.389403

Wood Name

Theme Name: Ancient & Semi-Natural Woodland

Theme ID: 1492868

Area (Ha): 2.226778

Wood Name

Theme Name: Ancient & Semi-Natural Woodland

Theme ID: 1493475

Area (Ha): 1.240542

Wood Name

Theme Name: Ancient & Semi-Natural Woodland

Theme ID: 1494246

Area (Ha): 0.84243

Wood Name

Theme Name: Ancient & Semi-Natural Woodland

Theme ID: 1494065

Area (Ha): 2.710168

Wood Name

Theme Name: Ancient & Semi-Natural Woodland
Theme ID: 1494140
Area (Ha): 6.233314

Wood Name

Theme Name: Ancient & Semi-Natural Woodland
Theme ID: 1493880
Area (Ha): 2.197604

Wood Name

Theme Name: Ancient & Semi-Natural Woodland
Theme ID: 1494789
Area (Ha): 2.850161

Wood Name: BLACK CORNER WOOD

Theme Name: Ancient & Semi-Natural Woodland
Theme ID: 1476368
Area (Ha): 1.64933

Wood Name: BLACK CORNER WOOD

Theme Name: Ancient & Semi-Natural Woodland
Theme ID: 1476390
Area (Ha): 1.263317

Wood Name: BRIDGELANDS SHAW

Theme Name: Ancient & Semi-Natural Woodland
Theme ID: 1480556
Area (Ha): 2.753824

Wood Name: HEATHYGROUND WOOD

Theme Name: Ancient & Semi-Natural Woodland
Theme ID: 1480646
Area (Ha): 10.067749

Wood Name: WELLFIELD COPSE

Theme Name: Ancient & Semi-Natural Woodland
Theme ID: 1480553
Area (Ha): 5.417228

Wood Name

Theme Name: Ancient & Semi-Natural Woodland
Theme ID: 1494144
Area (Ha): 4.779882

Wood Name

Theme Name: Ancient & Semi-Natural Woodland
Theme ID: 1493881
Area (Ha): 1.210697

Wood Name

Theme Name: Ancient Replanted Woodland
Theme ID: 1494418
Area (Ha): 0.550496

Wood Name: BLACK CORNER WOOD

Theme Name: Ancient & Semi-Natural Woodland
Theme ID: 1476382
Area (Ha): 0.451462

Wood Name: BLACK CORNER WOOD

Theme Name: Ancient & Semi-Natural Woodland
Theme ID: 1476399
Area (Ha): 0.549164

Wood Name: FORGE WOOD, THREE ACRE

PLANTATION, THE BIRCHES
Theme Name: Ancient & Semi-Natural Woodland
Theme ID: 1476404
Area (Ha): 9.924652

Wood Name: TITCHMERES WOOD

Theme Name: Ancient & Semi-Natural Woodland
Theme ID: 1476394
Area (Ha): 7.135205

Wood Name: SHIPLEY BRIDGE WOOD

Theme Name: Ancient & Semi-Natural Woodland
Theme ID: 1480554
Area (Ha): 1.511692

Local Nature Reserves (England)

No Features found

National Nature Reserves (England)

No Features found

Sites of Special Scientific Interest (England)

No Features found

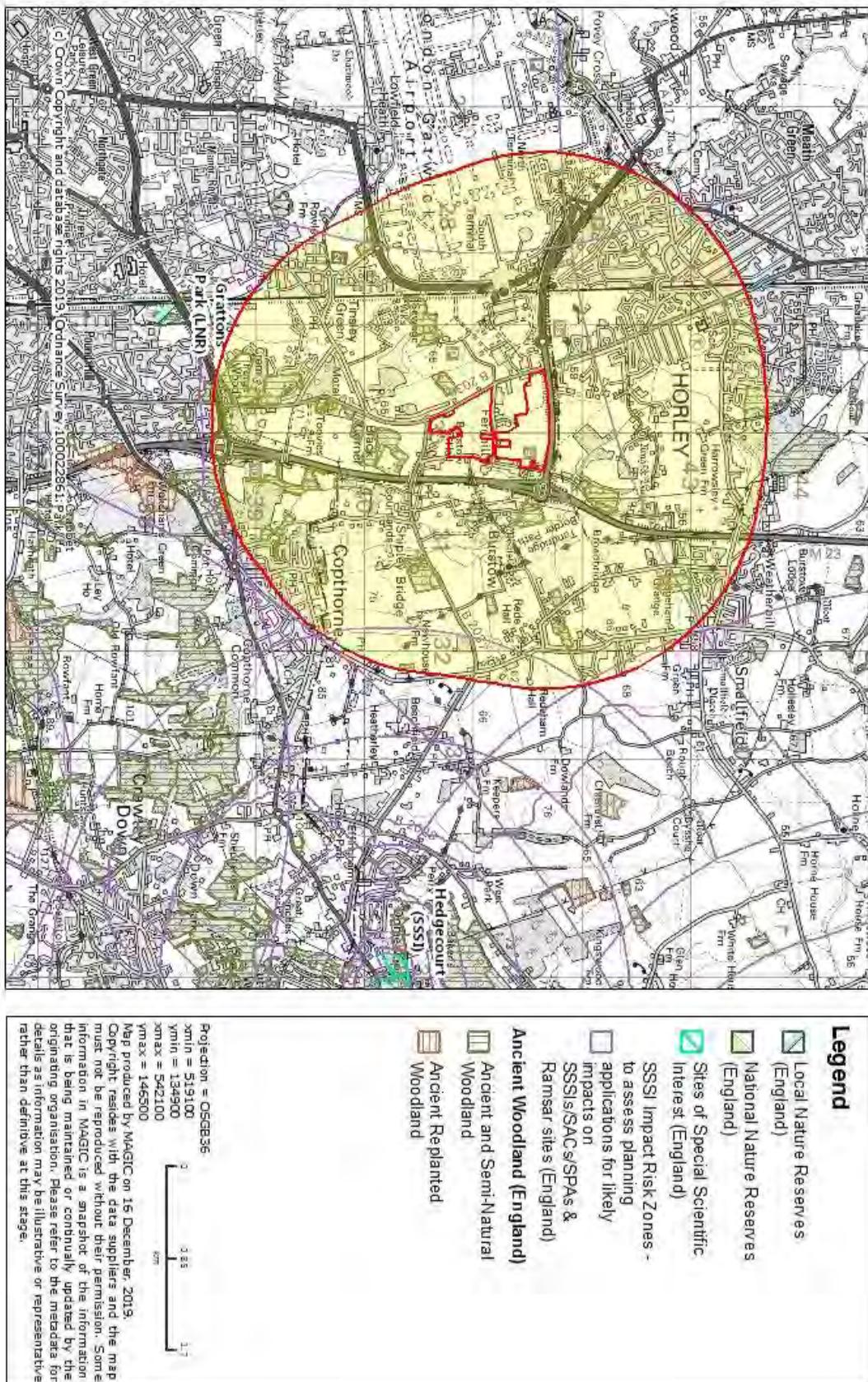
SSSI Impact Risk Zones - to assess planning applications for likely impacts on SSSIs/SACs/SPAs & Ramsar sites (England)

1. DOES PLANNING PROPOSAL FALL INTO ONE OR MORE OF THE CATEGORIES BELOW?
 2. IF YES, CHECK THE CORRESPONDING DESCRIPTION(S) BELOW. LPA SHOULD CONSULT NATURAL ENGLAND ON LIKELY RISKS FROM THE FOLLOWING:
- Infrastructure:** Airports, helipads and other aviation proposals.

GUIDANCE - How to use the Impact Risk Zones: [/Metadata_for_magic/SSSI IRZ User Guidance MAGIC.pdf](#)

MAGIC

UK Statutory Sites within 2 km



APPENDIX 2

Overview of Relevant Species-Specific Legislation

The reader should refer to the original legislation for definitive interpretation.

Badger

Badgers and their setts are protected under the Protection of Badgers Act 1992. The Protection of Badgers Act 1992 is based primarily on the need to protect badgers from baiting and deliberate harm or injury, badgers are not protected for conservation reasons. The following are criminal offences:

- To intentionally or recklessly interfere with a sett. Sett interference includes disturbing badgers whilst they are occupying a sett, as well as damaging or destroying a sett or obstructing access to it.
- To wilfully kill, injure, take, possess or cruelly ill-treat a badger, or to attempt to do so.

A badger sett is defined in the legislation as: '*Any structure or place that displays signs indicating current use by a badger*'. 'Current use' is not synonymous with current occupation and a sett is defined as such (and thus protected) as long as signs of current usage are present. Therefore, a sett is protected until such a time as the field signs deteriorate to such an extent that they no longer indicate 'current usage'.

Badger sett interference can result from a multitude of operations including excavation and coring, even if there is no direct damage to the sett, such as through the disturbance of badgers whilst occupying the sett. Any intentional or reckless work that results in the interference of badger setts is illegal without a licence from Natural England. In England a licence must be obtained from Natural England before any interference with a badger sett occurs.

Bats

Bats and the places they use for shelter or protection (i.e. roosts) receive European protection under The Conservation of Habitats and Species Regulations 2017 (Habitats Regulations 2017). They receive further legal protection under the Wildlife and Countryside Act (WCA) 1981, as amended. This protection means that bats, and the places they use for shelter or protection, are capable of being a material consideration in the planning process.

Regulation 41 of the Habitats Regulations 2017, states that a person commits an offence if they:

- deliberately capture, injure or kill a bat;
- deliberately disturb bats; or
- damage or destroy a bat roost (breeding site or resting place).

Disturbance of animals includes in particular any disturbance which is likely to impair their ability to survive, to breed or reproduce, or to rear or nurture their young, or in the case of animals of a hibernating or migratory species, to hibernate or migrate; or to affect significantly the local distribution or abundance of the species to which they belong.

It is an offence under the Habitats Regulations 2017 for any person to have in his possession or control, to transport, to sell or exchange or to offer for sale, any live or dead bats, part of a bat or anything derived from bats, which has been unlawfully taken from the wild.

Whilst broadly similar to the above legislation, the WCA 1981 (as amended) differs in the following ways:

- Section 9(1) of the WCA makes it an offence to *intentionally* kill, injure or take any protected species.
- Section 9(4)(a) of the WCA makes it an offence to *intentionally or recklessly** damage or destroy, or *obstruct access to*, any structure or place which a protected species uses for shelter or protection.
- Section 9(4)(b) of the WCA makes it an offence to *intentionally or recklessly** disturb any protected species *while it is occupying a structure or place which it uses for shelter or protection*.

*Reckless offences were added by the Countryside and Rights of Way (CROW) Act 2000.

As bats re-use the same roosts (breeding site or resting place) after periods of vacancy, legal opinion is that roosts are protected whether or not bats are present.

The following bat species are Species of Principal Importance for Nature Conservation in England: Barbastelle Bat *Barbastella barbastellus*, Bechstein's Bat *Myotis bechsteinii*, Noctule Bat *Nyctalus noctula*, Soprano Pipistrelle *Pipistrellus pygmaeus*, Brown Long-eared Bat *Plecotus auritus*, Greater Horseshoe Bat *Rhinolophus ferrumequinum* and Lesser Horseshoe Bat *Rhinolophus hipposideros*.

Birds

The Conservation of Habitats and Species Regulations 2017 places a duty on public bodies to take measures to preserve, maintain and re-establish habitat for wild birds.

Nesting and nest building birds are protected under the Wildlife and Countryside Act WCA 1981 (as amended).

Subject to the provisions of the act, if any person intentionally:

- kills, injures or takes any wild bird;
- takes, damages or destroys the nest of any wild bird while that nest is in use or being built; or
- takes or destroys an egg of any wild bird, he shall be guilty of an offence.

Some species (listed in Schedule 1 of the WCA) are protected by special penalties. Subject to the provisions of the act, if any person intentionally or recklessly:

- disturbs any wild bird included in Schedule 1 while it is building a nest or is in, on or near a nest containing eggs or young; or
- disturbs dependent young of such a bird, he shall be guilty of an offence.

Several bird species are Species of Principal Importance for Nature Conservation in England, making them capable of being material considerations in the planning process.

Common amphibians

Common frogs, common toad, smooth newt and palmate newt are protected in Britain under Schedule 5 of the Wildlife and Countryside Act (1981, as amended) with respect to sale only. They are also listed under Annex III of the Bern Convention 1979. Any exploitation of wild fauna specified in Appendix III shall be regulated in order to keep the populations out of danger. The convention seeks to prohibit the use of all indiscriminate means of capture and killing and the use of all means capable of causing local disappearance of, or serious disturbance to, populations of a species.

Common toad is listed as a Species of Principal Importance for Nature Conservation in England.

Dormouse

Dormice and the places they use for shelter or protection receive European protection under The Conservation of Habitats and Species Regulations 2017 (Habitats Regulations 2017). They receive further legal protection under the Wildlife and Countryside Act (WCA) 1981, as amended. This protection means that dormice, and the places they use for shelter or protection, are capable of being a material consideration in the planning process.

Regulation 41 of the Habitats Regulations 2017, states that a person commits an offence if they:

- deliberately capture, injure or kill a dormouse;
- deliberately disturb dormice; or
- damage or destroy a breeding site or resting place.

Disturbance of animals includes in particular any disturbance which is likely to impair their ability to survive, to breed or reproduce, or to rear or nurture their young, or in the case of animals of a hibernating or migratory species, to hibernate or migrate; or to affect significantly the local distribution or abundance of the species to which they belong.

It is an offence under the Habitats Regulations 2017 for any person to have in his possession or control, to transport, to sell or exchange or to offer for sale, any live or dead dormouse, part of a dormouse or anything derived from a dormouse, which has been unlawfully taken from the wild.

Whilst broadly similar to the above legislation, the WCA 1981 (as amended) differs in the following ways:

- Section 9(1) of the WCA makes it an offence to *intentionally* kill, injure or take any protected species.
- Section 9(4)(a) of the WCA makes it an offence to *intentionally or recklessly** damage or destroy, or *obstruct access to*, any structure or place which a protected species uses for shelter or protection.
- Section 9(4)(b) of the WCA makes it an offence to *intentionally or recklessly** disturb any protected species *while it is occupying a structure or place which it uses for shelter or protection*.

*Reckless offences were added by the Countryside and Rights of Way (CRoW) Act 2000.

Dormice are listed as a Species of Principal Importance for Nature Conservation in England.

Great crested newt

Great crested newts (GCN) and the places they use for shelter or protection receive European protection under The Conservation of Habitats and Species Regulations 2017, (Habitats Regulations 2017). They receive further legal protection under the Wildlife and Countryside Act (WCA) 1981, as amended. This protection means that GCN, and the places they use for shelter or protection, are capable of being a material consideration in the planning process.

Regulation 41 of the Habitats Regulations 2017, states that a person commits an offence if they:

- deliberately capture, injure or kill a GCN;
- deliberately disturb GCN;
- deliberately take or destroy eggs of a GCN; or
- damage or destroy a GCN breeding site or resting place.

Disturbance of animals includes in particular any disturbance which is likely to impair their ability to survive, to breed or reproduce, or to rear or nurture their young, or in the case of animals of a hibernating or migratory species, to hibernate or migrate; or to affect significantly the local distribution or abundance of the species to which they belong.

It is an offence under the Habitats Regulations 2017 for any person to have in his possession or control, to transport, to sell or exchange or to offer for sale, any live or dead GCN, part of a GCN or anything derived from GCN, which has been unlawfully taken from the wild. This legislation applies to all life stages of GCN.

Whilst broadly similar to the above legislation, the WCA 1981 (as amended) differs in the following ways:

- Section 9(1) of the WCA makes it an offence to intentionally kill, injure or take any protected species.
- Section 9(4)(a) of the WCA makes it an offence to intentionally or recklessly* damage or destroy, or obstruct access to, any structure or place which a protected species uses for shelter or protection.
- Section 9(4)(b) of the WCA makes it an offence to intentionally or recklessly* disturb any protected species while it is occupying a structure or place which it uses for shelter or protection.

*Reckless offences were added by the Countryside and Rights of Way (CRoW) Act 2000.

Hedgehog

Hedgehogs receive some protection under Schedule 6 of the Wildlife and Countryside Act 1981 (as amended); this section of the Act lists animals which may not be killed or taken by certain methods, namely traps and nets, poisons, automatic weapons, electrical devices, smokes/gases and various others. Humane trapping for research purposes requires a licence.

Hedgehogs are a Species of Principal Importance for Nature Conservation in England and are thus capable of being material considerations in the planning process.

Invasive plants

The Wildlife and Countryside Act 1981 provides the primary controls on the release of non-native species into the wild in Great Britain. It is an offence under section 14(2) of the Act to 'plant or otherwise cause to grow in the wild' any plant listed in Schedule 9, Part II. This list contains 36 plant species and their hybrids. The Infrastructure Act 2015 makes it possible, under certain circumstances, to compel landowners or occupiers to carry out control or eradication operations, or to allow them to be carried out by the issuing authority.

Reptiles

All of the UK's native reptiles are protected by law. The two rarest species – sand lizard *Lacerta agilis* and smooth snake *Coronella austriaca* – benefit from the greatest protection; however, these two species have a limited geographical distribution and special habitat requirements that are not met on this site. Common lizard, slow-worm, adder and grass snake are protected under the Wildlife and Countryside Act 1981 as amended from intentional killing or injuring.

In England and Wales, this Act has been amended by the Countryside and Rights of Way Act 2000 (CRoW), which adds an extra offence, makes species offences arrestable, increases the time limits for some prosecutions and increases penalties. The Natural Environment and Rural Communities (NERC) Act 2006

places a duty on Government Departments to have regard for the conservation of biodiversity and maintains lists of species and habitats which are of principal importance for the purposes of conserving biodiversity in England and Wales. All native reptile species are included on these lists.

This is a simplified description of the legislation. In particular, the offences mentioned here may be absolute, intentional, deliberate or reckless. Note that where it is predictable that reptiles are likely to be killed or injured by activities such as site clearance, this could legally constitute intentional killing or injuring.

**GATWICK GREEN, CRAWLEY,
WEST SUSSEX**

**HEDGEROW REGULATIONS (1997)
ASSESSMENT**

A Report to: Savills

Report No: RT-MME-151186-02

Date: February 2020



Triumph House, Birmingham Road, Allesley, Coventry CV5 9AZ

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REPORT VERIFICATION AND DECLARATION OF COMPLIANCE

This study has been undertaken in accordance with British Standard 42020:2013 “Biodiversity, Code of practice for planning and development”.

| Report Version | Date | Completed by: | Checked by: | Approved by: |
|----------------|------------|---|---|--|
| DRAFT | 23/01/2020 | Victoria Aelen BSc (Ecological Consultant) | Paul Roebuck MSc MCIEEM (South East Manager) | Colin Bundy MCIEEM (Associate Director) |
| Final | 27/02/2020 | Sophie Moy MSc GradCIEEM (Senior Ecological Consultant) | Paul Roebuck MSc MCIEEM (South East Manager) | Colin Bundy MCIEEM (Associate Director) |

The information which we have prepared is true, and has been prepared and provided in accordance with the Chartered Institute of Ecology and Environmental Management's Code of Professional Conduct. We confirm that the opinions expressed are our true and professional bona fide opinions.

DISCLAIMER

The contents of this report are the responsibility of Middlemarch Environmental Ltd. It should be noted that, whilst every effort is made to meet the client's brief, no site investigation can ensure complete assessment or prediction of the natural environment.

Middlemarch Environmental Ltd accepts no responsibility or liability for any use that is made of this document other than by the client for the purposes for which it was originally commissioned and prepared.

VALIDITY OF DATA

The findings of this study are valid for a period of up to five years from the date of survey. If works have not commenced by this date, an updated site visit should be carried out by a suitably qualified ecologist to assess any changes in the habitats present on site, and to inform a review of the conclusions and recommendations made.

NON-TECHNICAL SUMMARY

In November 2019 Savills, on behalf of Wilky Group, commissioned Middlemarch Environmental Ltd to undertake a Hedgerow Regulations (1997) Assessment of the site of a proposed development at Gatwick Green, Crawley, West Sussex. It is understood that Savills are promoting the site for future development, and that the Crawley Local Plan identifies the site as part of an 'Area of Search' for a strategic employment site. The land is also part of an area safeguarded for future airport use. The current survey is required to identify possible biodiversity constraints and opportunities associated with any future development of the site. At the time of writing, no detailed development proposals have been produced.

Two hedgerows recorded on site H1 and H2 were deemed to be 'important' under the wildlife and landscape criteria detailed in the Hedgerow Regulations (1997). Both H1 and H2 satisfy criteria relating to the number of woody species recorded and the criteria for associated features. While remaining hedgerows on site do not satisfy the relevant criteria, it should be noted that importance in respect of the historical and archaeological criteria have not been assessed.

All hedgerows are a Habitat of Principal Importance as defined by Section 41 of the Natural and Rural Communities Act 2006 (NERC) and are a priority habitat on the Local BAP. The hedgerows on site also provide suitable nesting habitat for a number common and widespread birds. Without mitigation, these clearance works could result in a breach of Section 1 of the Wildlife and Countryside Act 1981 (as amended). The following recommendations have therefore been made, with full text provided in Chapter 6:

- R1** Hedgerows H1 and H2 are classified as important under the Hedgerow Regulations (1997) and should therefore be retained and protected during any development of the site. Should any impacts to important hedgerows be unavoidable, permission must first be sought from the local authority.
- R2** The proposed development should be designed to allow for the retention and enhancement of hedgerow features where possible. Where loss of hedgerows is unavoidable, appropriate reinstatement/replacement and site enhancement should be undertaken, using native species of local provenance.
- R3** Any hedgerows on or adjacent to the site that are not to be directly impacted by the proposed works should be protected from harm during the development. Protection should be based on British Standard 5837: 2012 "Trees in relation to design, demolition and construction - recommendations".
- R4** Vegetation clearance should be undertaken outside the nesting bird season. If this is not possible then any vegetation that is to be removed/disturbed should be checked by an experienced ecologist immediately prior to works commencing to establish presence/absence and advise further.

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1. INTRODUCTION

1.1 PROJECT DESCRIPTION

In November 2019 Savills, on behalf of Wilky Group, commissioned Middlemarch Environmental Ltd to undertake a Hedgerow Regulations (1997) Assessment of the site of a proposed development at Gatwick Green, Crawley, West Sussex. It is understood that Savills are promoting the site for future development, and that the Crawley Local Plan identifies the site as part of an 'Area of Search' for a strategic employment site. The land is also part of an area safeguarded for future airport use. The current survey is required to identify possible biodiversity constraints and opportunities associated with any future development of the site. At the time of writing, no detailed development proposals have been produced.

Middlemarch Environmental Ltd has also been instructed to conduct an updated Preliminary Ecological Appraisal at this site (RT-MME-151186-01). Middlemarch Environmental Ltd has previously carried out a Preliminary Ecological Appraisal at the site, the results of which can be found in Report RT-MME-118885-01.

To fulfil the brief to determine whether the site supports any hedgerows considered to be 'important' under the Hedgerow Regulations (1997) a walkover survey was undertaken on the 20th November 2019 and the 25th November 2019.

1.2 DEVELOPMENT SITE DESCRIPTION AND CONTEXT

The site is located to the east of Gatwick Airport, in Crawley, West Sussex, and is centred at National Grid Reference TQ 299 411. The site is low-lying and generally flat in topography, situated on a largely undeveloped greenfield site. It is an irregular shaped parcel of land that measures approximately 48 ha in size.

At the time of the survey, the site comprised multiple fields of improved and semi-improved grassland, which were bound by a network of hedgerows, ditches and trees. Small areas of semi-natural broadleaved woodland and scrub were also present. The site was bisected by Fernhill Road and bordered by the M23 airport spur to the north, Peeks Brook Lane to the east, the B2037 to the south, and the B2036 to the west.

The wider landscape was dominated by further farmland. Gatwick Airport was located to the west, and the urban fringes of Crawley and Horley were located to the south and north respectively.

1.3 DOCUMENTATION PROVIDED

The conclusions and recommendations made in this report are based on information provided by the client regarding the scope of the project. Documentation made available by the client is listed in Table 1.1.

| Document Name / Drawing Number | Author |
|--|-------------------------|
| Gatwick Green Ownership Plan | Savills |
| Final Call for Sites (Employment) 16.09.2019.pdf | Crawley Borough Council |

Table 1.1: Documentation Provided by Client

1.4 OVERVIEW OF HEDGEROW REGULATIONS CRITERIA

The Hedgerows Regulations (1997) include various criteria upon which a hedgerow may be classed as 'important' with respect to wildlife and landscape or archaeology and history. A hedgerow is deemed 'important' if it, or the wider hedgerow of which it forms a part:

- (a) has existed for 30 years or more; and,
- (b) satisfies at least one of the criteria listed in Part II of Schedule 1.

The criteria listed in Part II of Schedule 1 consists of the following:

- (i) Historic hedgerow existing before 1850, marking a parish or township boundary.
- (ii) The hedgerow incorporates an archaeological feature.
- (iii) Is part of, or associated with, an archaeological site.
- (iv) Marks the boundary of, or is associated with, a pre-1600 estate or manor.

- (v) Forms an integral part of a pre-Parliamentary enclosure field system.
- (vi) Contains certain categories of species of bird, animals or plants listed in the Wildlife & Countryside Act or JNCC publications.
- (vii) Includes:
 - 1. seven or more woody species in a 30 m length;
 - 2. six woody species, in a 30 m length, and at least three associated features;
 - 3. six woody species, in a 30 m length, and includes one of the following – black poplar, large leafed lime, small leafed lime, wild service tree; or
 - 4. five woody species, in a 30 m length, and at least four associated features.
 - 5. four woody species, in a 30 m length, is adjacent to a footpath, bridleway, road used as a public footpath or a byway open to all traffic and has at least two associated features (a-e only below).

The following are considered to be associated features:

- a. A wall or bank supporting the hedgerow along at least half its length;
- b. Less than 10% gaps;
- c. An average of one standard tree or more per 50 m of hedgerow;
- d. At least 3 species from a list of 57 woodland plants listed in Schedule 2 of the regulations;
- e. A ditch along at least half its length;
- f. A number of connections with other hedgerows, ponds or woodland*; and
- g. A parallel hedge within 15 m.

* to fulfil this category the hedgerow must have at least 4 connection points where: a hedgerow is 1 point; broadleaved woodland is 2 points; and, a pond is 2 points.

2. METHODOLOGIES

2.1 DESK STUDY

Existing ecological data relating to the site were reviewed in order to determine the potential presence of any protected or Red Data book species likely to be associated with the hedgerows within the site.

In addition, first edition Ordnance Survey maps were used (if available) to assess some of the historical features relating to the hedgerows, e.g. their probability of occurring for over 30 years, or if they form an integral part of a pre-Parliamentary enclosure field system (pre 1845-1854) and any key archaeological features. It should be noted that the assessment is concentrated on the ecological elements of the Hedgerow Regulations assessment, and that a full historic and archaeological desk study was not completed.

2.2 FIELD SURVEY

A site walkover survey was undertaken during the optimal period for assessing woody species and ground flora. All hedgerows within the site were visually assessed, and those that potentially met the criteria for classification as important under the Hedgerow Regulations were subject to a more detailed inspection. Any hedgerows identified in the desk study as being of potential importance were also subject to a detailed inspection. In accordance with the Hedgerow Regulations (1997), features greater than 5 m in width at the base do not qualify for assessment.

3. DESK STUDY RESULTS

3.1 BIOLOGICAL RECORDS

As part of the Preliminary Ecological Assessment completed by Middlemarch Environmental Ltd, a desk study for records of protected species was completed. This study identified the following records relating to notable hedgerows and any relevant protected or notable species, summarised in Table 3.1.

| Species | No. of Records | Most Recent Record | Proximity of Nearest Record to Study Area | Species of Principal Importance? | Legislation / Conservation Status |
|---|----------------|--------------------|---|----------------------------------|-----------------------------------|
| Mammals – bats | | | | | |
| Common pipistrelle <i>Pipistrellus pipistrellus</i> | 113 | 2017 | 260 m south-west | - | ECH 4, WCA 5, WCA 6 |
| Noctule <i>Nyctalus noctula</i> | 16 | 2016 | 260 m south-west | ✓ | ECH 4, WCA 5, WCA 6 |
| Unidentified bat <i>Chiroptera</i> sp. | 19 | 2016 | 300 m south-west | # | ECH 2 #, ECH 4, WCA 5, WCA 6 |
| Soprano pipistrelle <i>Pipistrellus pygmaeus</i> | 17 | 2016 | 300 m south-west | ✓ | ECH 4, WCA 5, WCA 6 |
| Unidentified Myotis <i>Myotis</i> sp. | 22 | 2014 | 300 m south-west | # | ECH 2 #, ECH 4, WCA 5, WCA 6 |
| Pipistrelle species <i>Pipistrellus</i> sp. | 20 | 2011 | 300 m south-west | # | ECH 4, WCA 5, WCA 6 |
| Long-eared bat species <i>Plecotus</i> sp. | 3 | 2011 | 490 m south-west | # | ECH 4, WCA 5, WCA 6 |
| Brandt's bat <i>Myotis brandtii</i> | 2 | 2011 | 530 m south-west | - | ECH 4, WCA 5, WCA 6 |
| Brown long-eared bat <i>Plecotus auritus</i> | 5 | 2016 | 630 m south-west | ✓ | ECH 4, WCA 5, WCA 6 |
| Daubenton's bat <i>Myotis daubentonii</i> | 1 | 2005 | 630 m south-west | - | ECH 4, WCA 5, WCA 6 |
| Natterer's bat <i>Myotis nattereri</i> | 4 | 2010 | 910 m south-west | - | ECH 4, WCA 5, WCA 6 |
| Barbastelle bat <i>Barbastella barbastellus</i> | 1 | 2004 | Potentially within 1 km* | ✓ | ECH 2, ECH 4, WCA 5, WCA 6 |
| Vesper bat <i>Vespertilionidae</i> sp. | 1 | 2000 | Potentially within 1 km* | # | ECH 2 #, ECH 4, WCA 5, WCA 6 |
| Whiskered bat <i>Myotis mystacinus</i> | 1 | 1992 | Potentially within 1 km* | - | ECH 4, WCA 5, WCA 6 |
| Bechstein's bat <i>Myotis bechsteinii</i> | 1 | 2008 | Potentially within 1 km** | ✓ | ECH 2, ECH 4, WCA 5, WCA 6 |
| Mammals – other | | | | | |
| Dormouse <i>Muscardinus avellanarius</i> | 6 | 2016 | 170 m south-west | ✓ | ECH 4, WCA 5, WCA 6 |
| Hedgehog <i>Erinaceus europaeus</i> | 5 | 2015 | 400 m south | ✓ | WCA 6 |
| Amphibians | | | | | |
| Common frog <i>Rana temporaria</i> | 22 | 2017 | 330 m south-west | - | WCA 5 S9(5) |
| Common toad <i>Bufo bufo</i> | 14 | 2017 | 350 m south-west | ✓ | WCA 5 S9(5) |
| Great crested newt <i>Triturus cristatus</i> | 33 | 2019 | 400 m south-west | ✓ | ECH 2, ECH 4, WCA 5 |
| Palmar newt <i>Lissotriton helveticus</i> | 8 | 2017 | 410 m south-west | - | WCA 5 S9(5) |
| Smooth newt <i>Lissotriton vulgaris</i> | 11 | 2017 | 410 m south-west | - | WCA 5 S9(5) |
| Reptiles | | | | | |
| Grass snake <i>Natrix natrix</i> | 79 | 2017 | 310 m south-west | ✓ | WCA 5 S9(1) WCA 5 S9(5) |

Table 3.1: Relevant Ecological Records Within 1 km of the Development Boundary (continues)

| Species | No. of Records | Most Recent Record | Proximity of Nearest Record to Study Area | Species of Principal Importance? | Legislation / Conservation Status | | | | | |
|--|--|--------------------|---|----------------------------------|-----------------------------------|--|--|--|--|--|
| Common lizard <i>Zootoca vivipara</i> | 1 | 2006 | 770 m south-east | ✓ | WCA 5 S9(1) WCA 5 S9(5) | | | | | |
| Slow worm <i>Anguis fragilis</i> | 2 | 2016 | 780 m south-west | ✓ | WCA 5 S9(1) WCA 5 S9(5) | | | | | |
| Birds | | | | | | | | | | |
| Barn owl <i>Tyto alba</i> | 3 | 2018 | 290 m south-west | - | WCA1i | | | | | |
| Kingfisher <i>Alcedo atthis</i> | 11 | 2017 | 290 m south-west | - | WCA1i | | | | | |
| Hobby <i>Falco subbuteo</i> | 4 | 2017 | 620 m west | - | WCA1i | | | | | |
| Red kite <i>Milvus milvus</i> | 4 | 2019 | 630 m south-west | - | WCA1i | | | | | |
| Little ringed plover <i>Charadrius dubius</i> | 1 | 2004 | 660 m south-west | - | WCA1i | | | | | |
| Fieldfare <i>Turdus pilaris</i> | 1 | 2008 | Potentially within 1 km* | - | WCA1i | | | | | |
| Redwing <i>Turdus iliacus</i> | 1 | 2008 | Potentially within 1 km* | - | WCA1i | | | | | |
| Key: | | | | | | | | | | |
| #: | Dependent on species. | | | | | | | | | |
| *: | Grid reference provided was four figures only. | | | | | | | | | |
| **: | Grid reference provided was two figures only. | | | | | | | | | |
| ECH 2: Annex II of the European Communities Council Directive on the Conservation of Natural Habitats and Wild Fauna and Flora. Animal and plant species of community interest whose conservation requires the designation of Special Areas of Conservation. | | | | | | | | | | |
| ECH 4: Annex IV of the European Communities Council Directive on the Conservation of Natural Habitats and Wild Fauna and Flora. Animal and plant species of community interest in need of strict protection. | | | | | | | | | | |
| WCA 1i: Schedule 1 Part 1 of Wildlife and Countryside Act 1981 (as amended). Birds protected by special penalties at all times. | | | | | | | | | | |
| WCA 5: Schedule 5 of Wildlife and Countryside Act 1981 (as amended). Protected animals (other than birds). | | | | | | | | | | |
| WCA 5 S9(1): Schedule 5 Section 9(1) of Wildlife and Countryside Act 1981 (as amended). Protected animals (other than birds). Protection limited to intentional killing, injury or taking. | | | | | | | | | | |
| WCA 5 S9(5): Schedule 5 Section 9(5) of Wildlife and Countryside Act 1981 (as amended). Protected animals (other than birds). Protection limited to selling, offering for sale, processing or transporting for purpose of sale, or advertising for sale, any live or dead animal, or any part of, or anything derived from, such animal. | | | | | | | | | | |
| WCA 6: Schedule 6 of Wildlife and Countryside Act 1981 (as amended). Animals which may not be killed or taken by certain methods. | | | | | | | | | | |
| WCA 8: Schedule 8 of Wildlife and Countryside Act 1981 (as amended). Protected plants and fungi. | | | | | | | | | | |
| WCA 8 S13(2): Schedule 8 Section 13(2) of Wildlife and Countryside Act 1981 (as amended). Protection limited to selling, offering for sale, possessing or transporting for purpose of sale, or advertising for sale, any live or dead plant, or any part of, or anything derived from, such plant. | | | | | | | | | | |
| Species of Principal Importance: Species of Principal Importance for Nature Conservation in England. | | | | | | | | | | |
| Note. This table does not include reference to the Berne Convention (Convention on the Conservation of European Wildlife and Natural Habitats), the Bonn Convention on the Conservation of Migratory Species of Wild Animals or the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES). | | | | | | | | | | |

Table 3.1: Relevant Ecological Records Within 1 km of the Development Boundary (continued)

3.2 HISTORICAL MAPPED DATA

A review of historic maps found that 11 of the surveyed hedgerows within the site were likely to be over 30 years old at the time of survey. These hedgerows are therefore deemed to meet section 4(a) of the Hedgerow Regulations (1997).

3.3 PREVIOUS SURVEY DATA

A previous hedgerow survey has been undertaken on the land to the north-east of Gatwick Airport, West Sussex and north and south of M23 in 2019. The results of these surveys are within the Preliminary Environmental Information Report provided by Your London Gatwick Airport (February 2020). The majority of this land surveyed is outside of the current survey area for these proposed works. Only a small section of the survey area for the previous ecological surveys was Wilky owned land, which is the area of land to the north-west of the site, located directly to the south of the M23 spur road and to the east of Balcombe Road. The rest of the Wilky owned land has not been previously surveyed.

These previous surveys were conducted to inform a Preliminary Environmental Information Report (PEIR) and the results for the Wilky Land: Fields North and South of M23, east of B2036 were provided in February 2020. During the previous hedgerow survey conducted on site, which would have only included hedgerow H7 and H8, no hedgerows surveyed were identified as important hedgerows.

4. FIELD SURVEY RESULTS

4.1 INTRODUCTION

A walkover survey of the site was undertaken by Sophie Moy (Senior Ecological Consultant) and Margarita Smoldareva (Ecological Project Officer) on 20th and the 25th November 2019. This walkover encompassed all boundary features within the site footprint, and those which were considered to conform to the criteria for assessment under the Hedgerow Regulations (1997) were subject to a detailed inspection. The locations of hedgerows assessed are shown on Drawing C151186-02-01 in Chapter 7.

4.2 SURVEY CONSTRAINTS

Due to the presence of electric fencing and livestock within the fields located in the north-east and north-west of the site, it was considered unsafe to access these fields. Therefore, they were not fully assessed.

4.3 DESCRIPTION OF HEDGEROWS SURVEYED

The walkover survey identified a total of 14 hedgerows considered suitable for assessment under the Hedgerow Regulations (1997). The site did include other vegetated boundary features; however, these were noted to be either extremely gappy in nature, or to be in excess of 5 m in width and therefore classified as linear scrub or woodland edge, or less than 30 m wide.

Table 4.1 provides a brief description of each of the hedgerows assessed, and lists woody species recorded in a representative 30 m section of each hedge.

| Hedgerow Number | Woody Species Recorded | | Description |
|-----------------|--|---|--|
| | Common Name | Scientific Name | |
| H1 | Hawthorn Ash Blackthorn Holly Oak Field Maple Old Man's Beard Bramble | <i>Crataegus monogyna</i> <i>Fraxinus</i> <i>Prunus spinosa</i> <i>Ilex aquifolium</i> <i>Quercus sp</i> <i>Acer campestre</i> <i>Clematis vitalba</i> <i>Rubus</i> | A 700 m length of hedgerow located towards the centre of the site. Approximately 2m in height with a wet ditch running along the northern edge of the hedgerow. Ground flora consisted of bracken, nettle and ground ivy. Average height of 2 m with occasional mature tree present within the hedgerow. |
| H2 | Dogrose Hawthorn Oak Blackthorn Field Maple Elder Sycamore Bramble | <i>Rosa canina</i> <i>Crataegus monogyna</i> <i>Quercus sp</i> <i>Prunus spinosa</i> <i>Acer campestre</i> <i>Sambucus nigra</i> <i>Acer pseudoplatanus</i> <i>Rubus</i> | A 420m length of hedgerow located towards south west of site. Approximately 2-3 m in height towards the northern end of the hedgerow, up to 10m in height due to the mature scattered trees dominant in the south. Ground flora consisted of ivy. |
| H3 | Dogrose Oak Bramble | <i>Rosa canina</i> <i>Quercus sp</i> <i>Rubus</i> | A 350 m length of hedgerow located towards the center of the site. Approximately 2 m in height with a wet ditch running along the southern edge of the hedgerow. Gaps were present within the hedgerow. |
| H4 | Leyland cypress Oak | <i>Cupressus × leylandii</i> <i>Quercus sp</i> | This hedgerow is located off site. Metal heras fencing runs along the western boundary of the hedgerow. |
| H5 | Oak Holly Hawthorn Sycamore Bramble | <i>Quercus sp</i> <i>Ilex aquifolium</i> <i>Crataegus monogyna</i> <i>Acer pseudoplatanus</i> <i>Rubus</i> | A 450 m length of hedgerow located to the east of the site along the side of a road. A wet ditch was also present to the east. The dominant species with the hedgerow was oak. Approximately 10m in height. |
| H6 | Oak Hazel Dogrose Hawthorn Snowberry | <i>Quercus sp</i> <i>Corylus avellana</i> <i>Rosa canina</i> <i>Crataegus monogyna</i> <i>Symphoricarpos</i> | Small section of hedgerow located to the north of the site, along the eastern boundary of grassland field. 100 m in length, 4-5 m in height. Ground flora consisted of bramble. A large quantity gaps were present within southern section of the hedgerow. |

Table 4.1: Woody Species Recorded within Each Hedgerow Surveyed (continues)

| | | | |
|-----|--|--|---|
| H7 | Hazel Hawthorn | <i>Corylus avellana</i> <i>Crataegus monogyna</i> | Small section of hedgerow located to the north west of the site. Approximately 3m in height. The dominant species within the hedgerow was hazel. A patch of scrub, dominated by bramble, was present along the southern boundary of the hedgerow. |
| H8 | Ash Oak Blackthorn Dogrose | <i>Fraxinus</i> <i>Quercus sp</i> <i>Prunus spinosa</i> <i>Rosa canina</i> | Small section of hedgerow located to the north of the site. Approximately 1.5 m in height. Ground flora consisted of bramble. |
| H9 | Ash Hawthorn Willow sp Oak Dogrose | <i>Fraxinus</i> <i>Crataegus monogyna</i> <i>Salix sp</i> <i>Quercus sp</i> <i>Rosa canina</i> | A 700m length of hedgerow located towards the north of the site. Approximately 1.5-2 m in height with small gaps present to the north of the hedgerow. Ground flora comprised of bramble and nettle. |
| H10 | Ash Hawthorn Willow sp Oak Dogrose | <i>Fraxinus</i> <i>Crataegus monogyna</i> <i>Salix sp</i> <i>Quercus sp</i> <i>Rosa canina</i> | A 300m length of hedgerow located towards the north of the site. Approximately 1.5-2 m in height. Ground flora comprised of bramble. |
| H11 | Leyland cypress | <i>Cupressus × leylandii</i> | A 150m length of hedgerow located towards the north of the site comprising of Leyland cypress. The hedgerow was approximately 5m in height with no ground flora present. |
| H12 | Ash Hawthorn Willow sp Oak Dogrose | <i>Fraxinus</i> <i>Crataegus monogyna</i> <i>Salix sp</i> <i>Quercus sp</i> <i>Rosa canina</i> | A 250m length of hedgerow located towards the north east of the site. Approximately 1.5-2m in height with a 5m gap at the northern end of the hedgerow. Ground flora comprised of bramble and nettles. |
| H13 | Ash Hawthorn Field Maple Oak | <i>Fraxinus</i> <i>Crataegus monogyna</i> <i>Acer campestre</i> <i>Quercus sp</i> | A 220 m length of hedgerow located to the east of the site. Approximately 1.5m in height. Ground flora comprised of bramble and nettles. |
| H14 | Ash Hawthorn Field Maple Oak Dogrose | <i>Fraxinus</i> <i>Crataegus monogyna</i> <i>Acer campestre</i> <i>Quercus sp</i> <i>Rosa canina</i> | A 150m length of hedgerow located to the east of the site. The hedgerow was intact and was approximately 1.5 m in height. Ground flora comprised of bramble and nettles. |

Table 4.1: Woody Species Recorded within Each Hedgerow Surveyed (continued)

The majority of hedgerows recorded on site are frequently managed, species-poor specimens typical of arable field boundaries or roadsides. These hedges tend to have an impoverished hedge ground flora, often as a result of nutrient enrichment from agricultural and highways runoff.

Section 3.4 provides an assessment of each of the hedgerows against the Hedgerow Regulations (1997) criteria, in order to assess whether any qualify as 'important' hedgerows.

4.4 HEDGEROW REGULATIONS (1997) ASSESSMENT

Table 4.2 provides a summary of the assessment for each hedgerow in accordance with the criteria summarised in Chapter 2. Where answers to questions are not known, they are left blank rather than estimated. This is not considered to present a significant constraint to a robust assessment.

| FEATURE | H1 | H2 | H3 | H4 | H5 | H6 | H7 | H8 | H9 | H10 | H11 | H12 | H13 | H14 |
|---|----------|----------|----------|----------|----------|----------|----------|----------|----------|----------|----------|----------|----------|----------|
| Existed for 30 years or more? | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ | ✗ | ✓ | ✓ | ✓ | ✓ | ✓ | ✗ | ✗ |
| Criteria listed in Part II of Schedule 1 (to be 'important' needs to satisfy one of the following or one from woody species list) | | | | | | | | | | | | | | |
| Historic hedgerow existing before 1850, marking a parish or township boundary | ? | ? | ? | ? | ? | ? | ? | ? | ? | ? | ? | ? | ? | ? |
| The hedgerow incorporates an archaeological feature | ✗ | ✗ | ✗ | ✗ | ✗ | ✗ | ✗ | ✗ | ✗ | ✗ | ✗ | ✗ | ✗ | ✗ |
| Is part of, or associated with, an archaeological site | ✗ | ✗ | ✗ | ✗ | ✗ | ✗ | ✗ | ✗ | ✗ | ✗ | ✗ | ✗ | ✗ | ✗ |
| Marks the boundary of, or is associated with, a pre-1600 estate or manor | ? | ? | ? | ? | ? | ? | ? | ? | ? | ? | ? | ? | ? | ? |
| Forms an integral part of a pre-Parliamentary enclosure field system | ? | ? | ? | ? | ? | ? | ? | ? | ? | ? | ? | ? | ? | ? |
| Contains certain categories of species of bird, animals or plants listed in the Wildlife & Countryside Act or JNCC publications. | ✗ | ✗ | ✗ | ✗ | ✗ | ✗ | ✗ | ✗ | ✗ | ✗ | ✗ | ✗ | ✗ | ✗ |
| No. woody species in 30 m section | 6 | 7 | 2 | 1 | 4 | 3 | 2 | 4 | 4 | 4 | 0 | 4 | 4 | 4 |
| Greater than seven | ✗ | ✗ | ✗ | ✗ | ✗ | ✗ | ✗ | ✗ | ✗ | ✗ | ✗ | ✗ | ✗ | ✗ |
| Six (needs 3+ associated features to be classified as 'important') | ✓ | ✓ | ✗ | ✗ | ✗ | ✗ | ✗ | ✗ | ✗ | ✗ | ✗ | ✗ | ✗ | ✗ |
| Six including one of the following – black poplar, large leafed lime, small leafed lime, wild service tree | ✗ | ✗ | ✗ | ✗ | ✗ | ✗ | ✗ | ✗ | ✗ | ✗ | ✗ | ✗ | ✗ | ✗ |
| Five (needs 4+ associated features to be classified as 'important') | ✗ | ✗ | ✗ | ✗ | ✗ | ✗ | ✗ | ✗ | ✗ | ✗ | ✗ | ✗ | ✗ | ✗ |
| Four (needs 2+ associated features & be adjacent to a footpath, bridleway, road used as a public footpath or a byway open to all traffic) | ✗ | ✗ | ✗ | ✗ | ✓ | ✗ | ✗ | ✓ | ✓ | ✓ | ✗ | ✓ | ✓ | ✓ |
| Adjacent to rights of way (footpath, bridleway, road used as a public footpath or a byway open to all traffic) | ✗ | ✗ | ✗ | ✗ | ✗ | ✗ | ✗ | ✗ | ✗ | ✗ | ✗ | ✗ | ✗ | ✗ |
| Total no. of associated features from those listed below | 3 | 4 | 2 | 1 | 4 | 0 | 1 | 1 | 2 | 3 | 1 | 2 | 2 | 2 |
| A wall or bank supporting the hedgerow | ✗ | ✗ | ✗ | ✗ | ✗ | ✗ | ✗ | ✗ | ✗ | ✗ | ✗ | ✗ | ✗ | ✗ |
| Less than 10% gaps | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ |
| An average of one standard tree or more per 50 m of hedgerow | ✗ | ✓ | ✗ | ✗ | ✓ | ✗ | ✗ | ✗ | ✗ | ✓ | ✗ | ✓ | ✗ | ✗ |
| At least 3 species from a list of 57 woodland plants | ✗ | ✗ | ✗ | ✗ | ✗ | ✗ | ✗ | ✗ | ✗ | ✗ | ✗ | ✗ | ✗ | ✗ |
| A ditch | ✓ | ✓ | ✓ | ✗ | ✓ | ✗ | ✗ | ✗ | ✓ | ✓ | ✗ | ✗ | ✗ | ✗ |
| In excess of 4 'points' from connections with other hedgerows, ponds or woodland (see Chapter 2) | ✗ | ✗ | ✗ | ✗ | ✗ | ✗ | ✗ | ✗ | ✗ | ✗ | ✗ | ✗ | ✗ | ✗ |
| A parallel hedge within 15 m | ✓ | ✓ | ✗ | ✗ | ✓ | ✗ | ✗ | ✗ | ✗ | ✗ | ✗ | ✓ | ✓ | ✓ |
| 'Important' Hedgerow? | ✓ | ✓ | ✗ | ✗ | ✗ | ✗ | ✗ | ✗ | ✗ | ✗ | ✗ | ✗ | ✗ | ✗ |

Key:

? Answer not known / category not assessed.

Table 4.2: Assessment of Hedgerow Features Based on Hedgerows Regulations (1997) Criteria

A total of 11 of the hedgerows surveyed were believed to be over 30 years old (see Section 3.2) and so meet the criteria in Section 4(a) of the Hedgerow Regulations (1997).

Most of the hedgerows assessed support a limited range of woody species. Of the hedgerows surveyed, only one of the hedgerows (H2) within the survey area was found to support seven or more woody species per 30 m length however it should be noted that for the purposes of the assessment, 'woody species' must be those listed in Schedule 3 of the regulations. As such, not all species count towards the woody species total. Most of the hedgerows assessed support a species poor range of woody species. The greatest diversity of woody species was recorded in the southern western boundary hedgerows H2, supporting 7 woody species and H1, supporting 6 woody species, while remaining hedgerows supported an average of 4 woody species.

The ground flora species listed in Schedule 2 of The Hedgerow Regulations (1997) are all woodland species, which are characterised by low mobility and dispersal distances. The presence of these species in hedgerows indicates that the hedgerow and soil around it has been present and undisturbed for a significant period of time. Almost all of the hedgerows on site had a species-poor ground flora, with none of the woodland indicator species recorded.

Of the hedgerows surveyed, H1 and H2 satisfies the criteria listed in Part II of Schedule 1 as follows:

- six woody species, in a 30 m length, and at least three associated features.

According to the above criteria, H1 and H2 are deemed to be 'important' under the wildlife and landscape criteria detailed in the Hedgerow Regulations (1997). While remaining hedgerows on site do not satisfy the relevant criteria, it should be noted that importance in respect of the historical and archaeological criteria have not been assessed.

5. DISCUSSION AND CONCLUSIONS

5.1 SUMMARY OF SITE PROPOSALS

The site is identified in the Crawley Local Plan as being part of an 'Area of Search' for strategic employment land, and is also part of an area safeguarded for future airport use. Savills are currently promoting the site for future development, although at the time of writing no detailed development proposals have been produced.

The following discussion identifies potential biodiversity opportunities and constraints that could apply to any future development of the site. The discussion, conclusions and recommendations should be reviewed as design proposals for the site evolve.

5.2 STATUS OF HEDGEROWS ON SITE

According to the above criteria, H1 and H2 are deemed to be 'important' under the wildlife and landscape criteria detailed in the Hedgerow Regulations (1997). While remaining hedgerows on site do not satisfy the relevant criteria, it should be noted that importance in respect of the historical and archaeological criteria have not been assessed.

5.3 CONCLUSIONS AND SUMMARY OF POTENTIAL IMPACTS

Removal of any hedgerow features associated with H1 and H2 as part of a proposed development would result in the loss of hedgerow habitat that is deemed to be important under the wildlife and landscape criteria of the Hedgerow Regulations (1997). Subsequently any works that may impact the hedgerows require prior permission from the Local Authority before any hedgerow removal can be undertaken on site to avoid an offence under the Hedgerow Regulations (1997). A recommendation to this effect is provided in Chapter 6.

Although the remained of the surveyed hedgerows on site do not meet the criteria for classification as 'important' hedgerows under the Hedgerow Regulations (1997), it should be noted that all hedgerows are of value to wildlife as they provide suitable habitat for a variety of uncommon species, as well as acting as dispersal corridors between other important habitat types.

Any works scheduled to occur in proximity to hedgerows have the potential to result in root damage and soil compaction, which may ultimately prove fatal to the woody species. Such damage can be minimised through appropriate mitigation such as the incorporation of an appropriate standoff distance for excavation machinery, and ecological supervision of excavations which may occur near to important features. This is particularly important should works be needed at times of year when hedgerows are likely to support nesting bird species.

The creation of gaps within hedgerows can result in habitat fragmentation, whereby species may be dissuaded from crossing open spaces and therefore become isolated. As such, it is advised that hedgerows should be retained and kept intact where possible and reinstated with appropriate native species planting of local provenance if temporary removal is required. Where the permanent loss of hedgerows is perceived, it is recommended that these are replaced elsewhere on site in order to preserve the overall hedgerow resource at the currently level or greater. A recommendation to this effect is made in Chapter 6.

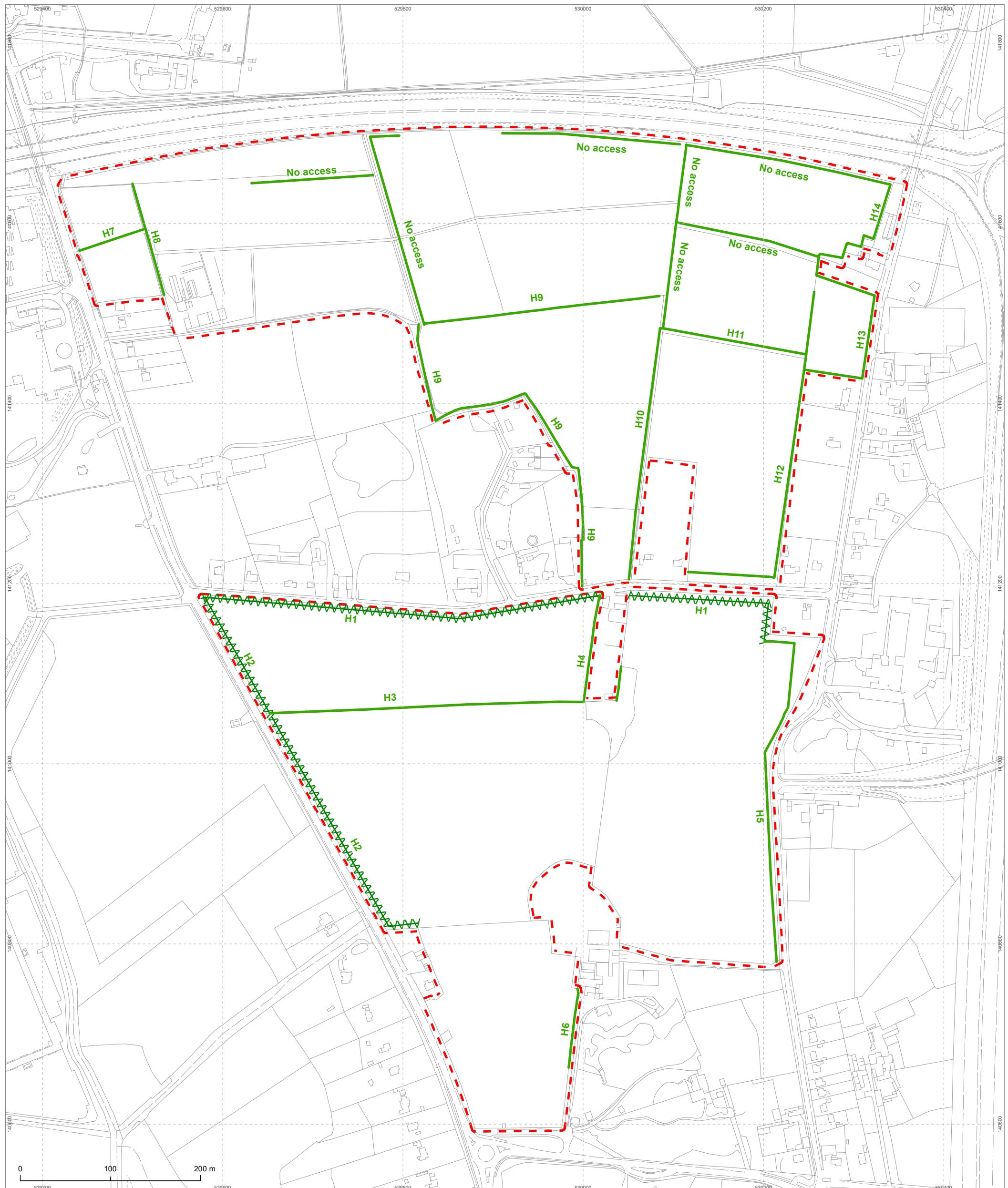
6. RECOMMENDATIONS

All recommendations provided in this section are based on Middlemarch Environmental Ltd's current understanding of the site proposals, correct at the time the report was compiled. Should the proposals alter, the conclusions and recommendations made in the report should be reviewed to ensure that they remain appropriate.

- R1** Hedgerows H1 and H2 are classified as important under the Hedgerow Regulations (1997), and should therefore be retained and protected during any development of the site. Should any impacts to important hedgerows be unavoidable, permission must first be sought from the local authority.
- R2** In accordance with Chapter 15 of the National Planning Policy Framework, the proposed development should be designed to allow for the retention and enhancement of hedgerow features where possible. Where loss of hedgerows is unavoidable, appropriate reinstatement/replacement should be undertaken, using native species of local provenance. Further, it is recommended that the proposed development incorporates the creation of new areas of native species hedgerow.
- R3** Any hedgerows on or adjacent to the site that are not to be directly impacted by the proposed works should be protected from harm during the development. Protection should be based on British Standard 5837: 2012 "Trees in relation to design, demolition and construction - recommendations".
- R4** To ensure compliance with the Wildlife and Countryside Act 1981 (as amended), vegetation clearance should be undertaken outside the nesting bird season. The nesting bird season is weather dependent but generally extends between March and September inclusive. If this is not possible then any vegetation that is to be removed or disturbed should be checked by an experienced ecologist for nesting birds immediately prior to works commencing. If birds are found to be nesting, any works which may affect them will have to be delayed until the young have fledged and the nest has been abandoned naturally.

7. DRAWINGS

Drawing C151186-02-01 – Locations of Hedgerows Assessment



Legend

- Site boundary
- Species-poor intact hedgerow
- ~~~~~ Species-rich intact hedgerow

| | | |
|---|--------------------------------|--------------------|
| Project | Gatwick Green, West Sussex | |
| Drawing | Hedgerow Regulation Assessment | |
| Client | Savills | |
| Drawing Number | C151186-02-01 | Revision 00 |
| Scale @ A3 | 1:4,000 | Date December 2019 |
| Approved By | SM | Drawn By VO |
|  Triumph House, Birmingham Road, Allesley, Coventry CV5 9AZ T:01676 525880 F:01676 521400 E:admin@middlemarch-environmental.com | | |
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C151186-02-01

8. PHOTOGRAPHS



Plate 1: H1



Plate 2: H2



Plate 3: H5



Plate 4: H8



Plate 5: H9



Plate 6:H12

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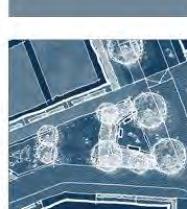
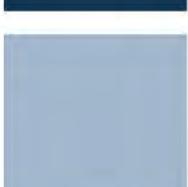
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Allen Pyke



Landscape Character and Visual Appraisal

**Gatwick Green,
Land off Balcombe Road &
Fernhill Road, Crawley**

Date: January 2020

Ref: 2893-RE-01a-DA

LAND AT GATWICK GREEN, CRAWLEY

LANDSCAPE CHARACTER AND VISUAL APPRAISAL

CONTENTS:

- 1. Introduction**
- 2. Approach**
- 3. Landscape Context – the Site and its Setting**
- 4. Principle of Development**
- 5. Landscape and Visual Sensitivity**
- 6. Capacity to Accept Development**
- 7. Summary & Conclusions**

FIGURES:

- Fig.1 Location Plan**
Fig 2 Aerial Photograph
Fig 3 Zone of Visual Influence & Viewpoints

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1. INTRODUCTION

- 1.1. This landscape appraisal has been prepared by Landscape Consultants, Allen Pyke Associates, who specialise in advising on the landscape and visual implications of potential development schemes.
- 1.2. The purpose of this appraisal is to assess the capacity of land located off the Balcombe Road and Fernhill Road in Crawley to accept development without causing harm to the existing landscape character and visual amenity of the proposed Site and its immediate setting.
- 1.3. The principle of new development on this land is being promoted to the Crawley planning authority following the recent proposal in the emerging Local Plan to remove an existing safeguarding policy and replace it with a wider Area Action Plan covering much of the remaining semi-rural land to the south and east of Gatwick Airport, including the area around the Balcombe Road.
- 1.4. The proposal has yet to be tested through public examination. Therefore, this assessment provides a high-level study putting the landscape case for use of the strategic landholding being assembled by Wilky Property Developments Ltd for a major new business campus to provide a range of world class commercial activities.
- 1.5. The title given to this area of land is 'Gatwick Green' and will be referred to as either 'the Strategic Site' or 'the Site' in this document.

2. APPROACH

- 2.1. The methodology used in the preparation of this appraisal has been carried out in accordance with the principles of best practice set out in the 'Guidelines for Landscape and Visual Impact Assessment, 3rd Edition, 2013' (GLVIA3) published jointly by the Landscape Institute and IEMA. Photographs are used to provide a range of representative viewpoints to illustrate the character of the Site and its immediate setting in accordance with the Landscape Institute Technical Note 06/19.
- 2.2. The study does not constitute a fully detailed Landscape & Visual Impact Assessment (LVIA) given that the proposals are being promoted at a policy level. It does seek to identify existing baseline landscape conditions and sensitivity of the key landscape elements to change (landform, landscape and cultural features, adjacent development, landmarks, key views and connectivity).
- 2.3. The appraisal will then provide recommendations for the form of development and provision of green infrastructure to mitigate or avoid the more significant potential effects.

2.4. Information gathering has been undertaken as a desktop review of published material and on Site investigations. A Site visit was undertaken on 29th November 2019, on a clear bright day when the absence of leaves on deciduous vegetation and woodland belts allowed the identification of the maximum zone of visual influence.

3. LANDSCAPE CONTEXT – THE SITE AND ITS SETTING (see Figures 1 & 2 below)

3.1. The Gatwick Green Site is located in the north-east corner of the Crawley Borough Council administrative area and is approximately 5km from the town centre. It lies to the south of the M23 motorway spur to Gatwick Airport, and the elevated junction 9 of the motorway. The spur road marks the boundary with Horley and the borough of Reigate & Banstead, while the motorway delineates the boundary with Tandridge District Council and open countryside to the east.

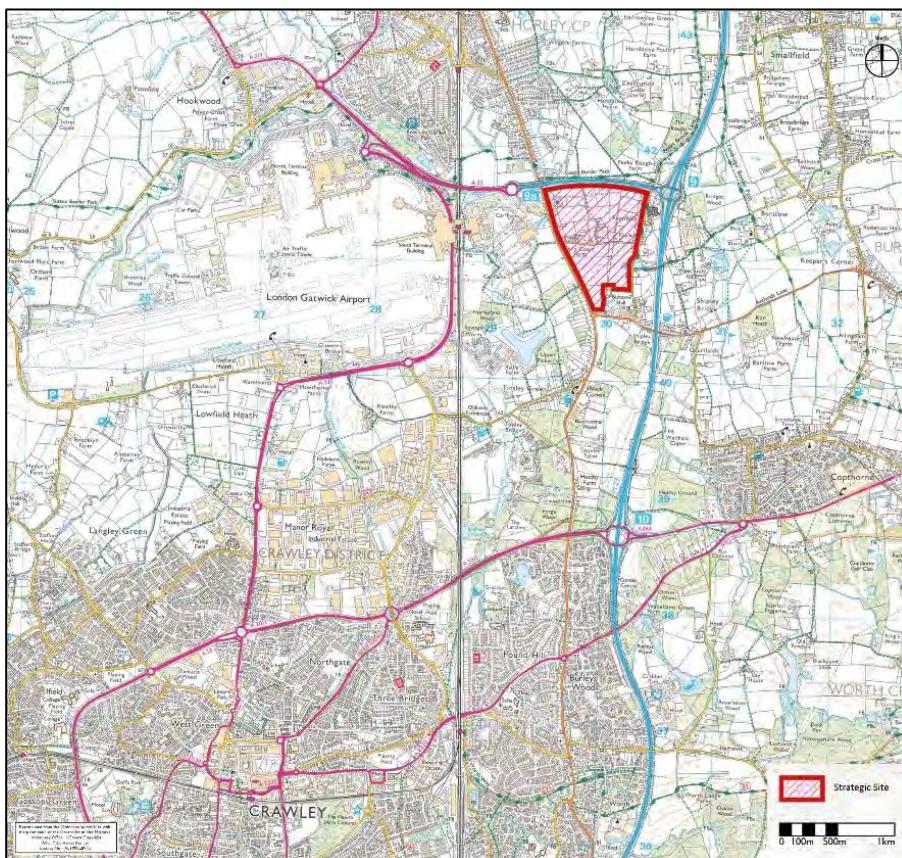


Fig.1: Location Plan

3.2. The strategic area is broadly triangular in shape and approximately 60 hectares in area. The northern boundary being contiguous with the M23 spur road, the western boundary running along the Balcombe Road (B2036), the eastern boundary running along Peeks Brook Lane, with the short southern tip touching Antlands Lane (B2037). The land is divided into two by Fernhill Road, a narrow unclassified lane that runs from west to east between the Balcombe Road and Peeks Brook Lane.

3.3. The landscape in and around the strategic area was once rural but has been heavily influenced over the past 70 years by three factors:

1. The expansion of the small West Sussex village of Crawley as a New Town in the late 1950s.
2. The transformation of Gatwick Airport since the 1950s into a major international airport.
3. The opening of the M23 in 1975, linking both Crawley and the airport to the national motorway network.

Land Use

3.4. The Strategic Site consists of a mix of small and medium sized fields used primarily as paddocks for horse and cattle grazing and its appearance is typical of many urban fringe areas. Within this matrix of irregular fields are located isolated groups of residential properties dotted along the roads that generally pre-date the formation of the New Town.

3.5. Fernhill Road and Peeks Brook Lane also contain a haphazard collection of small commercial enterprises that range from vehicular storage areas and light industrial works to a soil storage business and small office complexes.

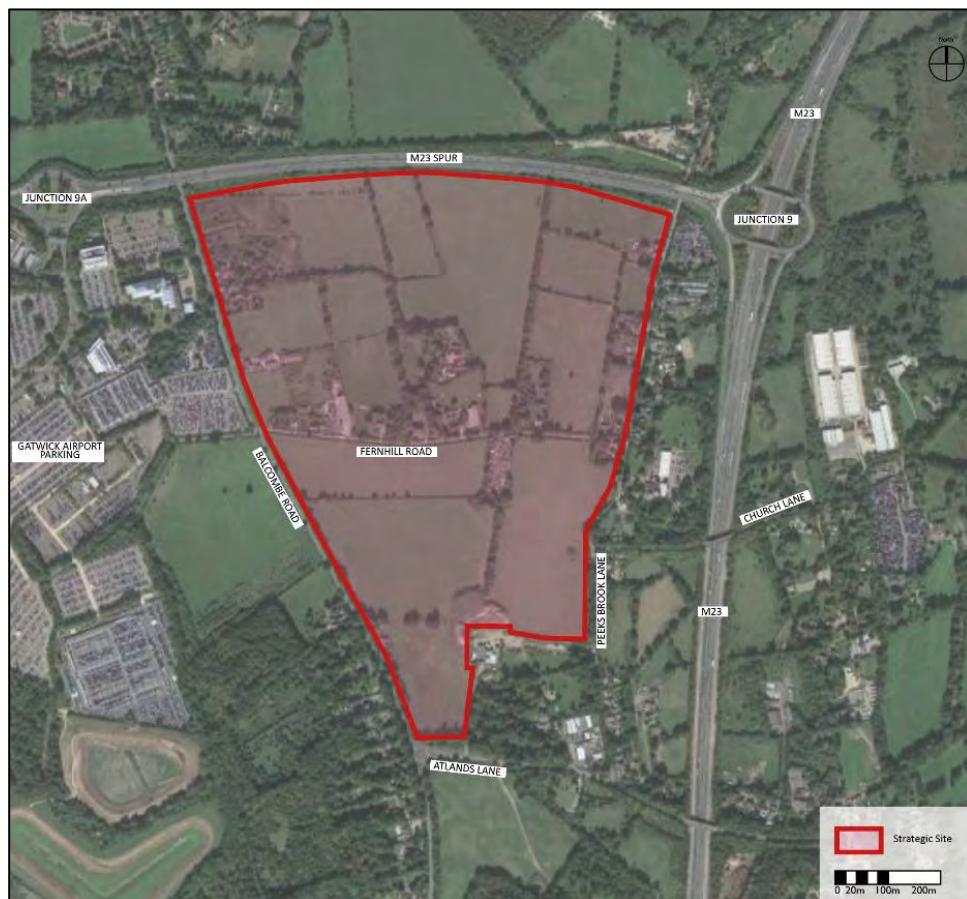


Fig.2: Aerial Photograph

Topographical Features & Vegetation

- 3.6. The ground is generally flat with a slight fall from Antlands Lane (61m AOD) down to the northern boundary beside the M23 spur (59m AOD). The ground is poorly drained with the clayey soils typical of the Low Weald being prone to seasonal flooding. The Natural England 'Agricultural Land Classification Map' for the Crawley area indicates the rural area around the Strategic Site to be a mix of the poorer 3 and 4 quality grades (within a scale of 1 [excellent] down to 5 [very poor]).
- 3.7. A particular landscape feature of the area is the woodland and shelterbelt cover along the road and more distant ridge slopes as well as the extensive, often clipped, hedgerows that surround a tight collection of historic enclosure fields. The cumulative effect is to create a strong sense of containment from boundary vegetation when travelling on the roads.
- 3.8. The elevated motorway junction and spur road embankment over Peeks Brook Lane are a prominent local feature that reinforces the sense of containment to the north half of the Site.
- 3.9. To the west of the Balcombe Road are located the extensive airport parking facilities, the main London to Brighton railway line and airport terminal buildings. The east-west alignment of the runway means the flight path passes directly over the Site area with the resultant noise and visibility of aeroplanes regularly passing overhead when either landing or taking off.

Connectivity

- 3.10. There is a distinct separation of the highway network between the high traffic movements on the motorway to or from the airport, and the secondary movement of local traffic on the Balcombe Road and Antlands Lane. However, the local roads providing access to the Site do not connect directly to the M23 or motorway spur road junctions.
- 3.11. The northern part of Peeks Brook Lane has become a cul-de-sac lane since the construction of the motorway but still provides access to a small number of older residential properties and an eclectic range of commercial enterprises set back from the road behind tall hedgerows and trees. The southern section provides local access via Church Lane over the motorway to the countryside to the east.
- 3.12. One public right of way runs northwards from Fernhill Road via Donkey Lane but was severed by construction of the M23 spur road and now continues along the motorway boundary to Balcombe Road. It passes under the motorway bridge before joining the Sussex Border Path on the Horley side of the spur road and reconnecting with the original footpath. The Sussex Border Path continues

along the north side of the motorway spur up the bridge over Peeks Brook Lane before travelling south along the road to Church Lane where it passes over the main M23.

- 3.13. There are no public footpaths crossing the southern part of the Site.

Planning Policies

- 3.14. The National Planning Policy Framework (2nd Edition, 2019)(NPPF) sets the criteria for local authorities to draft Local Plans and assist decision-making on planning issues. The NPPF places an overriding presumption in favour of sustainable development and for Local Plans to positively seek opportunities to meet the development needs of their area.
- 3.15. The document provides guidance on achieving well-designed places, ensuring the effective use of land, and the conservation and enhancement of the natural environment. Chapter 15 deals with the protection of valued landscapes, soils and biodiversity sites, and provides a hierarchy for judging their status while stipulating the need to allocate land with the least environmental or amenity value. The chapter also confirms the need to assess the potential detrimental effects of development and extent to which their impact on the environment could be moderated.

Local Plan

- 3.16. This appraisal was produced when the Local Plan was under review with the emerging Local Plan at the Regulation 18 stage. The existing Development Plan comprises the adopted Crawley Borough Local Plan 2015 (CBLP), the Joint Minerals Local Plan (2018) and the Waste Local Plan (2014). The key policies in the CBLP affecting the Site include:

- **Policy GAT2** – Safeguarded Land;
- **Policy EC9** – Rural Economy;
- **Policy CH9** – Development Outside the Built-Up Area (the Site lies within the North East Crawley Rural Fringe);
- **Policy CH8** – Important Views (the Site lies within a long distance view from Target Hill);
- **Policy ENV1** – Green Infrastructure (the Site is part of a Biodiversity Opportunity Area) and;
- **Policy ENV2** – Biodiversity (the Site is part of a Biodiversity Opportunity Area).

- 3.15 The Site is safeguarded for a second runway for Gatwick Airport under Policy GAT2 of the CBLP.
- 3.16 The Site's location within the rural area of Crawley means Policy EC9 is relevant. Development proposals involving the loss of the best agricultural land (Grades 1-3a) are not permitted. The Site is classified as being in lower value 3 and 4 grade land classification, so development would not be contrary to this policy.
- 3.17 The Site sits outside the boundary for the 'built up area' of Crawley (Policy CH9). Development in such areas should meet a number of criteria, and mitigation and/or compensation must be provided if harm to the landscape character cannot be avoided. The Site falls within the North East Crawley Rural Fringe Character Area – within this Character Area, proposals are supported where they avoid or can mitigate visual/noise intrusion. The area has an important function to play in separating Gatwick Airport from Crawley and providing recreational links to northern Crawley town. The policy includes design criteria intended to take account of views, visual amenity, landscape features and local character.
- 3.18 Policy CH8 seeks to protect and/or enhance long distance views, one of which crosses the north western half of the Site and extends from Target Hill to the south west of Crawley. The Target Hill viewpoint location in CH8 lies at the junction of Hobbs Road and Edrich Road in the Broadfield Neighbourhood area. From road level distant glimpsed views over or between houses are possible from more elevated locations but the town centre, and taller buildings around the airport and the Strategic Site, are screened by substantial blocks of tall intervening vegetation. The policy requires development not to obstruct the foreground of this view and should protect or enhance any feature towards which the view is directed. Proposals must be justified by the use of view montages or cross sections but it should be noted that the Strategic Site is located at the distant northern edge of this view rather than the foreground.
- 3.19 The existing undeveloped parts of the Site are located within the 'Gatwick Woods Biodiversity Opportunity Area' (BOA) and are subject to green infrastructure (GI) and biodiversity policies. Any

future proposals for the Site will need to include a comprehensive GI and landscape assessment and demonstrate compliance with the policy. However, the BOA is ranked in the third and lowest level of the hierarchy of biodiversity designations, so moderating the effect of the policy

- 3.20 Policy ENV1 'Green Infrastructure', requires the protection and enhancement of the green network in the Borough and supports development that protects and enhances green infrastructure. This means that boundary hedgerows and trees within the Strategic Site must be retained; any gaps filled with new planting and losses (for access etc) compensated through additional planting; provide additional green links within the Site and to adjacent hedgerows, and where possible incorporate open space and pedestrian links.
- 3.21 Policy ENV2 'Biodiversity', requires a net gain in biodiversity in BOAs as well as the incorporation of features to support biodiversity in development proposals.

Crawley Local Plan Review

- 3.22 The Council conducted a consultation on the Crawley Borough Local Plan review 2020-2035 (CBLP review), which closed in September 2019. The Regulation 19 pre-submission version is due to be issued for consultation on 20 January 2020. This is likely to contain a revised approach to land use policy around the Airport, with the CBLP review removing the Safeguarded Land (and related policy) and instead, identifying the land for an Area Action Plan (AAP) to address any robust future needs of the airport alongside the future economic and social aims of Crawley.
- 3.23 The newly proposed Policy SD3 'North Crawley Area Action Plan' covers the large tract of land stretching around the southern and eastern perimeter of the airport; with the eastern section including the Strategic Site. The review of the AAP will take into consideration the landscape, visual, heritage and environment assets, including ancient woodland and nature conservation sites but it is assumed the policy will seek to maximise development but retain, wherever practicable, important or significant existing features.
- 3.24 The Development Plan and emerging Local Plan policies are consistent in the general protection of landscape character and landscape features as well as emphasizing the importance of good design, the incorporation of green infrastructure into new developments and maintaining local distinctiveness by reflecting the positive character of both man-made and natural features.
- 3.25 In addition to local planning policies, any new development around the airport would have to comply with specific operational restrictions. The flight path to and from the Gatwick runway passes over

the central part of the Strategic Site and any new development would need to comply with building height and public safety considerations. These would include factors such as ‘take-off climb’ and ‘landing approach’ zones as explained in the Civil Airport Authority’s (CAA) publication CAP 168. Although the Site does lie within the 15km CAA ‘Safeguarding Area’, the indications are that the Strategic Site is sufficiently distant from the runway to avoid any major restriction on building heights.

Landscape and Other Designations

- 3.26 The Strategic Site is not located within any national, statutory or local landscape designation. The entire administrative area of Crawley, including the Strategic Site, also lie beyond the London Metropolitan Green Belt boundary, which stretches as far south as the neighbouring local authorities of Tandridge, Mole Valley and Reigate & Banstead. While the adjacent Low Weald countryside to the east and south of the M23 is attractive it is only the landscape to the south of the town that lies within the High Weald AONB. The Strategic Site is remote from the AONB and does not form part of its setting.
- 3.27 The Site is a Biodiversity Opportunity Area but is not subject to any other statutory or local nature conservation or environmental designation.
- 3.28 The Strategic Site is not located within any of the Borough’s ‘Areas of Special Local Character’ or a statutory ‘Conservation Area’. However, two listed buildings on Donkey Lane and a building of local significance on the north of Fernhill Road lie within the Strategic Site area. Five other similarly designated buildings of local significance also lie on or adjacent to Peeks Brook Lane and Antland Lane near to the Site boundary.

Landscape Character

- 3.29 The landscape character of the Strategic Site and wider area has been examined at national, county and local levels.

National Level

- 3.30 Crawley is located in the Natural England national character profiles within the ‘Low Weald’ character area (No.121). The Low Weald is described as being a broad low-lying clay vale which runs around three sides of the High Weald through Kent, Sussex and Surrey. Over such a large area there is local variation but the profile does make specific reference to the Gatwick, Crawley and Horley area as having urban influences. This is distinctly different to the overall character area where there

is a predominately pastoral and tranquil landscape containing small towns and villages scattered among an intricate mix of woodland, coppice, tree-lined watercourses, grassland and hedgerows.

- 3.31 The national profile identifies a number of landscape opportunities that include the incorporation of high quality green infrastructure and buffering of zones within planned new landscapes around predicted growth areas across the region – especially around settlements such as Crawley.

County Level

- 3.32 At a regional level West Sussex County Council produced their ‘Land Management Guidelines’ in 2003. The landscape around the west and northern parts of Crawley, including the airport and Strategic Site, lie within area LW8: ‘Low Weald Northern Vales’. This area is described as a narrow clay vale running between low wooded ridges that contain a mixed landscape of shaws, hedgerows and pasture overlain by road and rail corridors. Crawley, Horsham and Gatwick Airport are noted for their dominant, strong suburban and urban fringe influences.
- 3.33 The overall sensitivity of this character area is considered to be ‘moderate’ with the thick hedgerows, hedgerow trees and occasional woodlands reducing its visual sensitivity. Key issues associated with change to the landscape include: visual & noise impact from Gatwick Airport, traffic pressures, localised visual impact of urban fringe uses (horse paddocks, smallholdings and small scale industrial uses), urban development and loss of hedgerows.

Local Level

- 3.34 The Crawley Landscape Character Assessment (LCA) was published by the Borough in 2012. The overarching purpose of the LCA was to conserve and enhance the distinctive character of the landscape from its recognisable and consistent features. For Crawley this also meant the need to accommodate change to meet social, economic and environmental objectives.
- 3.35 The study described the tight administrative boundary around the town with the near completion of the New Town development strategy and expansion of the airport to agreed limits. The remaining sections of countryside within the town boundary are regarded more as continuations or edges to the extensive surrounding High and Low Weald rural landscapes in neighbouring local authorities rather than separate character areas.
- 3.36 The two remaining significant areas of rural landscape are located between the existing settlement edge of the town and the airport boundary. The land to the south of the airport is identified as ‘Area 1: Upper Mole Farmlands Rural Fringe’ and the area to the east as ‘Area 6: North East Crawley High

'Woodland Fringes'. However, the study confirms that both areas are set within the lower lying Low Weald landscape.

- 3.37 Area 6 includes the Strategic Site and is defined by the main London to Brighton railway to the west, the M23 motorway to the east, and the M23 spur to the north. To the south, the recent residential expansion of the Pound Hill Neighbourhood north from the A2011 means that the character area has been halved in size since production of the report in 2012. The assessment for the character area repeats verbatim the judgements made in the County assessment, including the conclusion that the overall area is of 'moderate' sensitivity to change.
- 3.38 The Area 6 LCA does recognise that the M23 creates a negative boundary that with limited access prevents a positive integrated relationship between Crawley and the wider countryside. Whilst highlighting the strong suburban influences of Crawley and Gatwick Airport, the study also considered that the condition of the landscape to be in decline because of visual/noise intrusion. There is no detailed analysis of the different land uses and their effects on the character of the LCA but a number of 'key issues' are identified:
- Visual and noise impact of Gatwick Airport and the M23;
 - Pressures of traffic on rural lanes;
 - Potential for increased recreational pressure;
 - Localised visual impact of urban fringe uses, including development of horse paddocks, airport car parks, smallholdings and small scale industrial uses; and,
 - Pressure from further urban development.
- 3.39 Nevertheless, the study states that this area is of 'high landscape value' due to its proximity to the urban area. It is presumed that this judgement is made on the scarcity of this type of landscape within the Borough boundary rather than an evaluation its intactness, condition, appearance or low status in the hierarchy of landscape designations, as set out in the NPPF.
- 3.40 Had such an analysis been undertaken, the remaining semi-rural areas in the LCA would at best be attributed a moderate sensitivity; whereas the airport land and piecemeal development in and around the Strategic Site would have attracted a lower sensitivity rating and, consequently, possess a higher capacity to accommodate change.

Visibility

- 3.41 The zone of visual influence for the Strategic Site wraps tightly around the adjacent road boundaries because of the extensive network of tree and hedgerow cover along with the well-established internal field boundary vegetation. To the west of the Balcombe Road the clipped roadside

hedgerows allow filtered views across fields towards the tops of larger airport buildings but, in contrast, the large short and long term parking areas are at ground level and are screened by tall intervening vegetation.

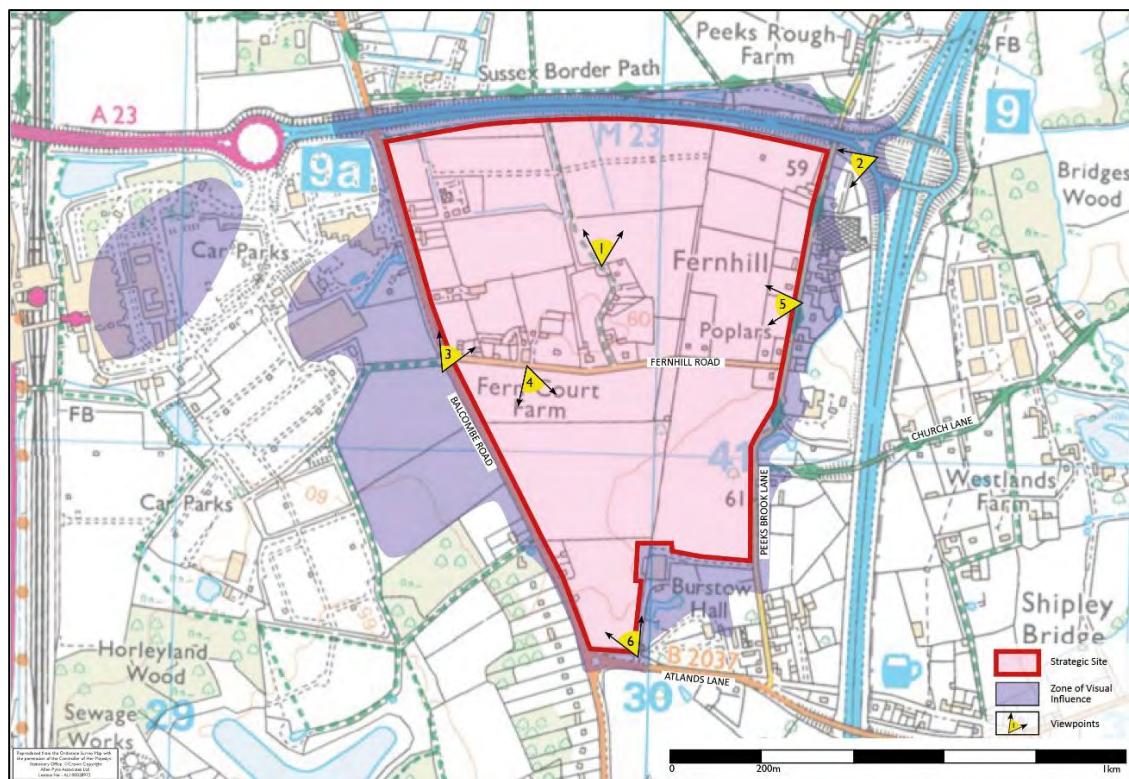


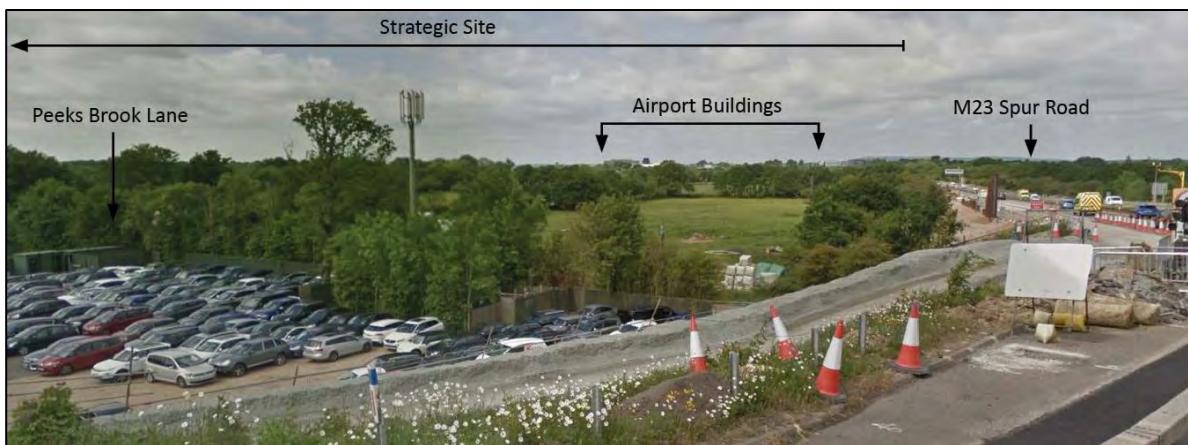
Figure 3: Zone of Visual Influence & Viewpoints

- 3.42 The extensive roadside and field boundary trees and hedgerow vegetation within the Strategic Site prevent longer views across the Site area as well as screening reverse views into the Site from the surrounding landscape. Glimpsed views into parts of the Site can be obtained from short breaks in taller roadside vegetation or at field gates. The density of this vegetation also provides an effective screen in winter months although filtered views of the grazing land beyond the road boundary hedgerows can be obtained in some roadside locations.



Viewpoint 1: Donkey Lane footpath looking north towards the M23 spur road and Horley

- 3.43 The elevated M23 motorway junction, spur road and associated vegetation form a significant barrier to views out of the Strategic Site to the north (View 1, above). Fields to the north of the spur road add to the visual separation between the Strategic Site and the settlement edge of Horley. Views into the northern part of the Site are obtained from the elevated western edge of the motorway junction and the spur road. Vegetation on the motorway boundary embankment partially screens the grazed fields in the foreground but solid lines of vegetation across the Strategic Site prevent views further south (View 2).



Viewpoint 2: Elevated M23 Junction looking south across the Strategic Site (Google 'Street View' image)



Viewpoint 3: Balcombe Road and Fernhill Road junction looking into small field in the Strategic Site

- 3.44 Some views into adjacent parts of the Site are possible from the busy Balcombe Road and the footpath running along the western side of the road around the Fernhill Road junction (View 3, above). To the north, the Site is screened by existing residential properties and vegetation lining the road. To the south, tall hedgerows and a continuous line of trees screen views throughout the year. Where short gaps do occur in the roadside screen, further field boundary vegetation prevents more distant views into the rest of the Site (View 4, below).

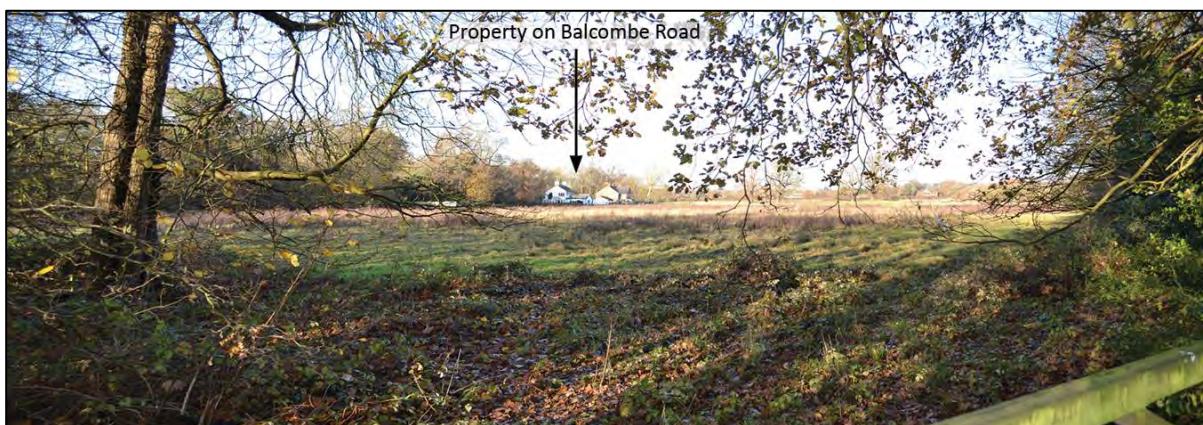


Viewpoint 4: Fernhill Road looking south across part of the Strategic Site



Viewpoint 5: Peeks Brook Lane with glimpsed view of a small enclosed field within the Strategic Site

3.45 Peeks Brook Lane is narrow and also lined with mature trees and hedgerow vegetation allowing only occasional glimpses into the Strategic Site, where further field boundary vegetation screens wider views (View 5). Properties along the road also tend to be screened by this vegetation. The short Antlands Lane boundary consists of a broad belt of mature trees that screen views into the Site from the road but limited views can be obtained from an access track off the road (View 6, below).



Viewpoint 6: Antlands Lane Site boundary beyond the dense woodland screen on the road frontage

- 3.46 Taller buildings associated with the airport, particularly the terminal buildings and hotels form occasional reference points above the treed skyline from the motorway spur (View 2, above) and major roads around the terminal areas. This intermittent mix and type of development in combination with the gazed land and surrounding road infrastructure in and around the Site creates the appearance of a piecemeal and uncoordinated urban fringe landscape.
- 3.47 Although the Strategic Site is generally well screened from adjacent roads, longer views are only possible from elevated locations on the motorway and where footpaths cross larger fields. Views are generally undistinguished but there still remains some visual value to the urban fringe land around the Strategic Site despite the incongruous urban elements.
- 3.48 Within the Crawley settlement boundary, views of fields and rural activities are a diminishing feature, but are still a common component of the extensive, and largely unaltered, Wealden countryside surrounding the town.
- 3.49 The high levels of screening reduce the sensitivity of views to change. The views into and out of the Strategic Site, as illustrated in the representative viewpoints above, are generally of moderate sensitivity but there are localised views of older commercial buildings, parking and external storage areas that are of low sensitivity.

4 PRINCIPLE OF DEVELOPMENT

- 4.1 The Strategic Site forms part of a larger semi-rural area that has been safeguarded for many years as part of the proposal for a second runway at Gatwick. The necessity to protect this land has been removed by a government decision to locate additional runway capacity in the South East of England at Heathrow Airport in West London.
- 4.2 Crawley Borough Council has responded by proposing in its Local Plan Review (in late 2019) the removal of the safeguarding designation covering all the land between the town's settlement boundary and the airport. The area previously included in the 'Upper Mole Farmlands Rural Fringe' and 'North East Crawley High Woodland Fringes' LCAs would be to be amalgamated under proposed Policy SD3 into the 'North Crawley Area Action Plan'. The policy commits the Council to starting consideration of the AAP within three months of adopting the emerging Local Plan.
- 4.3 Whilst the policy is at an embryonic stage, and there is no guarantee either the policy or emerging Local Plan will remain unaltered, SD3 does establish the potential for development in part or whole of the proposed AAP. If the work planned to start after adoption were to go ahead then the Strategic

Site would form an important part of that review of potential development areas and associated implications for the landscape, heritage and other environmental assets.

- 4.4 In light of SD3 this Landscape Appraisal has identified the significant, but limited, baseline landscape and visual constraints associated with the Strategic Site. The second part of the study provides conceptual recommendations for a landscape led approach to guiding development on the Strategic Site as a high quality and appropriate commercial gateway for both Crawley and international travellers using the airport. An essential part of this input is to incorporate from the outset a landscape framework that will assist the integration of the built form into the landscape, mitigate the potential effects of construction, enhance existing landscape and topographic features, improve biodiversity, create better connectivity and add to the recreational opportunities in the area.
- 4.5 Given the landscape and visual context for the Strategic Site, it has to be accepted that development of the existing agricultural land will inevitably have a permanent effect on the character and visual perception of the area. However, with sensitive design and appropriate mitigation that accords with planning policy guidance, future high quality development on the Strategic Site is capable of becoming a very positive addition to the local landscape as well as delivering an enhanced range of attractive landscape, environmental and amenity benefits.
- 4.6 The potential change in planning policy does present a unique opportunity to create a comprehensive approach to the inclusion of the Strategic Site in the Borough's plans for economic growth. Any future assessment of the Site's potential should consider:
 1. The protection and augmentation of important landscape, heritage, and other environmental features;
 2. Provision of a strong and integrated Green Infrastructure network that retains existing vegetation of merit, preserves the character and appearance of the area, and maintains existing connections with surrounding tree belts and hedgerows;
 3. The sympathetic assimilation of development into the landscape;
 4. The mix of development opportunities to maximise future growth potential; and,
 5. Improvements to highway and pedestrian networks to meet future needs.
- 4.7 The design approach should involve continued collaboration between the design team for the Strategic Site, the local authority and other key stakeholders to achieve the aims of the AAP. The scheme proposals would also need to fully respect the landscape and local distinctiveness of north-east Crawley, and maximise the opportunities presented by the Site. The evolution of the design needs to be part of an iterative process that meets the long term economic and social aspirations of the whole community.

5 SUMMARY & CONCLUSIONS

Policy Constraints

- 5.1 The Strategic Site is located 5km to the north-east of Crawley town centre, immediately to the south of the motorway spur road leading from junction 9 of the M23 to Gatwick Airport.
- 5.2 The planning policies governing development are set out in the Crawley Borough Local Plan 2015. The Regulation 19 pre-submission version of the Borough's emerging Local Plan is due for consultation in late January 2020. With the ending of Government plans for a second runway at Gatwick Airport, the Local Plan review is to contain a revised approach to land use policy around the airport. This is likely to involve the removal of the Safeguarded Land designation, which includes the area covered by the Strategic Site.
- 5.3 A small number of general planning policies restricting development, including the Safeguarded Land (Policy GAT 2), will be superseded if the proposed North Crawley Area Action Plan (Policy SD3) is adopted as part of the new Local Plan.
- 5.4 The Strategic Site is not covered by any statutory or local policies designed to protect scenic quality or beauty of the natural landscape. The only environmental policy designation affecting the Site is the local Gatwick Woods Biodiversity Opportunity Area listed under Policy ENV 2. Within the Strategic Site there are also two Listed Buildings and one building of local significance. The proposed AAP review will take into consideration the implications for all existing environmental and cultural assets.
- 5.5 Proposals for the Strategic Site would be judged by the planning authority at the time of any future submissions for compliance with general landscape policies governing the design and protection of the landscape features, green infrastructure and biodiversity.

Land Use

- 5.6 The Strategic Site consists primarily of low-lying agricultural land in the poorer 3 and 4 quality classifications. The underlying clay soils are subject to seasonal flooding and restrict their use mainly to grazing and paddocks.
- 5.7 Whilst planning policies have limited development in and around the Strategic Site, there are a significant number of residential and small commercial properties along the local roads bounding and crossing the land (Balcombe Road, Fernhill Road and Peeks Brook Lane). These properties

generally pre-date the creation of the New Town but many have been adapted to support smaller scale airport activities with light industry, offices, storage and parking facilities.

Landscape Character

- 5.8 The Strategic Site does not lie within any statutory landscape, nature conservation or heritage designation and is located beyond the London Metropolitan Green Belt, which does not extend into the Crawley administrative area.
- 5.9 The northern part of Crawley lies within the Low Weald landscape character area, a rural landscape type recognised at both national and local levels. LCAs are not planning policy designations but their description of the landscape components and management objectives are used as part of the evidence base for making planning decisions.
- 5.10 The Strategic Site is located within the local 'North East Crawley High Woodland Fringes' LCA. The amount of countryside remaining within the Borough boundary is limited and generally restricted to the safeguarded land around the airport. While this area contains many of the features associated with the surrounding Low Weald landscape the significant presence of urban elements, proximity to Gatwick Airport and horse grazing give the Strategic Site and its immediate setting a distinct urban fringe quality.
- 5.11 The Crawley Landscape Character Assessment considers the overall sensitivity of the Woodland Fringes LCA to be moderate with the enclosure created by substantial hedgerows and belts of tall vegetation reducing visual sensitivity to change. This Landscape Appraisal agrees with this assessment.
- 5.12 The Woodland Fringes LCA also suggests the area to be of high landscape quality but since the publication of the Borough's study in 2012 the southern part of the area has been used to form part of the expanded Pound Hill residential neighbourhood. This Landscape Appraisal, therefore, considers that the remaining urban fringe character and airport land uses in and around the Strategic Site can at best be considered to be of moderate landscape value.

The area around the Strategic Site still possesses the typical dense hedgerow and woodland cover described in the wider LCA. This existing screening vegetation allows only a limited zone of visual influence that wraps tightly around the Site and gives the land a good capacity to accommodate development. On-site belts of tall vegetation also block long or open views across the Strategic Site. The proposed future development would be designed to retain and enhance existing vegetation,

which would be reinforced by major new planting within the green infrastructure and public open spaces.

Access constraints

- 5.13 Crawley and the airport are well connected to national road and rail networks. However, the secondary local road network around the Strategic Site has no direct access to the M23; the construction of which has affected the connectivity of some adjacent roads and footpaths.

Future Development

- 5.14 The inclusion of the Strategic Site in the preparation of the North East Crawley Area Action Plan would create a unique opportunity to unlock the potential of a substantial and sustainably located piece of land whose development would provide a significant stimulus to future economic growth for Crawley, Gatwick Airport and the sub-region.
- 5.15 Development of green field land will inevitably alter the character and appearance of the Strategic Site. Sensitive regeneration of this undistinguished landscape has the potential to create a coordinated, high quality development that is not only appropriate to its gateway location beside the main highway approach to one of the world's leading airports, but should also benefit the perception of the wider setting.
- 5.16 The design of development on the Strategic Site will require a comprehensive and collaborative approach with other key stakeholders in response to the new Area Action Plan proposals. The Strategic Site has the capacity to accommodate exemplar development, reinforce the existing historic pattern of the landscape and enhance the existing sense of arrive into the north eastern section of Crawley. The design principles should respect the character of the surrounding rural area, enhance the existing matrix of tall hedgerows and woodland cover, and set any new business campus within an attractive and vibrant landscape framework.
- 5.17 This green infrastructure should not only contribute to the creation of an imposing setting for the new development but also provide landscape buffers and a range of interlinking multifunctional spaces for recreation and new footpath connections. An integral SuDS drainage system would increase the substantial opportunities for enhancement of wildlife habitats and biodiversity across the whole Strategic Site and encourage use of the amenity areas by the wider community.

Gatwick Green

Heritage Constraints Appraisal



Project: Gatwick Green - Heritage Constraints Appraisal

Client: The Wilky Group Limited

Revision: 001 (First issue)

File Origin: 2. National\West Sussex\Gatwick Green

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Abbreviations and Conventions used in the text

| | | | |
|-----|-----------------------------|------|-------------------------------------|
| c. | circa | km | kilometres |
| CA | Conservation Area | LB | Listed Building |
| ha | hectares | LPA | Local Planning Authority |
| HA | Heritage Asset | m | metres |
| HE | Historic England | NGR | National Grid Reference |
| HER | Historic Environment Record | NHLE | National Heritage List for England |
| | | NPPG | National Planning Practice Guidance |
| | | NPPF | National Planning Policy Framework |

Assumptions and Limitations

This report is compiled using primary and secondary information derived from a variety of sources, only some of which have been directly examined. The assumption is made that this data, as well as that derived from other secondary sources, is reasonably accurate.

Compliance

This document has been prepared in accordance with the requirements stated within the National Planning Policy Framework (NPPF; (Ministry of Housing, Communities & Local Government, 2019) National Planning Practice Guidance (NPPG; (Ministry of Housing, Communities & Local Government, 2019) and the Chartered Institute for Archaeologists' Standard and guidance for historic environment desk-based assessment, and Standard and guidance for commissioning work on, or providing consultancy advice on, archaeology and the historic environment (Chartered Institute for Archaeologists, December 2017).

Executive summary

Savills has been commissioned by The Wilky Group Limited to carry out a Heritage Constraints Appraisal (HCA) in regard to the potential development of a Site at Gatwick Green, Crawley.

The appraisal constitutes a preliminary scoping report for the client, outlining the likely constraints to future scheme options in terms of buried heritage assets (archaeological remains) and above ground assets (standing buildings of historic interest and their setting). Such assets, whether designated or not, are afforded protection and can represent a planning constraint to future development.

This top-level appraisal does not constitute a full Archaeological Desk Based Assessment or Heritage Statement that might be submitted to the Local Planning Authority (LPA), where required, to accompany a planning application, but will provide the historic environment baseline for such documents. The Site is not within a conservation or archaeological priority area and there are no Registered Parks and Gardens which would be impacted by development on the Site.

Above ground heritage assets

There are two statutory listed buildings within the Site (Lilac cottage and Old cottage), there are several locally listed buildings in the immediate vicinity of the Site. The Historic Environment Record (HER) identifies several historic farmsteads to the south of the Site which may constitute undesignated heritage assets.

The statutory listed buildings of Lilac cottage and Old cottage are predominantly surrounded by mature vegetation with limited views looking south west across the open land to the north east. The locally listed buildings of the Poplars and Royal Oak House are also surrounded by mature vegetation; these assets have less weight in planning decisions than statutory protected assets, but nonetheless remain a consideration.

It is anticipated that future development would not materially impact these assets. However, any future development proposals would have to be sensitive to the setting of the statutory listed buildings as well as the Locally listed buildings in close proximity to the development area. The LPA may view the agricultural land surrounding these assets as a contributor to their significance.

Below ground heritage assets

Within the Site itself there are no designated assets of archaeological importance, such as scheduled monuments. Having assessed the Historic Environment Record (HER) data it is considered that there is a low archaeological potential within the Site for buried remains dating from the Prehistoric period to be present. Through the assessment of previous archaeological investigations in the vicinity of the Site, it is deemed there is a moderate potential for Romano-British to post-medieval remains to be present, these are likely to comprise agricultural features which would only be of minor local significance.

Overall, it is unlikely the Site would yield any archaeological remains of medium or high significance. However, due to the Site being located in a recognised historic landscape, the local authority may require an archaeological fieldwork evaluation which would assess the below ground potential for archaeological remains.

It is proposed that any archaeological work would need to be undertaken in accordance with an approved Written Scheme of Investigation (WSI) and could be carried out under the terms of a staged archaeological planning condition set out under the granting of planning consent.

1.0 Introduction

1.1 Project background

1.1.1 Savills Heritage Planning has been commissioned by The Wilky Group Limited to carry out Heritage Constraints Appraisal (HCA) to inform its promotion of the Gatwick Green site through the Crawley Borough Local Plan (CBLP review); the Site is located north of Crawley and east of Gatwick Airport in West Sussex (NGR 530022 141205: **Figure 1, hereafter referred to as ‘the Site’**).

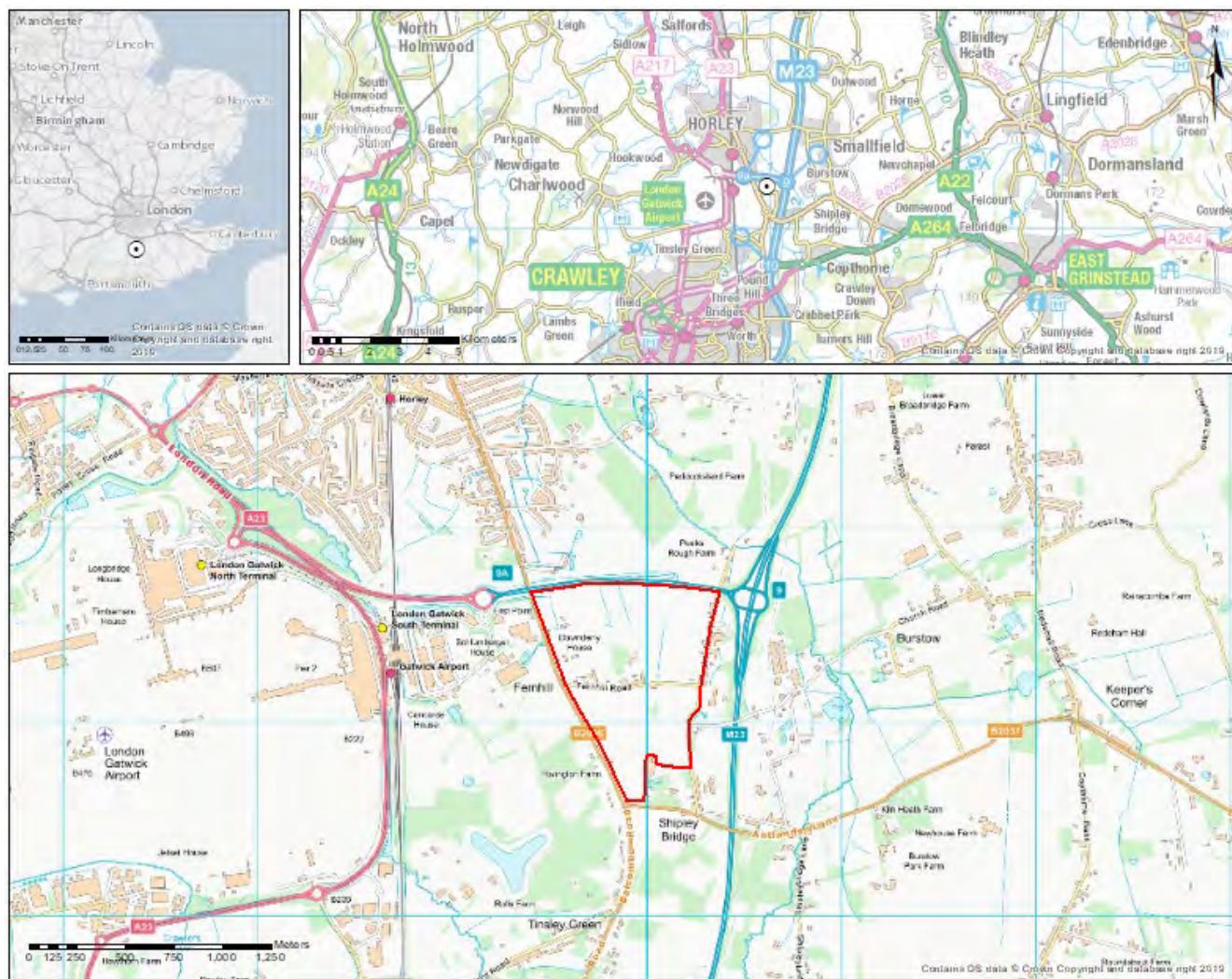


Figure 1: Site location

1.1.2 The proposed Gatwick Green development site is envisaged to provide high quality economic infrastructure for Crawley and Horley with a regionally significant commercial hub as its focal point.

1.2 Planning background

1.2.1 The Site is located in West Sussex, in the borough of Crawley and the current local planning policy context is covered in **Appendix 1: Section 5.3**. The Development Plan for the area containing the Site comprises the adopted Crawley Borough Local Plan 2015 (CBLP), the Joint Minerals Local Plan (JMLP, July 2018) and the Waste Local Plan (WLP, April 2014). The key heritage policies affecting the Site are contained in the CBLP and include:

- Policy CH12: Heritage Assets
- Policy CH15: Listed Buildings and Structures
- Policy CH16: Locally Listed Buildings

1.2.2 The Crawley Borough Local Plan review 2020 (CBLP review) is in draft and includes a key change with regard to the Site; the Safeguarded Land and the Area of Search for strategic employment have been removed and replaced with an equivalent area covered by Strategic Policy SD3 (North Crawley Area Action Plan), which establishes the intention to undertake an Area Action Plan (AAP) to address the future expansion requirements of Gatwick airport and Crawley's socio-economic development (such as employment, housing, community and infrastructure). The purpose of this Heritage Constraints Appraisal is to provide evidence to support the allocation of the Site through the Crawley Borough Local Plan (CBLP review).

1.3 Heritage considerations

1.3.1 This Heritage Constraints Appraisal reviews previous documentation namely an Environment baseline and Utilities Report (Arup 2009).

1.3.2 Statutory provision for the safeguarding of heritage assets has been made at a national and local level (see **Appendix A**). These might comprise below and above ground archaeological remains, buildings, structures, monuments or heritage landscape within or immediately around the site, identified as having a degree of '*significance*' meriting consideration in planning decisions because of its heritage interest. Such assets are identified as having a degree of significance meriting consideration in planning decisions and include designated heritage assets and assets identified by the local planning authority (including local listing), and non-designated assets.

1.3.3 The presence of potential heritage assets can therefore constitute a constraint and may affect the initial

selection of development options on the potential development site and in the subsequent design, planning and programming. This document therefore aims to provide a high level appraisal of the likely heritage constraints specific to the Site and flag up potential issues so that they may be anticipated, planned and, where feasible, mitigated.

- 1.3.4 This report does not constitute an Archaeological Desk Based Assessment (ADBA) or a Heritage Statement (HS), often required by the LPA to accompany a planning application. It is a preliminary scoping of any predicted heritage constraints, as a commercial appraisal for the client to inform and support its ongoing promotion of the Site through the CBLP review.
- 1.3.5 The assessment is made from a number of key sources and information. The report does not purport to be exhaustive but indicative. Information in this document is, to the best knowledge of the author and Savills, correct at the time of writing.

1.4 **Aims and objectives**

- 1.4.1 Indicate the presence of designated (i.e. protected through national or local planning policy) and known non-designated heritage assets within the site or its immediate vicinity, and the significance of such assets:
- Provide an indication of previous impacts which may have affected heritage asset survival for known assets but also possible, previously unrecorded assets;
 - Provide a broad indication of the likely constraints to any possible future development on the Site; and
 - Outline likely mitigation requirements to reduce or offset any adverse effects.

2.0 Scope, methodology and sources

2.1 Data sources

- 2.1.1 In order to determine the full historic environment potential of the Site, a range of standard documentary and cartographic sources, including results from any past archaeological investigations in the Site and a 1.5km radius study area around the centre point of the Site were examined in order to determine the likely nature, extent, preservation and significance of any known or possible buried heritage assets that may be present within or adjacent to the Site
- 2.1.2 The table below provides a summary of the key data sources. Occasionally there may be reference to assets beyond this study area, where appropriate, e.g., where such assets are particularly significant and/or where they contribute to current understanding of the historic environment.

Table 1: Sources Consulted

| Source | Data | Comments |
|---------------------------------|---|---|
| Historic England | National Heritage List (NHL) with information on statutorily designated heritage assets | Statutory designations (scheduled monuments; statutorily listed buildings; registered parks and gardens; historic battlefields) can provide a significant constraint to development. |
| West Sussex County Council | Historic Environment Record (HER) | Primary repository of archaeological information. Includes information from past investigations, local knowledge, find spots, and documentary and cartographic sources HER data received 18.11.2019 |
| Historic England | National Record of the Historic Environment (NRHE) | National database maintained by Historic England. Not as comprehensive as the HER but can occasionally contain additional information. Accessible via pastscape website. This was consulted for the Site and its immediate vicinity only. |
| Local Planning Authority | Conservation area | An area of special architectural or historic interest the character or appearance of which it is desirable to preserve or enhance. |
| Local Planning Authority | Locally listed building | Building of local importance designated by the local planning authority due to architectural and/or historic significance and a positive contributor to the character of an area. Whilst not statutorily protected, a building's inclusion on the list means that it is a material consideration in the planning process. |
| British Geological Survey (BGS) | Solid and drift geology digital map; online BGS geological borehole record data. | Subsurface deposition, including buried geology and topography, can provide an indication of potential for early human settlement, and potential depth of archaeological remains. |

2.2 Site visit

- 2.2.1 In order to produce this report a site visit was carried out on 20th November 2019. Walkovers of the Site and environs were completed to determine the topography and existing land use, the nature of the

existing buildings and monuments, identification of any visible heritage assets (e.g. structures, buildings and/or earthworks), and assess factors which may have affected the survival or condition of any known or potential assets.

2.2.2 The site visit also extended into the outer study area beyond the Site for the purposes of scoping designated heritage assets and their inter-visibility with the development area, as Historic England guidance, and for the settings assessment itself.

2.3 Limitations

2.3.1 Several key limitations to the appraisal should be recognised:

- The assessment is a high-level appraisal of heritage risk and has not included a review of a full range of resources (e.g. documentary, cartographic, air photographic, and geotechnical, architectural and engineering sources) that would normally be consulted in a full desk-based assessment for planning.
- Archaeological remains are buried and not visible. In the absence of intrusive archaeological field investigation, it is possible that there are buried assets within the site that have not been identified by this Heritage Constraints Appraisal.
- Trees protected by Tree Preservation Orders, hedgerows protected under the Hedgerow Regulations 1997, or Ancient Woodland designated by Natural England and/or the LPA that would be a material consideration in the planning process, are not included within the scope of this assessment.

2.4 Heritage assessment

2.4.1 This Heritage Constraints Appraisal does not comprise a full statement of significance of the identified heritage assets. This section outlines the heritage guidance to assess significance, setting, impact and harm in respect to heritage assets, which would be required in a full Archaeological Desk Based Assessment (ADBA) or Heritage Statement (HS), required by the LPA to accompany a planning application.

Assessing heritage significance

2.4.2 The NPPF defines significance as '*The value of a heritage asset to this and future generations because*

of its heritage interest. That interest may be historic, archaeological, architectural or artistic.' The determination of the significance is based on statutory designation and/or professional judgement against these values. They are identified in Historic England Conservation Principles (revised in Historic England Advice Note: 12 Statements of Significance):

- **Historic interest:** the ways in which the asset can illustrate the story of past events, people and aspects of life (illustrative value, or interest). It can be said to hold communal value when associated with the identity of a community. Historical interest considers whether the asset is the first, only, or best surviving example of an innovation of consequence, whether related to design, artistry, technology or social organisation. It also considers an asset's integrity (completeness), current use / original purpose, significance in place making, associative value with a notable person, event, or movement.
- **Archaeological interest:** the potential of the physical remains of an asset to yield evidence of past human activity that could be revealed through future archaeological investigation. This includes above-ground structures and landscapes, earthworks and buried or submerged remains, palaeo-environmental deposits, and considers date, rarity, state of preservation, diversity/complexity, contribution to published priorities (research value), supporting documentation, collective value and comparative potential, and sensitivity to change.
- **Architectural and artistic interest:** derive from a contemporary appreciation of an asset's aesthetics. Architectural interest can include the design, construction, craftsmanship and decoration of buildings and structures. Artistic interest can include the use, representation or influence of historic places or buildings in artwork. It can also include the skill and emotional impact of works of art that are part of heritage assets or assets in their own right.

- 2.4.3 These values encompass the criteria that Historic England are obliged to consider when statutorily designating heritage assets are affected by development. Each asset has to be evaluated against the range of criteria listed above on a case by case basis. Unless the nature and exact extent of buried archaeological remains within any given area has been determined through prior investigation, significance is often uncertain.
- 2.4.4 The table below gives examples of the significance of designated and non-designated heritage assets.

Table 2: Significance of heritage assets

| Significance | Asset description |
|--------------|--|
| Very High | World heritage sites scheduled monuments Grade I and II* listed buildings Grade I and II* registered parks and gardens Designated historic battlefields Protected Wrecks Undesignated heritage assets of high national importance |
| High | Grade II listed buildings Grade II registered parks and gardens Conservation areas Burial grounds Protected heritage landscapes (e.g. ancient woodland or historic hedgerows) Undesignated heritage assets of lower national, regional or county importance |
| Medium | Heritage assets with a district value or interest for education or cultural appreciation Locally listed buildings |
| Low | Heritage assets with a local (i.e. parish) value or interest for education or cultural appreciation |
| Negligible | Item with no significant value or interest |
| Uncertain | Heritage assets that have a clear potential, but for which current knowledge is insufficient to allow significance to be determined |

Assessing harm

2.4.5 Professional judgement is used to consider the impact of future development on the significance of a known or potential heritage asset. This is assessed in NPPF terms as 'no harm', 'less than substantial harm', 'substantial harm' or 'total loss of significance'. The following levels of harm may be identified during this assessment:

- **Substantial harm:** The Planning Practice Guide discusses 'substantial harm' (using Listed buildings as an example) and states that 'an important consideration would be whether the adverse impact seriously affects a key element of its special architectural or historic interest. It is the degree of harm to the asset's significance rather than the scale of the development that is to be assessed'.
- **Less than substantial harm;** and
- **No harm (or 'preservation'),** such that the attributes identified within the statement of significance of the heritage asset have not been harmed.

Assessing the contribution of setting

2.4.6 In relation to designated heritage assets, the assessment takes into account the contribution that setting

makes to the overall significance of the asset.

- 2.4.7 Setting is the way in which the asset is understood (i.e. evidential and historical values) and experienced (aesthetic and communal values). It is not an asset in itself. It differs from curtilage (historic/present property boundary); context (association with other assets irrespective of distance) and historic character (sum of all historic attributes, including setting, associations, and visual aspects).
- 2.4.8 Guidance produced by Historic England (HE 2016) and the Landscape Institute and Institute of Environmental Management and Assessment (2013) has been used to adopt a stepped approach for settings assessment. The former sets out five steps, of which the first four are relevant:
- **Step 1: asset identification.** The NPPF requires an approach that is proportional to the significance of the asset, and for this reason only the settings of the most sensitive (i.e. designated) heritage assets are considered in this assessment. A scoping exercise filters out those assets which would be unaffected, typically where there are no views to/from the site.
 - **Step 2: assess the contribution of setting.** This stage assesses how setting contributes to the overall significance of a designated asset.
 - **Step 3: assess change.** This considers the effect of the proposals on the asset's significance. However, it is noted that it can be difficult to quantify such change to the overall significance of a designated heritage asset (for example, significance would rarely be downgraded from 'high' to 'medium' due to changes in setting). For this reason, the impact is reported in this assessment in terms of the extent to which the proposals would change how the asset is understood and experienced (in terms of no harm, less than substantial harm, substantial harm or total loss of significance).
 - **Step 4: mitigation.** This explores the way to maximise enhancement and avoid or minimise harm. This is typically considered at the design stage (i.e. embedded design mitigation).
 - **Step 5: reporting.** Making and documenting decisions and outcomes. This reports the assessment of effects.
- 2.4.9 In accordance with Historic England guidance (GPA 3), this report has taken into account the physical surroundings of the asset, including topography and intervening development and vegetation. It also considers how the asset is currently experienced and understood through its setting, in particular views to and from the asset and the Site, along with key views, and the extent to which setting may have

already been compromised. Interpretations of criteria to determine the level of impact relating to this report have been tabled below:

Table 3: Criteria to determine the level of impact:

| Magnitude of Change | Description of change | |
|---------------------|---|--|
| High | Complete destruction or a fundamental, substantial change of an asset or historic environment feature. Change to most or all key elements of the historic environment, such that the resource is totally altered. | A comprehensive and fundamental change to the key positive attributes of a heritage asset's setting, such that the setting is substantially or totally altered. |
| Medium | A considerable change or appreciable difference to the existing baseline. Changes to many key elements of the historic environment, such that the resource is clearly modified. | A considerable change to the key positive attributes of a heritage asset's setting such that its contribution to the importance of the asset is appreciably reduced. |
| Low | A minor change to the baseline condition of a heritage asset. Changes to the key elements of the historic environment, such that the asset is slightly altered. | A limited change to the key positive attributes of a heritage asset's setting resulting in a slight but discernible reduction to its contribution to the asset's importance. |
| Negligible | A barely distinguishable change to the historic environment baseline | A very slight change to the key positive attributes of a heritage asset's setting such that the change is barely distinguishable. |

3.0 Historic baseline and known heritage assets

3.1.1 Site location

- 3.1.2 The Site is located east of Gatwick Airport in the borough of Crawley in the county of West Sussex. The current use comprises largely undeveloped agricultural greenfield land use with a number of small businesses situated within the Site. The Site is bordered by the M23 spur to the north, Peeks Brooke lane to the east, the B2036 to the west and the B2037 to the south.
- 3.1.3 Documentary and archaeological evidence have revealed that the Site was most likely to have been agricultural land throughout the medieval and post-medieval periods. The HER includes Historic Landscape character data which characterises the Site by '*piecemeal planned private enclosure with small farmsteads*'.

3.2 Topography and geology

- 3.2.1 Geology can provide an indication of suitability for early settlement, and potential depth of remains. The geological map for the area, indicates the Site to be underlain by Weald Clay Formation – Mudstone.

3.3 Archaeological and historical background

Prehistoric period (800,000 BC–AD 43)

- 3.3.1 The Lower (800,000–250,000 BC) and Middle (250,000–40,000 BC) Palaeolithic periods saw alternating warm and cold phases and intermittent, perhaps seasonal occupation. During the Upper Palaeolithic (40,000–10,000 BC) period, after the last glacial maximum, and in particular after around 13,000 BC, further climate warming took place and the environment changed from steppe-tundra to birch and pine woodland. It is probably at this time that England saw continuous occupation. Erosion has removed much of the Palaeolithic land surfaces and finds are typically residual.
- 3.3.2 The Mesolithic hunter-gatherer communities of the postglacial period (10,000–4000 BC) inhabited a still largely wooded environment. The river valleys and coast would have been favoured in providing a predictable source of food (from hunting and fishing) and water, as well as a means of transport and communication. Evidence of activity is characterised by flint tools rather than structural remains. There

are no known sites or finds dated to this period within the study area.

- 3.3.3 The Neolithic (4000–2000 BC), Bronze Age (2000–600 BC) and Iron Age (600 BC–AD 43) are traditionally seen as the time of technological change, settled communities and the construction of communal monuments. Farming was established and forest cleared for cultivation. An expanding population put pressure on available resources and necessitated the utilisation of previously marginal land.
- 3.3.4 During the Bronze Age, population growth led to more widespread deforestation and the expansion of farmland, although the majority of occupation sites remained within the river valleys. During the early Bronze Age there is little change from the Neolithic, however the Middle Bronze Age marks a transformation to a landscape associated with more extensive agricultural production. Archaeological investigations at Land East of Balcombe Road, Crawley (HCA ref: E7) found evidence of Late Bronze age, Iron age and medieval phases of activity represented by industrial remains recovered from ditches and pits thought to be part of enclosure forming an early boundary or land division. The major evidence for Iron age activity in the study area is the cremation cemetery (designated as a ANA) located to the southwest of the Site

Romano-British period (AD 43–410)

- 3.3.5 Within Southern England the development of the agricultural landscape continued during the Roman period, resulting in a well-organised landscape system of settlements and fields. Some of this agricultural land was formed into large estates centred on villas, whereas in other areas the pre-existing Iron Age settlements continued on into the Roman period. The scale of agricultural production was also increased to cater for the large non-agrarian urban populations in the new towns and cities. An Archaeological Notification Area (ANA) is located a few hundred metres west of the Site and is designated due to the evidence of Romano-British occupation (Figure 2). Archaeological investigations at Land East of Balcombe Road discovered evidence of late Iron Age/ Romano-British occupation in the form of field systems, postholes and pits. The lack of evidence of this period within the study area may also be due to the minimal amount of intrusive archaeological investigations.

Early medieval (Saxon) period (AD 410–1066)

- 3.3.6 No evidence of Anglo Saxon activity has been recorded within the study area and little is known about

the Saxon period in the surrounding area; early place names are known but there is hardly any excavated evidence (Drewett et al, 1988). Where it exists, the documentary evidence for the period indicates that the area was extensively wooded, as is indicated by the name: Weald is Saxon for woodland (Ekwall, 1991).

Later medieval period (AD 1066–1540)

- 3.3.7 During the medieval period the Site is likely to have been used for agricultural purposes. The Site partly falls into what was originally Thunderfield Common (used to graze pigs) which covered most of what is now Horley, from Horley Row and Ladbroke Road, right down to the north of Tinsley Green, but included only just a narrow strip of Haroldslea and a bit of Burstow near Peeks Brook Lane. The name Thunderfield Common is likely to include a much larger area of land. It is named in Anglo Saxon documents dating back to AD 880.
- 3.3.8 The HER data shows several instances of medieval activity within the study area. Medieval earthworks are evidenced at Toovies Farm (designated a ANA) and archaeological investigations at Land East of Balcombe Road uncovered associated medieval agricultural remains. A scheduled monument of a Medieval settlement (located 150m south west of Oldlands Farm) lies just outside of the study area.

Post-medieval period (AD 1540–present)

- 3.3.9 The agricultural land use across the Site has continued throughout the post-medieval period as evidenced on early tithe and historic OS maps (not reproduced). The 1870 OS map shows the Site as comprising agricultural land which mirrors the current land use. Peeks Brook Lane is clearly annotated, defining the eastern boundary of the Site, as are the groups of historic farmsteads such as Teizers Inn, Ferncourt and Fernhill. Recently and throughout the 20th century small businesses have sprung up around the periphery of the Site.
- 3.3.10 The HER identifies many post-medieval farmsteads in the vicinity of the Site which points to a well-recognised historic landscape (see **Section 3.7**). The extensive archaeological investigations at the Land East of Balcombe Road evidenced a small amount of post-medieval activity located within the south and eastern edges of the archaeological Site with a small amount of industrial material recovered. A post-medieval lime kiln site was also identified, but not excavated.

3.4 Designated heritage assets

- 3.4.1 Designation includes 'statutory' protection for nationally significant assets, and other 'local' designations which identify an asset that may be a material consideration in the planning process. These assets are shown on **Figure 2**.

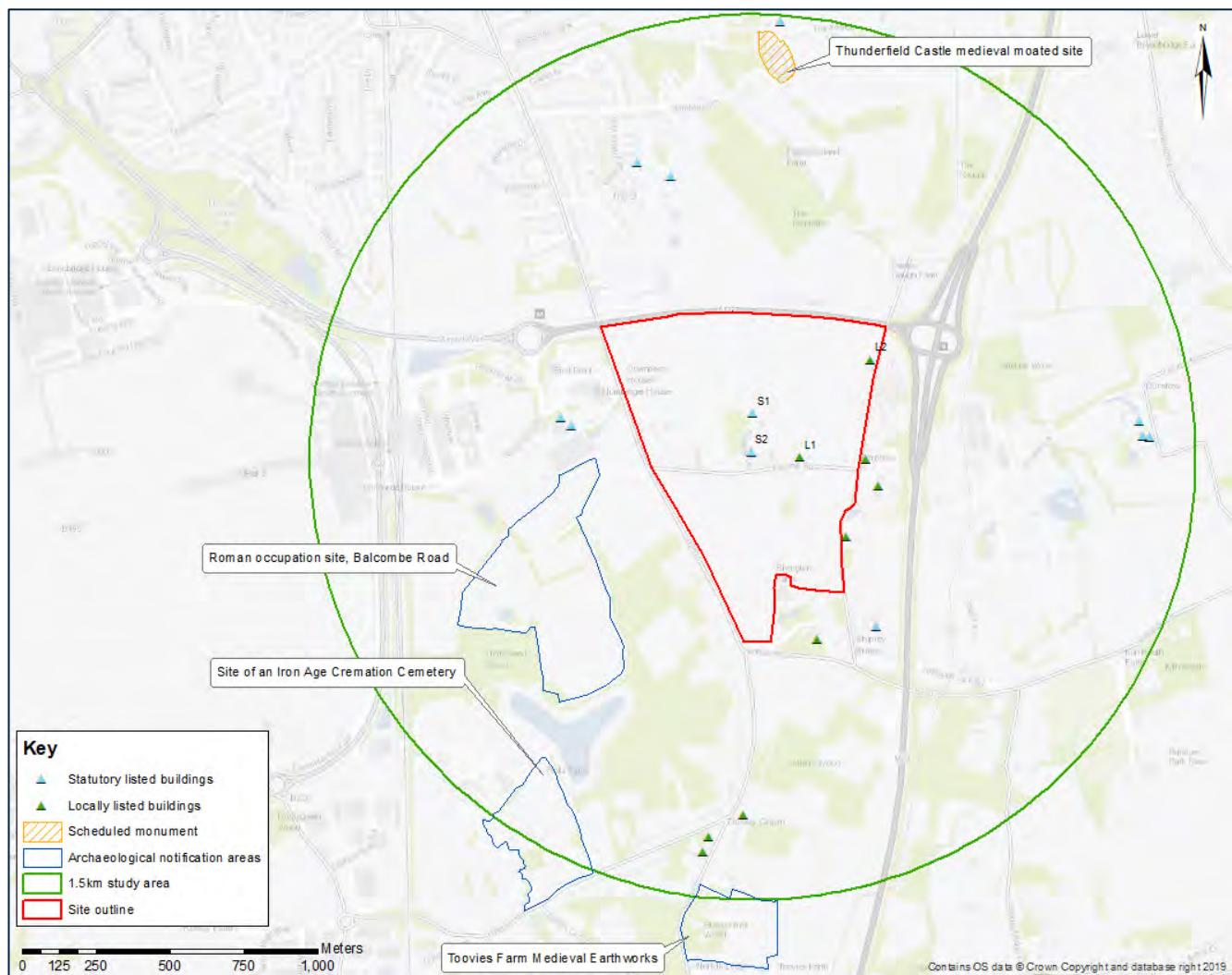


Figure 2: Designated heritage assets

- 3.4.2 National planning policy requires that the impact of proposed development on the setting of a designated asset should be taken into account in the determination of planning applications.
- 3.4.3 With very few exceptions, works (including extension, alteration and demolition in whole or in part) affecting the exterior or interior of a listed building of any grade, its curtilage and/or any artefacts/structures/elements affixed to it require Listed Building Consent (LBC) in addition to any other

permissions or licences that might apply (e.g. Planning Permission, Building Regulations approval, etc.) Demolition, with few exceptions, of a building in a Conservation Area requires planning permission, and failure to have such permissions is a criminal offence. However, it is anticipated development on the Site would not materially impact any designated heritage asset and therefore no other supplementary consents (such as LBC) would be required.

- 3.4.4 The setting of a listed building is a heritage asset in its own right and is a material consideration in the determination of any planning application likely to affect it.
- 3.4.5 The table below indicates whether or not the Site contains built heritage assets.

Table 4: Designated heritage assets within the study area

| Heritage asset | Planning constraint | Within site? |
|---|---|--|
| Statutory protected Grade II listed building | A structure of exceptional or special architectural and/or historical interest which is statutorily protected under the Planning (Listed Buildings and Conservation Areas) Act 1990. Listed building consent is required from the LPA, as advised by Historic England, for works materially affecting a listed building (which may include attached and curtilage buildings or other structures). | There are two Grade II listed buildings in the vicinity of the Site which have the potential to be impacted via a change in setting: Lilac Cottage and Old Cottage, both on Donkey Lane. |
| Local Planning Authority locally listed building | Local listing is a way of flagging up to owners and decision makers that the building is of value to the local scene, character or history. Whilst this designation holds less heritage significance than statutorily listed buildings it can nevertheless represent a constraint to future development. | There are two locally listed buildings in the vicinity of the Site which have the potential to be impacted via a change in setting: Poplars, Fernhill and Royal Oak House, Peeks Brook Lane. Other locally listed buildings are in the vicinity of the Site (grouped near the junction of Farenhill Road and Peeks Brook Lane) it is considered these buildings would not be substantially harmed if the Site is development. |
| Statutory protected Scheduled monument | Nationally significant archaeological site protected under the Ancient Monuments and Archaeological Areas Act 1979. Prior Scheduled Monument Consent is required from the Secretary of State for works affecting a scheduled monument. | There is one scheduled monument within the study area: Thunderfield Castle medieval moated site c. 800m to the north of the Site. Development on Site would not impact this asset or effect its significance. |
| Local Planning Authority Archaeological notification area | Archaeological Notification Areas (ANAs) are based on data held within the East Sussex Historic Environment Record (ESHER). Their primary purpose is to trigger consultation with the West Sussex County Council Archaeology Advisors and the HER. ANAs define presently known and recorded areas of heritage sensitivity and that further presently unrecorded archaeological and historic interest may exist outside ANAs. In the development management process alert mapping helps to meet the aims of the National | There are three ANAs within the study area: a site of roman occupation (approx. 250m west of the Site), a site of an Iron Age Cremation Cemetery (approx. 1km south west of the Site) and a site of Medieval Earthworks at Toovies Farm (approx. 850m south of the Site) The Site is located at a distance from these designated areas of archaeological interest and development on Site would not impact these areas. |

| | | |
|--|---|--|
| | <p>Planning Policy Framework (para 189) where it is stated: '<i>as a minimum the relevant historic environment record should have been consulted and the heritage assets assessed using appropriate expertise where necessary. Where a site on which development is proposed includes or has the potential to include heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.</i>'.</p> | |
|--|---|--|

- 3.4.6 This appraisal has utilised modern and historic mapping, aerial photography, Google Earth, the National Heritage List, and the Historic Environment Record to identify which designated above ground heritage assets identified within 1.5km of the Site boundary may include the proposed development area as part of their setting.
- 3.4.7 Following the Site walkover, six of the designated heritage assets that have been identified have been scoped out of this appraisal due to the existing vegetation and built form which surrounds the Site, including residential areas and roads and obscures any inter-visibility with these heritage assets. In addition, no historical or functional connections have been identified between the Site and such assets. As such, it is not considered that the Site forms part of the setting of further assets which contribute to their heritage significance. This is in accordance with Step 1 of the methodology recommended by the Historic England guidance (GPA 3).

3.5 Statutory designated assets

- 3.5.1 There are several statutory designated assets within the study area, six of these have been scoped out of this report primarily due to distance and lack of inter-visibility with the Site (these are shown in **Table 5** below).

Table 5: Statutory designated heritage assets scoped out

| Designated heritage asset | List Number | Type | Significance | Reason For Scoping Out |
|--|-------------|--------------------|--------------|---------------------------|
| Teizers Farm House | 1029955 | Grade: II | High | Distance/inter-visibility |
| Wing House | 1187073 | Grade: II | High | Distance/inter-visibility |
| Edgeworth House | 1187072 | Grade: II | High | Distance/inter-visibility |
| Yew Tree Cottage | 1028988 | Grade: II | High | Distance/inter-visibility |
| Inholms Farm House | 1028987 | Grade: II | High | Distance/inter-visibility |
| Thunderfield Castle medieval moated site | 1013348 | Scheduled monument | High | Distance/inter-visibility |

- 3.5.2 As a result of this scoping, future development of the Site has the potential to impact upon the setting

and significance of two designated heritage assets. These assets are summarised in **Table 6** below and shown on **Figure 2**. The following section will detail these assets, including their setting.

Table 6: Statutory designated heritage assets which may be impacted

| Heritage Asset | List Number | Significance | HCR number |
|---------------------------------------|-------------|--------------|------------|
| Lilac Cottage, Donkey Lane (Grade II) | 1298874 | High | S1 |
| Old Cottage, Donkey Lane (Grade II) | 1187082 | High | S2 |

3.5.3 These assets are shown in **Figure 3** and **Figure 4**, and described below.



Figure 3: Lilac Cottage, Donkey Lane



Figure 4: Old Cottage, Donkey Lane

Lilac Cottage, Donkey Lane

3.5.4 Lilac Cottage (**Figure 3, ref: S1**) is located within the centre of the Site. The building dates from the early 18th century and was listed Grade II in 1983 (Historic England ref: 1298874), therefore it is an asset of high significance. The Historic England listing description is given below:

DONKEY LANE 1. Fernhill 5403 Lilac Cottage TQ 24 SE 1/18 II 2. Probably early C18. Two storeys. Ground floor painted brick, the first floor tile bung. Tiled roof with outshut to rear. Two casement windows. Doorcase in modern lean-to porch. Two external chimney stacks at either end. Interior has exposed beams and inglenook fireplace.

3.5.5 The cottage is surrounded by mature vegetation which forms a physical and visual boundary between

the immediate setting of the asset and the wider setting of agricultural land beyond. It is anticipated that the immediate setting of the cottage will be preserved. Overall it is judged the wider agricultural setting of the Grade II listed building makes a lesser contribution to its significance than the immediate setting.

Old Cottage, Donkey Lane

- 3.5.6 Old Cottage (**Figure 4, ref: S2**) is located within the centre of the Site, the building was listed Grade II in 1983 (Historic England ref: 1187082), therefore it is an asset of high significance. The Historic England listing description is given below:

DONKEY LANE 1. 5403 Fernhill Old Cottage TQ 24 SE 1/17 II 2. Probable C17 timber-framed cottage. Set sideways to road. Two storeys. Ground floor painted brick. First floor tile hung. Tiled roof. External brick chimney stack to west with base of Charlwood Stone. Three casements. Later porticoed wood and tiled weather porch.

- 3.5.7 It is considered that, as with Lilac Cottage to the north, the wider agricultural setting of the Grade II listed building will make a lesser contribution to its significance than the immediate setting, which is enclosed by mature vegetation.



Figure 5: Photograph showing the mature vegetation between Donkey Lane and the wider agricultural land

3.6 Locally designated assets

3.6.1 There are several locally listed assets within the study area, these include locally listed buildings and archaeological notification areas (ANA). The Crawley Local Building List (CBC 2010) uses the following criteria to assess which buildings and structures in Crawley merit inclusion on the local list:

- **Historic Interest.** The age of a building and the extent to which it is a good example of its period or illustrates an important phase in Crawley's history, such as its redevelopment as a New Town. There may be historic interest associated with the original use of the building or with locally notable people or events.
- **Architectural Interest.** The building may have been designed or constructed by a nationally or locally notable architect or building firm. It may be a good example of the local vernacular or use local building materials.

- **Group and Townscape Value.** The building may be a local landmark or play an important role in the townscape or local scene. There may be aesthetic value in the position of the buildings in its setting.
- **Intactness.** Where a building is of local architectural or historic interest one would expect a high proportion of its historic features such as sash windows, porches and doors to remain intact to merit local listing. However, if a building would otherwise be of national architectural and historic interest, but has been too altered for statutory listing, it may be merit inclusion on the local list.
- **Communal Value.** The extent to which a building or structure is valued by the local community should also be considered. It may be of commemorative or symbolic value such as a war memorial, of social value, perhaps if it is a public building or spiritual value if it is a church.

3.6.2 These criteria are broadly analogous to the Historic England defined ‘heritage interests’ detailed in **Section 2.**

3.6.3 As with the statutory designated assets, **Table 7** lists the locally listed assets that have been scoped out due to distance, lack of inter-visibility and existing mature vegetation. None of the locally listed buildings that have been scoped out have been listed due to their *Group and Townscape Value*, therefore it is considered that the setting of these assets are not a substantial contributor to their significance.

Table 7: Locally designated heritage assets scoped out

| Designated heritage asset | Type | Significance | Reason For Scoping Out |
|--|-------------------------|--------------|---|
| Touchwood Chapel | Locally listed building | Medium | Inter-visibility and existing mature vegetation |
| Gatwick House | Locally listed building | Medium | Inter-visibility and existing mature vegetation |
| 1 Pullcotts Farm Cottages | Locally listed building | Medium | Inter-visibility and existing mature vegetation |
| Burstow Hall | Locally listed building | Medium | Distance/inter-visibility |
| Cottage in the Wood | Locally listed building | Medium | Distance/inter-visibility |
| Parsons Pig Inn | Locally listed building | Medium | Distance/inter-visibility |
| The Open Door | Locally listed building | Medium | Distance/inter-visibility |
| Site of an Iron Age Cremation Cemetery, Tinsley Green, Crawley | ANA | High | Distance/inter-visibility |
| Roman Occupation, Balcombe Road, Crawley | ANA | High | Distance/inter-visibility |
| Toovies Farm Medieval Earthworks, Crawley | ANA | High | Distance/inter-visibility |

3.6.4 Following this scoping exercise only two locally listed buildings are considered to be potentially affected by development on the Site. These assets are summarised in **Table 6** below and shown on **Figure 2.**

The following section details these assets, including their setting.

Table 8: Locally designated heritage assets which may be impacted

| Designated heritage asset | Type | Significance | HCR number |
|-----------------------------------|-------------------------|--------------|------------|
| Poplars, Fernhill | Locally listed building | Medium | L1 |
| Royal Oak House, Peeks Brook Lane | Locally listed building | Medium | L2 |



Figure 6: Poplars, Fernhill Road



Figure 7: Royal Oak House, Peeks Brook Lane

Poplars, Fernhill Road, RH6 9SY

- 3.6.5 Locally listed in 2010 for its *historic* and *architectural* interest, this is a detached, mid-19th century house with 3 bays and a central porch. It is thought the ground floor bay windows are later additions. The building retains its original slate roof, but the windows have been replaced with uPVC and the front door is not original.
- 3.6.6 The building is surrounded by mature vegetation and as the asset is not listed due to its *historic* and *architectural* interest, it is thought that the wider agricultural setting (which the Site comprises) makes a minor contribution to its significance.

Royal Oak House, Peeks Brook Lane, RH6 9ST

- 3.6.8 Locally listed for its historic and architectural interest, this Queen Anne style villa of the 1880s has a picturesque jetted first floor gable end and a side bay window. The windows are characteristic of the Queen Anne style with 6-pane over 2-pane sash windows. The building has been heavily rendered. It is thought the smaller building to the rear may be an earlier 19th century cottage.
- 3.6.9 As with the Poplars house, Royal Oak House is surrounded by mature vegetation and as the asset is not listed due to its *historic* and *architectural* interest, it is thought that the wider agricultural setting (which the Site comprises) makes a minor contribution to its significance.

3.7 Undesignated heritage assets

- 3.7.1 The Historic Environment Record (HER) identifies several undesignated heritage assets within the study area. These include historic farmsteads, findspots, features found during archaeological fieldwork and other assets deemed worthy of including in the HER. **Table 9** is a gazetteer of the undesignated heritage assets which are shown on **Figure 10**.

Table 9: Undesignated heritage assets within 1.5km study area

| Undesignated heritage asset | HER number | Type | Significance | HCR number |
|---|------------|----------------------|--------------|------------|
| Field Boundary, Crawley | MWS14283 | Field boundary | Low | U1 |
| Rose Cottage Historic Farmstead, Crawley | MWS13461 | Farmstead; farmhouse | Low | U2 |
| Riverington Farm Historic Farmstead, Crawley | MWS13432 | Farmstead | Low | U3 |
| Antlands Lane West, Shipley Bridge, Crawley, West Sussex: Results of Archaeological Watching Brief | MWS8320 | Negative evidence | Low | U4 |
| Little Teizers (Teizers Inn Farm) Historic Farmstead, Crawley | MWS12080 | Farmstead | Low | U5 |

| | | | | |
|--|----------|--|-----|-----|
| Site of Allen's Farm Historic Outfarm, Crawley | MWS9277 | Outfarm; u shape plan | Low | U6 |
| Roman occupation - Horleyland | MWS932 | Findspot | Low | U7 |
| The Cottage in the Wood, Balcombe Road, Crawley: Results of Historic Building Information | MWS9014 | House; jetty; post; inglenook; chimney stack; bay window; casement window; noggin | Low | U8 |
| Site of Roles Farm Historic Farmstead, Crawley | MWS13451 | Farmstead | Low | U9 |
| Site of Pickett's Barn Historic Outfarm, Crawley | MWS13322 | Outfarm | Low | U10 |
| Gatwick Airport: Proposed Hotel, Edgeworth Site, Buckingham Gate, Crawley | MWS12089 | Boundary ditch; rubbish pit; pit; wall | Low | U11 |
| Flint arrowheads - Gatwick | MWS727 | Findspot | Low | U12 |
| Roman pottery and coins - Gatwick | MWS933 | Findspot | Low | U13 |
| Gatwick Upper Mole Flood Storage Reservoir: Results of Archaeological Investigation | MWS11621 | Tree throw; pit; ditch; palaeochannel | Low | U14 |
| Oval Enclosure, Crawley | MWS14282 | Oval enclosure; bank (earthwork); ditch | Low | U15 |
| Land East of Balcombe Road, Crawley: Results of Archaeological Investigations | MWS14712 | Pit; pit; post hole; boundary ditch; ditch; field system?; ditch; enclosure?; boundary ditch?; ditch; field system; ditch; fence?; pit; post hole; pit; field boundary; double ditch; ditch; boundary ditch; pit; lime kiln; pit | Low | U16 |

3.7.2 The majority of these identified assets will not be impacted by development on the Site, but allow an evaluation of the historic environment potential of the wider study area and consequently the Site. The presence of several historic farmsteads in the study area points to the potential for below ground (archaeological) remains, probably relating to medieval and post-medieval agriculture. The presence of Romano-British archaeological remains in the study area increases the potential for remains of this period to be present at the Site. However, it is expected these remains if found would only be of minor local significance.



Figure 8: Looking east towards Riverington Farm across the field boundary feature identified in the HER



Figure 9: Rose Cottage, Crawley

3.7.3 It is anticipated these undesignated heritage assets are not significant enough to influence the design

of the development. It is considered that the LPA may require archaeological field evaluation to further assess the significance of the field boundary identified in the HER (HCA ref: U1) and the archaeological potential of the Site as a whole. Archaeological field evaluation is likely to be a requirement during the planning process as there have been no previous intrusive archaeological investigations on the Site. Field evaluation may uncover further undesigned heritage assets (in the form of archaeological remains) across the Site. However, it is unlikely these will be remains of high significance and could be preserved ‘by record’.

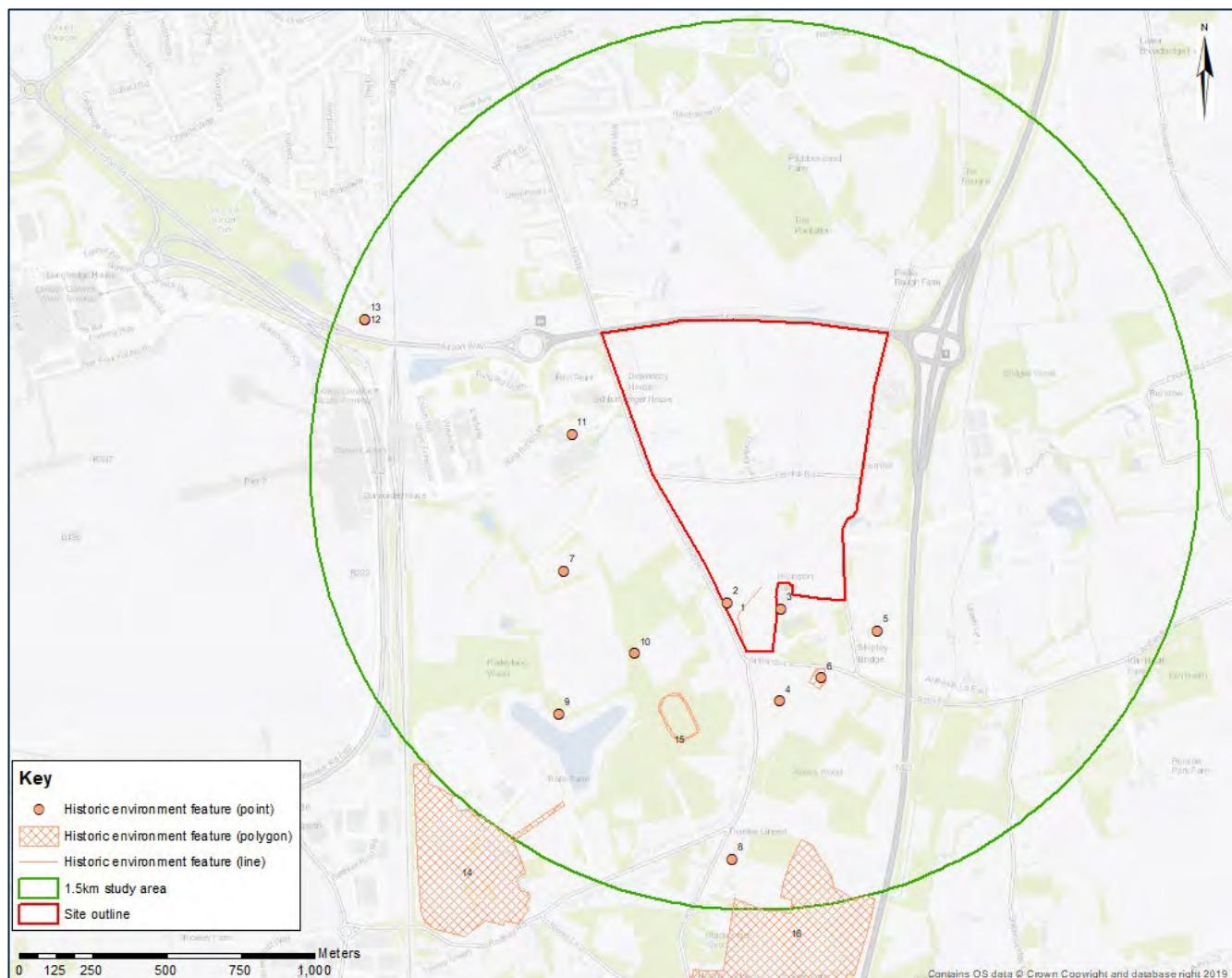


Figure 10: Undesignated heritage assets

3.7.4 Three of these assets border or are within the Site; a field boundary (HCR reference U1, **Figure 8**), Rose Cottage historic farmstead (HCR reference U2, **Figure 9**) and Riverington Farm historic farmstead (HCR reference U3, **Figure 8**).

3.8 Past archaeological investigations

- 3.8.1 No past archaeological investigations have been carried out within the Site. A total of seven archaeological investigations have been conducted within the study area, comprising both desk-based assessments along with archaeological fieldwork investigations. The results of these investigations are summarised in **Table 10** and shown in plan on **Figure 11**.

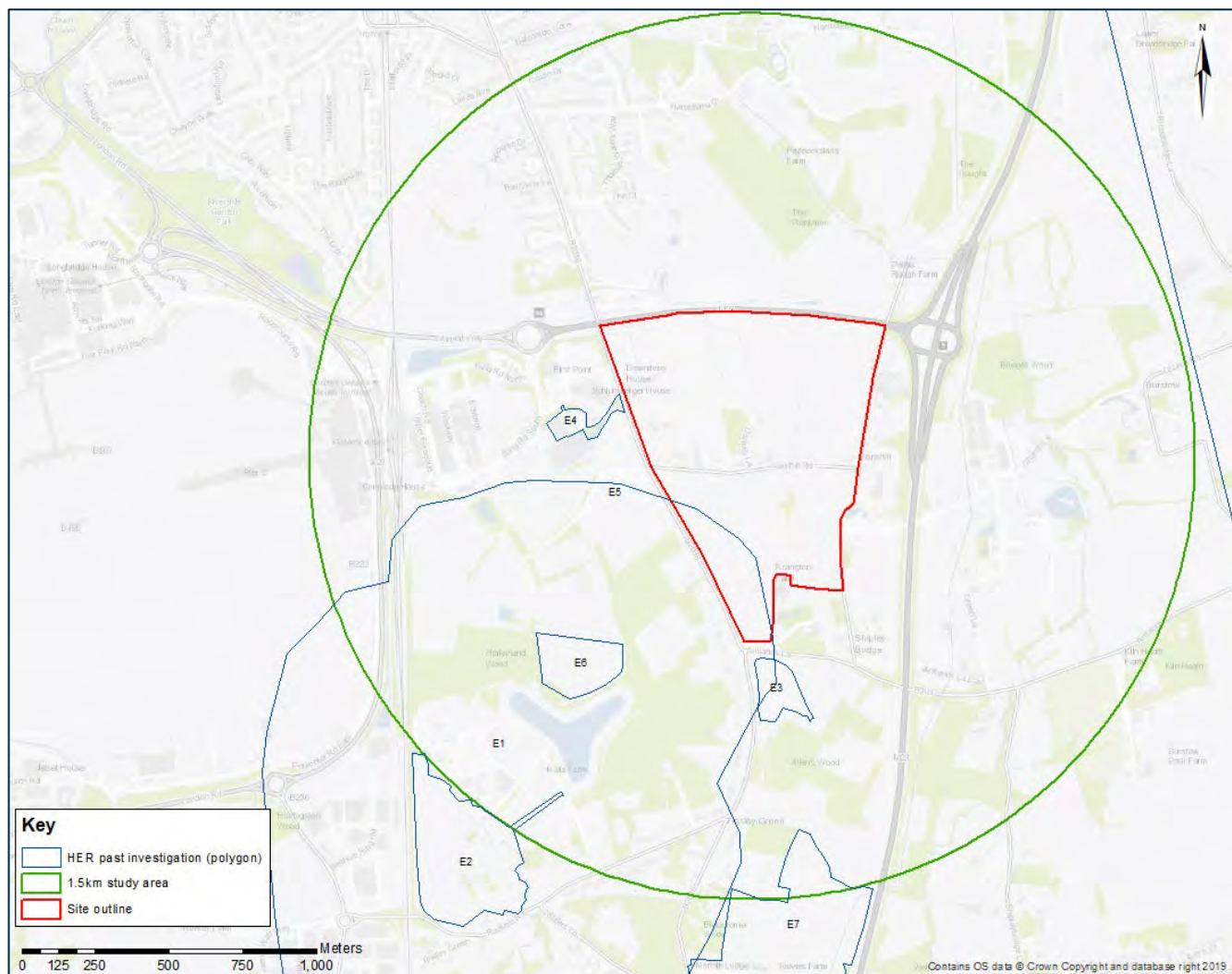


Figure 11: Past investigations

- 3.8.2 Overall the investigations highlight varying levels of archaeological potential within the vicinity of the Site and it is possible that finds of a similar date may also be located within the proposed development area.

Table 10: Past investigations within 1.5km study area

| Past investigation | HER ID | Date | HCR number |
|---|---------|------|------------|
| <p>Gatwick Airport, Pollution Control Lagoon, Desk-Based Assessment & Field Reconnaissance</p> <p>An archaeological desk based assessment was undertaken of the site at Gatwick Airport Pollution Control Lagoon. The sites archaeological potential for the Palaeolithic, Mesolithic and Neolithic periods was seen to be low. The archaeological potential for the Bronze Age period was seen to be low to medium as evidence for settlement activity has been identified close to the study site dating to this period. The sites archaeological potential for the Iron Age period was seen to be medium. During this period there was an increase in settlement and industry with evidence of local iron ore deposits and settlement remains found to the north and south of the site.</p> <p>The archaeological potential for the early Medieval period was seen to be low. The archaeological potential for the Medieval period however was seen to be high. The study site is seen to be within close proximity to a scheduled Medieval village and as a result it was suggested that associated field systems could be anticipated.</p> <p>Archaeology associated to iron working during this period could also be encountered. The archaeological potential for the post-medieval and early modern period was seen to be medium to high. It was presumed that the archaeology from this period would most likely relate to either agricultural activity or WWII defensive features associated to a nearby former RAF airfield. It was recommended that a watching brief should take place on the site in order to access the potential for any possible archaeology that may exist on the site.</p> | EWS1457 | 2015 | E1 |
| <p>Gatwick Upper Mole Flood Storage Reservoir: Archaeological Investigations</p> <p>An archaeological evaluation was undertaken in advance of the construction of the Flood Storage Reservoir at Gatwick Airport.</p> <p>A total of 49 trial trenches were excavated which revealed a significant amount of finds dating to the Mesolithic period thought to be of possible national significance. A number of other finds and features dating to the prehistoric period also indicate a significant level of activity during these periods. The evaluation uncovered evidence that would also indicate land clearance during the prehistoric period however the nature and extent of the clearance of the land and its possible subsequent agricultural exploitation was not fully defined or understood. The evaluation showed that there are known heritage assets which may be affected by the proposed development, some of which could possibly be seen as nationally significant with the rest being seen as local – regional however it was stated that further archaeological work would be deemed suitable in order to record any further archaeology. An archaeological desk-based assessment was also carried out. The assessment concluded that the potential for finds and features dating to the Mesolithic period being identified was high due to the number of finds identified during the evaluation. The remaining periods were seen to have a potential of low-medium.</p> <p>An Archaeological evaluation was undertaken prior to the construction of a flood storage area to the west of the Crawley Water Treatment Plant, just south of Gatwick Airport. The evaluation identified two ditches within trench 404 dating to the prehistoric period. One of these was thought to be related to a field system however a second was seen to be either a prehistoric barrow or a round house ditch. It was proposed that more archaeological work should be carried out to determine the nature of the ditches.</p> <p>A monitoring visit was made to the site on Thursday 13th March 2014 to inspect the ground works that had taken place at the site since the last watching brief visit in October 2013. This work mostly involved the construction of the new, northern flow control structure and the excavation of portions of the new stream channel, in areas 2 and 4. During the time of the site visit the focus of work on site appeared to be the expansion of the earthen bank associated with the new flow control structure. This was achieved by material being moved from stock pile sites near to the structure, dumped onto the bank and then compressed and shaped via various plant. No new penetrative ground works were seen during the course of the visit and no archaeological features or finds were observed.</p> | EWS1328 | 2014 | E2 |
| <p>Antlands Lane West, Shipley Bridge, Crawley - Archaeological Watching Brief</p> <p>An archaeological watching brief was undertaken at Antlands Lane West, Shipley Bridge, Crawley. Although the site was relatively large no archaeological finds or features were recorded during the watching brief.</p> | EWS1423 | 2015 | E3 |
| Gatwick Airport: Proposed Hotel, Edgeworth Site, Buckingham Gate, Crawley | EWS1513 | 2015 | E4 |

| | | | |
|--|---------|------|----|
| <p>Desk-based Assessment for the proposed development of a new hotel on land within the curtilage of Gatwick Airport. The proposed development area is immediately adjacent to two Grade II Listed Buildings, and consists of the demolition of an existing building. The potential for the site to have contained significant archaeological deposits has been assessed as moderate to low, although an archaeological evaluation would be reasonable.</p> | | | |
| <p>Gatwick Airport R2 Heritage Assessment: LiDAR Analysis</p> <p>Analysis of LiDAR data for 7400ha surrounding Gatwick Airport was undertaken as part of the heritage assessment works relative to the proposed second runway (R2) at the airport. LiDAR data collected by the Environment Agency was manipulated and visualised in conjunction with an assessment of existing HER records in order to identify, characterise and map previously unrecorded features of archaeological interest. Over 200 new features were documented, mostly relating to historic agriculture and land division, but also including several undocumented earthworks, enclosures, mounds and other features likely to be of archaeological importance.</p> <p>A study number (or 'AOC' number) was allocated to every feature digitised. On identification each feature was allocated a 'class', indicating the best estimate of the nature of the feature identified, and a 'super-class' was then applied in order to group features into the following categories: Agricultural, Earthwork or enclosure, Mound, Quarries, pits and ponds, Roads and tracks, Indeterminate and Non-archaeological. In order to complement the analysis of aerial imagery undertaken in 2014, the corresponding features were assessed in the LiDAR data. Many of the features identified in that study are missing from the LiDAR data, often owing to construction or changes in land use since the time of the photography. As part of the initial archaeological assessment works, a walkover survey was carried out. This walkover identified 20 features of likely possible archaeological significance.</p> | EWS1739 | 2016 | E5 |
| <p>Gatwick Airport Development (Balancing Pond North)- Geophysical Survey</p> <p>A magnetometer survey was carried out at the proposed site of a drainage pond, South-East of Gatwick Airport. The site covers a total area of around 4.8ha and is under consideration for the construction of drainage balancing ponds and flood storage areas. The site is mainly grassland, but has in part been planted with trees. It is on a bedrock of Cretaceous Wealden Mudstone.</p> <p>The magnetometer readings were collected along transects 1m apart using Bartington 1m fluxgate gradiometers. The survey results shows various magnetic disturbances, although few appear to be of archaeological significance. Various wooded and obstructed areas of the site could not be surveyed but findings from the remainder of the survey include a number of strong linear responses representing iron pipes and other recent disturbances. Alignments between some of the magnetic anomalies suggest they are linked by nonferrous pipes or services. There are also strong isolated magnetic anomalies indicating buried iron objects, as well as localised disturbed areas suggesting deposits of ferrous and other debris (rubble, concrete). There is also strong magnetic activity along a track across the site.</p> <p>Very few of the detected features show any of the characteristics to be expected from archaeological findings. A few individual magnetic anomalies show rounded profiles, which can be a characteristic of silted pits. However, these are small and inconclusive and do not suggest the presence of any concentrations of archaeologically significant findings. They are not clearly distinguishable from other small background magnetic anomalies which could be of natural or non-archaeological origin.</p> | EWS570 | 2017 | E6 |
| <p>Land East of Balcombe Road, Crawley - Archaeological Investigations</p> <p>An archaeological evaluation and strip, map and sample excavation was carried out at Land east of Balcombe Road, Crawley, in advance of development of the site. The fieldwork comprised the excavation of 151 trenches within three separate fields A, B and C along with a 2500m² strip, map and sample excavation area in Area B. Small quantities of prehistoric and medieval pottery were recovered from a number of features and evidence of a Late Bronze age, Iron age and medieval phases of activity was represented by small amounts of industrial activity recovered from ditches and pits.</p> <p>Upper Palaeolithic to the Late Neolithic: There is little evidence of prehistoric activity with only small quantities of struck flint recovered from within Areas A and B.</p> | EWS1884 | 2019 | E7 |

Late Bronze Age: Area C produced a moderate amount of evidence for late Bronze Age activity, mainly within the centre and the northeast of the site. One of the ditches contained some of the earliest pottery found on site. This ditch is thought to be part of an enclosure forming an early boundary or land division, and likely to have connected to two further ditches (one orientated north-south and the other east-west) to form either a field system or enclosure. These ditches all have multiple dark fills suggestive of continued use and have produced a large amount of pottery dating to the late Bronze Age. The pottery recovered may have been part of three vessels deliberately placed within the ditch. To the east of the main ditch were two undated pits and a possible terminus. It is likely that these features are related to the enclosure and are an indication of activity outside the enclosure, possibly part of a fence line or general pitting of the area. Several possible Bronze Age features were identified outside the enclosure area. These include two boundary ditches, a small posthole/pit and pit, which contained four bodysherds of Bronze Age pottery. These possibly represent further Bronze Age subdivisions of land and areas of infrequent pitting. It is likely that this area represents the continuation of the outskirts of a Bronze Age settlement or farmstead with small amounts of activity taking place in this area.

Iron Age / Roman: Late Iron Age/Roman features were present in Area B and C in the form of field systems, postholes and pits. The most substantial feature was observed in Area B and was comprised of a large multiple fill northeast-southwest ditch. This ditch was also excavated during the strip, map and sample excavation. The large Iron Age ditch was comprised of multiple silty clay fills, a recut then a final fill associated with disuse. The ditch became increasingly shallow until its termination, possibly suggesting a change in landscape or historic topography. Three associated postholes continued northeast on the ditches alignment. These features may constitute the fenced continuation of the boundary or the truncated remains of the ditch. The ditch served to divide the mitigation area into two. The western area revealed nine small postholes and a pit each heavily truncated by rooting. They are thought to be contemporary with the Iron Age ditch. These did not form any pattern or alignment and it is possible that truncation may have removed further features within the group. The eastern half of the mitigation area contained eleven small postholes, three pits and a shallow north-south aligned ditch terminus. All were undated with a similar level of truncation to the postholes and pits as those observed west of the ditch and are most likely part of the same time scale of occupation. North of this ditch was another moderate sized northeast-southwest ditch. Iron Age pottery was found within its fill and it is likely to represent another Iron Age field boundary. Double ditches were also observed and their alignment suggests that they form a corner of an enclosure or boundary. Possible Iron Age pottery was recovered. A single Roman coin was found within the subsoil during the excavation phase dated to the AD 2nd century. It was not associated with any feature and due to its location within the subsoil cannot be taken as evidence of specific Roman activity within the area.

Medieval: Area A's only dateable feature was a ditch oriented east-northeast–west-southwest. One shard of 13th-14th century medieval was recovered from its fill. It is likely that the majority of other features are contemporary with this and represent some low status agricultural activity south of Toovies Farm. There is a small amount of medieval activity located in the south-western edge of Area C, near the current location of the farmhouse. A small amount of pottery was recovered within a moderate boundary ditch and pit. A ditch ran on a northwest-southeast alignment and is smaller than most of the prehistoric ditches present on site and contained medieval pottery from the 14th century. East of this ditch was a pit containing mid-15th- to mid-16th- century pottery from the fill.

Post-medieval: There is a small amount of post-medieval activity located within the south and eastern edges of site with a small amount of industrial material recovered. A post-medieval lime kiln site was also identified but not excavated.

Overall, the archaeological fieldwork has produced residual evidence of early prehistoric activity comprising flint work of possible Upper Palaeolithic – Middle Bronze Age date. Evidence of Late Bronze Age land division was also identified. Further later prehistoric land division dating to the Late Iron Age/Early Roman period and low level medieval/post-medieval activity was also encountered.

4.0 Recommendations

4.1 Introduction

4.1.1 This Heritage Constraint Appraisal has been produced to provide a review of available documentation and data in order to provide advice to the client with regard to the development potential for the Site.

4.2 Built heritage

4.2.1 The LPA is likely to require a **Heritage Statement** as part of a planning application (the Local Plan adopted in 2015 refers to this as a Heritage Impact Assessment). The Heritage Statement will provide a detailed understanding of the heritage significance of the assets and assess the impact of the proposed scheme on that significance. Professional expert opinion will be used to assess heritage significance, based on historic, archaeological, architectural or artistic interest, as set out in Historic England's Conservation Principles (HE 2019).

4.2.2 It is anticipated that the forthcoming development proposals will not materially impact any known built heritage assets, either statutory listed buildings or locally listed buildings. Therefore it is judged that the only potential development impact to the identified assets will be to a change in their setting.

4.2.3 The key heritage constraint on the Site is the Grade II statutory listed buildings (Old House and Lilac House), and the effects development might have on the setting of these building. The proposals must be sensitive to the context of the listed buildings and must seek to "*preserve or enhance the design and character ... and have regard to its historic significance*" in accordance with adopted Local Plan policy CH15.

4.2.4 There are several locally listed buildings in the immediate vicinity of the Site. Local listing is a way of acknowledging to owners and decision makers that the building is of value to the local scene, character or history. Whilst this designation holds less heritage significance than statutorily listed buildings it can nevertheless represent a constraint to future development. The current local plan (2015 – 2030) states, in relation to locally listed buildings that "*development should also maintain features of interest, and respect or preserve the character or setting of the building*". The Heritage Statement must demonstrate that any proposed development has taken into account the historic, architectural, townscape and communal interest of any buildings that are likely to be affected (in line with CBC policy CH16).

4.3 Archaeology

- 4.3.1 The Site is unlikely to contain any remains of national significance. However, there may be below-ground remains associated with the previous historic farmsteads (which are visible on the historic OS maps).
- 4.3.2 The LPA archaeological advisor is likely to require an archaeological desk-based assessment as part of a planning application. Site based archaeological work may also be required under the terms of a standard planning condition, dependant on the expected scheme impacts. This may comprise a staged programme of archaeological evaluation and mitigation (i.e. excavation and/or a watching brief).

4.4 Conclusion

- 4.4.1 This Heritage Constraints Appraisal concludes that based on the available evidence, there are no significant or material heritage constraints to the development of the Site, provided inherent and additional mitigation is incorporated into the proposals.
- 4.4.2 It is judged this Heritage Constraints Appraisal is sufficient to inform and support the ongoing promotion and proposed allocation of the site via the Council's Local Plan review.

5.0 Appendix 1: Planning Policy

5.1 Statutory protection

Listed buildings and conservation areas

- 5.1.1 The Planning (Listed Buildings and Conservation Areas) Act 1990 sets out the legal requirements for the control of development and alterations which affect listed buildings or conservation areas (including buildings of heritage interest which lie within a conservation area). Grade I are buildings of exceptional interest. Grade II* are particularly significant buildings of more than special interest. Grade II are buildings of special interest.
- 5.1.2 The Planning (Listed Buildings and Conservation Areas) Act 1990 states that with regard to applications for planning permission affecting listed buildings or its setting:

“s.66(1) In considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority or, as the case may be, the Secretary of State shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.”

- 5.1.3 The Planning (Listed Buildings and Conservation Areas) Act 1990 sets out that with regard to application for planning permission within conservation areas:

“s.72(1) In the exercise, with respect to any buildings or other land in a conservation area, of any powers under any of the provisions mentioned in subsection (2), special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area.”

5.2 National Planning Policy Framework

- 5.2.1 The Government issued a revised version of the National Planning Policy Framework (NPPF) in February 2019 (MHCLG 2019) and supporting revised Planning Practice Guidance in 2019 (MHCLG 2019).
- 5.2.2 The purpose of the planning system is to contribute to the achievement of sustainable development, and the NPPF has a presumption in favour of such, where it meets needs of the present without compromising the ability of future generations to meet their own needs. Sustainable development is achieved within the context of economic, social and environmental objectives.

5.2.3 **Section 16** of the NPPF deals with 'Conserving and Enhancing the Historic Environment'. The NPPF recognises that heritage assets are an irreplaceable resource which 'should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations' (para 184).

5.2.4 The NPPF requires the significance of heritage assets to be considered in the planning process, whether designated or not. NPPF **Section 16** is reproduced in full below:

Proposals affecting heritage assets

Para 184. Heritage assets range from sites and buildings of local historic value to those of the highest significance, such as World Heritage Sites which are internationally recognised to be of Outstanding Universal Value [*footnote: Some World Heritage Sites are inscribed by UNESCO to be of natural significance rather than cultural significance; and in some cases they are inscribed for both their natural and cultural significance*]. These assets are an irreplaceable resource, and should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations [*Footnote: The policies set out in this chapter relate, as applicable, to the heritage-related consent regimes for which local planning authorities are responsible under the Planning (Listed Buildings and Conservation Areas) Act 1990, as well as to plan-making and decision-making*].

Para 185. Plans should set out a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats. This strategy should take into account:

- a) The desirability of sustaining and enhancing the significance of heritage assets, and putting them to viable uses consistent with their conservation;
- b) The wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring;
- c) The desirability of new development making a positive contribution to local character and distinctiveness; and
- d) Opportunities to draw on the contribution made by the historic environment to the

character of a place.

Para 186. When considering the designation of conservation areas, local planning authorities should ensure that an area justifies such status because of its special architectural or historic interest, and that the concept of conservation is not devalued through the designation of areas that lack special interest.

Para 187. Local planning authorities should maintain or have access to a historic environment record. This should contain up-to-date evidence about the historic environment in their area and be used to:

- a) Assess the significance of heritage assets and the contribution they make to their environment; and
- b) Predict the likelihood that currently unidentified heritage assets, particularly sites of historic and archaeological interest, will be discovered in the future.

Para 188. Local planning authorities should make information about the historic environment, gathered as part of policy-making or development management, publicly accessible.

Para 189. In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance. As a minimum the relevant historic environment record should have been consulted and the heritage assets assessed using appropriate expertise where necessary. Where a site on which development is proposed includes, or has the potential to include, heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.

Para 190. Local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this into account when considering the impact of a proposal on a heritage asset, to avoid or minimise any conflict between the heritage asset's conservation and any aspect of the proposal.

Para 191. Where there is evidence of deliberate neglect of, or damage to, a heritage asset the

deteriorated state of the heritage asset should not be taken into account in any decision.

Para 192. In determining applications, local planning authorities should take account of:

- a) The desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;
- b) The positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and
- c) The desirability of new development making a positive contribution to local character and distinctiveness.

Considering potential impacts

Para 193. When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.

Para 194. Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification.

Substantial harm to or loss of:

- a) Grade II listed buildings, or Grade II registered parks or gardens, should be exceptional;
- b) Assets of the highest significance, notably scheduled monuments, protected wreck sites, registered battlefields, grade I and Grade II* listed buildings, Grade I and II* registered parks and gardens, and World Heritage Sites, should be wholly exceptional. (*Footnote: Non-designated heritage assets of archaeological interest, which are demonstrably of equivalent significance to scheduled monuments, should be considered subject to the policies for designated heritage assets.*)

Para 195. Where a proposed development will lead to substantial harm to (or total loss of significance of) a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or total loss is necessary to achieve substantial public benefits

that outweigh that harm or loss, or all of the following apply:

- a) The nature of the heritage asset prevents all reasonable uses of the site; and
- b) No viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; and
- c) Conservation by grant-funding or some form of not for profit, charitable or public ownership is demonstrably not possible; and
- d) The harm or loss is outweighed by the benefit of bringing the site back into use.

Para 196. Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.

Para 197. The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.

Para 198. Local planning authorities should not permit the loss of the whole or part of a heritage asset without taking all reasonable steps to ensure the new development will proceed after the loss has occurred.

Para 199. Local planning authorities should require developers to record and advance understanding of the significance of any heritage assets to be lost (wholly or in part) in a manner proportionate to their importance and the impact, and to make this evidence (and any archive generated) publicly accessible¹. However, the ability to record evidence of our past should not be a factor in deciding whether such loss should be permitted.

Para 200. Local planning authorities should look for opportunities for new development within Conservation Areas and World Heritage Sites, and within the setting of heritage assets, to enhance or better reveal their significance. Proposals that preserve those elements of the setting that make a

¹ Copies of evidence should be deposited with the relevant historic environment record, and any archives with a local museum or other public depository

positive contribution to the asset (or which better reveal its significance) should be treated favourably.

Para 201. Not all elements of a Conservation Area or World Heritage Site will necessarily contribute to its significance. Loss of a building (or other element) which makes a positive contribution to the significance of the Conservation Area or World Heritage Site should be treated either as substantial harm under paragraph 195 or less than substantial harm under paragraph 196, as appropriate, taking into account the relative significance of the element affected and its contribution to the significance of the Conservation Area or World Heritage Site as a whole.

Para 202. Local planning authorities should assess whether the benefits of a proposal for enabling development, which would otherwise conflict with planning policies but which would secure the future conservation of a heritage asset, outweigh the dis-benefits of departing from those policies.

5.3 Local planning policy context

- 5.3.1 The Site is located in West Sussex, in the borough of Crawley. The Crawley Borough Local Plan 2030, which sets out the planning policy framework to guide development in Crawley up to 2030. Crawley Borough Council's committee draft Local Plan is currently going through the committee cycle with Reg 19 consultation to take place in January - March 2020.
- 5.3.2 The Crawley Borough Local Plan 2015 – 2030 includes policies CH12, CH15 and CH16 which relate to heritage assets and are relevant to the development area.

Policy CH12: Heritage Assets

All development should ensure that Crawley's designated and non-designated heritage assets are treated as a finite resource, and that their key features or significance are not lost as a result of development.

Where a development affects a heritage asset or the setting of a heritage asset, a Heritage Impact Assessment will be required. This should describe the significance of any heritage assets affected and the contribution made by their setting, the impact of the development, and any measures adopted to ensure the heritage asset is respected, preserved or enhanced or, for exceptionally significant development, relocated.

If, in exceptional circumstances, a heritage asset is considered to be suitable for loss or replacement, and it has been demonstrated its site is essential to the development's success, proposals will need to demonstrate how they have recorded the heritage asset:

- i. in line with a written scheme of investigation submitted to, and approved by, Crawley Borough Council; or*
- ii. in the case of standing structures, to a minimum of Historic England recording Level 2, or higher if specified by the council.*

Applicants are also required to notify any relevant parties including Historic England and submit their recording to the Historic Environment Record (HER).

Applicants should demonstrate that the benefits of the entire scheme outweigh the loss of the asset and that any replacement scheme is of equal quality in terms of its design.

Policy CH15: Listed Buildings and Structures

To recognise the value of Listed Buildings (including Listed Structures) within Crawley, the council will ensure that any proposed works to them are consistent with the character, appearance and heritage value of any statutory Listed Building/Structure, in line with national legislation, policy and guidance.

Any changes must preserve or enhance the design and character of the Listed Building and have regard to its historic significance. A Heritage Impact Assessment is required to be submitted demonstrating how proposals will protect the value of the listed building, its setting, and its key features. Listed Buildings should be retained and, therefore, the demolition, or part thereof, of a Listed Building will only be acceptable in exceptional circumstances, where

- i. there are clearly defined reasons why the building cannot be retained in its original or a reasonably modified form; and*
- ii. a significant benefit that cannot have facilitated the retention of the building can be demonstrated.*

If demolition is seen to be acceptable, the council will require the building to have been recorded to Historic England Level 4 and submitted to the Historic Environment Record. Any development

on the site of a demolished Listed Building must have regard to the original building.

Policy CH16: Locally Listed Buildings

All development will seek to secure the retention of buildings included on the Crawley Borough Local Building List.

Development should also maintain features of interest, and respect or preserve the character or setting of the building. Development proposals affecting Locally Listed Buildings must demonstrate in the Heritage Impact Assessment that proposals take account of the following criteria:

- i) *The Historic interest of the building.*
- ii) *The Architectural interest of the building.*
- iii) *The Townscape value of the building.*
- iv) *The Communal value of the building and its surroundings.*

Proposals seeking the demolition or partial demolition of a Locally Listed Building may be acceptable in exceptional circumstances if the development proposals:

- a) *reflect or retain the key features of the original building; and*
- b) *significantly outweigh the merit of retaining of the original building with regard to social, economic and environmental benefit to the wider area; and*
- c) *records the building up to Historic England Level 4, unless previously agreed with the Local Planning Authority, and submits that record to the Historic Environment Record in consultation with the Local Authority.*

The council will also assess the merit of designating new locally listed buildings in consultation with local residents and will define the characteristics of the buildings that warrant this level of protection.



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Strategic Environmental Assessment

Land at Gatwick Green



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Strategic Environmental Assessment

Land at Gatwick Green

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1. Introduction

1.1. Crawley Borough Council (CBC) is reviewing its adopted Local Plan (Crawley Borough Council Local Plan (CBLP): Crawley 2030, 2015). This Strategic Environmental Assessment (SEA) is undertaken on behalf of the Wilky Group (TWG). It forms part of the evidence base to support representations on the Regulation 19 consultation on the Draft Crawley Borough Local Plan (DCBLP).

1.2. The DCBLP contains Policy SD3 committing CBC to prepare an Area Action Plan (AAP) covering land that the DCBLP no longer proposes to be safeguarded for a second runway at Gatwick Airport. The purpose of the AAP therefore is to enable the Council to plan for its future economic, housing, infrastructure and community needs, including amongst which are any critical and justified future needs of the Airport. This will be subject to separate consultation and assessment and will include *inter alia* the consideration of land east of the Airport for strategic employment; a site known as Gatwick Green.

1.3. The Council has undertaken a Strategic Environmental Assessment (SEA) and a Sustainability Appraisal (SA)¹, respectively under an EU Directive and under regulations of the Planning and Compulsory Purchase Act 2004 to ensure that the environmental effects of the Plan are taken into account and to satisfy independent examination and allow the Plan to be formally adopted. The SEA contained an assessment of a number of proposed site allocations, but did not cover potential sites within the area covered by the AAP under Policy SD3. Instead, the SEA undertook an assessment of the whole AAP area, which adequately provided a baseline assessment to demonstrate the area's broad suitability to accommodate growth and the key considerations that such growth may need to address. In the context of the Wilky Group's ongoing representations seeking the allocation of Gatwick Green for strategic employment in the event that the proposal for an AAP is not adopted, it is appropriate that evidence is presented to demonstrate the suitability of the Gatwick Green site in sustainability and environmental terms.

1.4. The SEA covers the area of land shown in **Figure 1**, extending to about 59 ha. This site is largely owned by the TWG (80%); areas in which the TWG do not have an interest are subject to ongoing discussions between TWG and landowners. These discussions have resulted in a number of landowners agreeing to bring their land forward for development in the event the overall site is allocated.

1.5. The site comprises an area of mixed land uses dominated by low quality pasture mainly grazed by horses and divided into a number of fields by mature hedgerows. Small areas of tree cover occur in the central and north western part of the site. Clusters of residential and some rural-commercial properties occur along Fernhill Road and Donkey Lane, with some frontage development to Balcombe Road and Peeks Brook Lane. The site is bisected by the Public Safeguarding Zone (PSZ) for the standby runway at Gatwick Airport. Aerodrome safeguarding requirements under CAP 168, the advice note and the Town & Country Planning process by way of ODPM/DfT circular 01/2003 'Safeguarding of aerodromes & military explosives storage areas' Direction 2002 must be adhered to.

¹ SUSTAINABILITY APPRAISAL / STRATEGIC ENVIRONMENTAL ASSESSMENT DRAFT REPORT For the Submission Local Plan, Crawley BC, January 2020

Strategic Environmental Assessment

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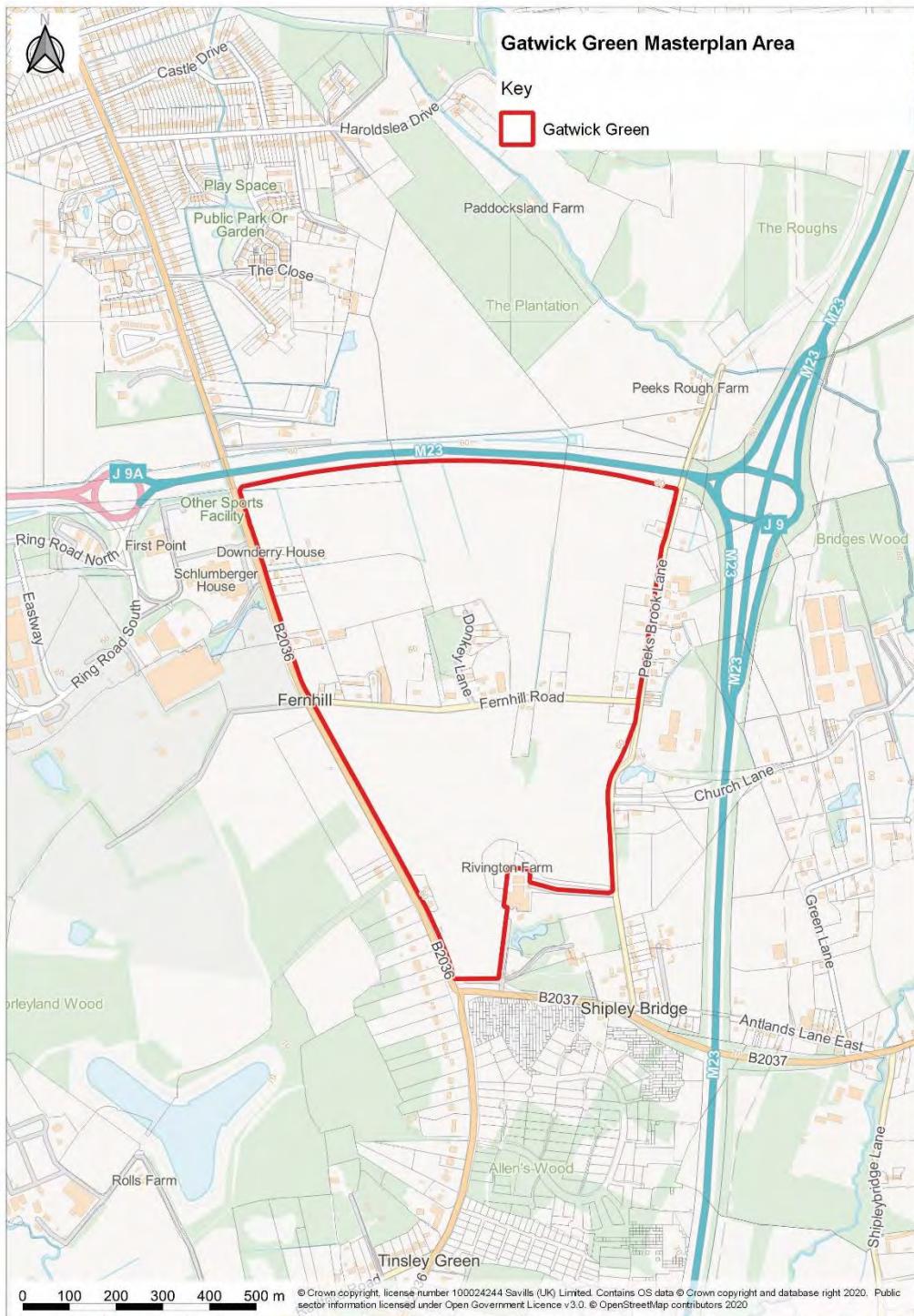


Figure 1 – Land at Gatwick Green

Strategic Environmental Assessment

Land at Gatwick Green

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1.6. This SEA report assesses and identifies the likely environmental effects that are likely to arise from the proposed use of land at Gatwick Green for employment purposes. This process involves drawing on available baseline survey data² and identifying the likely positive and adverse effects, and then the broad range of mitigation to reduce the adverse effects. The assessment includes impacts on people's health and in respect of disability, gender and racial equality.

1.7. The purpose of this SEA is to assess the sustainability of the Gatwick Green site against the Sustainability Objectives used by Crawley Borough Council (CBC) in the sustainability appraisal and strategic environmental assessment draft Report 2020, which are as follows:

- To mitigate climate change, by taking actions to reduce the concentration of greenhouse gases in the atmosphere.
- To adapt to the effects of climate change by reducing the negative consequences of changes in the climate on people and the environment, or by achieving a positive outcome from the effects of climate change.
- To protect and enhance the valued built environment and character within the borough through high quality new design and the protection of culturally valuable areas and buildings.
- To ensure that everyone has the opportunity to live in a decent and affordable home.
- To maintain, support and promote a diverse employment base that can serve the local and sub-regional and regional economy.
- To conserve and enhance the biodiversity habitats, key landscape features, fauna and flora within the borough.
- To reduce car journeys and promote sustainable and alternative methods of transport, whilst ensuring sufficient transport infrastructure is delivered to meet the requirements of the borough.
- To ensure the provision of sufficient infrastructure to meet the requirements of the borough.
- To promote 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.

1.8. The methodology for conducting the sustainability assessment evaluated the extent to which Gatwick Green met or could meet the above Sustainability Objectives and then attributed a sustainability rank against each Objective in line with the hierarchy of ranking levels below (Table 1.1).

Table 1.1 – Sustainability rank hierarchy

| |
|--|
| Significant Positive Impact on the sustainability objective (++) |
| Positive Impact on the sustainability objective (+) |
| Possible Positive or Slight Positive Impact on the sustainability objective (+?) |
| No Impact on the sustainability objective (0) |
| Neutral Impact on the sustainability objective (/) |
| Uncertain Impact on the sustainability objective (?) |
| Possible Negative or Slight Negative Impact on the sustainability objective (-?) |
| Negative Impact on the sustainability objective (-) |
| Significant Negative Impact on the sustainability objective (--) |

² Preliminary environmental/engineering investigations contained in technical reports prepared on behalf of WG and submitted with representations on its behalf on the CLP.

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1.9. The assessment has drawn on a number of preliminary environmental and engineering investigation reports prepared for the Wilky Group relating to the Gatwick Green site and consideration of the specific proposals for the site contained on the Concept Masterplan for Gatwick Green. The Assessment Criteria were those used in the assessment of site allocations used by CBC in the Sustainability and Strategic Environmental Assessment 2019 (SEA) prepared in support of the DCBPL. The SEA contains the following Assessment Criteria related to each of the nine Sustainably Objectives (Table 1.2):

Table 1.2 – Assessment Criteria

| Sustainability Objective | Assessment Criteria |
|---|--|
| 1. To mitigate climate change, by taking actions to reduce the concentration of greenhouse gasses in the atmosphere. | <ul style="list-style-type: none">• Is the construction of the site going to meet high standards of energy efficiency through the Code for Sustainable Homes (CfSH)?• Is the need to travel reduced through the location of the site?• Is the site contaminated or are there pedestrian pathways linking the site with contaminated land? Can the site be remediated?• Is the development impacted by noise (through adjacent road, airport, rail or industrial usage), or will the site itself result in noise increases?• Will the development site impact negatively or positively on air quality?• Will the development maintain or enhance water quality in rivers or groundwater? |
| 2. To adapt to the effects of climate change, by reducing the negative consequences of changes in the climate on people and the environment, or by achieving a positive outcome from the effects of climate change. | <ul style="list-style-type: none">• Are site proposals located away from areas that are high risk flooding zones, now or in the future?• Are flood prevention measures incorporated into any new development proposal? |
| 3. To protect and enhance the valued built environment and character within the borough through high quality new design and the protection of culturally valuable areas and buildings. | <ul style="list-style-type: none">• Would the development proposal impact upon the setting of a Listed Building, Conservation Area or Locally Listed Building?• If so, could a negative impact on the heritage asset be mitigated appropriately? |
| 4. To ensure that everyone has the opportunity to live in a decent and affordable home. | <ul style="list-style-type: none">• How does the proposal address housing needs in the borough?• Would the proposal deliver an element of affordable housing?• How does this provision meet the housing needs or the accommodation needs of the GTTS community? |
| 5. To maintain, support and promote a diverse employment base that can serve the local and sub-regional and regional economy. | <ul style="list-style-type: none">• Would the development proposal assist in maintaining, supporting or enhancing the local economy of the area? |

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| Sustainability Objective | Assessment Criteria |
|---|--|
| 6. To conserve and enhance the biodiversity habitats, key landscape features, fauna and flora within the borough. | <ul style="list-style-type: none">• Would the development proposal impact upon an existing or future environmental designation (such as a SNCI or AONB)?• Will there be any loss to biodiversity, or damage to the landscape as a result of the delivery of the site?• Will there be opportunities for increasing or enhancing environmental habitats through a development site? |
| 7. To reduce car journeys and promote sustainable and alternative methods of transport, whilst ensuring sufficient transport infrastructure is delivered to meet the requirements of the borough. | <ul style="list-style-type: none">• Is the site proposal located in close proximity to sustainable transport links in order for the occupants to reach essential services and facilities?• Is the need for a 'private' car reduced?• Is the site close to both a pedestrian and/or cycling network? |
| 8. To ensure the provision of sufficient infrastructure to meet the requirements of the borough. | <ul style="list-style-type: none">• Would the development increase highway and/or rail usage and would this have a detrimental impact upon highway and/or rail congestion?• What is the capacity of the site to ensure that sewage can be adequately treated?• Would the development site be designed to be connected to high quality telecommunication systems?• Is the site likely to provide additional renewable energy provision as part of the new development?• Is the site close to existing gas/electricity/ water mains? Is there sufficient capacity of current local physical connections? |
| 9. To promote active, cohesive and socially sustainable communities and To ensure everyone has the opportunity to participate in sport and to encourage active, healthy and independent lifestyles. | <ul style="list-style-type: none">• Are sites located reasonably close to neighbourhood centres and/or community centres? Are the sites located within the Built-Up Area Boundary (BUAB)?• Is the site allocation re-using previously developed land?• Is the site likely to have 'secured by design' principles implemented within the development design?• Is the site located in close proximity to existing leisure and recreation facilities?• Is the site located in close proximity to existing health facilities?• Is the site located in close proximity to existing local schools?• Will amenity areas be provided in association with the site?• Is the potential site capacity of the allocation likely to increase the numbers of users for local facilities (such as schools, GP surgeries) and would this have a detrimental impact upon such local facilities?• Would the development of a site mean the loss of formal or informal playing fields or other open space? Would the development have an impact on existing open space and would this be mitigated? |

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2. Sustainability Assessment

2.1. Land at Gatwick Green forms part of the land designated as part of the North Crawley Area Action Plan (AAP) area, covered by Policies SD3 and EC1 in the DCBLP. The AAP will address the future socio-economic needs of Crawley and land requirements related to any planned long term growth of Gatwick Airport.

2.2. The land subject to the Area Action Plan has been subject to a strategic environmental assessment, contained in the Council's SEA (pages 296-297), December 2019. In this context, the land at Gatwick Green has already been part of an area-based sustainability assessment, which concluded that the AAP area offered largely positive impacts, but uncertain with regard to climate change and negative in relation to biodiversity and landscape. Table 2.1 below shows the results of the AAP assessment alongside the findings of the Gatwick Green assessment. The results show that Gatwick Green has both less risk of adverse impacts and offers more sustainability benefits compared with the AAP area as a whole. This reinforces the importance of Gatwick Green in meeting the economic needs of Crawley and the Gatwick Diamond/LEP area, but in a highly sustainable manner.

Table 2.1 – Sustainability Assessment – AAP area and Gatwick Green

| Sustainability Objective | AAP Assessment | Gatwick Green Assessment |
|---|-----------------------------|---|
| 1. To mitigate climate change, by taking actions to reduce the concentration of greenhouse gasses in the atmosphere. | Uncertain impact (?) | <p>Land at Gatwick Green is located beyond the Built Up Area Boundary. It comprises majority greenfield land with clusters of commercial properties and groups of residences. This location means economic development would potentially increase the need to travel to access employment opportunities. However, the land is adjacent to existing employment sites served by public transport and is well-located for access by public transport, walking and cycling. The strategic nature and scale of the site provides the opportunity to access the site via an integrated sustainable transport solution. The scale of development would also enable a high level of sustainable design and construction to significantly reduce or avoid climate change impacts.</p> <p>The scale of Gatwick Green combined with its sustainable location adjacent to three Fastway routes offers some more scope to avoid / mitigate climate change than the AAP area as a whole.</p> <p>The impacts would therefore be Possible Positive Impact +?</p> |
| 2. To adapt to the effects of climate change, by reducing the negative consequences of changes in the climate on people and the environment, or by achieving a positive outcome from the effects of climate change. | Possible Positive Impact +? | <p>Identification of employment sites that are well connected to existing Main Employment Areas (e.g. Gatwick), represent the most sustainable options. Development on land at Gatwick Green could be designed to be resilient to climate change. The scale of development at Gatwick Green offers an opportunity for strategic level new build that has a high level of sustainable design in order to facilitate adaptation to climate change. On this basis, it is considered that development could offer significant scope to respond positively to climate change through the planning process.</p> <p>In relation to climate change adaptability, Gatwick Green has similar attributes / characteristics to other land parcels in the AAP area.</p> |

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| Sustainability Objective | AAP Assessment | Gatwick Green Assessment |
|--|--|--|
| | | The impact would therefore be Possible Positive Impact +? |
| 3. To protect and enhance the valued built environment and character within the borough through high quality new design and the protection of culturally valuable areas and buildings. | Possible Positive Impact +? | <p>There is an identified need for high quality business land and floorspace in Crawley which will likely exceed that which can be provided by sites within the Built Up Area Boundary. Local Plan policies will require high standards of design to be met which respond to their surroundings and protect and enhance culturally valuable areas and buildings. Development on the Gatwick Green site would therefore be required to enhance the overall aesthetics of the local built environment and provide the opportunity for positive impacts.</p> <p>In relation to enhancing the built environment and protecting cultural assets, Gatwick Green has a similar capacity to contribute to this objective compared to the AAP area as a whole.</p> <p>The impact would therefore be Possible Positive Impact +?</p> |
| 4. To ensure that everyone has the opportunity to live in a decent and affordable home. | Possible Positive Impact +? | <p>As an employment site, Gatwick Green will not directly deliver decent and affordable homes. However, the provision of this land for employment ensures this need is met in a sustainable location, so contributing to balancing jobs with new homes in a sustainable manner. For this reason, land identified for Gatwick Green is viewed as having an uncertain, but potentially positive impact against this indicator.</p> <p>In relation to ensuring everyone has access to a decent and affordable home, Gatwick Green would ensure a balance between homes and jobs which is similar to the balance that the AAP area could achieve.</p> <p>The impact would therefore be Possible Positive Impact +?</p> |
| 5. To maintain, support and promote a diverse employment base that can serve the local and sub-regional and regional economy. | Possible Significant Positive Impact ++? | <p>As an employment site, land at Gatwick Green provides a high profile site for high quality business-led employment development in a highly sustainable location. The site will address the need for high-quality Strategic Employment Locations (SELs), employment space and support sustainable economic growth in the area. Gatwick Green is also uniquely placed to diversify the area's employment base given its ability to attract alternative occupiers to those normally locating at Manor Royal: in that sense it would have a high degree of complementarity with Manor Royal and help to rebalance the economy. The site therefore presents a significant opportunity to accommodate the business needs of Crawley and the wider region at a strategic location adjacent to the Airport, the M23, mainline rail and Fastway, so reinforcing the area's role as the leading employment destination in the Gatwick Diamond. Gatwick Green offers more scope to deliver these benefits than other parts of the AAP area.</p> <p>Gatwick Green has an enhanced capability to promote a diverse economic base to support the local and sub-regional economy similar to that of the AAP area as a whole, but greater than other locations with the area.</p> <p>The impact would therefore be Possible Significant Positive Impact ++</p> |

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| Sustainability Objective | AAP Assessment | Gatwick Green Assessment |
|---|-----------------------------|---|
| 6. To conserve and enhance the biodiversity habitats, key landscape features, fauna and flora within the borough. | Possible Negative Impact -? | <p>The site is not subject to any statutory landscape or nature conservation designations, but local landscape values and biodiversity have been recognised in policies in the adopted CBLP. Whilst it may have slightly higher values than other parts of the AAP area, some of those areas are subject to statutory nature conservation designations. The development of land at Gatwick Green for employment use could have a negative impact on biodiversity, landscape features, flora and fauna. However, the strategic size of the site presents an opportunity to mitigate impacts on biodiversity or provide compensation. Such mitigation or compensation could be inherent or additional, either as part of the scheme or on other land in Wilky's ownership. Development of the site will in any event need to comply with future requirements to deliver Biodiversity Net Gain, presenting the opportunity to enhance habitats and landscape features.</p> <p>Compared to the AAP area as a whole, Gatwick Green has a slightly higher level of biodiversity value, but is not affected by any statutory nature conservation designations: its therefore has a marginally greater potential to mitigate or compensate impacts and deliver biodiversity net gain compared with the AAP area.</p> <p>The impact would therefore be Possible Positive Impact +?.</p> |
| 7. To reduce car journeys and promote sustainable and alternative methods of transport, whilst ensuring sufficient transport infrastructure is delivered to meet the requirements of the borough. | Possible Positive Impact +? | <p>Land at Gatwick Green is located beyond the Built Up Area Boundary which means economic development would potentially increase the need to travel to access employment facilities. However, Gatwick Green is situated in a highly sustainable location adjacent to the Airport, the M23, mainline rail and Fastway, so offering significant scope for highly sustainable arrangements for access. This location combined with the sale of development proposed, creates the opportunity for the wider provision of sustainable transport infrastructure at the site and in adjacent areas. This would make the development highly accessible by sustainable modes of transport, including Fastway, local bus services, walking and cycling. Such arrangements could benefit nearby employment areas and the Airport. Further, the provision of higher value and more diverse job opportunities would help to retain employees in an area that is overly reliant on low skilled jobs at the Airport and elsewhere: this will help to reduce levels of less sustainable out-commuting to London.</p> <p>Gatwick Green is located at the most accessible location in the AAP area with greater scope to reduce out-commuting to London; consequently, it has a higher sustainability profile than other parts of the AAP area.</p> <p>The impact would therefore be Possible Significant Positive Impact ++.</p> |

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| Sustainability Objective | AAP Assessment | Gatwick Green Assessment |
|---|-----------------------------|--|
| 8. To ensure the provision of sufficient infrastructure to meet the requirements of the borough. | Possible Positive Impact + | <p>The development of land at Gatwick Green for employment use will require a range of infrastructure to address transport, energy, renewable energy, utility, broadband/5G and social needs. The scale of development at Gatwick Green offers the opportunity for innovative and high quality infrastructure to address these needs - these will meet the needs of proposed development and could help meet wider requirements of the borough. The potential of Gatwick Green in this regard is likely to be higher than that of the AAP area as a whole.</p> <p>Aerodrome safeguarding requirements must be adhered to, including a PSZ for the standby runway at Gatwick Airport. However, this does not represent a constraint to the site being developed as the safety limitation surfaces under these requirements are of significant height and limitations in regards to lighting can be addressed in design.</p> <p>The scale and high value of Gatwick Green offers the opportunity for greater innovation and quality of infrastructure to meet wider needs compared with the potential in the AAP area as a whole.</p> <p>The impact would therefore be Positive Impact +.</p> |
| 9. To promote active, cohesive and socially sustainable communities and to ensure everyone has the opportunity to participate in sport and to encourage active, healthy and independent lifestyles. | Possible Positive Impact +? | <p>The strategic nature of land at Gatwick Green presents the opportunity to enhance bus, pedestrian and cycle links to nearby communities and offers scope to encourage healthy lifestyles through the design of such links and provision within the built environment. The scale of the proposed development also offers opportunities to incorporate a range of employee amenities and community uses, from sports, to leisure and recreational uses. The proposals also have the capability to offer higher value jobs, so helping to diversify the economy and create more socially-sustainable communities. Such benefits are not, however, exclusive to Gatwick Green as the AAP area as a whole offers similar opportunities.</p> <p>Gatwick Green has a similar capability to contribute towards cohesive and socially sustainable communities and provide for sport and recreation, which is similar to the capability of the AAP area.</p> <p>The impact would therefore be Possible Positive Impact +?</p> |
| Conclusion | - | <p>As an extension to the Main Employment Areas of Manor Royal and Gatwick Airport, or as a standalone site(s) for Strategic Employment Location(s) to meet the business land needs of Crawley as a sub-regional employment destination, land identified for the AAP represents the most sustainable location for strategic employment growth in Crawley. Some areas within the broadly identified area will be more sustainable than others – this applies to Gatwick Green given its scale, location, attributes and high profile, which means it has a higher sustainability profile compared to the AAP area. Overall, it would enable highly sustainable, high quality new development to complement and deliver linkages with the existing residential and business communities.</p> |

3. Conclusion

3.1. 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.

3.2. 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.

3.3. 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.

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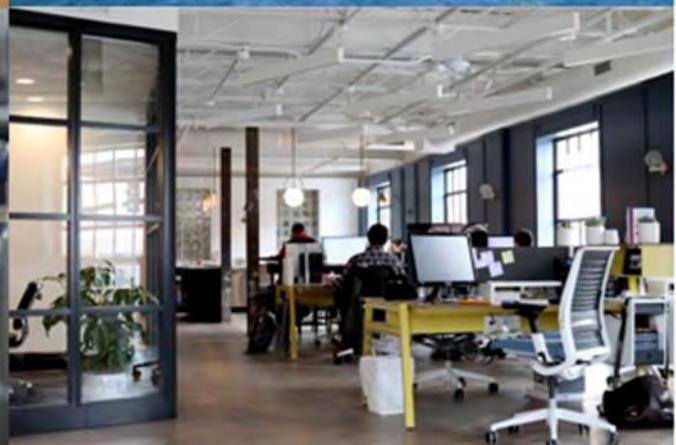
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Assessment of Employment Land

Strategic employment sites north of Crawley



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1. Introduction

- 1.1. Crawley Borough Council (CBC) is reviewing its Local Plan (the Crawley Borough Council Local Plan: Crawley 2030, adopted in 2015 - CBLP). The draft for consultation under Regulation 19 was released in January 2020: the Draft Crawley Borough Local Plan 2020-2035 (DCBLP).
- 1.2. The DCBLP provides a policy framework to guide development within the Borough up to 2035, including policies to control the nature of, and provide for additional development at, the Council's ten Main Employment Areas (MEAs) of Manor Royal, Crawley Town Centre, Gatwick Airport, Three Bridges Corridor, Maidenbower Business Park, Tilgate Forest Business Park, Lowfield Heath, Bradfield Stadium and K2 Crawley and The Hawth. Collectively, these MEAs have capacity to deliver about 12 ha of new employment space over the Plan period. Based on the forecast of future labour supply (from uncapped housing requirements), the Borough has a need for at least 113 ha of new employment land, or at least 101 ha when account is taken of the current land supply. The Council's Employment Land Trajectory (ELT) contains a list of 24 sites that have the potential to provide for about 155 ha of land over and above the 12 ha short term land supply. Some of these sites may not be deliverable and many are small; below 5 ha.
- 1.3. It has long been the intention that much of Crawley's long term economic and employment needs should be from strategic employment land given the Borough's location at the 'Heart of the Gatwick Diamond' and the 'engine of growth' in the Coast to Capital Local Enterprise Partnership (LEP) area. The adopted CBLP identified the need for one or more Strategic Employment Locations to address the long-standing shortfall in economic infrastructure, rather than solely a collection of smaller employment sites as extensions to MEAs. The CBLP identified an Area of Search for SELs under Policy EC1, covering the area safeguarded for a second runway at Gatwick. With the safeguarding removed from the DCBLP, the revised Policy EC1 and new Policy SD3 identifies all of the previously safeguarded land for the North Crawley Area Action Plan (AAP) – this covers about 619 ha to the north of Crawley, generally south and east of the Airport.
- 1.4. This Assessment is relevant in the event that the Examination of the DCBLP requires consideration of strategic employment sites and their allocation within the DCBLP itself rather than as part of later work in an AAP. The ELT identifies five larger sites, two of which qualify as 'strategic' within the AAP area – three of the sites fall below the minimum site threshold of 20 ha, but have been included in order to provide a comprehensive review of the strategic or near-strategic opportunities to the north of Crawley. All five sites have therefore been subject to a comparative evaluation to assess their relative merits and identify which has the strongest attributes.
- 1.5. The assessment includes the Gatwick Green site, an area of land shown in **Figure 1**, extending to about 59 ha. This site is largely owned by the TWG (80%): areas in which the TWG do not have an interest are subject to ongoing discussions between TWG and landowners. These discussions have resulted in a number of landowners agreeing to bring their land forward for development in the event the overall site is allocated.

- 1.6. The site comprises an area of mixed land uses dominated by low quality pasture mainly grazed by horses and divided into a number of fields by mature hedgerows. Small areas of tree cover occur in the central and north western parts of the site. Clusters of residential and some rural-commercial properties occur along Fernhill Road and Donkey Lane, with some frontage development to Balcombe Road and Peeks Brook Lane.

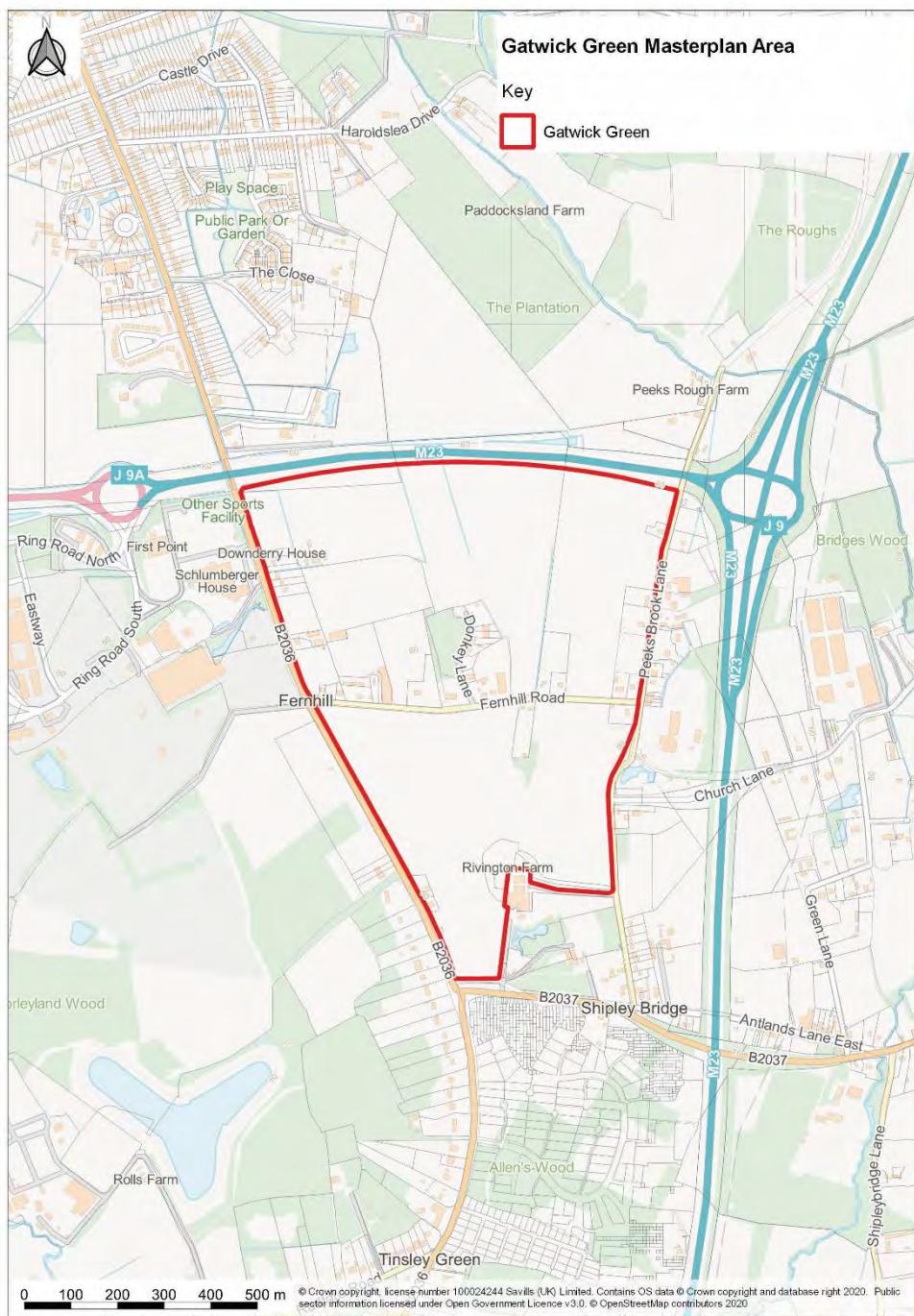


Figure 1 – Land at Gatwick Green

2. Methodology

- 2.1. This report provides an assessment of potential alternative sites for a strategic employment allocation in the Crawley and Gatwick area. The consideration and evaluation of reasonable site options is an important part of the plan-making process and is necessary in order to demonstrate that the plan is justifiable and represents the most appropriate strategy in accordance with the tests of soundness contained in the NPPF (para 35).
- 2.2. In order to provide an objective assessment process, a criteria-based matrix has been used as the basis to evaluate potential employment sites. The Assessment Criteria are set out in Section 3 of this report, along with an explanation of the rationale behind each criterion.
- 2.3. The Assessment Criteria reflect the factors that determine a site's suitability for strategic employment development and have been drawn up taking into account overarching planning policy guidance, including Planning Practice Guidance on Housing and Economic Land Availability Assessments, local planning policies including the adopted Crawley Borough Council Local Plan 2015, the DCBLP, the North West Sussex Economic Growth Assessment 2020 and the Coast to Capital Local Industrial Strategy. The Assessment Criteria have been devised taking account of the following considerations:
- Strategic policy considerations
 - Accessibility
 - Sustainability
 - Market requirements and perceptions
 - Site availability and deliverability
 - Environmental constraints and designations
- 2.4. Each of the potential strategic locations, as described in Section 4 of this report, has been assessed against the individual appraisal criteria. The assessment has been undertaken qualitatively, using the following simple scoring system:
- Excellent ✓✓
 - Good ✓
 - Fair ~
 - Poor ✗
 - Very poor ✗✗

3. Assessment Criteria

- 3.1. Planning Practice Guidance (PPG) states that the assessment of land availability is an important source of evidence to inform plan-making and decision-taking. The role of an availability assessment is to provide information on a range of sites which are available to meet housing or employment needs, but it is for the development plan to determine which of those sites are most suitable to meet those requirements. The assessment of the options for employment land forms part of the plan-making process and seeks to confirm which sites are likely to respond well to the expectations of occupiers and property developers and also meet strategic policy and sustainability criteria.
- 3.2. PPG requires Local Planning Authorities to '*identify all sites and broad locations in order to provide a complete audit of available land*' (paragraph 008). It also states that '*Plan-makers will need to assess the suitability, availability and achievability of sites, including whether the site is economically viable. This will provide information on which a judgement can be made as to whether a site can be considered deliverable within the next five years, or developable over a longer period*' (paragraph 017).
- 3.3. The assessment of strategic sites identified in the ELT will inform the overall site identification work of CBC under the approach set out in PPG. This report therefore provides an objective assessment of five of the larger employment sites identified in the ELT – including Gatwick Green – so as to identify the relative merits of the site and which represent the most appropriate in policy, market, sustainability and deliverability terms.
- 3.4. The Assessment Criteria used to assess the sites are listed below. They have been devised having had regard to the approach set out in PPG (paragraphs 015 and 018) – Housing and Economic Land Availability Assessments, taking account of relevant national planning policy and the market perceptions and demand and policy considerations that are relevant to the DCBLP area.
- 3.5. The PPG states at paragraphs 015 and 018 that the following information should be considered when assessing sites including the suitability of sites / broad locations for development:

- Site size, boundaries, and location;
- Current land use and character;
- Land uses and character of surrounding area;
- Physical constraints (e.g. access, contamination, steep slopes, flood risk, natural features of significance, location of infrastructure/utilities);
- Potential environmental constraints;
- Consistency with the development plan's policies;
- Proximity to services and other infrastructure, such as public transport;
- Where relevant, development progress (e.g. ground works completed, number of units started, number of units completed);
- Initial assessment of whether the site is suitable for a particular type of use or as part of a mixed-use development;
- National policy;
- Appropriateness and likely market attractiveness for the type of development proposed;
- Contribution to regeneration priority areas; and
- Potential impacts including the effect upon landscapes including landscape features, nature and heritage conservation.

3.6. Using best practice and in light of the above, the following Assessment Criteria have been used to assess each site.

Strategic Policy Considerations

3.7. The ability of each site to contribute to the strategic aims of the C2C LEP area, the Gatwick Diamond and the DCBLP, with particular regard to sustainable economic growth. Sites are assessed with regard to their ability to sustain and enhance the pivotal role played by Crawley / Gatwick in the sub-regional and wider economy and contribute to strong economic development in the area and wider region. The key strategic economic and planning policies:

- **Gatwick Diamond Local Strategic Statement (LSS)¹** – requires that in the short and medium term, the primary focus for new business development will be the areas around Crawley and Gatwick.
- **Coast to Capital Strategic Economic Plan (SEP)²** – identifies Gatwick Airport as the driver of, and location for, economic growth given its place at the geographical and economic heart of the region.
- **Coast to Capital Local Industrial Strategy (LIS)** evidence base – the opportunity for a wider Airport City concept around Crawley/Gatwick has been identified to capitalise on the area's proximity to the Airport, Manor Royal and Crawley town centre: the opportunity comprises about 150 ha of land in the safeguarded area, with land east of the Airport representing a key opportunity³⁴.
- **West Sussex Economic Growth Plan (EGP)⁵** – maximise the opportunities from Gatwick by creating and supporting higher value employment in a wide zone of opportunity around the Airport.

- 3.8. The size of the site and its ability to accommodate a strategic allocation was also taken into account. For this, a strategic site has been identified as a site of at least 20 ha.
- 3.9. The Coast to Capital Local Industrial Strategy (LIS) identifies the Gatwick 360 area as an opportunity to function as a regional economic hub, and the LIS identifies the paucity of high-quality employment land and the potential for a strategic employment opportunity near to Crawley/Gatwick.

Accessibility

- 3.10. Key considerations include ease of access to the strategic road network (an important determining factor for employment land irrespective of the business sector); proximity to existing public transport links (Fastway, local bus services, mainline rail); potential future connectivity with and proximity to Gatwick Airport, and potential to enhance connections between Crawley, Gatwick and Horley. These factors were all considered in the assessment of the relative merits of each site in terms of its accessibility as a key attribute for strategic employment land.

¹ Gatwick Diamond Local Strategic Statement, Gatwick Diamond local authorities [excluding Tandridge DC], March 2012

² Gatwick 360° The Coast to Capital Strategic Economic Plan 2018-2030, Coast to Capital LEP, 2018

³ Coast to Capital Commercial Property Study, Hatch Regeneris, December 2019

⁴ Coast to Capital Local Industrial Strategy, Draft Economic Profile, Hatch Regeneris, September 2019

⁵ West Sussex County Council Economic Growth Plan 2018-2023, WSCC, May 2018

Physical & Environmental Constraints

- 3.11. Each location has been assessed in terms of environmental factors that influence the extent to which the site may be suitable for development. Areas that are unconstrained have been assessed as 'excellent', while, conversely, those that are affected by national designations (e.g. Green Belt, SSSI, AONB) would be considered to be 'very poor'. Whilst natural and physical constraints such as archaeology and ecology will not change, it is acknowledged that man-made policy factors can and do change through successive development plans. Whilst airport safeguarding has not been taken into account insofar as this has been removed for the DCBLP, the assessment has taken account of the safeguarding corridor for the Crawley Western Link Road (CWLR) under Policy ST4 of the DCBLP.
- 3.12. For the purpose of this appraisal, publicly available desk-based information such as through Magic Maps, has been used to inform the assessments. No survey work or consultation has been undertaken at this stage.

Previously Developed Land

- 3.13. The National Planning Policy Framework (NPPF) (2019) requires local planning authorities to make the most efficient use of land, including prioritising previously developed land which is suitable for re-use (para 117). Locations that would involve the development of greenfield land score poorly, while options that would involve the partial or entire redevelopment of brownfield land would register scores of 'good' and 'excellent' respectively. It is acknowledged that this is somewhat simplistic because brownfield sites with poor access can be less sustainable overall than greenfield sites with good accessibility and locational characteristics.
- 3.14. Proximity of the site to Gatwick Airport means that there is established market profile as a main employment area, sustainable connects and high profile location.

Site availability and deliverability for employment use

- 3.15. Since 2003, Crawley Borough Council has been required by government policy to safeguard land between the town of Crawley and Gatwick Airport to accommodate the possible construction of an additional runway and associated facilities. However, national policy for Aviation has now evolved with the Government's decision to support the expansion of Heathrow Airport and, currently, there is no national evidence of need for further runway provision beyond Heathrow. The DCBLP has therefore removed the safeguarding area and related policy, replacing it with the designation of the former safeguarded area (as adjusted) for an Area Action Plan (AAP) following adoption of the DCBLP. The North Crawley Area Action Plan will address whether there is any evidence to justify the safeguarding of any land to meet the legitimate future needs of the Airport. Accordingly, the sites have been assessed on the basis that they are no longer affected by the safeguarding area.

- 3.16. The availability of each site will therefore be assessed taking into account its current use, physical condition and land ownership / assembly issues where these are known. The assessment provides a commentary on the likelihood of strategic employment development coming forward within the period of the DCBLP to 2035. The assessment has been undertaken qualitatively, taking account of the combination of these factors.

4. Site Assessment

- 4.1. The following sites have been identified in the Crawley area as potential locations for a strategic employment sites. The findings of the assessment are set out in the site assessment matrix in **Table 4.1** below. The following paragraphs provide a brief description of each site, a summary of the key issues identified in the assessment and consideration of the overall suitability of the site for strategic employment development.
- 4.2. The sites assessed were chosen following the publication of the Employment Land Trajectory (December 2019) and have been identified as potential options for employment development alongside land at Gatwick Green. It is recognised that in order to meet the current and future employment needs of the Crawley Borough Council area, it is likely that a combination of these sites may need to be brought forward.

Land at Gatwick Green (ELT Ref 13)

- 4.3. Land at Gatwick Green is a site of c 59 ha sustainably located with excellent links to strategic transport networks and Gatwick Airport. Proximity to the Airport, mainline rail and the M23 provide excellent transport connections, with high potential for improved sustainable connectivity. The site is safeguarded for the second runway (landside non-operational facilities) in the adopted CBLP. It is located within the AAP area in the DCBLP, which will address future employment and other needs, and allocate land for those purposes. Its strategic size means it is available for one single large user and ancillary businesses as required to meet the employment needs of Crawley and the sub-region. Its topography provides land suitable for the provision of large employment uses. It is not at risk of flooding and assessments have been carried out in regard to biodiversity, heritage, noise and air quality and landscape value from which the site has been assessed as excellent in these metrics. While the site is in proximity to listed assets, it provides the opportunity for good design to allow this to be sensitively incorporated into any proposal. In comparison to any of the other sites, it offers the opportunity for excellent strategic access and therefore a desirable location for new employment use of all types, of a size which can provide an innovation hub and employment centre as required. The site is being promoted for employment development by Savills on behalf of the Wilky Group: it is available and deliverable within the Local Plan timeframe to 2035.

Land at Jersey Farm (ELT Refs 16 and 17)

- 4.4. Land at Jersey Farm is a site of c 11 ha and is also located within the AAP area in the DCBPL. Most of the site is safeguarded for the second runway (8.77 ha – airside operational facilities) in the adopted CBLP. It is located within the AAP area in the DCBPL, which will address future employment and other needs, and allocate land for those purposes. Adjacent to the Manor Royal allocated employment site, access to existing and proposed infrastructure and transport links is good, but the site is not as close as others to strategic links of “A” roads and the motorway nor public transport facilities. A small area of the site on the northern boundary may be affected by flood risk. It is not connected to the M23 motorway and is not large enough to be considered a strategic site. There are no heritage considerations at this location and the topography would allow for large employment uses. However, the site is not large enough to be considered strategic and therefore will not meet identified employment needs alone, necessitating further allocations which could potentially be unsustainable. Reference has been made to the presence of any ecological designations, but further information is needed in regard to biodiversity and ecology on the site. The site is significantly impacted by the Indicative Search Corridor for a Western Link Road under Policy ST4 of the DCBPL, which introduces some uncertainty as to the extent of the developable area and its deliverability. The site is being promoted through the DCBPL by Vail Williams on behalf of Ardmore: deliverability and availability remain to be confirmed.

Land at Little Dell Farm (ELT Refs 18, 19 and 20)

- 4.5. Land at Little Dell Farm comprises a site of c 6.2 ha. Most of the site is safeguarded for the second runway (airside operational facilities) in the adopted CBLP. It is located within the AAP area in the DCBPL, which will address future employment and other needs, and allocate land for those purposes. There is good connectivity to “A” roads and the site is adjacent to the Manor Royal employment site. However, it is not connected to the M23 motorway and is not large enough to be considered a strategic site. The flat topography would allow for large employment uses. Reference has been made to the presence of any ecological designations, but further information is needed in regard to the biodiversity and ecology values of the site. The site is significantly impacted by the Indicative Search Corridor for a Western Link Road under Policy ST4 of the DCBPL, which introduces some uncertainty as to the extent of the developable area and its deliverability. The site is being promoted through the DCBPL by Vail Williams on behalf of Willmott and Ohm and Hill: deliverability and availability remain to be confirmed.

Hydehurst Lane (ELT Ref 15)

- 4.6. Adjacent to Manor Royal, this site comprises about 18 ha and benefits from good connectivity to the A23, public transport and existing employment uses. Most of the site is located within the Gatwick Airport safeguarding area in the adopted CBLP (airside operational facilities). It is located within the AAP area in the DCBPL, which will address future employment and other needs, and allocate land for those purposes. Part of the site falls within an area of flood risk and it is in proximity to some ancient and semi-natural woodland. It is not connected to the M23 motorway and is not large enough to be considered a strategic site. Reference has been made to the presence of any ecological designations, but further information is needed in regard to the biodiversity and ecology values of the site. The site is being promoted through the DCBPL by Quod on behalf of Aberdeen Standard Investments and The Barker Trust: deliverability and availability remain to be confirmed. As previously undeveloped land, landscaping and good design will need to be considered in any future development.

Land at Rowley Farm (ELT Ref 14)

4.7. Located at the northern boundary of Manor Royal and western boundary of City Place, land at Rowley Farm comprises a site of about 52 ha (35 ha net developable) and has good access to strategic routes and existing public transport infrastructure. It is located in the area safeguarded for airport expansion in the adopted CBLP (airside operational facilities). It is located within the AAP area in the DCBLP, which will address future employment and other needs, and allocate land for those purposes. It is of a strategic size which can contribute to provision of future infrastructure provision and meeting employment needs through provision of employment space adjacent to existing uses, although topography of the site may be less favourable than others. Reference has been made to the presence of some areas of flood risk, heritage assets and ecological designations, but further information is needed in regard to biodiversity and ecology on the site. Landscaping and good design will need to be considered in any development. The site is being promoted through the DCBLP by Homes England: deliverability and availability remain to be confirmed.

4.8. Table 4.1 below sets out the results of the comparative assessment of the five sites.

Table 4.1 – Comparative assessment of the five strategic sites

| | | Land at Gatwick Green | Land at Jersey Farm | Land at Little Dell Farm | Land north and south of Hydehurst lane | Land at Rowley Farm |
|--|--|-----------------------|---------------------|--------------------------|--|---------------------|
| Theme | Criterion | | | | | |
| Strategic Policy Considerations | Contribution to strategic policy objectives | ✓✓ | ~ | ~ | ✓ | ✓ |
| | Ability to accommodate a single large user | ✓✓ | ~ | ~ | ✓✓ | ✓✓ |
| | Strategic Site > 20 ha | ✓✓ | ✗ | ✗ | ✗ | ✓✓ |
| Accessibility | Ease of access to the strategic road network | ✓✓ | ✓ | ✓✓ | ✓✓ | ✓✓ |
| | Proximity to existing public transport links | ✓✓ | ~ | ✓✓ | ✓✓ | ✓✓ |
| | Potential future connectivity | ✓✓ | ✓ | ✓ | ✓ | ✓ |
| | Proximity to Gatwick Airport | ✓✓ | ✓ | ✓ | ✓ | ✓ |
| Physical and Environmental Constraints | Flood risk and drainage | ✓✓ | ✓ | ✓✓ | ✓ | ✓ |
| | Landscape | ✓✓ | ✓ | ✓ | ✓ | ✓ |
| | Built & cultural heritage | ✓ | ✓✓ | ✓ | ✓✓ | ✓ |
| | Safeguarding for CWLR | ✓✓ | ✗ | ✗ | ✓✓ | ✓✓ |

| | | Land at Gatwick Green | Land at Jersey Farm | Land at Little Dell Farm | Land north and south of Hydehurst lane | Land at Rowley Farm |
|--------------------------------------|---|-----------------------|---------------------|--------------------------|--|---------------------|
| Previously Developed Land | Site status - PDL | ✗ | ✗ | ✗ | ✗ | ✗ |
| | Relationship to existing employment sites | ✓ | ✓ | ✓ | ✓ | ✓ |
| Site availability and deliverability | Site availability and ability to deliver within the period of the DCBLP | ✓✓ | ✓ | ✓ | ✓ | ✓ |

5. Conclusions

- 5.1. The results of the assessment are summarised above. The sites that have the greatest potential to meet strategic policy objectives and are considered as being most suitable for strategic employment development are Gatwick Green, which offers a prime location to exploit high levels of accessibility by rail, road and air, and Rowley Farm, with strong connections to existing employment facilities and infrastructure at Manor Royal. Of these, Gatwick Green offers greater benefits against the assessment criteria, but both sites could deliver quality employment development at a strategic scale.
- 5.2. All the sites considered would need further assessment in terms of biodiversity, landscape and physical and environmental constraints, and be subject to good design and mitigation proposals as part of future development.
- 5.3. Land at Gatwick Green offers a sustainable, well-located site which would provide a high-profile location for future employers of all use classes. There is therefore an opportunity to provide a high-quality employment development at Gatwick Green and its strategic size means that employment need can be located in a sustainable manner alongside innovative and area-based transport infrastructure provision. While other sites exist in the locality, land at Gatwick Green is available, deliverable and sustainable and has been subject to investigations with regard to sustainable infrastructure options.
- 5.4. The Crawley / Gatwick sub-region requires the delivery of a wide range of employment opportunities and sites. Extensions to the Manor Royal area to provide better quality industrial and office employment provision would therefore complement rather than compete with Gatwick Green, which is needed to deliver opportunities in new generation logistics, office and hotel development at the very high end of the employment spectrum to attract companies that may not otherwise chose to locate in the sub-region.

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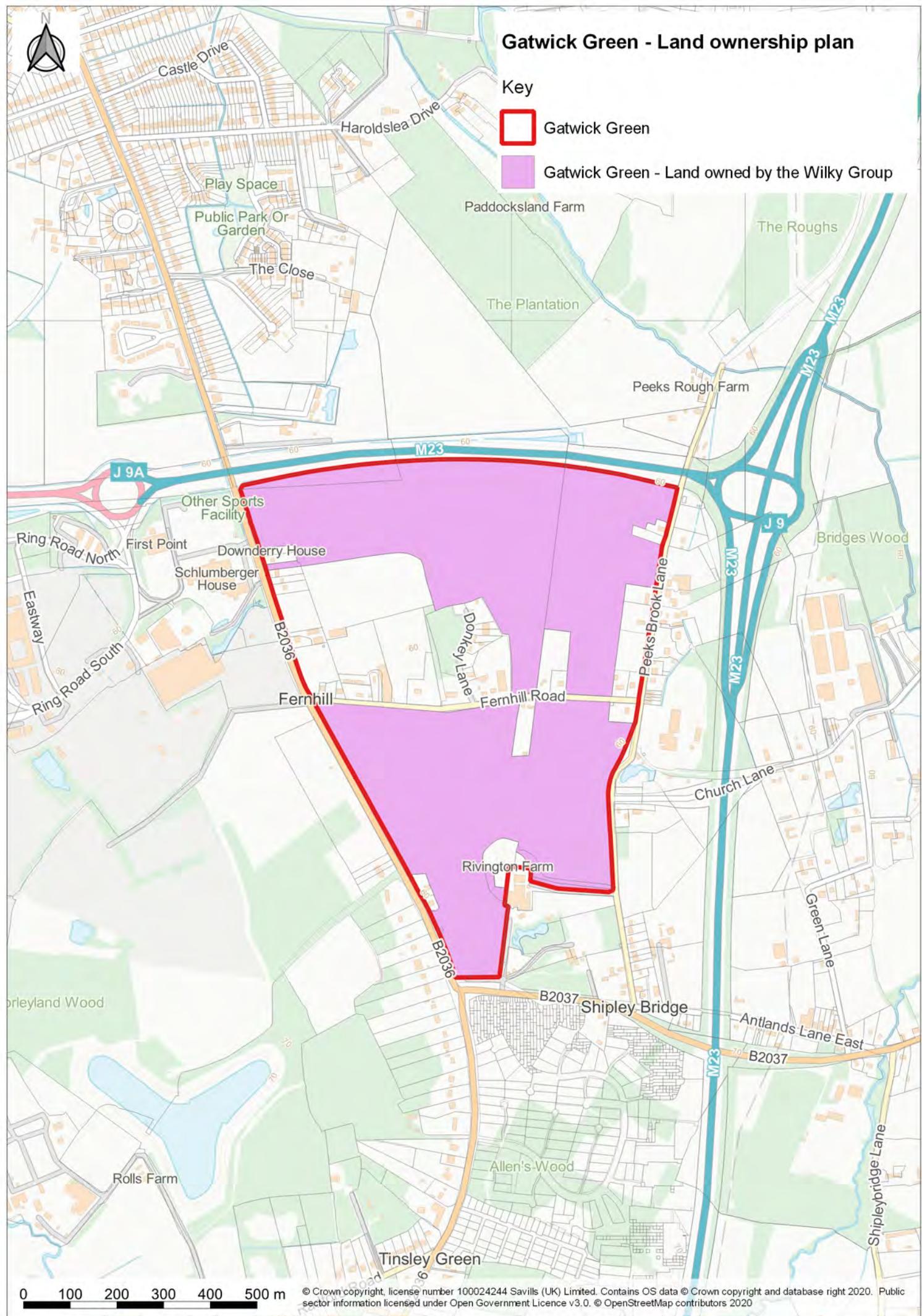
Gatwick Green - Land ownership plan



Key

Gatwick Green

Gatwick Green - Land owned by the Wilky Group



Appendix 2

Employment Land Needs in Crawley

Appendix 2

Gatwick Green: Employment Land Need

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Gatwick Green: Employment Land Need

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1. Introduction

1.1.1. Crawley Borough Council (CBC) published in January its Consultation Draft Local Plan 2020-2035 (hereon referred as draft Local Plan). This uses an updated evidence base that reviews the current and future need for employment land (B use). The updated study has been undertaken by Lichfields and was published in January 2020.

1.1.2. The NPPF states the following about the preparation or review of all policies.

“The preparation and review of all policies should be underpinned by relevant and up-to-date evidence. This should be adequate and proportionate, focused tightly on supporting and justifying the policies concerned, and take into account relevant market signals” (paragraph 31)

1.1.3. This appendix reviews the method and the results of this study to conclude on the future employment land need included in the draft Local Plan.

1.1.4. The appendix is structured as follows:

- Section 2 lists the main employment centres in Crawley and sets out the employment land need in the adopted and consultation draft plans.
- Section 3 reviews the method and results of the Northern West Sussex Economic Growth Assessment (EGA) Update.
- Section 4 focuses on the role of airports in local property markets.
- Section 5 provides a market update for B uses in Crawley and concludes on the employment land need.

1.1.5. This appendix concludes that Crawley should plan for at least 70.2 ha of employment land over the short term to address the historic under supply of employment land and pent-up unmet demand. This mean a minimum employment need over the short term of 58.2 ha after taking account of the 12 ha of total employment land already identified in the Employment Land Trajectory. This employment land can be provided in North Crawley, in particular at Gatwick Green, following the release of land previously safeguarded for a second runway at the airport. Given the extent of the unmet need, there is a case to consider the allocation of Gatwick Green in the short term to address these requirements. The strong viability characteristics identified in Appendix 5 to the representation on the Employment Land Trajectory means the site could come forward relatively quickly and at the necessary scale to meet current unmet market demand.

1.1.6. The proposed North Crawley AAP will address any justified needs of the airport alongside Crawley's other unmet socio-economic needs over the longer term related to meeting the requirements derived from the Borough's labour supply and identified in the EGA as 113 ha. It is considered that the labour supply-derived need should be treated as a minimum longer term need (policy-off) given that it takes no account of wider considerations as required by PPG, such as market signals, wider economic trends, the influence of the airport and regional economic policy objectives (policy-on). A longer-term need taking account of these considerations will need to be used to meet in full Crawley's objectively assessed housing and population growth requirements and improve Crawley's employment retention rate.

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- 1.1.7. The allocation of Gatwick Green can offer up to 58.7 ha of employment land and we believe it represents a suitable site of regional / nation significance in a location sought after by commercial investors and occupiers. Failure to plan positively can jeopardise the economic growth of the wider area due to Crawley's important position and affect the growth aspirations of the Coast to Capital (C2C) Local Economic Partnership (LEP), particularly as many other LEPs and Local Planning Authorities in other parts of England are seeking to bring forward major commercial investments in highly accessible locations nearby to airports.
- 1.1.8. This submission should be read in conjunction with Savills Regulation 19 representations on behalf of the Wilky Group and the Savills Gatwick Economic Development Area Market Analysis Report (November 2018) which was referenced in representations on behalf of the Wilky Group at the Regulation 18 stage.

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2. Crawley Local Plan

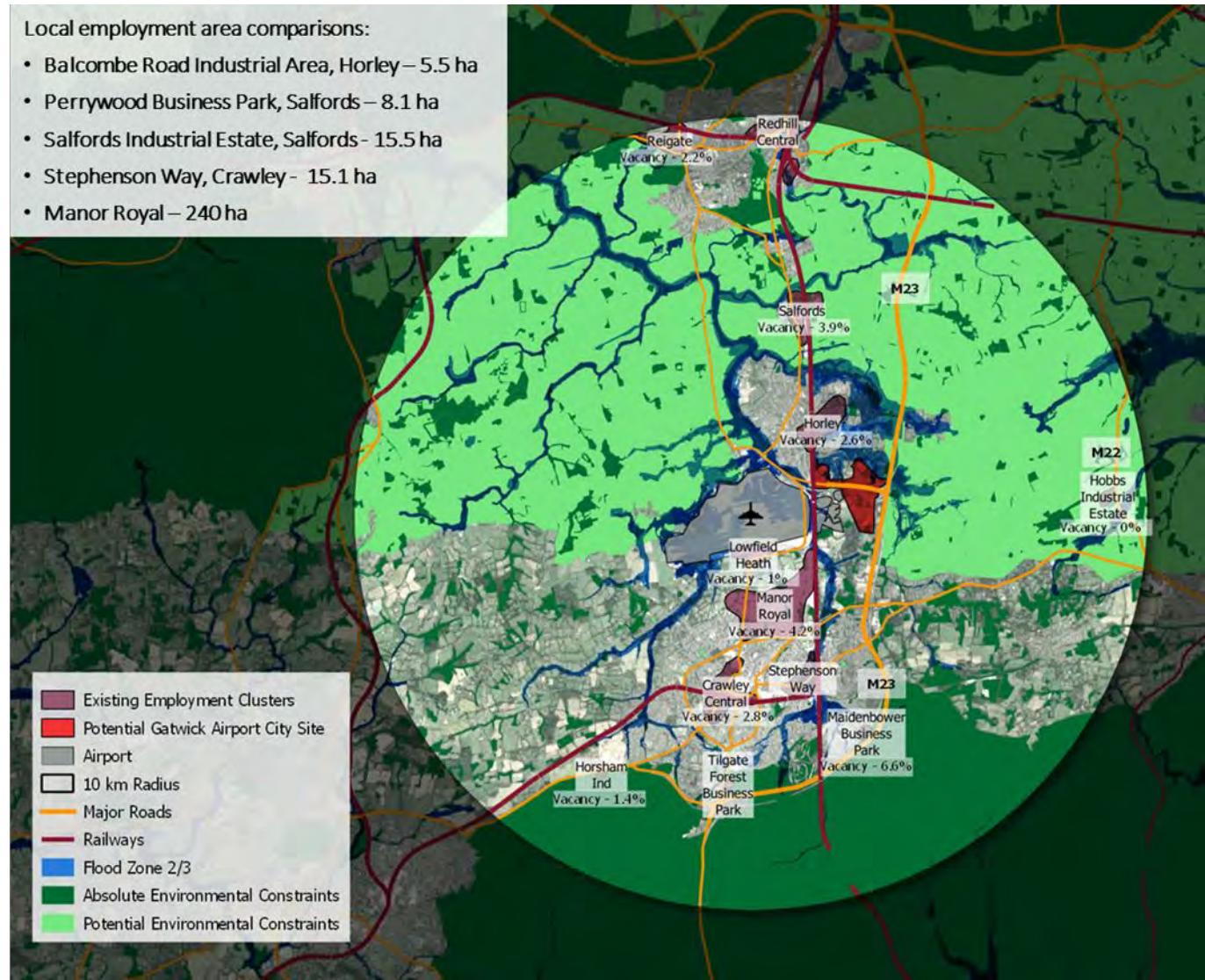
- 2.1.1. This chapter describes Crawley's main economic centres and comments on its employment land need.
- 2.2. Main Economic Centres**
- 2.2.1. The draft Local Plan identifies Gatwick Airport as one of the three key economic centres for Crawley alongside Manor Royal and Crawley Town Centre. Crawley's local economy depends significantly on Gatwick Airport with 75% of Crawley's employment being in distribution, hotels, transport, communications, banking and finance sectors which have strong links with airports. Gatwick Airport generates approximately 25,000 direct jobs accounting for 26.5% of the total jobs in Crawley. The draft Local Plan states that 26.9% the airport's employees are Crawley residents.
- 2.2.2. Manor Royal is identified in the draft Local Plan as one of the largest business parks in the South East region covering a total of 240 hectares and is home to more than 600 businesses and over 32,000 jobs. These account for 40% of Crawley's total number of jobs. Manor Royal provides 77% of Crawley's employment land and since its official naming in 1950, it has evolved and diversified its employment offer from its traditional manufacturing base. Manor Royal was the last major business park developed in Crawley and since 1950 it has replenished its stock without significant outward growth. However, the draft Local Plan suggests that there are still present opportunities in Manor Royal for employment land re-use and intensification to deliver net floorspace gains and support of Crawley's economic development. The draft Local Plan also supports minor extensions to manor Royal under Policy EC1, provided these don't prejudice the wider development of the AAP area: these sites would be very modest in scale and there is some uncertainty as to whether such sites will come forward.
- 2.2.3. The success of Manor Royal is testament to the benefits of its location nearby the airport and the M23. It attracts the highest average rents for better quality premises in the region, £23.20 per sqft for offices and £13.50 per sqft for industrial. It is one of the largest employment areas in the region as shown on **Figure 1** below. The Gatwick Green site is located in a more prominent and visible location with respect to the M23 and location directly adjacent to the Airport and Gatwick's rail station underpins its high level of connectivity, so underlining its strong viability as an employment location.

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Figure 1 Locally significant clusters of economic activity



Source: Wilky Group and the Savills Gatwick Economic Development Area Market Analysis Report, November 2018

2.3. Employment Land Need

- 2.3.1. In terms of employment land the adopted Local Plan (2015) identifies a significant shortfall of 35 ha of employment land with the identified land of 23 ha being sufficient only for the early part of plan period (2015-2030). The adopted Plan states that strategic growth could be constrained if additional land cannot be identified in Crawley.
- 2.3.2. For this reason, the adopted Local Plan makes provision for a thorough sequential assessment of employment site options once a final decision has been made by the Government on UK airport expansion and safeguarding. These options will focus first in the north of the Borough.

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- 2.3.3. The draft Local Plan (2020) post-dates the decision to build a third runway at Heathrow airport to meet the runway capacity needs of the South East until 2050. One of the main aims of the draft Local Plan is to identify enough employment land to support Crawley's economic growth in the short term, with the balance to be addressed in the North Crawley AAP. The evidence base, explained in detail below, identifies a minimum need for 33 ha of employment land with only 12 ha of this need being currently identified in the Employment Land Trajectory. This leads to a shortfall of 21 ha of employment land. For reasons set out in this paper, it is considered that the Council's land requirement significantly underplays the real need for new employment land in Crawley over the short term.
- 2.3.4. The draft Local Plan identifies the potential of addressing this shortfall by identifying land north of Manor Royal and east of Gatwick Airport for an AAP to be undertaken following adoption of the draft Local Plan. The Council commits to produce the North Crawley Area Action Plan (AAP) to address the above unmet needs and ensure airport development is properly considered alongside other needs. The proposed timing of the AAP will undoubtedly result in further uncertainty regarding how, when and where future employment land needs are to be satisfied. In order to capture the commercial investment Crawley so desperately needs, the draft Local Plan needs to provide certainty by way of new employment land allocations. If it does not, important investment may be lost, not just from Crawley but the region as a whole. No other area in the region provides the benefits of adjacency to the UK's second largest airport; visibility from the region's major movement corridor (M23), and direct servicing from one of the most connected railway stations in the country (Gatwick Airport station serving over 129 destinations directly).

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3. Crawley Employment Land Evidence Base

- 3.1.1. This chapter sets out the assumptions and results of Northern West Sussex EGA Update.

3.2. Results

- 3.2.1. The Northern West Sussex EGA Update recommends that Crawley should consider the past take-up base requirement of 33 ha of employment land as a minimum. The EGA states that this would enable historically strong levels of employment development to continue in the Borough over the new plan period: in reality, those past rates have been significantly constrained by the poor land supply as a result of safeguarding as paragraph 9.9 of the DCBLP acknowledges.
- 3.2.2. **Table 1** below summarises the results of the Northern West Sussex EGA Update under each scenario with the recommended scenario being the use of past development rates.

Table 1 Indicative Gross Land Requirements by Scenario to 2036 (ha)

| Use | 1. Baseline Job Growth | 2. Past Development Rates | 3. Baseline Labour Supply |
|------------------------|------------------------|---------------------------|---------------------------|
| Offices (B1a/B1b) | 5.6 | 4.5 | 8.9 |
| Manufacturing (B1c/B2) | -6.0 | 28.5 | 19.2 |
| Distribution (B8) | -0.7 | | 84.9 |
| All B Uses | -1.1 | 33.0 | 113.0 |

Source: Northern West Sussex EGA Update, January 2020

3.3. Assumptions

- 3.3.1. Northern West Sussex EGA Update states that the commercial property is relatively self-contained with most of business space enquiries coming from within the region. However, the assessment also states that Crawley continues to attract strong levels of demand from multinational firms and local businesses. Therefore we believe that Crawley and in particular the major employment locations near the M23 and Gatwick Airport, such as Manor Royal and the potential Gatwick Green site, are not self-contained. These locations are nationally and regionally significant in terms of their market attractiveness for commercial uses, which means they attract demand from further afield on top of strong local demand.
- 3.3.2. The EGA also states that continuing strong demand for commercial space in Crawley is down to the town's highly competitive infrastructure and communications offer linked to an international airport, including good motorway connections and rail links to London and the South Coast. The importance of the Airport is also clear given the size and success of Manor Royal as Crawley's, and the region's, major employment location.
- 3.3.3. The assumptions for each of the above scenarios are detailed in the EGA and summarised below:

- Baseline Job Growth: This scenario is based on employment forecast for the area provided by Oxford Economics which is then translated into employment floorspace with the use of the Employment Density Guide (HCA, 2015).

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- Past Development Rates: This is based on net construction completions of employment floorspace provided by Crawley Borough Council.
- Baseline Labour Supply: This scenario uses the population growth associated with the planned housing provision and identifies the floorspace needed for a certain proportion of the economically active population in the future to be retained within Crawley.

3.3.4. These scenarios are then turned into employment land need with the use of the following plot ratios.

- Industrial (B1c/B2/B8):0.4 plot ratio
- Office (B1a/B1b): assumed half of the new floorspace will be in lower density development with a plot ratio of 0.4 and half in higher density locations with a plot ratio of 2.0.

3.3.5. Based on our analysis, we do not consider the first two scenarios above to fully capture local market signals. This is due to:

- The Baseline Job Growth is based on Oxford Economics employment forecasts which capture future growth trends as currently estimated. However, the role of the Local Plan is to positively and proactively encourage sustainable economic growth. Therefore we consider the use of current employment forecasts inadequate to serve the above purpose, especially considering the historic shortfall of employment land in Crawley.
- Past Development Rates take into account historic trends since 2011 in Crawley's constrained market based on low floorspace availability and limited new land being allocated for development. Also the 'look back' period adopted covers the aftermath of the Global Financial Crisis, which suppressed demand well below historical averages. Further, this approach takes no account of the Airport's predicted 50% growth from 46.5 to 72.0 million passengers per annum (mppa) over the plan period to 2036. Due to these reasons, the scenario does not adequately cover the future potential of the local economy.

3.3.6. The baseline labour supply scenario focuses on employment land needed to serve the forecast workforce growth and is based on the employment retention rates assumption in the Northern West Sussex Strategic Housing Market Assessment (2019). Crawley reported a low employment retention rate in 2011 with 40% of people working in Crawley being also Crawley residents.

3.3.7. We believe that the two most appropriate scenarios for gauging future employment land need are:

- A property market demand forecast that builds on the current constrained supply of employment land and takes into account a growing Airport. The details and results of this approach are provided in Chapter 5.
- The baseline labour supply scenario described above, but only as a longer term minimum. This is because allocating employment land in attractive locations such as Gatwick Green should increase local employment retention, further increasing the need for employment floorspace as the increasing local labour force (associated with future housing growth) seeks to work locally.

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4. The Role of Airports in Local Economies

4.1. Gatwick Airport

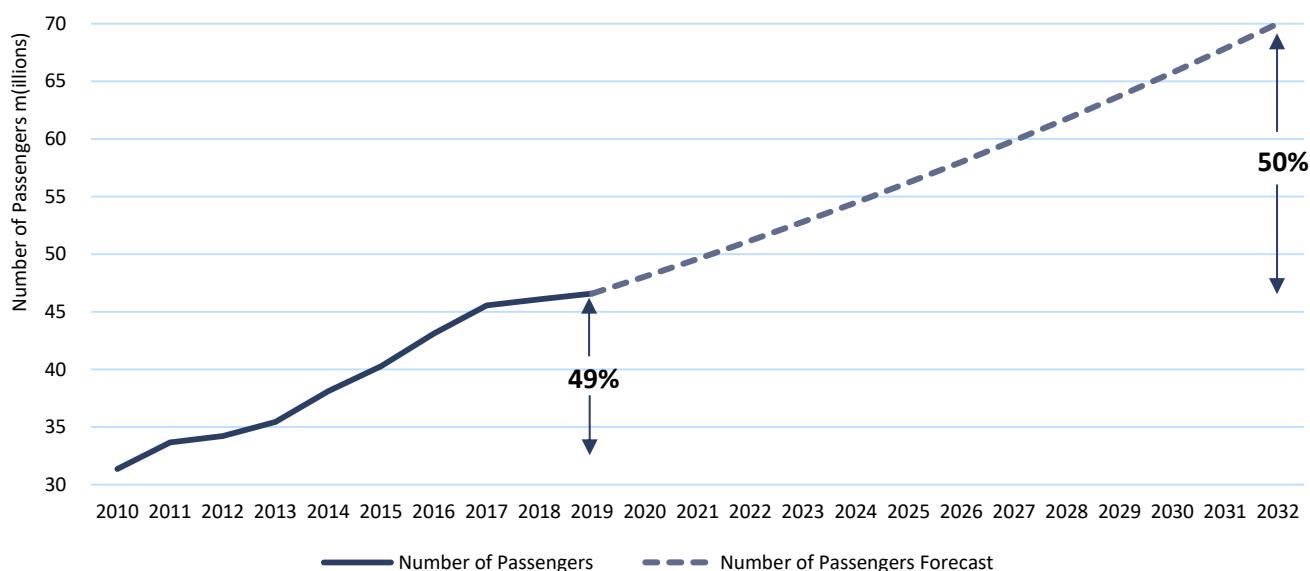
- 4.1.1. Airports have always been important economic generators for the local and regional economies within which they are located. However, in more recent times they have transformed from a facility with the sole purpose of transportation to one which offers an array of services and amenities, including shops, restaurants, hotels and entertainment. This recognises that airports can perform beyond its traditional aeronautical services to obtain high amounts of revenue (40-60%) through non-aeronautical revenue, as well as catalysing numerous real estate opportunities in the areas surrounding them, such as hotels, offices, medical facilities and more. In response, the 'Airport City' concept has emerged in many airports across the world and its applicability to Gatwick Airport was reviewed extensively in the Savills Gatwick Economic Development Area Market Analysis Report (November 2018).
- 4.1.2. Within this report, a number of key European Airports were reviewed to help understand how commercial development is responding to airport growth. These case studies help to demonstrate that the 'Airport City' concept is real and is being aggressively pursued in Europe and throughout the world whether it be a 20 million or 70 million passenger airport. A clear correlation has been established between growth in passenger numbers and freight volumes and the ability of airports to attract new commercial development, both in terms of larger companies as well as certain business sectors that are attracted to the agglomeration benefits of an airport location.
- 4.1.3. Accordingly, adjacency to Gatwick Airport is considered to be crucial to maximising the economic and investment opportunity for commercial uses in particular. Focusing development activity where it will be in most demand and achieve the highest values should enable 'new commercial uses at Gatwick Green to best contribute to wider infrastructure needs of the region, sub-region and Borough. The majority of future infrastructure requirements will benefit both the Airport and Gatwick Green and therefore offer investment and utilisation efficiencies that will also serve the transport sustainably objectives of the Council.
- 4.1.4. Finally, there is a lack of alternative development sites in the wider region of this scale with as strong motorway and rail accessibility, not to mention adjacency to a large and growing international airport. As outlined throughout the Savills Gatwick Economic Development Area Market Analysis Report (November 2018) and presented in **Figure 1** above, existing employment clusters within a 10 km radius of Gatwick Airport are relatively small in size at between 5 to 15 ha versus 59 ha for Gatwick Green. Manor Royal is the exception at 240 ha, but it is restricted from growing its footprint under current and emerging Local Plan policy. The existing employment areas within a 10 km radius of the Airport have limited land and floorspace availability to accommodate the strong future commercial floorspace demand identified in this report. Gatwick Green represents a prime opportunity to accommodate this future demand alongside a growing Gatwick Airport.

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- 4.1.5. The importance of Gatwick Airport is acknowledged by the C2C LEP, which identifies it as the single biggest driver of economic growth in the area. Its influence is especially important to the M23 corridor. C2C encourages the collaboration of planning and strategic authorities around Gatwick to maximise the economic potential of the area around the airport. The excellent public transport and road connectivity of the airport, and the lack of planning constraints on much of the land around it (provided the airport safeguarding is removed), make it an ideal anchor for further development of business space and housing, both of which are in acute demand in the area. By developing the economic infrastructure around the airport, the airport and its zone of influence can benefit not only Crawley, but the wider sub-region and region.
- 4.1.6. **Figure 2** below shows that the historic number of passengers flying from and to Gatwick airport. The number of passengers has grown by 49% over the last nine years. This is equal to a compound annual growth rate of 4.5%.

Figure 2 Number of Passengers



Source: Department for Transport Statistics Table TSGB0202b (AVI0102b), Gatwick Airport Master Plan 2019

- 4.1.7. Gatwick Airport published its final master plan in 2019. This proposes significant growth through the use of its existing runways and states that it is no longer actively pursuing plans for an additional runway. This master plan forecasts 70 million passengers by 2032 based on bringing the standby (emergency) runway into regular use for departing aircraft. This is a 50% growth over 13 years and is equal to a high compound annual growth rate of 3.2%.

4.2. UK Airports and Commercial Floorspace

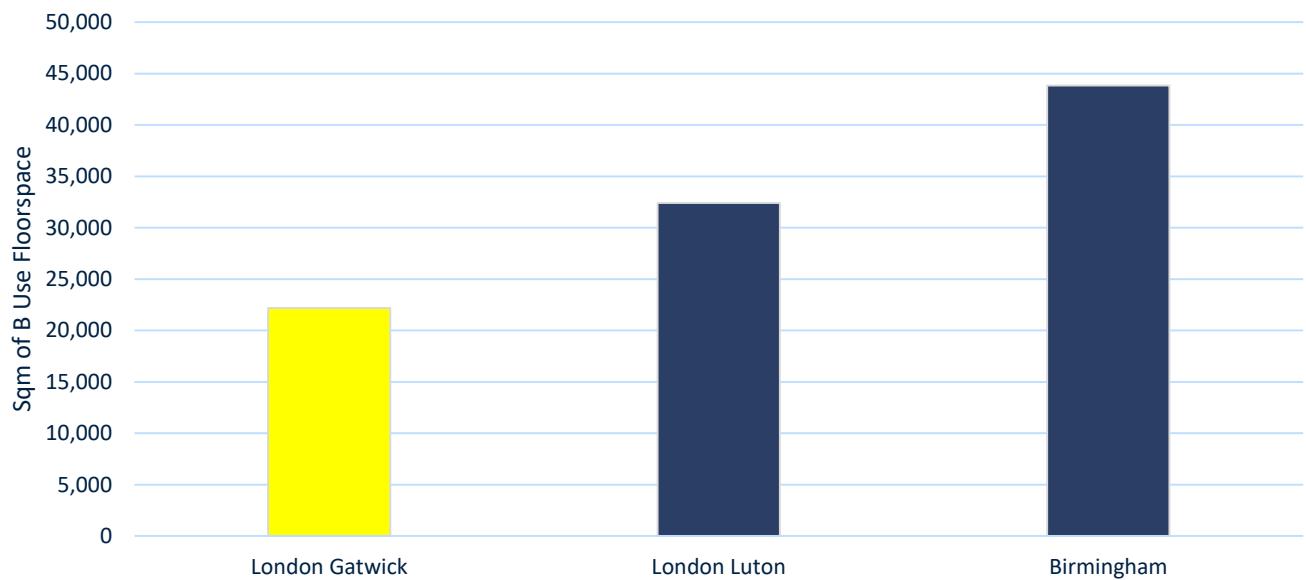
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- 4.2.1. **Figure 3** below shows the existing provision of B use floorspace per million of passengers within a 2 mile radius from key UK airports. This shows Luton and Birmingham having a higher provision per million passengers than Gatwick Airport, illustrating the under provision of B use floorspace in Gatwick's zone of influence. This is 32% less than London Luton and 49% lower than Birmingham, despite these being much smaller airports.

Figure 3 Existing B Use Floorspace Provision per Million Passengers



Source: CoStar 2020, Department for Transport Statistics Table TSGB0202b (AVI0102b)

- 4.2.2. Outline permission was granted some years ago to deliver Century Park, a 70 acre commercial development east of London Luton airport. The park is part of the London Luton Airport Enterprise Zone, supported by South East Midlands LEP. The enterprise zone is anticipated to deliver up to 7,200 new jobs and attract inward investments to support economic growth across the sub-region. More recently, the airport has commenced work on a Development Concept Order (DCO) application to permit the airport to expand from c 18 mppa to about 32 mppa, alongside the provision of a similar scale of adjacent commercial development to that envisaged by the Century Park proposal, but reconfigured to enable a viable arrangement.
- 4.2.3. As shown on **Figure 2**, Birmingham Airport has high access to employment floorspace with Birmingham Business Park (60 ha), Elmdon Trading Estate (17 ha) and Jaguar Land Rover Solihull (105 ha) being within a two-mile radius from Birmingham Airport. The draft local plan of Solihull identifies the airport's area as unique with the potential to deliver major growth on a nationally significant scale both to meet the economic growth aims of the Borough as well as the wider growth aspirations of the Greater Birmingham and Solihull LEP and the West Midlands Combined Authority. The same plan identifies land for employment at Damson Parkway to allow for the future expansion of Jaguar Land Rover.

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- 4.2.4. It is evident from these two examples how airports are being viewed by their respective local planning authorities and LEPs as major economic drivers for attracting further economic activity. Therefore, its vitally important Crawley Borough Council and C2C LEP take the opportunity to identify the potential of the zone of opportunity at Gatwick and allocate prime employment land at Gatwick Green now that the draft Local Plan review has removed blanket safeguarding from the land east of the airport. If the Council does not seize the opportunity to harness the economic potential of a growing Gatwick Airport, the economic downsides will be felt both in Crawley Borough and more widely in the region.

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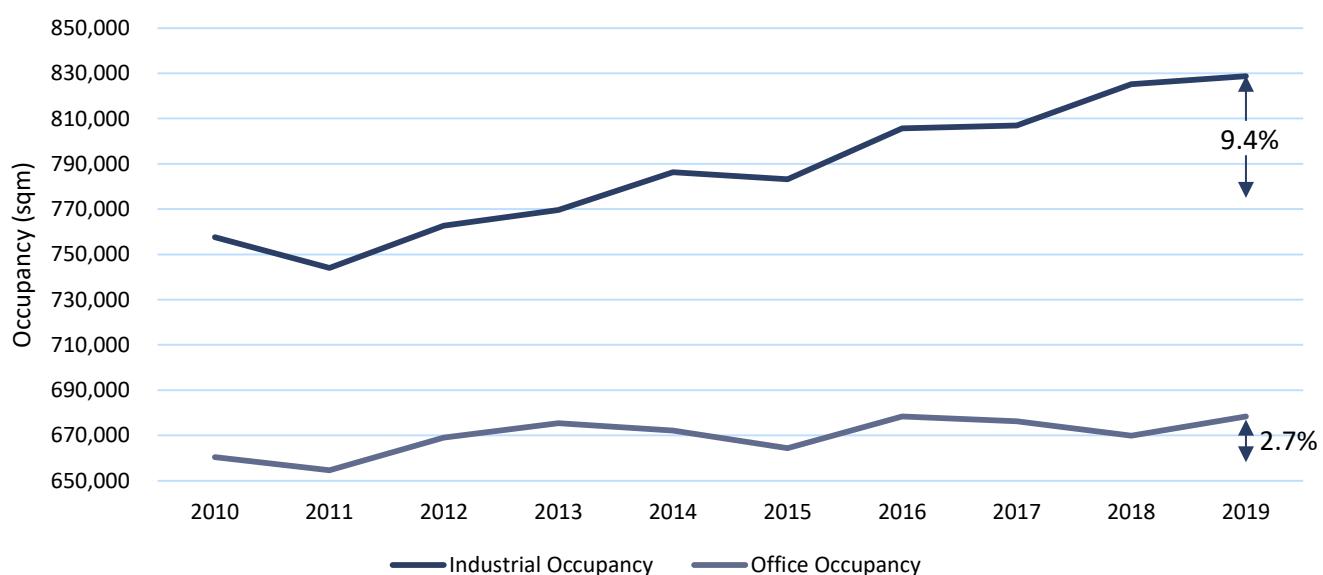
5. Crawley Property Market Update

- 5.1.1. This section analyses occupancy levels for office and industrial floorspace in Crawley and presents a set of forecast scenarios that demonstrate the Council baseline need of 33 ha represents an underestimate of true need.

5.2. Historic Trends

- 5.2.1. This section provides a market update on B use floorspace in Crawley. **Figure 4** below shows occupancy growth in Crawley for industrial and office uses. This shows that occupancy has grown by 9.4% and 2.7% since 2010 for industrial and office space, respectively. This is a much lower growth once compared with the growth of passenger numbers in Gatwick Airport over the same period. Passenger numbers have grown by 9.4%, while employment floorspace has grown by only 2.7%, presenting a clear mismatch. This clearly reflects the consequence of Crawley not being able to meet its employment land needs in its adopted Local Plan, which identified a 35 ha deficit.

Figure 4 Office and Industrial Occupancy in Crawley



Source: CoStar 2020

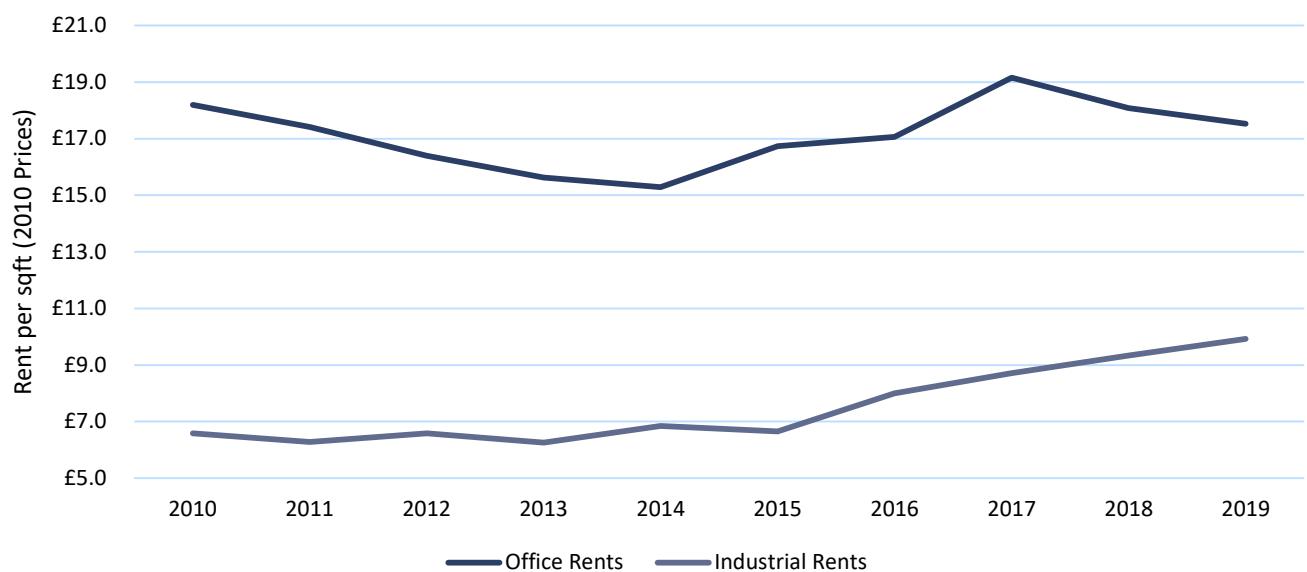
- 5.2.2. **Figure 5** below shows average rents per sqft for office and industrial uses in 2010 prices. These rents exclude inflation and show that in real term, rents have grown significantly for industrial (50% increase) and remain relatively stable for office. This shows a potential constrained supply of industrial floorspace in particular.

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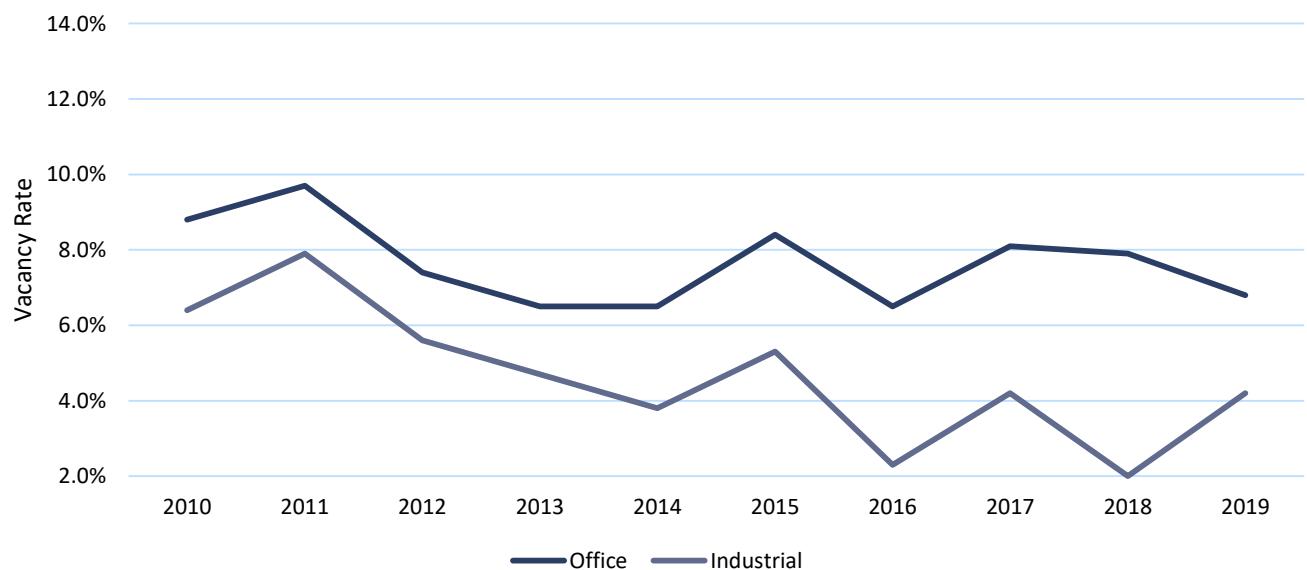
Figure 5 Office and Industrial Real Rents per sqft in 2010



Source: CoStar 2020

- 5.2.3. **Figure 6** below shows the vacancy rates in Crawley since 2010 for office and industrial uses. Overall vacancy rates follow a decreasing trend and are currently lower than the frictional vacancy rate of eight per cent used in the London Plan (2016). This is evidence of a very tight employment land and floorspace market.

Figure 6 Office and Industrial Availability Rate



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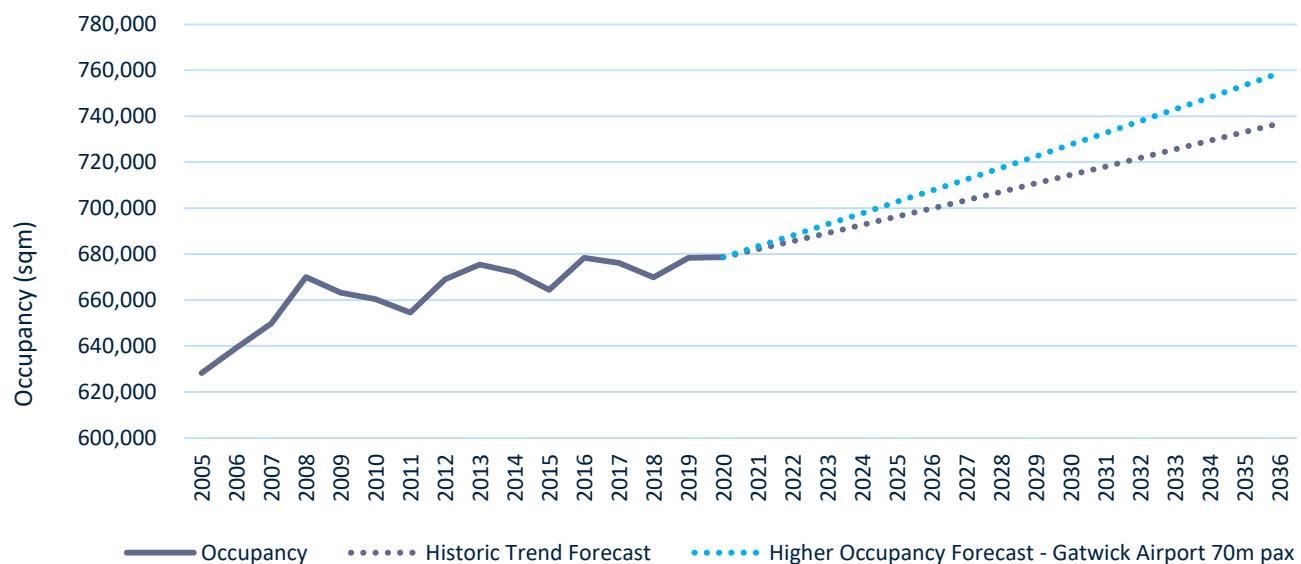
savills

Source: CoStar 2020

5.3. Projected Trends

- 5.3.1. **Figure 7** below shows historic office occupancy for Crawley and two forecasts. The first forecast uses the compound annual growth rate since 2005 (0.5% per annum) to project occupancy by 2036 whereas the other scenario takes into account the fact that historic occupancy is floorspace / land constrained and assumes a higher annual growth rate (0.7%) due to the airport's planned growth to 70 million passengers per annum.

Figure 7 Crawley Office Occupancy and Forecasts



Source: CoStar 2020, Savills 2020

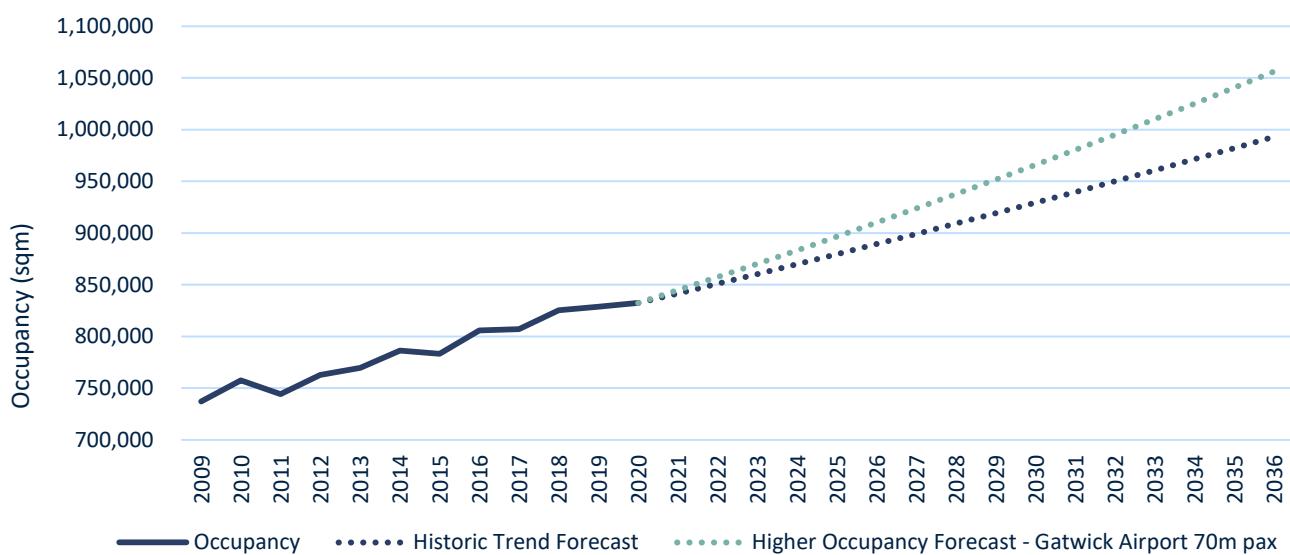
- 5.3.2. The above scenarios suggest an office occupancy uplift of 67,000 and 89,000 sqm by 2036. Once this is converted to employment land by using the plot ratio assumptions noted in **Section 3.3**, we forecast a need for 10.0-13.3 ha of land for office only.
- 5.3.3. Figure 8 below shows historic industrial occupancy and two forecast scenarios. One uses the compound annual growth rate since 2009 (1.1%) and the other uses a higher annual growth rate (1.5%) taking into account that past occupancy trends are land / floorspace constrained and the airport's planned growth to 70 million passengers per annum.
- 5.3.4. The above industrial occupancy scenarios result into an occupancy uplift of 164,000 and 228,000 sqm. Once this is converted to employment land using the plot ratio assumptions noted in **Section 3.3**, we identify a need for 41.0-56.8 ha of land for industrial only.

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Figure 8 Crawley Industrial Occupancy and Forecasts



Source: CoStar 2020, Savills 2020

5.4. Minimum Employment Land Need

- 5.4.1. Once the unconstrained industrial and office forecast needs noted in Section 5.3 are taken into account, we estimate that the additional employment land needed is between 51.1 ha and 70.2 ha. This shows that by looking at historic trends of a constrained market, a higher need for additional employment land (51.1 ha vs 33.0 ha) can be justified. This is due to our forecasts using a longer period and an indicator (occupancy vs net completions) that more directly reflects market signals.
- 5.4.2. However, we consider the Crawley property market to be constrained and historic trends not to be a suitable basis to proactively plan for economic growth. We therefore recommend using the higher growth rates that reflect better the unconstrained function of Crawley's market and additional potential from Gatwick Airport's projected passenger growth.
- 5.4.3. We therefore recommend that the Plan should allocate at least 70.2 ha of employment land over the shorter term to meet historic unmet market demand. A higher minimum figure based on the baseline labour supply scenario should be adopted over the longer term to take account of the planned future housing growth to 2036.
- 5.4.4. Gatwick Green can offer a new mixed-use commercial development that will likely attract substantial new investment and jobs. The site can cover a mix of uses including office, industrial (warehousing and distribution), hotels and training and education components. Office and hotel developments are likely to benefit the most from proximity to the station and airport terminals. Whereas, warehouse and distribution uses should benefit from convenient access to the Strategic Road Network.

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- 5.4.5. Demand for additional hotels at Gatwick Airport is likely given the forecast passenger growth. Higher and further education investments are based on clear locational preferences and wider trends concerning government funding, visa requirements for attracting international students and demographic trends.

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6. Conclusion

- 6.1.1. LEPs use airports as key economic drivers to attract further economic activity near them. The importance of airports in the wider economy is also shown by the support that others and Gatwick Airport receive from LEPs. These rely on areas near airports to support economic growth in their regions. Failure to plan positively can jeopardise the economic growth of the wider area due to Crawley's important position and affect the economic growth of C2C LEP.
- 6.1.2. This appendix reviews the evidence base assessing the employment land needs for Crawley. The recommended minimum land requirement of 33 ha is found to be inadequate to proactively support future economic growth in Crawley over the short term as it is based on historic trends of a constrained property market.
- 6.1.3. Our analysis of Crawley's property market area concludes that Crawley should plan for a minimum of 70.2 ha of employment land over the shorter term and identify additional sites to address the current minimum shortfall of 58.2 ha. This employment land can be provided in North Crawley, in particular at Gatwick Green, following the release of the safeguarded land around the airport. The Gatwick Green site is available, deliverable and viable and should be taken forward as a strategic employment allocation by the Council through the draft Local Plan review / North Crawley AAP. The allocation of Gatwick Green can provide up to **58.7 ha of employment land and cover the minimum current shortfall identified above.**
- 6.1.4. Over the longer term, the North Crawley AAP must address the longer term economic needs of the area. As a minimum, this should be 113 ha to 2036 based on the 'policy-off' baseline labour supply scenario identified in the Council's EGA. We consider this to be a longer term 'minimum' need given that the new employment allocations will help improve the current low local labour retention alongside the growth in the labour supply itself (associated with new housing).

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Assessment of Employment Land

Strategic employment sites north of Crawley



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1. Introduction

- 1.1. Crawley Borough Council (CBC) is reviewing its Local Plan (the Crawley Borough Council Local Plan: Crawley 2030, adopted in 2015 - CBLP). The draft for consultation under Regulation 19 was released in January 2020: the Draft Crawley Borough Local Plan 2020-2035 (DCBLP).
- 1.2. The DCBLP provides a policy framework to guide development within the Borough up to 2035, including policies to control the nature of, and provide for additional development at, the Council's ten Main Employment Areas (MEAs) of Manor Royal, Crawley Town Centre, Gatwick Airport, Three Bridges Corridor, Maidenbower Business Park, Tilgate Forest Business Park, Lowfield Heath, Bradfield Stadium and K2 Crawley and The Hawth. Collectively, these MEAs have capacity to deliver about 12 ha of new employment space over the Plan period. Based on the forecast of future labour supply (from uncapped housing requirements), the Borough has a need for at least 113 ha of new employment land, or at least 101 ha when account is taken of the current land supply. The Council's Employment Land Trajectory (ELT) contains a list of 24 sites that have the potential to provide for about 155 ha of land over and above the 12 ha short term land supply. Some of these sites may not be deliverable and many are small; below 5 ha.
- 1.3. It has long been the intention that much of Crawley's long term economic and employment needs should be from strategic employment land given the Borough's location at the 'Heart of the Gatwick Diamond' and the 'engine of growth' in the Coast to Capital Local Enterprise Partnership (LEP) area. The adopted CBLP identified the need for one or more Strategic Employment Locations to address the long-standing shortfall in economic infrastructure, rather than solely a collection of smaller employment sites as extensions to MEAs. The CBLP identified an Area of Search for SELs under Policy EC1, covering the area safeguarded for a second runway at Gatwick. With the safeguarding removed from the DCBLP, the revised Policy EC1 and new Policy SD3 identifies all of the previously safeguarded land for the North Crawley Area Action Plan (AAP) – this covers about 619 ha to the north of Crawley, generally south and east of the Airport.
- 1.4. This Assessment is relevant in the event that the Examination of the DCBLP requires consideration of strategic employment sites and their allocation within the DCBLP itself rather than as part of later work in an AAP. The ELT identifies five larger sites, two of which qualify as 'strategic' within the AAP area – three of the sites fall below the minimum site threshold of 20 ha, but have been included in order to provide a comprehensive review of the strategic or near-strategic opportunities to the north of Crawley. All five sites have therefore been subject to a comparative evaluation to assess their relative merits and identify which has the strongest attributes.
- 1.5. The assessment includes the Gatwick Green site, an area of land shown in **Figure 1**, extending to about 59 ha. This site is largely owned by the TWG (80%): areas in which the TWG do not have an interest are subject to ongoing discussions between TWG and landowners. These discussions have resulted in a number of landowners agreeing to bring their land forward for development in the event the overall site is allocated.

- 1.6. The site comprises an area of mixed land uses dominated by low quality pasture mainly grazed by horses and divided into a number of fields by mature hedgerows. Small areas of tree cover occur in the central and north western parts of the site. Clusters of residential and some rural-commercial properties occur along Fernhill Road and Donkey Lane, with some frontage development to Balcombe Road and Peeks Brook Lane.

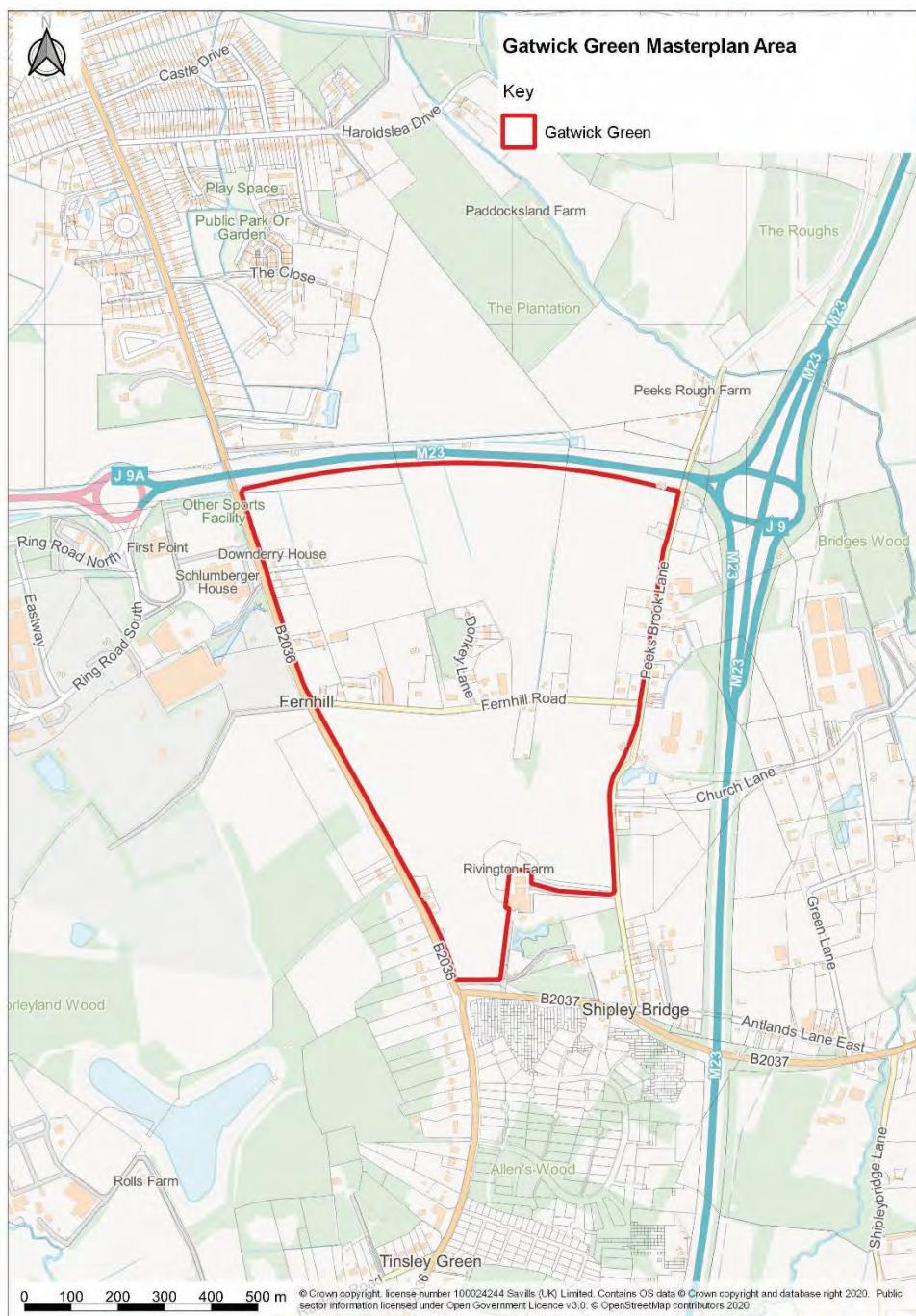


Figure 1 – Land at Gatwick Green

2. Methodology

- 2.1. This report provides an assessment of potential alternative sites for a strategic employment allocation in the Crawley and Gatwick area. The consideration and evaluation of reasonable site options is an important part of the plan-making process and is necessary in order to demonstrate that the plan is justifiable and represents the most appropriate strategy in accordance with the tests of soundness contained in the NPPF (para 35).
- 2.2. In order to provide an objective assessment process, a criteria-based matrix has been used as the basis to evaluate potential employment sites. The Assessment Criteria are set out in Section 3 of this report, along with an explanation of the rationale behind each criterion.
- 2.3. The Assessment Criteria reflect the factors that determine a site's suitability for strategic employment development and have been drawn up taking into account overarching planning policy guidance, including Planning Practice Guidance on Housing and Economic Land Availability Assessments, local planning policies including the adopted Crawley Borough Council Local Plan 2015, the DCBLP, the North West Sussex Economic Growth Assessment 2020 and the Coast to Capital Local Industrial Strategy. The Assessment Criteria have been devised taking account of the following considerations:
- Strategic policy considerations
 - Accessibility
 - Sustainability
 - Market requirements and perceptions
 - Site availability and deliverability
 - Environmental constraints and designations
- 2.4. Each of the potential strategic locations, as described in Section 4 of this report, has been assessed against the individual appraisal criteria. The assessment has been undertaken qualitatively, using the following simple scoring system:
- Excellent ✓✓
 - Good ✓
 - Fair ~
 - Poor ✗
 - Very poor ✗✗

3. Assessment Criteria

- 3.1. Planning Practice Guidance (PPG) states that the assessment of land availability is an important source of evidence to inform plan-making and decision-taking. The role of an availability assessment is to provide information on a range of sites which are available to meet housing or employment needs, but it is for the development plan to determine which of those sites are most suitable to meet those requirements. The assessment of the options for employment land forms part of the plan-making process and seeks to confirm which sites are likely to respond well to the expectations of occupiers and property developers and also meet strategic policy and sustainability criteria.
- 3.2. PPG requires Local Planning Authorities to '*identify all sites and broad locations in order to provide a complete audit of available land*' (paragraph 008). It also states that '*Plan-makers will need to assess the suitability, availability and achievability of sites, including whether the site is economically viable. This will provide information on which a judgement can be made as to whether a site can be considered deliverable within the next five years, or developable over a longer period*' (paragraph 017).
- 3.3. The assessment of strategic sites identified in the ELT will inform the overall site identification work of CBC under the approach set out in PPG. This report therefore provides an objective assessment of five of the larger employment sites identified in the ELT – including Gatwick Green – so as to identify the relative merits of the site and which represent the most appropriate in policy, market, sustainability and deliverability terms.
- 3.4. The Assessment Criteria used to assess the sites are listed below. They have been devised having had regard to the approach set out in PPG (paragraphs 015 and 018) – Housing and Economic Land Availability Assessments, taking account of relevant national planning policy and the market perceptions and demand and policy considerations that are relevant to the DCBLP area.
- 3.5. The PPG states at paragraphs 015 and 018 that the following information should be considered when assessing sites including the suitability of sites / broad locations for development:

- Site size, boundaries, and location;
- Current land use and character;
- Land uses and character of surrounding area;
- Physical constraints (e.g. access, contamination, steep slopes, flood risk, natural features of significance, location of infrastructure/utilities);
- Potential environmental constraints;
- Consistency with the development plan's policies;
- Proximity to services and other infrastructure, such as public transport;
- Where relevant, development progress (e.g. ground works completed, number of units started, number of units completed);
- Initial assessment of whether the site is suitable for a particular type of use or as part of a mixed-use development;
- National policy;
- Appropriateness and likely market attractiveness for the type of development proposed;
- Contribution to regeneration priority areas; and
- Potential impacts including the effect upon landscapes including landscape features, nature and heritage conservation.

3.6. Using best practice and in light of the above, the following Assessment Criteria have been used to assess each site.

Strategic Policy Considerations

3.7. The ability of each site to contribute to the strategic aims of the C2C LEP area, the Gatwick Diamond and the DCBLP, with particular regard to sustainable economic growth. Sites are assessed with regard to their ability to sustain and enhance the pivotal role played by Crawley / Gatwick in the sub-regional and wider economy and contribute to strong economic development in the area and wider region. The key strategic economic and planning policies:

- **Gatwick Diamond Local Strategic Statement (LSS)¹** – requires that in the short and medium term, the primary focus for new business development will be the areas around Crawley and Gatwick.
- **Coast to Capital Strategic Economic Plan (SEP)²** – identifies Gatwick Airport as the driver of, and location for, economic growth given its place at the geographical and economic heart of the region.
- **Coast to Capital Local Industrial Strategy (LIS)** evidence base – the opportunity for a wider Airport City concept around Crawley/Gatwick has been identified to capitalise on the area's proximity to the Airport, Manor Royal and Crawley town centre: the opportunity comprises about 150 ha of land in the safeguarded area, with land east of the Airport representing a key opportunity³⁴.
- **West Sussex Economic Growth Plan (EGP)⁵** – maximise the opportunities from Gatwick by creating and supporting higher value employment in a wide zone of opportunity around the Airport.

- 3.8. The size of the site and its ability to accommodate a strategic allocation was also taken into account. For this, a strategic site has been identified as a site of at least 20 ha.
- 3.9. The Coast to Capital Local Industrial Strategy (LIS) identifies the Gatwick 360 area as an opportunity to function as a regional economic hub, and the LIS identifies the paucity of high-quality employment land and the potential for a strategic employment opportunity near to Crawley/Gatwick.

Accessibility

- 3.10. Key considerations include ease of access to the strategic road network (an important determining factor for employment land irrespective of the business sector); proximity to existing public transport links (Fastway, local bus services, mainline rail); potential future connectivity with and proximity to Gatwick Airport, and potential to enhance connections between Crawley, Gatwick and Horley. These factors were all considered in the assessment of the relative merits of each site in terms of its accessibility as a key attribute for strategic employment land.

¹ Gatwick Diamond Local Strategic Statement, Gatwick Diamond local authorities [excluding Tandridge DC], March 2012

² Gatwick 360° The Coast to Capital Strategic Economic Plan 2018-2030, Coast to Capital LEP, 2018

³ Coast to Capital Commercial Property Study, Hatch Regeneris, December 2019

⁴ Coast to Capital Local Industrial Strategy, Draft Economic Profile, Hatch Regeneris, September 2019

⁵ West Sussex County Council Economic Growth Plan 2018-2023, WSCC, May 2018

Physical & Environmental Constraints

- 3.11. Each location has been assessed in terms of environmental factors that influence the extent to which the site may be suitable for development. Areas that are unconstrained have been assessed as 'excellent', while, conversely, those that are affected by national designations (e.g. Green Belt, SSSI, AONB) would be considered to be 'very poor'. Whilst natural and physical constraints such as archaeology and ecology will not change, it is acknowledged that man-made policy factors can and do change through successive development plans. Whilst airport safeguarding has not been taken into account insofar as this has been removed for the DCBLP, the assessment has taken account of the safeguarding corridor for the Crawley Western Link Road (CWLR) under Policy ST4 of the DCBLP.
- 3.12. For the purpose of this appraisal, publicly available desk-based information such as through Magic Maps, has been used to inform the assessments. No survey work or consultation has been undertaken at this stage.

Previously Developed Land

- 3.13. The National Planning Policy Framework (NPPF) (2019) requires local planning authorities to make the most efficient use of land, including prioritising previously developed land which is suitable for re-use (para 117). Locations that would involve the development of greenfield land score poorly, while options that would involve the partial or entire redevelopment of brownfield land would register scores of 'good' and 'excellent' respectively. It is acknowledged that this is somewhat simplistic because brownfield sites with poor access can be less sustainable overall than greenfield sites with good accessibility and locational characteristics.
- 3.14. Proximity of the site to Gatwick Airport means that there is established market profile as a main employment area, sustainable connects and high profile location.

Site availability and deliverability for employment use

- 3.15. Since 2003, Crawley Borough Council has been required by government policy to safeguard land between the town of Crawley and Gatwick Airport to accommodate the possible construction of an additional runway and associated facilities. However, national policy for Aviation has now evolved with the Government's decision to support the expansion of Heathrow Airport and, currently, there is no national evidence of need for further runway provision beyond Heathrow. The DCBLP has therefore removed the safeguarding area and related policy, replacing it with the designation of the former safeguarded area (as adjusted) for an Area Action Plan (AAP) following adoption of the DCBLP. The North Crawley Area Action Plan will address whether there is any evidence to justify the safeguarding of any land to meet the legitimate future needs of the Airport. Accordingly, the sites have been assessed on the basis that they are no longer affected by the safeguarding area.

- 3.16. The availability of each site will therefore be assessed taking into account its current use, physical condition and land ownership / assembly issues where these are known. The assessment provides a commentary on the likelihood of strategic employment development coming forward within the period of the DCBLP to 2035. The assessment has been undertaken qualitatively, taking account of the combination of these factors.

4. Site Assessment

- 4.1. The following sites have been identified in the Crawley area as potential locations for a strategic employment sites. The findings of the assessment are set out in the site assessment matrix in **Table 4.1** below. The following paragraphs provide a brief description of each site, a summary of the key issues identified in the assessment and consideration of the overall suitability of the site for strategic employment development.
- 4.2. The sites assessed were chosen following the publication of the Employment Land Trajectory (December 2019) and have been identified as potential options for employment development alongside land at Gatwick Green. It is recognised that in order to meet the current and future employment needs of the Crawley Borough Council area, it is likely that a combination of these sites may need to be brought forward.

Land at Gatwick Green (ELT Ref 13)

- 4.3. Land at Gatwick Green is a site of c 59 ha sustainably located with excellent links to strategic transport networks and Gatwick Airport. Proximity to the Airport, mainline rail and the M23 provide excellent transport connections, with high potential for improved sustainable connectivity. The site is safeguarded for the second runway (landside non-operational facilities) in the adopted CBLP. It is located within the AAP area in the DCBLP, which will address future employment and other needs, and allocate land for those purposes. Its strategic size means it is available for one single large user and ancillary businesses as required to meet the employment needs of Crawley and the sub-region. Its topography provides land suitable for the provision of large employment uses. It is not at risk of flooding and assessments have been carried out in regard to biodiversity, heritage, noise and air quality and landscape value from which the site has been assessed as excellent in these metrics. While the site is in proximity to listed assets, it provides the opportunity for good design to allow this to be sensitively incorporated into any proposal. In comparison to any of the other sites, it offers the opportunity for excellent strategic access and therefore a desirable location for new employment use of all types, of a size which can provide an innovation hub and employment centre as required. The site is being promoted for employment development by Savills on behalf of the Wilky Group: it is available and deliverable within the Local Plan timeframe to 2035.

Land at Jersey Farm (ELT Refs 16 and 17)

- 4.4. Land at Jersey Farm is a site of c 11 ha and is also located within the AAP area in the DCBPL. Most of the site is safeguarded for the second runway (8.77 ha – airside operational facilities) in the adopted CBLP. It is located within the AAP area in the DCBPL, which will address future employment and other needs, and allocate land for those purposes. Adjacent to the Manor Royal allocated employment site, access to existing and proposed infrastructure and transport links is good, but the site is not as close as others to strategic links of “A” roads and the motorway nor public transport facilities. A small area of the site on the northern boundary may be affected by flood risk. It is not connected to the M23 motorway and is not large enough to be considered a strategic site. There are no heritage considerations at this location and the topography would allow for large employment uses. However, the site is not large enough to be considered strategic and therefore will not meet identified employment needs alone, necessitating further allocations which could potentially be unsustainable. Reference has been made to the presence of any ecological designations, but further information is needed in regard to biodiversity and ecology on the site. The site is significantly impacted by the Indicative Search Corridor for a Western Link Road under Policy ST4 of the DCBPL, which introduces some uncertainty as to the extent of the developable area and its deliverability. The site is being promoted through the DCBPL by Vail Williams on behalf of Ardmore: deliverability and availability remain to be confirmed.

Land at Little Dell Farm (ELT Refs 18, 19 and 20)

- 4.5. Land at Little Dell Farm comprises a site of c 6.2 ha. Most of the site is safeguarded for the second runway (airside operational facilities) in the adopted CBLP. It is located within the AAP area in the DCBPL, which will address future employment and other needs, and allocate land for those purposes. There is good connectivity to “A” roads and the site is adjacent to the Manor Royal employment site. However, it is not connected to the M23 motorway and is not large enough to be considered a strategic site. The flat topography would allow for large employment uses. Reference has been made to the presence of any ecological designations, but further information is needed in regard to the biodiversity and ecology values of the site. The site is significantly impacted by the Indicative Search Corridor for a Western Link Road under Policy ST4 of the DCBPL, which introduces some uncertainty as to the extent of the developable area and its deliverability. The site is being promoted through the DCBPL by Vail Williams on behalf of Willmott and Ohm and Hill: deliverability and availability remain to be confirmed.

Hydehurst Lane (ELT Ref 15)

- 4.6. Adjacent to Manor Royal, this site comprises about 18 ha and benefits from good connectivity to the A23, public transport and existing employment uses. Most of the site is located within the Gatwick Airport safeguarding area in the adopted CBLP (airside operational facilities). It is located within the AAP area in the DCBPL, which will address future employment and other needs, and allocate land for those purposes. Part of the site falls within an area of flood risk and it is in proximity to some ancient and semi-natural woodland. It is not connected to the M23 motorway and is not large enough to be considered a strategic site. Reference has been made to the presence of any ecological designations, but further information is needed in regard to the biodiversity and ecology values of the site. The site is being promoted through the DCBPL by Quod on behalf of Aberdeen Standard Investments and The Barker Trust: deliverability and availability remain to be confirmed. As previously undeveloped land, landscaping and good design will need to be considered in any future development.

Land at Rowley Farm (ELT Ref 14)

4.7. Located at the northern boundary of Manor Royal and western boundary of City Place, land at Rowley Farm comprises a site of about 52 ha (35 ha net developable) and has good access to strategic routes and existing public transport infrastructure. It is located in the area safeguarded for airport expansion in the adopted CBLP (airside operational facilities). It is located within the AAP area in the DCBLP, which will address future employment and other needs, and allocate land for those purposes. It is of a strategic size which can contribute to provision of future infrastructure provision and meeting employment needs through provision of employment space adjacent to existing uses, although topography of the site may be less favourable than others. Reference has been made to the presence of some areas of flood risk, heritage assets and ecological designations, but further information is needed in regard to biodiversity and ecology on the site. Landscaping and good design will need to be considered in any development. The site is being promoted through the DCBLP by Homes England: deliverability and availability remain to be confirmed.

4.8. Table 4.1 below sets out the results of the comparative assessment of the five sites.

Table 4.1 – Comparative assessment of the five strategic sites

| | | Land at Gatwick Green | Land at Jersey Farm | Land at Little Dell Farm | Land north and south of Hydehurst lane | Land at Rowley Farm |
|--|--|-----------------------|---------------------|--------------------------|--|---------------------|
| Theme | Criterion | | | | | |
| Strategic Policy Considerations | Contribution to strategic policy objectives | ✓✓ | ~ | ~ | ✓ | ✓ |
| | Ability to accommodate a single large user | ✓✓ | ~ | ~ | ✓✓ | ✓✓ |
| | Strategic Site > 20 ha | ✓✓ | ✗ | ✗ | ✗ | ✓✓ |
| Accessibility | Ease of access to the strategic road network | ✓✓ | ✓ | ✓✓ | ✓✓ | ✓✓ |
| | Proximity to existing public transport links | ✓✓ | ~ | ✓✓ | ✓✓ | ✓✓ |
| | Potential future connectivity | ✓✓ | ✓ | ✓ | ✓ | ✓ |
| | Proximity to Gatwick Airport | ✓✓ | ✓ | ✓ | ✓ | ✓ |
| Physical and Environmental Constraints | Flood risk and drainage | ✓✓ | ✓ | ✓✓ | ✓ | ✓ |
| | Landscape | ✓✓ | ✓ | ✓ | ✓ | ✓ |
| | Built & cultural heritage | ✓ | ✓✓ | ✓ | ✓✓ | ✓ |
| | Safeguarding for CWLR | ✓✓ | ✗ | ✗ | ✓✓ | ✓✓ |

| | | Land at Gatwick Green | Land at Jersey Farm | Land at Little Dell Farm | Land north and south of Hydehurst lane | Land at Rowley Farm |
|--------------------------------------|---|-----------------------|---------------------|--------------------------|--|---------------------|
| Previously Developed Land | Site status - PDL | ✗ | ✗ | ✗ | ✗ | ✗ |
| | Relationship to existing employment sites | ✓ | ✓ | ✓ | ✓ | ✓ |
| Site availability and deliverability | Site availability and ability to deliver within the period of the DCBLP | ✓✓ | ✓ | ✓ | ✓ | ✓ |

5. Conclusions

- 5.1. The results of the assessment are summarised above. The sites that have the greatest potential to meet strategic policy objectives and are considered as being most suitable for strategic employment development are Gatwick Green, which offers a prime location to exploit high levels of accessibility by rail, road and air, and Rowley Farm, with strong connections to existing employment facilities and infrastructure at Manor Royal. Of these, Gatwick Green offers greater benefits against the assessment criteria, but both sites could deliver quality employment development at a strategic scale.
- 5.2. All the sites considered would need further assessment in terms of biodiversity, landscape and physical and environmental constraints, and be subject to good design and mitigation proposals as part of future development.
- 5.3. Land at Gatwick Green offers a sustainable, well-located site which would provide a high-profile location for future employers of all use classes. There is therefore an opportunity to provide a high-quality employment development at Gatwick Green and its strategic size means that employment need can be located in a sustainable manner alongside innovative and area-based transport infrastructure provision. While other sites exist in the locality, land at Gatwick Green is available, deliverable and sustainable and has been subject to investigations with regard to sustainable infrastructure options.
- 5.4. The Crawley / Gatwick sub-region requires the delivery of a wide range of employment opportunities and sites. Extensions to the Manor Royal area to provide better quality industrial and office employment provision would therefore complement rather than compete with Gatwick Green, which is needed to deliver opportunities in new generation logistics, office and hotel development at the very high end of the employment spectrum to attract companies that may not otherwise chose to locate in the sub-region.

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Rev
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Scale
1 : 5000

Status
PRELIMINARY

Job
GATWICK GREEN

Date
26/02/2020

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JA

Author
AH

Check
JA

Drawing
Development Framework Plan (Masterplan)

NOTE: All figures are approximate and have been measured and expressed in a manner as defined by the current edition of the RICS Code of Measuring Practice, unless otherwise stated. Figures relate to the current stage of the project and any development decisions to be made on the basis of this information should include allowance for the increases and decreases inherent in the design and building processes.

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Date Director Author Check
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0 50 200m
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Appendix 5

Gatwick Green: Viability & Deliverability

Appendix 2

Gatwick Green: Viability & Deliverability

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1. Introduction

- 1.1.1. The NPPF focuses heavily on the deliverability of housing sites via paragraph 67 and in the definition for 'deliverable' in the glossary. Most of the guidance focuses on maintaining a 5 year housing land supply.
- 1.1.2. While the emphasis on housing is easy to understand given the housing crisis facing the UK, it's actually commercial uses, rather than housing, which are more challenging to deliver viably. While housing is viable in most locations provided the cost of enabling infrastructure is manageable, commercial uses are more location specific.
- 1.1.3. As we detail below, the proposed Gatwick Green allocation is potentially an employment location of national and regional significance given its prime location –
 - **M23:** Adjacency to the M23, the major north / south highway corridor in the region, affords the site high visibility which office and hotel uses desire; easy access to the motorway is a vital prerequisite for industrial and distributions uses;
 - **Gatwick Airport Train Station:** Adjacency to the Gatwick Airport train station which is connected directly to 129 train stations and indirectly to over 700 stations with just one change with further improvements planned. Such connectivity is highly attractive to commercial uses; and
 - **Gatwick Airport:** Gatwick Airport is the 2nd largest airport in the UK handling 46 million passengers per annum and over 100,000 tons of freight. It is no coincidence that the region's largest employment area, Manor Royal covering 240 ha is located nearby to the Airport. The attractiveness of airport locations for business is evident throughout the world via the growth of Airport Cities. This is discussed further in Appendix 2: Employment Land Need.
- 1.1.4. Crawley's current adopted Local Plan has an identified employment land shortfall of 35 hectares. While many adjacent local authorities may be of the view that they can attract this unmet employment demand, in reality commercial investment will only happen where achievable rents (capitalised) exceed the costs of development. For instance, surrounding employment markets such as Tandridge's are much weaker with lower rents, weaker yields and subsequently much smaller occupier demand. This is due to their much poorer rail and road connections and absence of a major economic generator similar to the Airport. While Reigate and Banstead, like Crawley, is serviced directly by the M23, it doesn't have a motorway junction allowing easy access onto and off the motorway. The only M23 junction serving Reigate and Banstead is the M23 Spur into the Airport. In recognition of this accessibility, the Council have just allocated a 30 ha employment site in its recently adopted Development Management Plan (DMP - Policy HOR9).
- 1.1.5. We evidence below the viability and deliverability of the proposed Gatwick Green allocation for major mixed-use commercial development of up to 265,000 sqm (2.85M sq ft) of floorspace. This regional and nationally significant opportunity can only be realised should the current Airport land safeguarding be removed as proposed by the Council and the site positively planned for in the new Local Plan.

Appendix 2

Gatwick Green: Viability & Deliverability

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2. Commercial Values

2.1. Offices

- 2.1.1. Current headline rents for Grade A offices nearby to Gatwick Airport are around £30psqft. These values are found in Manor Royal and City Place, Beehive Ring Road to the south of the Airport. These are some of the highest rents in the region.
- 2.1.2. The potential of the area around the Airport for new office development has already been recognised in the Reigate and Banstead DMP (adopted in 2019) which allocates 31 ha of land for strategic employment (Policy HOR9 – Horley Business Park (HBP)) north of the Gatwick Green site and adjacent to the M23 Spur. The viability evidence that supported the Reigate and Banstead DMP and the HOR9 allocation is detailed within the Reigate and Banstead Local Plan Viability Study (2018). This Study values new offices at HBP based on a rent of £32.5 psqft , 5.25% yield and 12 months rent free lease incentives.
- 2.1.3. These values give a similar capital value to the Savills assumptions used in our high level viability testing at 35 psqft rent, 5.75% yield and 24 months rent free / voids.

2.2. Industrial

- 2.2.1. Headline industrial asking rents in the Gatwick Airport Property Market Area (PMA) are between £14 and £15 psqft for Grade A premises (Table 1). The industrial rents in Manor Royal and surrounding Gatwick Airport are some of the highest in the wider region. Recent transactions show 1 to 2 months free rent on 5 year leases. This converts a headline rent of £14 psqft to an effective rent of about £13.40 psqft. Yields for A Grade premises are strong at 4.3%.

Table 1 – Recent Industrial Asking Rents within the Gatwick Market

| Building | Street Name | Sq Ft Availability | Grade | Rent (£/SF) |
|-----------------------------|------------------|--------------------|-------|-------------|
| U1/2 Centron | Crompton Way | 33,466 | A £ | 15.00 |
| Space Gatwick | Faraday Road | 84,540 | A £ | 14.00 |
| U1 Kelvin Lane | Kelvin Lane | 30,200 | B £ | 15.00 |
| U2 Newton Road | Newton Road | 13,702 | B £ | 15.00 |
| Focal Point Distribution | Fleming Way | 30,183 | B £ | 8.00 |
| Vanpouilles | Telford Pl | 10,697 | B £ | 13.00 |
| 3B & 3C Gatwick Gate | Charlwood Road | 20,027 | C £ | 11.00 |
| U2 Crompton Fields | Crompton Way | 25,500 | C £ | 11.00 |
| Sterling Park, Gatwick Road | Gatwick Road | 65,307 | C £ | 12.00 |
| Heath Business Centre | 26 Bonehurst Rd | 11,600 | C £ | 11.00 |
| U3A | Wheatstone Close | 10,639 | C £ | 11.00 |
| Under 10,000 sf | | 30,994 | B/C | Various |
| Total | | 366,855 | | |

Source: Savills (2019)

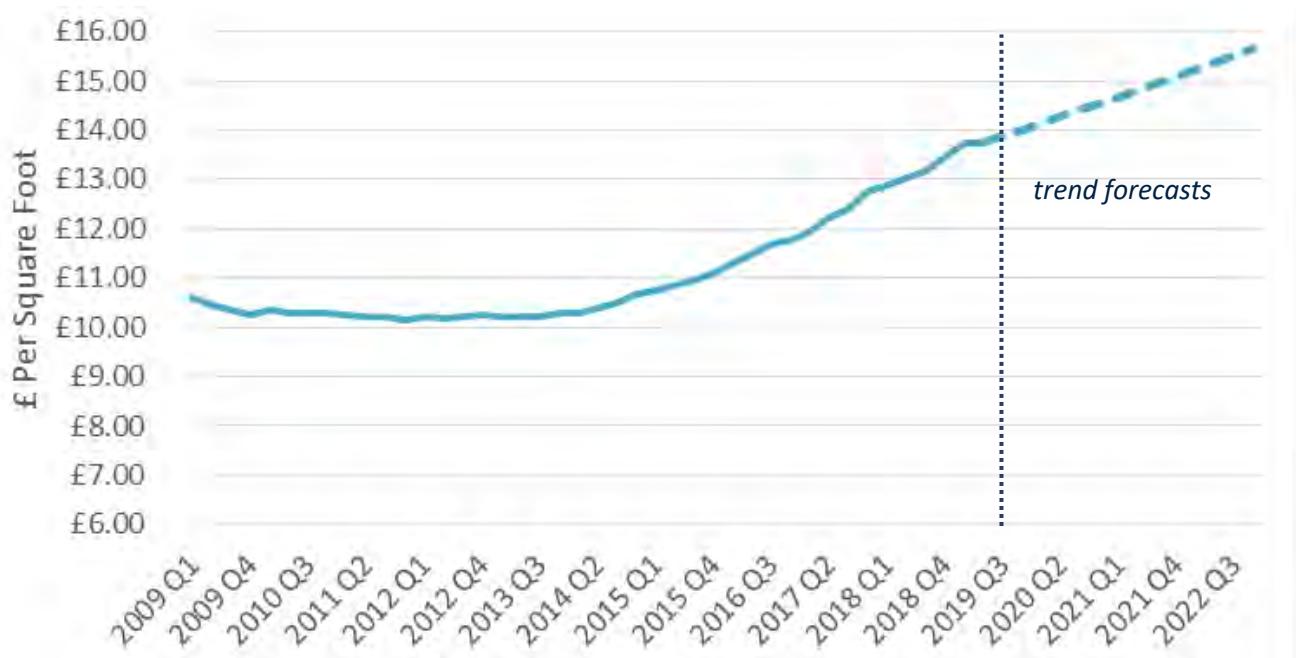
Appendix 2

Gatwick Green: Viability & Deliverability

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- 2.2.2. Industrial rental trends shows healthy growth over the next few years further evidencing the strength of the Gatwick Airport industrial market.

Figure 1 – Industrial rental trends for Grade A industrial premises within the Gatwick market



Source: Savills (2019)

- 2.2.3. Based on the strength of the Gatwick Airport's industrial market, Savills are of the view new Grade A premises of different unit sizes would achieve the following rents –

- Up to 10,000 sqft £15 psft
- 10,000 to 100,000 sqft £14 psft
- 100,000 to 250,000 sqft £12 psqft
- 250,000 + £9 psqft

Appendix 2

Gatwick Green: Viability & Deliverability



2.2.4. This equates to an average rent across all size bands of £12.50 psqft with a yield of 4.5%.

2.3. Hotels

- 2.3.1. Gatwick Airport represents a strong hotel market. As outlined in Savills Gatwick Economic Development Area Market Analysis Report (2018), the Gatwick Airport hotel market experiences extremely strong occupancy at over 85.5%. In fact occupancy within the Gatwick Airport market ranks number one across STR's cities index of 24 key hotel markets in the UK for 2018/19. Revenue Per Available Room (RevPar) has also improved significantly from 17th out of 24 to 10th by 2019 clearly signifying it as one of the UK's major hotel markets.
- 2.3.2. The Gatwick Green site is ideally located to help cater for increased hotel demand as the Airport grows from 46 million passengers towards 72 million passengers per annum. Savills are of the view that initial viability testing for new hotels within the proposed Gatwick Green allocation should be at £6,000 rent per room, 5% yield and 6 months rents free / voids. Some relevant hotel comparables are included in Table 2.

Table 2 – Comparable Hotel Transactions

| Year | Hotel | No. Rooms | Capital Value | Rent per key | Terms |
|------|----------------------------------|-----------|---------------|--------------|--|
| 2019 | Premier Inn Cardiff Custom House | 248 | £1,302,000 | £5,250 | New 30 year lease with a tenant only break in year 20. Rent reviews linked to CPI with a collar and cap of 0% and 4%. |
| 2019 | Premier Inn Milton Keynes | 180 | £1,026,000 | £5,700 | New 25 year lease with a tenant only break in year 20. Rent reviews linked to CPI with a collar and cap of 0% and 4%, compounded annually. |
| 2018 | Travelodge London Heathrow T5 | | | £7,233 | 20 years term certain. 5 yearly upwards only rent reviews linked to the higher of RPI (uncapped) or market rent. 5% NIY. |
| 2018 | Travelodge Lincoln Centre | 127 | £742,950 | £5,850 | New 25 year lease on a proposed Travelodge. Rent reviews linked to RPI, 5 yearly (1-4% cap & collar). |
| 2018 | Travelodge Gosport | 70 | £350,000 | £5,000 | New 25 year lease subject to 5 yearly upward only rent reviews linked to CPI with a collar and cap of 1% and 4%. |
| 2018 | Travelodge Dagenham | 82 | £429,250 | £5,235 | New 25 year FRI lease, subject to 5 yearly upward only rent reviews linked to CPI with a collar and cap of 1% and 4%. |
| 2018 | Travelodge Solihull | 82 | £565,800 | £6,900 | New 35 year lease, subject to 5 yearly RPI reviews compounded annually (1-4% cap & collar). |
| 2018 | Travelodge East Grinstead | 72 | £380,160 | £5,280 | New 25 year FRI lease subject to 5 yearly RPIX collared at 1% with a cap of 5%. |

Source Savills (2019)

Appendix 2

Gatwick Green: Viability & Deliverability



3. Viability & Deliverability

3.1.1. Based on Gatwick Green's market attractiveness for a range of commercial uses, we have undertaken initial high level viability testing using the following floorspace mix –

- 160,000 sqm GEA of B8, B2 and B1c industrial and warehousing
- 52,500 sqm GEA of B1 office / R&D
- 52,500 sqm GEA of hotel use.

3.1.2. These floorspace levels are based on a high level capacity assessment for the 59 ha site as explained in the 'Site Capacity' sub section of the Crawley Local Plan Employment Land Trajectory representation. Table 3 details the key value assumptions for each land use type (Section 2) along with the key cost assumptions used.

Table 3 – High Level Viability Testing Assumptions

| | Office | Warehouses | Hotel |
|--------------------------------|---|----------------------------------|---|
| Floorspace Gross to Net | 80% | 90% | 80% |
| Rent | £377 psqm (£35 sqft) | £134.50 psqm) (£12.50 (psqft) | £6,000 rent per room |
| Yield | 5.75% | 4.5% | 5% |
| Letting Assumption | 24 months' rent free / voids | 12 months' rent free / voids | 6 months rents free / voids |
| Purchaser's Costs | 6.8% | | |
| Developer's Profit | 15% of GDV | 15% of GDV | 10% of GDV |
| BCIS Base Build Costs | £2,128 psqm (£198 psqft) | £887.50 psqm (£82.5 psqft) | £80k per key £2,104 psqm (inclusive of professional fees, externals & contingency) |
| External Works | 10% | 10% | Included in base build cost |
| Contingency | 5% | 5% | Included in base build cost |
| Professional Fees | 10% | 10% | Included in base build cost |
| Site Access | £10 million | | |
| Marketing & Letting | 10% Letting Agent Fees 5% Letting Legal Fees | | |
| Disposal Fees | 1% Sales Agent Fees | | |

Appendix 2

Gatwick Green: Viability & Deliverability



| | |
|--------------|------------------------|
| | 0.50% Sales Legal Fees |
| Finance | 6.5% |
| Construction | 7 years |

- 3.1.3. Based on these assumptions the proposed Gatwick Green allocation generates a Residual Land Value (RLV) of circa £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. For instance the Government's latest 'Land Value Estimates for Policy Appraisal' (2017) estimates agricultural land in the Coast 2 Capital LEP area to be £22.5k per gross hectare. This is over 50 times lower than the estimated RLV generated by the proposed Gatwick Green allocation.
- 3.1.4. To incentivise land owners to release their land for development, it is not uncommon for local authorities to gross up agricultural values by 10-20 times to establish a 'Greenfield' Benchmark Land Value (BLV) as part of their local plan and CIL viability studies. Most of these studies typically established Greenfield BLVs within a range of £250k-£400k per gross hectare. At these levels, the RLV generated by the proposed Gatwick Green allocation (£1.2 million per gross hectare) still leaves significant head room to help fund wider strategic infrastructure and community benefit beyond the £10 million we have included for site access in our viability appraisal.
- 3.1.5. Finally the £72.5 million RLV for Gatwick Green could be improved further if the site was phased into smaller parcels with more regular capital receipts being achieved as each parcel is sold or developed. Currently we have assumed the full capital receipt for each land use is only achieved at the very end of the build period. This effectively increases the project's total finance costs as the income to pay off the debt is delayed until the very end of the project.

Appendix 2

Gatwick Green: Viability & Deliverability

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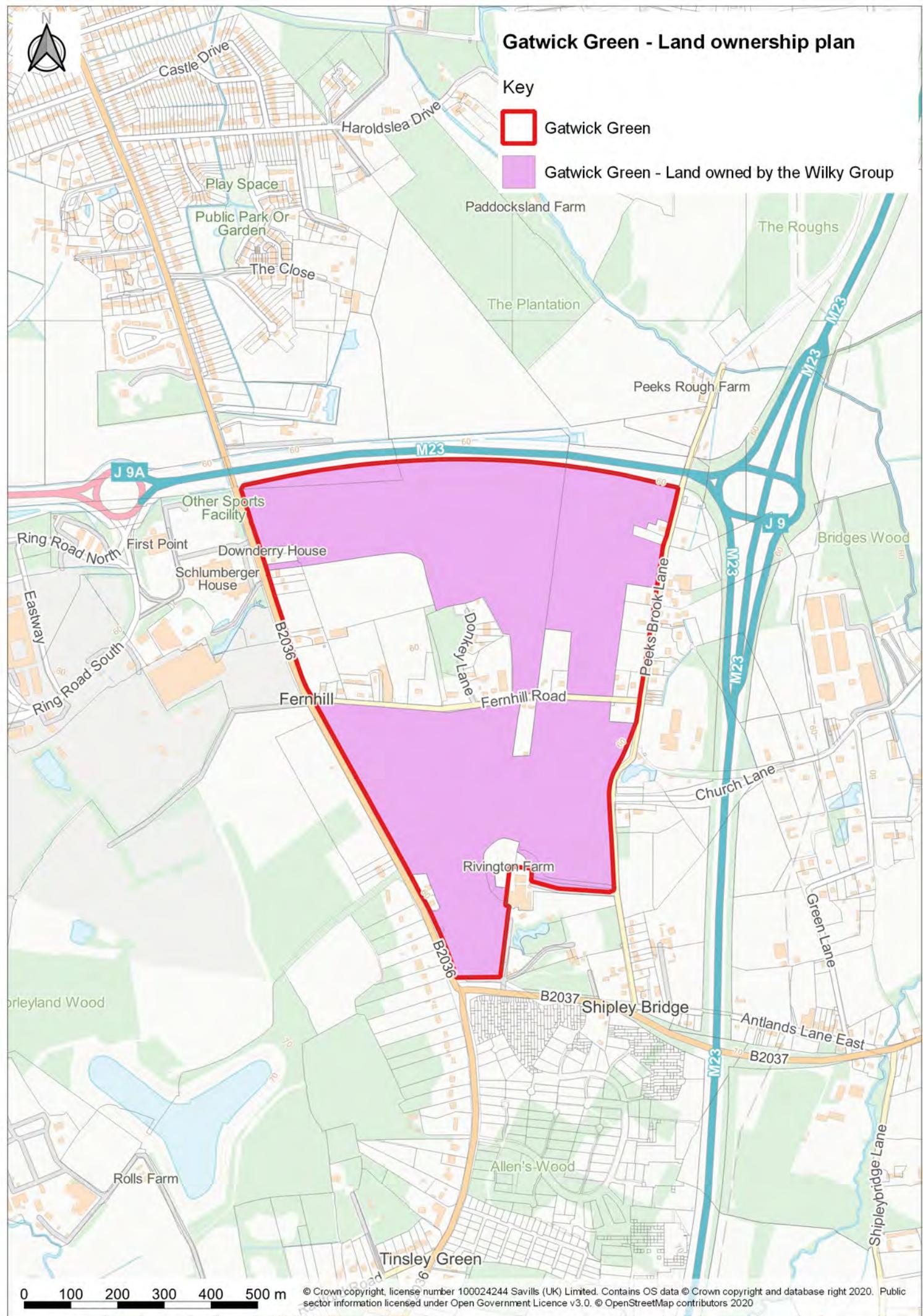
Gatwick Green - Land ownership plan

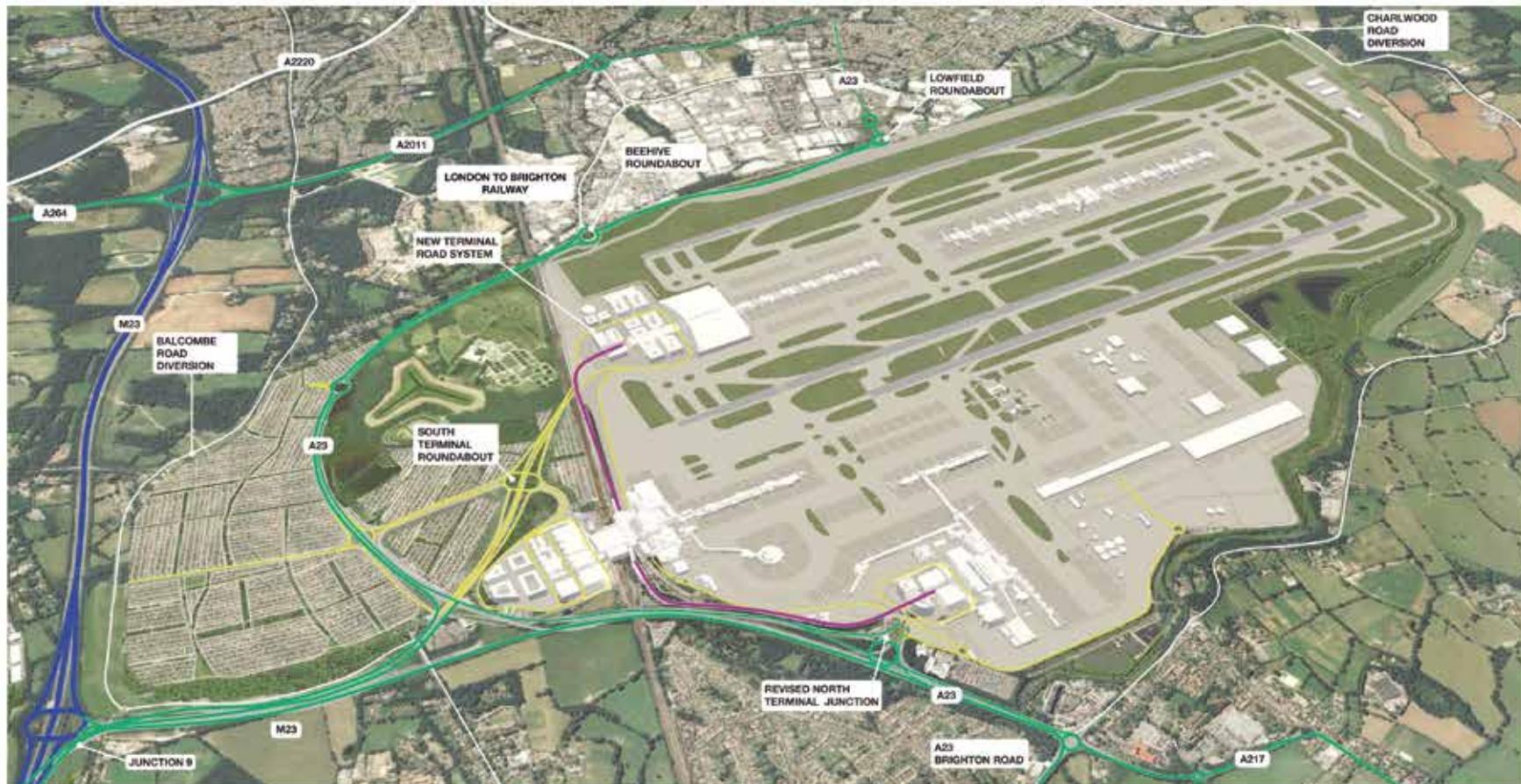


Key

Gatwick Green

Gatwick Green - Land owned by the Wilky Group





PLAN 22 - Surface Access Additional Runway

Motorway
M23. Main roads On Airport Roads Terminal Shuttle



Appendix 3

Proposed revised policy on airport car parking

Strategic Policy GAT2: Gatwick Airport Related Parking

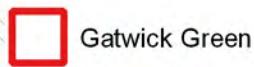
Proposals for additional airport-related parking must be justified by a demonstrable parking need case in the context of achieving a sustainable approach to surface transport. Applications for airport related car parking located outside the airport boundary will be permitted where all of the following criteria are met:

1. There is demonstrated by the applicant to be a need for long term car parking;
2. The proposal does not have an adverse impact on amenity; and
3. The proposal is in accordance with the Environmental Sustainability policies of the Local Plan.

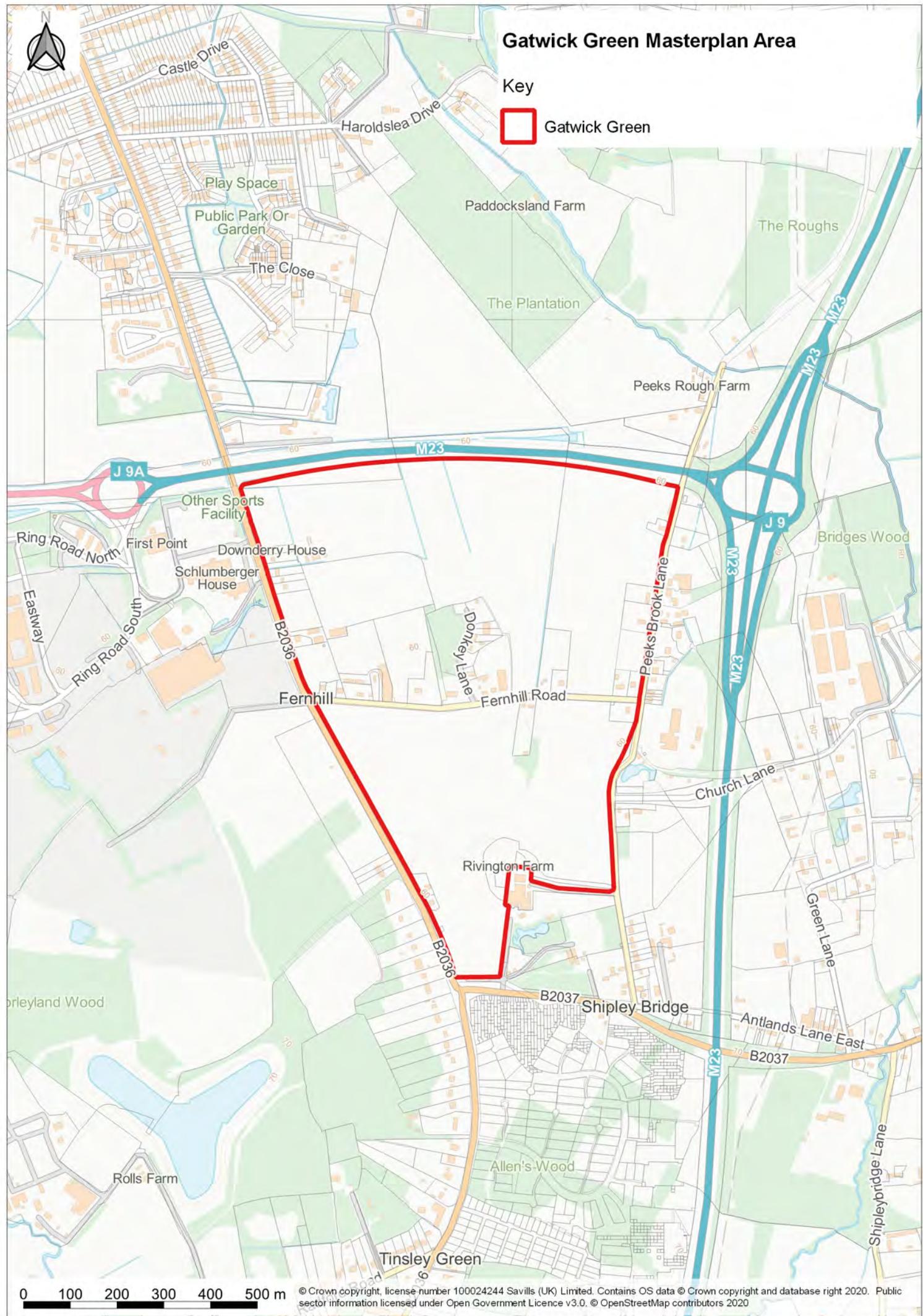
Gatwick Green Masterplan Area



Key



Gatwick Green



Strategic Environmental Assessment

Land at Gatwick Green



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Strategic Environmental Assessment

Land at Gatwick Green

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1. Introduction

1.1. Crawley Borough Council (CBC) is reviewing its adopted Local Plan (Crawley Borough Council Local Plan (CBLP): Crawley 2030, 2015). This Strategic Environmental Assessment (SEA) is undertaken on behalf of the Wilky Group (TWG). It forms part of the evidence base to support representations on the Regulation 19 consultation on the Draft Crawley Borough Local Plan (DCBLP).

1.2. The DCBLP contains Policy SD3 committing CBC to prepare an Area Action Plan (AAP) covering land that the DCBLP no longer proposes to be safeguarded for a second runway at Gatwick Airport. The purpose of the AAP therefore is to enable the Council to plan for its future economic, housing, infrastructure and community needs, including amongst which are any critical and justified future needs of the Airport. This will be subject to separate consultation and assessment and will include *inter alia* the consideration of land east of the Airport for strategic employment; a site known as Gatwick Green.

1.3. The Council has undertaken a Strategic Environmental Assessment (SEA) and a Sustainability Appraisal (SA)¹, respectively under an EU Directive and under regulations of the Planning and Compulsory Purchase Act 2004 to ensure that the environmental effects of the Plan are taken into account and to satisfy independent examination and allow the Plan to be formally adopted. The SEA contained an assessment of a number of proposed site allocations, but did not cover potential sites within the area covered by the AAP under Policy SD3. Instead, the SEA undertook an assessment of the whole AAP area, which adequately provided a baseline assessment to demonstrate the area's broad suitability to accommodate growth and the key considerations that such growth may need to address. In the context of the Wilky Group's ongoing representations seeking the allocation of Gatwick Green for strategic employment in the event that the proposal for an AAP is not adopted, it is appropriate that evidence is presented to demonstrate the suitability of the Gatwick Green site in sustainability and environmental terms.

1.4. The SEA covers the area of land shown in **Figure 1**, extending to about 59 ha. This site is largely owned by the TWG (80%); areas in which the TWG do not have an interest are subject to ongoing discussions between TWG and landowners. These discussions have resulted in a number of landowners agreeing to bring their land forward for development in the event the overall site is allocated.

1.5. The site comprises an area of mixed land uses dominated by low quality pasture mainly grazed by horses and divided into a number of fields by mature hedgerows. Small areas of tree cover occur in the central and north western part of the site. Clusters of residential and some rural-commercial properties occur along Fernhill Road and Donkey Lane, with some frontage development to Balcombe Road and Peeks Brook Lane. The site is bisected by the Public Safeguarding Zone (PSZ) for the standby runway at Gatwick Airport. Aerodrome safeguarding requirements under CAP 168, the advice note and the Town & Country Planning process by way of ODPM/DfT circular 01/2003 'Safeguarding of aerodromes & military explosives storage areas' Direction 2002 must be adhered to.

¹ SUSTAINABILITY APPRAISAL / STRATEGIC ENVIRONMENTAL ASSESSMENT DRAFT REPORT For the Submission Local Plan, Crawley BC, January 2020

Strategic Environmental Assessment

Land at Gatwick Green

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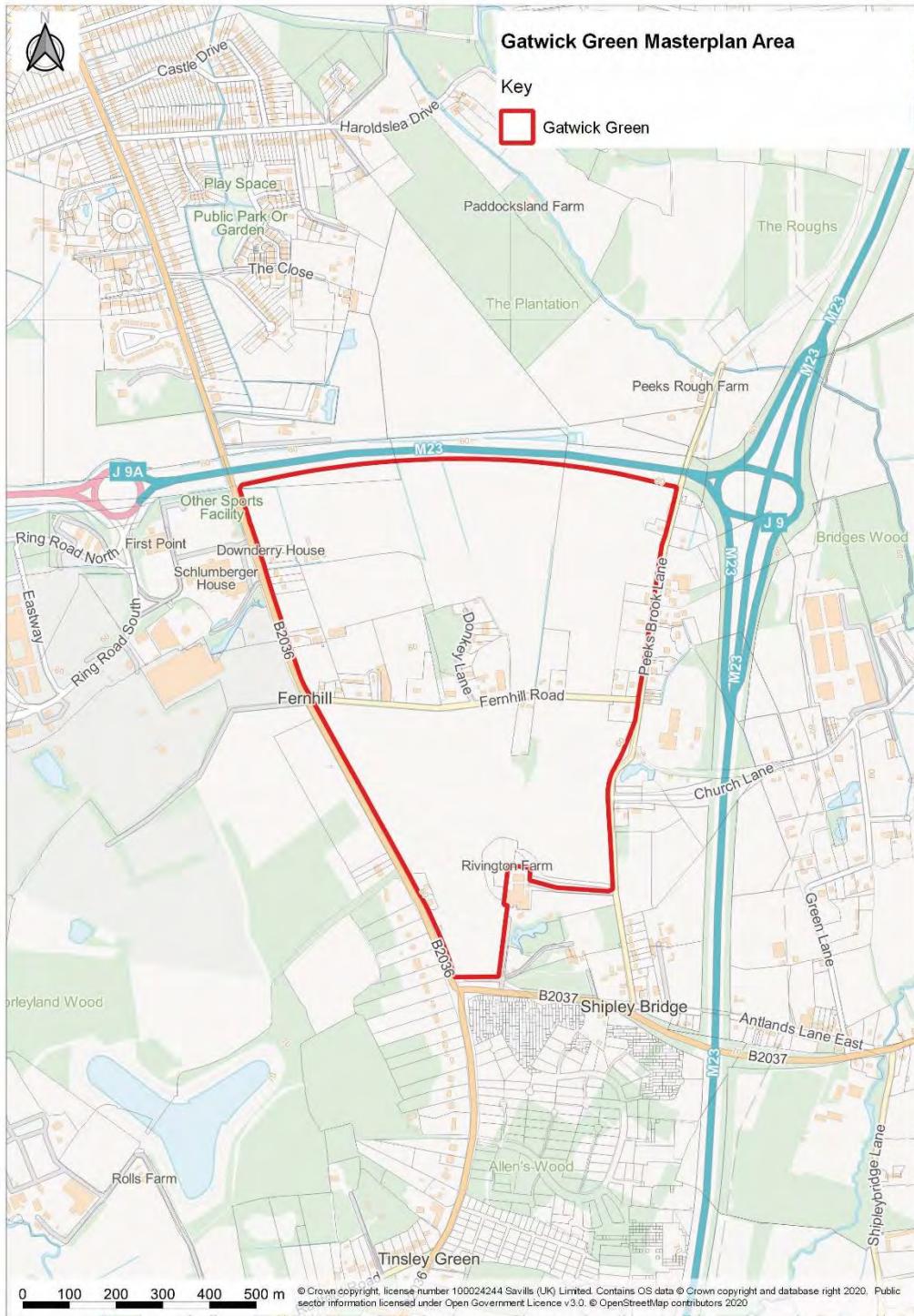


Figure 1 – Land at Gatwick Green

Strategic Environmental Assessment

Land at Gatwick Green

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1.6. This SEA report assesses and identifies the likely environmental effects that are likely to arise from the proposed use of land at Gatwick Green for employment purposes. This process involves drawing on available baseline survey data² and identifying the likely positive and adverse effects, and then the broad range of mitigation to reduce the adverse effects. The assessment includes impacts on people's health and in respect of disability, gender and racial equality.

1.7. The purpose of this SEA is to assess the sustainability of the Gatwick Green site against the Sustainability Objectives used by Crawley Borough Council (CBC) in the sustainability appraisal and strategic environmental assessment draft Report 2020, which are as follows:

- To mitigate climate change, by taking actions to reduce the concentration of greenhouse gases in the atmosphere.
- To adapt to the effects of climate change by reducing the negative consequences of changes in the climate on people and the environment, or by achieving a positive outcome from the effects of climate change.
- To protect and enhance the valued built environment and character within the borough through high quality new design and the protection of culturally valuable areas and buildings.
- To ensure that everyone has the opportunity to live in a decent and affordable home.
- To maintain, support and promote a diverse employment base that can serve the local and sub-regional and regional economy.
- To conserve and enhance the biodiversity habitats, key landscape features, fauna and flora within the borough.
- To reduce car journeys and promote sustainable and alternative methods of transport, whilst ensuring sufficient transport infrastructure is delivered to meet the requirements of the borough.
- To ensure the provision of sufficient infrastructure to meet the requirements of the borough.
- To promote 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.

1.8. The methodology for conducting the sustainability assessment evaluated the extent to which Gatwick Green met or could meet the above Sustainability Objectives and then attributed a sustainability rank against each Objective in line with the hierarchy of ranking levels below (Table 1.1).

Table 1.1 – Sustainability rank hierarchy

| |
|--|
| Significant Positive Impact on the sustainability objective (++) |
| Positive Impact on the sustainability objective (+) |
| Possible Positive or Slight Positive Impact on the sustainability objective (+?) |
| No Impact on the sustainability objective (0) |
| Neutral Impact on the sustainability objective (/) |
| Uncertain Impact on the sustainability objective (?) |
| Possible Negative or Slight Negative Impact on the sustainability objective (-?) |
| Negative Impact on the sustainability objective (-) |
| Significant Negative Impact on the sustainability objective (--) |

² Preliminary environmental/engineering investigations contained in technical reports prepared on behalf of WG and submitted with representations on its behalf on the CLP.

Strategic Environmental Assessment

Land at Gatwick Green

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1.9. The assessment has drawn on a number of preliminary environmental and engineering investigation reports prepared for the Wilky Group relating to the Gatwick Green site and consideration of the specific proposals for the site contained on the Concept Masterplan for Gatwick Green. The Assessment Criteria were those used in the assessment of site allocations used by CBC in the Sustainability and Strategic Environmental Assessment 2019 (SEA) prepared in support of the DCBPL. The SEA contains the following Assessment Criteria related to each of the nine Sustainably Objectives (Table 1.2):

Table 1.2 – Assessment Criteria

| Sustainability Objective | Assessment Criteria |
|---|--|
| 1. To mitigate climate change, by taking actions to reduce the concentration of greenhouse gasses in the atmosphere. | <ul style="list-style-type: none">• Is the construction of the site going to meet high standards of energy efficiency through the Code for Sustainable Homes (CfSH)?• Is the need to travel reduced through the location of the site?• Is the site contaminated or are there pedestrian pathways linking the site with contaminated land? Can the site be remediated?• Is the development impacted by noise (through adjacent road, airport, rail or industrial usage), or will the site itself result in noise increases?• Will the development site impact negatively or positively on air quality?• Will the development maintain or enhance water quality in rivers or groundwater? |
| 2. To adapt to the effects of climate change, by reducing the negative consequences of changes in the climate on people and the environment, or by achieving a positive outcome from the effects of climate change. | <ul style="list-style-type: none">• Are site proposals located away from areas that are high risk flooding zones, now or in the future?• Are flood prevention measures incorporated into any new development proposal? |
| 3. To protect and enhance the valued built environment and character within the borough through high quality new design and the protection of culturally valuable areas and buildings. | <ul style="list-style-type: none">• Would the development proposal impact upon the setting of a Listed Building, Conservation Area or Locally Listed Building?• If so, could a negative impact on the heritage asset be mitigated appropriately? |
| 4. To ensure that everyone has the opportunity to live in a decent and affordable home. | <ul style="list-style-type: none">• How does the proposal address housing needs in the borough?• Would the proposal deliver an element of affordable housing?• How does this provision meet the housing needs or the accommodation needs of the GTTS community? |
| 5. To maintain, support and promote a diverse employment base that can serve the local and sub-regional and regional economy. | <ul style="list-style-type: none">• Would the development proposal assist in maintaining, supporting or enhancing the local economy of the area? |

Strategic Environmental Assessment

Land at Gatwick Green

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| Sustainability Objective | Assessment Criteria |
|---|--|
| 6. To conserve and enhance the biodiversity habitats, key landscape features, fauna and flora within the borough. | <ul style="list-style-type: none">• Would the development proposal impact upon an existing or future environmental designation (such as a SNCI or AONB)?• Will there be any loss to biodiversity, or damage to the landscape as a result of the delivery of the site?• Will there be opportunities for increasing or enhancing environmental habitats through a development site? |
| 7. To reduce car journeys and promote sustainable and alternative methods of transport, whilst ensuring sufficient transport infrastructure is delivered to meet the requirements of the borough. | <ul style="list-style-type: none">• Is the site proposal located in close proximity to sustainable transport links in order for the occupants to reach essential services and facilities?• Is the need for a 'private' car reduced?• Is the site close to both a pedestrian and/or cycling network? |
| 8. To ensure the provision of sufficient infrastructure to meet the requirements of the borough. | <ul style="list-style-type: none">• Would the development increase highway and/or rail usage and would this have a detrimental impact upon highway and/or rail congestion?• What is the capacity of the site to ensure that sewage can be adequately treated?• Would the development site be designed to be connected to high quality telecommunication systems?• Is the site likely to provide additional renewable energy provision as part of the new development?• Is the site close to existing gas/electricity/ water mains? Is there sufficient capacity of current local physical connections? |
| 9. To promote active, cohesive and socially sustainable communities and To ensure everyone has the opportunity to participate in sport and to encourage active, healthy and independent lifestyles. | <ul style="list-style-type: none">• Are sites located reasonably close to neighbourhood centres and/or community centres? Are the sites located within the Built-Up Area Boundary (BUAB)?• Is the site allocation re-using previously developed land?• Is the site likely to have 'secured by design' principles implemented within the development design?• Is the site located in close proximity to existing leisure and recreation facilities?• Is the site located in close proximity to existing health facilities?• Is the site located in close proximity to existing local schools?• Will amenity areas be provided in association with the site?• Is the potential site capacity of the allocation likely to increase the numbers of users for local facilities (such as schools, GP surgeries) and would this have a detrimental impact upon such local facilities?• Would the development of a site mean the loss of formal or informal playing fields or other open space? Would the development have an impact on existing open space and would this be mitigated? |

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2. Sustainability Assessment

2.1. Land at Gatwick Green forms part of the land designated as part of the North Crawley Area Action Plan (AAP) area, covered by Policies SD3 and EC1 in the DCBLP. The AAP will address the future socio-economic needs of Crawley and land requirements related to any planned long term growth of Gatwick Airport.

2.2. The land subject to the Area Action Plan has been subject to a strategic environmental assessment, contained in the Council's SEA (pages 296-297), December 2019. In this context, the land at Gatwick Green has already been part of an area-based sustainability assessment, which concluded that the AAP area offered largely positive impacts, but uncertain with regard to climate change and negative in relation to biodiversity and landscape. Table 2.1 below shows the results of the AAP assessment alongside the findings of the Gatwick Green assessment. The results show that Gatwick Green has both less risk of adverse impacts and offers more sustainability benefits compared with the AAP area as a whole. This reinforces the importance of Gatwick Green in meeting the economic needs of Crawley and the Gatwick Diamond/LEP area, but in a highly sustainable manner.

Table 2.1 – Sustainability Assessment – AAP area and Gatwick Green

| Sustainability Objective | AAP Assessment | Gatwick Green Assessment |
|---|-----------------------------|---|
| 1. To mitigate climate change, by taking actions to reduce the concentration of greenhouse gasses in the atmosphere. | Uncertain impact (?) | <p>Land at Gatwick Green is located beyond the Built Up Area Boundary. It comprises majority greenfield land with clusters of commercial properties and groups of residences. This location means economic development would potentially increase the need to travel to access employment opportunities. However, the land is adjacent to existing employment sites served by public transport and is well-located for access by public transport, walking and cycling. The strategic nature and scale of the site provides the opportunity to access the site via an integrated sustainable transport solution. The scale of development would also enable a high level of sustainable design and construction to significantly reduce or avoid climate change impacts.</p> <p>The scale of Gatwick Green combined with its sustainable location adjacent to three Fastway routes offers some more scope to avoid / mitigate climate change than the AAP area as a whole.</p> <p>The impacts would therefore be Possible Positive Impact +?</p> |
| 2. To adapt to the effects of climate change, by reducing the negative consequences of changes in the climate on people and the environment, or by achieving a positive outcome from the effects of climate change. | Possible Positive Impact +? | <p>Identification of employment sites that are well connected to existing Main Employment Areas (e.g. Gatwick), represent the most sustainable options. Development on land at Gatwick Green could be designed to be resilient to climate change. The scale of development at Gatwick Green offers an opportunity for strategic level new build that has a high level of sustainable design in order to facilitate adaptation to climate change. On this basis, it is considered that development could offer significant scope to respond positively to climate change through the planning process.</p> <p>In relation to climate change adaptability, Gatwick Green has similar attributes / characteristics to other land parcels in the AAP area.</p> |

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| Sustainability Objective | AAP Assessment | Gatwick Green Assessment |
|--|--|--|
| | | The impact would therefore be Possible Positive Impact +? |
| 3. To protect and enhance the valued built environment and character within the borough through high quality new design and the protection of culturally valuable areas and buildings. | Possible Positive Impact +? | <p>There is an identified need for high quality business land and floorspace in Crawley which will likely exceed that which can be provided by sites within the Built Up Area Boundary. Local Plan policies will require high standards of design to be met which respond to their surroundings and protect and enhance culturally valuable areas and buildings. Development on the Gatwick Green site would therefore be required to enhance the overall aesthetics of the local built environment and provide the opportunity for positive impacts.</p> <p>In relation to enhancing the built environment and protecting cultural assets, Gatwick Green has a similar capacity to contribute to this objective compared to the AAP area as a whole.</p> <p>The impact would therefore be Possible Positive Impact +?</p> |
| 4. To ensure that everyone has the opportunity to live in a decent and affordable home. | Possible Positive Impact +? | <p>As an employment site, Gatwick Green will not directly deliver decent and affordable homes. However, the provision of this land for employment ensures this need is met in a sustainable location, so contributing to balancing jobs with new homes in a sustainable manner. For this reason, land identified for Gatwick Green is viewed as having an uncertain, but potentially positive impact against this indicator.</p> <p>In relation to ensuring everyone has access to a decent and affordable home, Gatwick Green would ensure a balance between homes and jobs which is similar to the balance that the AAP area could achieve.</p> <p>The impact would therefore be Possible Positive Impact +?</p> |
| 5. To maintain, support and promote a diverse employment base that can serve the local and sub-regional and regional economy. | Possible Significant Positive Impact ++? | <p>As an employment site, land at Gatwick Green provides a high profile site for high quality business-led employment development in a highly sustainable location. The site will address the need for high-quality Strategic Employment Locations (SELs), employment space and support sustainable economic growth in the area. Gatwick Green is also uniquely placed to diversify the area's employment base given its ability to attract alternative occupiers to those normally locating at Manor Royal: in that sense it would have a high degree of complementarity with Manor Royal and help to rebalance the economy. The site therefore presents a significant opportunity to accommodate the business needs of Crawley and the wider region at a strategic location adjacent to the Airport, the M23, mainline rail and Fastway, so reinforcing the area's role as the leading employment destination in the Gatwick Diamond. Gatwick Green offers more scope to deliver these benefits than other parts of the AAP area.</p> <p>Gatwick Green has an enhanced capability to promote a diverse economic base to support the local and sub-regional economy similar to that of the AAP area as a whole, but greater than other locations with the area.</p> <p>The impact would therefore be Possible Significant Positive Impact ++</p> |

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| Sustainability Objective | AAP Assessment | Gatwick Green Assessment |
|---|-----------------------------|---|
| 6. To conserve and enhance the biodiversity habitats, key landscape features, fauna and flora within the borough. | Possible Negative Impact -? | <p>The site is not subject to any statutory landscape or nature conservation designations, but local landscape values and biodiversity have been recognised in policies in the adopted CBLP. Whilst it may have slightly higher values than other parts of the AAP area, some of those areas are subject to statutory nature conservation designations. The development of land at Gatwick Green for employment use could have a negative impact on biodiversity, landscape features, flora and fauna. However, the strategic size of the site presents an opportunity to mitigate impacts on biodiversity or provide compensation. Such mitigation or compensation could be inherent or additional, either as part of the scheme or on other land in Wilky's ownership. Development of the site will in any event need to comply with future requirements to deliver Biodiversity Net Gain, presenting the opportunity to enhance habitats and landscape features.</p> <p>Compared to the AAP area as a whole, Gatwick Green has a slightly higher level of biodiversity value, but is not affected by any statutory nature conservation designations: its therefore has a marginally greater potential to mitigate or compensate impacts and deliver biodiversity net gain compared with the AAP area.</p> <p>The impact would therefore be Possible Positive Impact +?.</p> |
| 7. To reduce car journeys and promote sustainable and alternative methods of transport, whilst ensuring sufficient transport infrastructure is delivered to meet the requirements of the borough. | Possible Positive Impact +? | <p>Land at Gatwick Green is located beyond the Built Up Area Boundary which means economic development would potentially increase the need to travel to access employment facilities. However, Gatwick Green is situated in a highly sustainable location adjacent to the Airport, the M23, mainline rail and Fastway, so offering significant scope for highly sustainable arrangements for access. This location combined with the sale of development proposed, creates the opportunity for the wider provision of sustainable transport infrastructure at the site and in adjacent areas. This would make the development highly accessible by sustainable modes of transport, including Fastway, local bus services, walking and cycling. Such arrangements could benefit nearby employment areas and the Airport. Further, the provision of higher value and more diverse job opportunities would help to retain employees in an area that is overly reliant on low skilled jobs at the Airport and elsewhere: this will help to reduce levels of less sustainable out-commuting to London.</p> <p>Gatwick Green is located at the most accessible location in the AAP area with greater scope to reduce out-commuting to London; consequently, it has a higher sustainability profile than other parts of the AAP area.</p> <p>The impact would therefore be Possible Significant Positive Impact ++.</p> |

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| Sustainability Objective | AAP Assessment | Gatwick Green Assessment |
|---|-----------------------------|--|
| 8. To ensure the provision of sufficient infrastructure to meet the requirements of the borough. | Possible Positive Impact + | <p>The development of land at Gatwick Green for employment use will require a range of infrastructure to address transport, energy, renewable energy, utility, broadband/5G and social needs. The scale of development at Gatwick Green offers the opportunity for innovative and high quality infrastructure to address these needs - these will meet the needs of proposed development and could help meet wider requirements of the borough. The potential of Gatwick Green in this regard is likely to be higher than that of the AAP area as a whole.</p> <p>Aerodrome safeguarding requirements must be adhered to, including a PSZ for the standby runway at Gatwick Airport. However, this does not represent a constraint to the site being developed as the safety limitation surfaces under these requirements are of significant height and limitations in regards to lighting can be addressed in design.</p> <p>The scale and high value of Gatwick Green offers the opportunity for greater innovation and quality of infrastructure to meet wider needs compared with the potential in the AAP area as a whole.</p> <p>The impact would therefore be Positive Impact +.</p> |
| 9. To promote active, cohesive and socially sustainable communities and to ensure everyone has the opportunity to participate in sport and to encourage active, healthy and independent lifestyles. | Possible Positive Impact +? | <p>The strategic nature of land at Gatwick Green presents the opportunity to enhance bus, pedestrian and cycle links to nearby communities and offers scope to encourage healthy lifestyles through the design of such links and provision within the built environment. The scale of the proposed development also offers opportunities to incorporate a range of employee amenities and community uses, from sports, to leisure and recreational uses. The proposals also have the capability to offer higher value jobs, so helping to diversify the economy and create more socially-sustainable communities. Such benefits are not, however, exclusive to Gatwick Green as the AAP area as a whole offers similar opportunities.</p> <p>Gatwick Green has a similar capability to contribute towards cohesive and socially sustainable communities and provide for sport and recreation, which is similar to the capability of the AAP area.</p> <p>The impact would therefore be Possible Positive Impact +?</p> |
| Conclusion | - | <p>As an extension to the Main Employment Areas of Manor Royal and Gatwick Airport, or as a standalone site(s) for Strategic Employment Location(s) to meet the business land needs of Crawley as a sub-regional employment destination, land identified for the AAP represents the most sustainable location for strategic employment growth in Crawley. Some areas within the broadly identified area will be more sustainable than others – this applies to Gatwick Green given its scale, location, attributes and high profile, which means it has a higher sustainability profile compared to the AAP area. Overall, it would enable highly sustainable, high quality new development to complement and deliver linkages with the existing residential and business communities.</p> |

3. Conclusion

3.1. 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.

3.2. 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.

3.3. 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.

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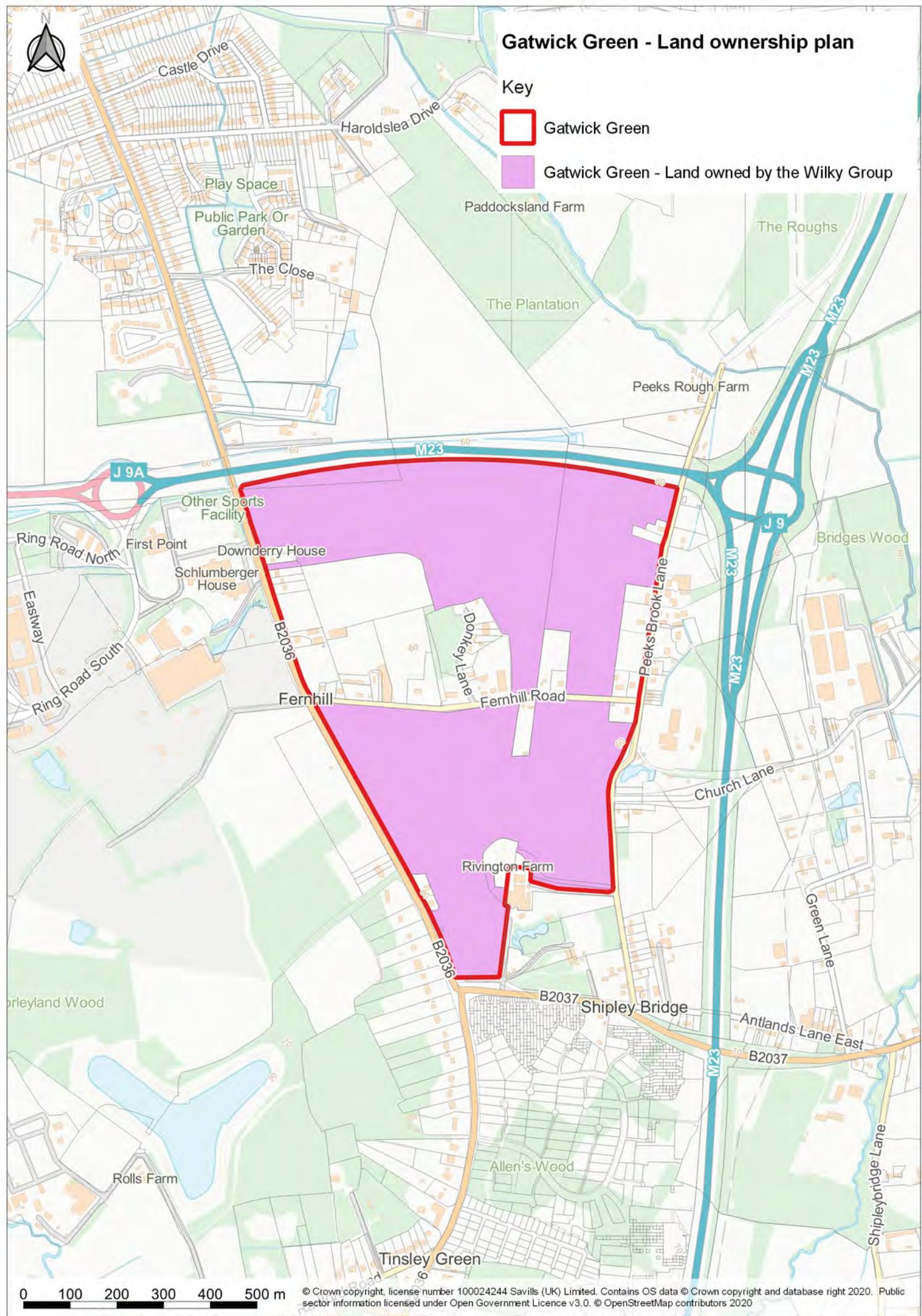
Gatwick Green - Land ownership plan



Key

 Gatwick Green

Gatwick Green - Land owned by the Wilky Group



Gatwick Green Masterplan Area



Key



Gatwick Green

