

# Consultation Statement

## January 2023



### Appendix 6: Additional Publication Consultation Representations

Incorporating amendments March & July 2023

## APPENDIX 6: ADDITIONAL PUBLICATION CONSULTATION REPRESENTATIONS

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# Crawley Local Plan

## Crawley Borough Local Plan, Vision & Sustainable Development

Regulation 19 January 2021 Representations

General Comments, Procedure, Local Plan Chapters 1 – 3 & Viability Assessment

Local Plan General			
Ref. No.	Respondent	Policy/ Para	Comments
REP/032	West Sussex County Council		<p>The current transport evidence base analysis has progressed considerably but is not yet fully complete. The County Council will continue to work with the Borough Council on further development of the evidence base towards resolution of the outstanding issues but considers that the Plan cannot yet be considered sound until this is achieved. The published report does not yet include costings for the highway mitigation on the County Council's highway network, although the County Council is aware of ongoing work to develop this. In addition, safety audit is still required for this highway mitigation to confirm that the design presented can be delivered.</p> <p>Further, several potential public transport schemes were presented as options in the transport study, but further evidence is required on costing, option selection for prioritisation, deliverability of prioritised schemes and delivery mechanisms to demonstrate that sufficient sustainable transport measures can be delivered during the Plan period to achieve the forecasted reductions in private car trips. This evidence is required to ensure compliance with paragraph 108 of the national Planning Policy Framework (NPPF). This certainty on the sustainable transport-based car trip reductions is needed to ensure that additional highway mitigation measures would not be required to prevent severe residual impacts on the highways network in compliance with paragraph 109 of NPPF. At present the extent of highway mitigation for the Strategic Road Network (SRN) has not yet been agreed with Highways England. The County Council will require assurance that the SRN mitigation package does not have any adverse effects with its interface with the local highway network but complements the rest of the mitigation package. The County Council will continue to work with the Borough Council and Highways England towards achieving this aim. We note that it is possible that the mitigation for the SRN may require some land adjacent to the SRN in third party ownership.</p> <p><b>Suggested Modifications:</b> As outlined above, the Plan cannot be considered sound until the Transport evidence has been completed. We will continue to provide technical advice to support this work and offer assistance as necessary to address the soundness of the Plan.</p>
REP/070	Resident 16	Page 16	<p>Page 16 - Insert a graphic that isn't pixelated and the legend can be read instead of it being pixelated</p> <p><b>Suggested Modifications:</b> Page 16 - Insert a graphic that isn't pixelated and the legend can be read instead of it being pixelated</p>
REP/105	Resident 39		<p>These are my observations:</p> <p>1. New homes are coming up but surely there is a need for New GP Surgery/s to cater for the demand? West Green lost its GP Practice to Langley Green years ago and still does not have one.</p> <p>2 We need shops/supermarkets The old Morrison site in the town centre has been vacant for 3 years we are now losing Debenham, Peacocks etc. in the town centre. I read an article a long while back that Aldington supermarket were looking to open up another supermarket in Crawley and this has not happened.</p> <p><b>Suggested Modifications:</b></p>

Local Plan General																		
Ref. No.	Respondent	Policy/ Para	Comments															
REP/116	Neame Sutton Limited on behalf of Danescroft (RLP Crawley) LLP		<p>1.1 Neame Sutton Limited, Chartered Town Planners, is instructed by Danescroft (RLP Crawley) LLP (“Danescroft”) to prepare and submit representations in relation to the second Regulation 19 consultation version of the Crawley Local Plan 2035 (“the Plan”) published in January 2021.</p> <p>1.2 This document sets out Danescroft’s Representations on the Plan and deals with the following specific matters:</p> <ul style="list-style-type: none"> <li>• Matters of Legal Compliance</li> <li>• Consideration of the correct Housing Need and Housing Requirement within the Plan in the context of the Housing Supply identified by the Council; and,</li> <li>• Site-specific representations in relation to Danescroft’s promotion site at Steers Lane.</li> </ul> <p>1.3 The relevant sections of the Plan, including paragraph and policy references, are cited throughout these representations along with the soundness tests that it is considered the Plan fails to comply with.</p> <p>1.4 As an overarching point Danescroft is concerned by the fact the Council has published this second Regulation 19 version of the Plan clearly without having all of the necessary evidence base ready and complete at the time of publication on 06 January 2021. Even the Plan itself anticipated a 6 week consultation expiring on 17 February 2021.</p> <p>1.5 Since the publication of the Plan in January 2021 the Council has been trickle feeding the key evidence</p> <table border="1"> <thead> <tr> <th>Evidence Update</th> <th>Date of Update</th> <th>Extension to Reg 19 Consultation</th> </tr> </thead> <tbody> <tr> <td>Draft Habitats Regulations Assessment</td> <td>18 January 2021</td> <td>17 February 2021</td> </tr> <tr> <td>Confirmation that Viability and Transport Modelling outstanding</td> <td>03 February 2021</td> <td>31 March 2021</td> </tr> <tr> <td>Viability Study Published</td> <td>19 March 2021</td> <td>30 April 2021</td> </tr> <tr> <td>Draft DtC Statement</td> <td>15 April 2021</td> <td>28 May 2021</td> </tr> </tbody> </table> <p>1.6 The Council’s website also confirms that a 6 week consultation will commence once the Transport Modelling work is complete. The timetable will therefore be extended even further.</p> <p>1.7 It is clear from this chronology of events that this second version of the Regulation 19 draft Plan was not ready for publication in January 2021 and it must also follow that its content is not reflective of the evidence that has subsequently been published. It cannot therefore be the case that the document as drafted is Sound as a matter of principle.</p> <p><b>Missing Evidence:</b></p> <p>2.30 The Council’s consultation pages on its website states that a number of key evidence documents have either not yet been prepared or are in the process of being completed. The Council intends to upload the missing documents as and when they become available (Paragraph 1.15 of the Plan also refers to the fact that the evidence base is incomplete).</p>	Evidence Update	Date of Update	Extension to Reg 19 Consultation	Draft Habitats Regulations Assessment	18 January 2021	17 February 2021	Confirmation that Viability and Transport Modelling outstanding	03 February 2021	31 March 2021	Viability Study Published	19 March 2021	30 April 2021	Draft DtC Statement	15 April 2021	28 May 2021
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			<p>2.31 This approach is inherently unsound. The Council is undertaking the formal Regulation 19 consultation with only partial evidence available. The publication of the missing evidence after the close of the consultation will mean that those wishing to provide comment/representation are unable to do so.</p> <p>2.32 A similar situation occurred in relation to Epping Forest District Council wherein a further consultation was required to ensure all parties had sufficient opportunity to respond before the Plan was submitted for Examination.</p> <p>2.33 The Council's approach of trickle feeding documents into its evidence base and extending the consultation period doesn't address the main issue here, which is that the Regulation 19 draft Plan was published in January 2021 without all of its supporting evidence. How can evidence published after the draft Plan be taken to have informed the production of the draft Plan?</p> <p>2.34 This is a fundamental issue that goes not only to the question of Soundness but also Legal Compliance. The Plan and its supporting evidence was clearly not ready for publication in January 2021 and at that time was incomplete.</p> <p><b>Suggested Modifications:</b></p> <p><b>5.0 Areas Where Changes are Required for Plan to be Legally Compliant and Sound</b></p> <p>5.1 As set out in Section 2 of these representations the Plan is currently not legally compliant.</p> <p>5.2 The Council therefore needs to rectify the significant deficiencies in the Plan's evidence base, particularly in relation to DtC, and then restart the Regulation 19 consultation stage for a third time. This is essential to ensure that the Plan does not fail at the Examination stage.</p> <p>5.3 As part of addressing the significant deficiencies in the Plan's evidence base the following key changes are required to the Plan for it to be made Sound:</p> <ol style="list-style-type: none"> <li>1. Restarting the SHLAA process to properly assess the potential from all land sources within the Borough to accommodate the housing needs of the Borough;</li> <li>2. Consider the opportunities for allocating further land that may be released from the Gatwick Airport noise constraint as a result of the revisions proposed in these representations to draft Policy EP4 and the inevitable change in approach that GAL will need to take regarding the future of the airport in the context of the Government's current accelerated Climate Change agenda combined with the long lasting affects of the Global Pandemic i.e Steers Lane Area B;</li> <li>3. Revise draft Policy EP4 to reflect the recommendations in the BAP Report attached at Appendix 2 of these Representations;</li> <li>4. Allocate Area B for 100 no. residential units capable of release immediately;</li> <li>5. Ensuring that the evidence base is complete before proceeding to a fresh Regulation 19 consultation;</li> <li>6. The SA needs to be undertaken again once the evidence base is complete to avoid unsubstantiated assumptions being applied to the assessment process; and,</li> </ol>

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			<p>7. Addressing the delivery deficiencies in the housing trajectory to ensuring a rolling 5-year housing land supply can be achieved across the Plan period i.e. addressing the Annex 2 deliverability test.</p> <p>5.4 Without the above changes/actions the Plan fails the Legal Compliance test in terms of the DtC and the evidence base and is also unsound.</p>
REP/120	Squires Planning on behalf of J. Ewing & V. Lovell		<p><b>1. Introduction</b></p> <p>1.1. This response has been prepared by Squires Planning on behalf of J. Ewing &amp; V. Lovell, who reside at The Poplars, Fernhill, Horley, Crawley, West Sussex, RH6 9SY. The commissioning of this submission was in response to Crawley Borough Council's newly proposed employment allocation (Policy EC4). This allocation has emerged at a very late stage in the plan preparation process and is, we understand, the primary reason for this second Regulation 19 Consultation.</p> <p>1.2. This document considers whether the Local Plan in its current state meets its legal and procedural requirements, and whether it is sound. It sets out the main issues with the plan, and why it is premature to include the allocation set out in EC4 for an employment use when it is needed for the potential delivery of a national infrastructure project – a second wide spaced runway at Gatwick Airport.</p> <p>1.3. J. Ewing &amp; V. Lovell are part of a wider group of local people who live and work in/around the most north eastern part of Crawley Borough who have come together as a result of the proposal now included in EC4. This group did not exist prior to January 2021 as there was no need for it, the situation in his area was well established with it being part of the Gatwick safeguarding area and the residents were aware that if/when the time came for Gatwick to expand their land would be compulsory purchased and they would need to move away. The group has been formed as the Local Plan as now proposed will lead to considerably damaging effects on the quality of local lives.</p> <p><b>Public examination hearings</b></p> <p>1.4. We can confirm that J. Ewing &amp; V. Lovell, or their advisors on their behalf, would like to participate in examination hearings. This is to ensure that the matters raised in this document, and the concerns of those who the proposed allocation under policy EC4 will directly impact, are fully considered.</p> <p><b>2. Legal Compliance</b></p> <p>2.1. It is with regret that we do not believe that the plan, as consulted upon, has been prepared in accordance with all legal and procedural requirements.</p> <p>2.2. To be legally compliant the following should have been done:</p> <ul style="list-style-type: none"> <li>(i) The Local Plan should have been prepared in accordance with the Council's latest Local Development Scheme.</li> <li>(ii) The Local Plan should be accompanied by a Sustainability Appraisal and Habitat Regulations Assessment.</li> <li>(iii) Consultation on the Local Plan should have been carried out in accordance with the Council's Statement of Community Involvement.</li> <li>(iv) The Council should have worked collaboratively with neighbouring authorities and prescribed bodies on strategic and cross boundary matters, known as the Duty to Cooperate.</li> </ul>

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			<p>(v) The Local Plan should comply with all relevant laws including the Planning and Compulsory Purchase Act 2004 and the Town and Country Planning (Local Planning) (England) Regulations 2012.</p> <p>2.3. Following our review, we would question whether the plan is legally compliant in the following areas:</p> <p><i>*See representations on:</i></p> <ul style="list-style-type: none"> <li>• <i>Local Development Scheme</i></li> <li>• <i>Sustainability Appraisal/Strategic Environmental Assessment;</i></li> <li>• <i>Statement of Community Involvement; and</i></li> <li>• <i>Duty to Cooperate*</i></li> </ul> <p><b>Suggested Modifications:</b></p>
REP/120	Squires Planning on behalf of J. Ewing & V. Lovell		<p><b>3. Soundness</b></p> <p>3.1. NPPF paragraph 35 confirms that local plans and spatial development strategies are examined to assess whether they have been prepared in accordance with legal and procedural requirements, and whether they are sound. It goes on to confirm that plans are 'sound' if they are:</p> <p>a) Positively prepared – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;</p> <p>b) Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;</p> <p>c) Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and</p> <p>d) Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework.</p> <p>3.2. Should the plan be considered to be legally compliant we would flag the following areas where we do not consider the plan to be sound.</p> <p><i>*See representations on:</i></p> <ul style="list-style-type: none"> <li>• <i>Policy GAT2: Safeguarding for a Second Runway at Gatwick</i></li> <li>• <i>Economic Growth Assessment</i></li> <li>• <i>Policy EC4: Strategic Employment Site Allocation*</i></li> </ul> <p><b>Suggested Modifications:</b></p>
REP/123	Barton Willmore on behalf of The		<p><b>1.0 Introduction</b></p> <p>1.1 These representations are submitted on behalf of our client, The Sogno Family Trust ("The Trust"). The Trust are the owners of the Land to the southeast of Heathy Farm, contained within the Draft Local Plan as a proposed allocation</p>



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Ref. No.	Respondent	Policy/ Para	Comments
	Sogno Family Trust		<p>under emerging Policy H2: Key housing sites. 1.2 These representations assess the Draft Local Plan against paragraph 35 of the National Planning Policy Framework (NPPF 2019), namely that to be found “sound”, the Plan must be:</p> <ul style="list-style-type: none"> <li>a) <b>Positively Prepared</b> – providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs, and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development.</li> <li>b) <b>Justified</b> – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</li> <li>c) <b>Effective</b> – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</li> <li>d) <b>Consistent with national policy</b> - enabling the delivery of sustainable development in accordance with the policies in this Framework.</li> </ul> <p>1.3 These representations support the Local Plan consultation document, are supportive of the proposed spatial strategy and demonstrate that the proposed allocation at Land southeast of Heathy Farm is “sound” and developable, having regard to national policy. It also reviews the Local Plan in terms of soundness of the Duty to Co-operate and other policies contained in the Plan, including for development management purposes.</p> <p>1.4 To support the council in progressing a sound plan in Examination, these representations identify some matters where greater clarification or alternative wording/approach is recommended to better align with national policy.</p> <p>1.5 We wish to participate at the oral part of examination as our client’s land is a strategic allocation which will contribute to meeting the District’s housing needs. It is necessary for us to attend to assist with discussions regarding the allocation, as well as related policies that influence its delivery.</p> <p><b>2.0 Strategic matters</b> <b>Plan Period</b></p> <p>2.1 The NPPF at paragraph 22 states that: “Strategic policies should look ahead over a minimum 15-year period from adoption ” (our emphasis)</p> <p>2.2 As above, the council must be certain that the plan can meet the 15-year period. The draft Local Plan is proposed to cover the period of 2021-2037; a total of 16 years; which to comply with the NPPF would require adoption in 2022.</p> <p>2.3 The December 2020 Local Development Scheme anticipates submission of the Local Plan to the Planning Inspectorate in March 2021 and adoption in March 2022. The Plan timetable has already been delayed by the extended consultation period on the Regulation 19 consultation, and in cases where authorities cannot meet their housing need, Plan Examination can be protracted. The Local Development Scheme further does not appear to account for any Main Modifications consultation and therefore would appear to be ambitious.</p>

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			<p>2.4 Given the delay to the Regulation 19 consultation, there appears to be limited opportunity for further delay without the plan period from adoption falling under 15 years. This is important as any extension to the plan period would require additional years of housing need to be accounted for within the emerging Local Plan strategy, and therefore could affect matters relating to housing need and unmet needs to be accommodated by neighbouring authorities.</p> <p>2.5 Therefore, at this stage, the council should ensure they are confident the Plan can suitably accommodate a minimum of 15 year period from adoption to be legally compliant.</p> <p><b>4.0 Soundness of other Local Plan policies</b></p> <p>4.1 The section below sets out our response to specific policies contained within the draft Local Plan, and our recommendations to ensure policies do not collectively affect the viability of developments, and therefore the Plan be found sound.</p> <p><i>*See further reps on specific policies*</i></p> <p><b>5.0 Conclusions</b></p> <p>5.1 Overall, the Trust are supportive of the draft Local Plan and consider the overall spatial and allocation strategy to be sound. The allocation of the Land southeast of Heathy Farm is sustainable, suitable, available and achievable for development within the plan period. Therefore, as a justified site without significant constraint and located sustainably to accommodate housing within the Borough, the allocation of the site is considered to be sound.</p> <p>5.2 We have identified areas where clarification or updates to specific policy is recommended, in order to allow for flexibility on the delivery of homes whilst still meeting environmental, social and economic objectives. With these proposed amendments we consider the plan can be found sound, and would be effective at delivering new homes within the Borough to meet as much of the Borough's identified housing requirement as possible.</p> <p><b>Suggested Modifications:</b></p>
REP/124	Gladman Developments Ltd.		<p>1.1.1. Gladman welcome the opportunity to comment on the Crawley Borough Council Local Plan Submission Publication consultation and request to be updated on future consultations and the progress of the Local Plan.</p> <p>1.1.2. Gladman welcome the opportunity to comment on the Crawley Borough Council Local Plan Submission Publication consultation and request to be updated on future consultations and the progress of the Local Plan.</p> <p>1.1.3. The Council will need to carefully consider its policy choice and ensure that the proposed approach positively responds to the revised National Planning Policy Framework (2019). There will also be a need to take consideration of changing circumstances associated with national planning policy and guidance over the course of the plan preparation period, including the Government's emerging proposals for the planning system, as set out in the Ministry for Housing, Communities and Local Government (MHCLG) consultations on "Changes to the</p>

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			<p>Current Planning System, August 2020”, “Planning for the Future, August 2020” and “National Planning Policy Framework and National Model Design Code: consultation proposals”.</p> <p><b>1.2. Plan Making</b></p> <p>1.2.1. The National Planning Policy Framework sets out four tests that must be met for Local Plans to be considered sound. In this regard, we submit that in order to prepare a sound plan it is fundamental that it is:</p> <ul style="list-style-type: none"> <li>• <b>Positively Prepared</b> – The Plan should be prepared on a strategy which seeks to meet objectively assessed development and infrastructure requirements including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development.</li> <li>• <b>Justified</b> – the plan should be an appropriate strategy, when considered against the reasonable alternatives, based on a proportionate evidence base.</li> <li>• <b>Effective</b> – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and</li> <li>• <b>Consistent with National Policy</b> – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.</li> </ul> <p><b>National Planning Guidance</b></p> <p><b>3.1. National Planning Policy Framework</b></p> <p>3.1.1. On 24th July 2018, the Ministry of Housing, Communities and Local Government (MHCLG) published the Revised National Planning Policy Framework which was subsequently updated in February 2019. These publications formed the first revisions of the Framework since 2012 and implemented changes that were informed through the Housing White Paper, The Planning for the Right Homes in the Right Places consultation and the draft Revised Framework consultation.</p> <p>3.1.2. The revised Framework (2019) introduced a number of major changes to national policy which provide further clarification to national planning policy as well as new measures on a range of matters. Crucially, the changes to national policy reaffirm the Government’s commitment to ensuring up-to-date plans are in place which provide a positive vision for the areas which they are responsible for to address the housing, economic, social and environmental priorities to help shape future local communities for future generations. In particular, Paragraph 16 of the Revised Framework (2019) states that Plans should:</p> <ol style="list-style-type: none"> <li>a) “a) Be prepared with the objective of contributing to the achievement of sustainable development;</li> <li>b) Be prepared positively, in a way that is aspirational but deliverable;</li> <li>c) Be shaped by early, proportionate and effective engagement between plan-makers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees;</li> <li>d) Contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals;</li> <li>e) Be accessible through the use of digital tools to assist public involvement and policy presentation; and</li> </ol>

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			<p>f) Serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area (including policies in this Framework, where relevant).”</p> <p>3.1.3. To support the Government’s continued objective of significantly boosting the supply of homes, it is important that the Local Plan provides a sufficient amount and variety of land that can be brought forward, without delay, to meet housing needs.</p> <p>3.1.4. In determining the minimum number of homes needed, strategic plans should be based upon a local housing needs assessment defined using the standard method, unless there are exceptional circumstances to justify an alternative approach.</p> <p>3.1.5. Once the minimum number of homes that are required is identified, the strategic planning authority should have a clear understanding of the land available in their area through the preparation of a strategic housing land availability assessment. In this regard, paragraph 67 sets out specific guidance that local planning authorities should take into account when identifying and meeting their housing needs. While Annex 2 of the Framework (2019) provides updated definitions for the terms “deliverable” and “developable.</p> <p>3.1.6. Once a local planning authority has identified its housing needs, these needs should be met as a minimum, unless any adverse impacts would significantly and demonstrably outweigh the benefits of doing so. This includes considering the application of policies such as those relating to Green Belt and giving consideration as to whether or not these provide a strong reason for restricting the overall scale, type and distribution of development (paragraph 11b)i.). Where it is found that full delivery of housing needs cannot be achieved (owing to conflict with specific policies of the NPPF), Local Authorities are required to engage with their neighbours to ensure that identified housing needs can be met in full (see Paragraph 35 of the NPPF 2019).</p> <p><b>3.2. Planning Practice Guidance</b></p> <p>The Planning Practice Guidance (PPG) was first published by the Government to provide clarity on how specific elements of the NPPF should be interpreted. The PPG has been updated to reflect the changes introduced by the revised NPPF to national planning policy. The most significant changes to the PPG relate to defining housing need, housing supply and housing delivery performance.</p> <p>3.2.2. The Standard Method was introduced by the Government to simplify the process of defining housing need, avoid significant delay in plan preparation and ultimately facilitate the Government’s ambition to achieve 300,000 new homes annually.</p> <p>3.2.3. Revisions to the PPG on the 20th February 2019 confirmed the need for local planning authorities to use the 2014-household projections as the starting point for the assessment of housing need under the standard method (PPG Paragraph: 005 Reference ID: 2a-005-20190220).</p>

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			<p>3.2.4. It is also vital to consider the economic impact of COVID-19 and the long-term role that housing will play in supporting the recovery of the economy, both locally and nationally. With 218,000 homes predicted not to be built due to COVID-19 from now to 2024/25 (Shelter &amp; Savills (2020). 'Over 80,000 new homes will be lost in one year due to COVID chaos'. Available at: <a href="https://england.shelter.org.uk/media/press_releases/articles/over_80.000_new_homes_will_be_lost_in_one_year_to_covid_chaos">https://england.shelter.org.uk/media/press_releases/articles/over_80.000_new_homes_will_be_lost_in_one_year_to_covid_chaos</a>), it is also imperative that Crawley Borough Council Local Plan identifies sufficient land to support the delivery of homes alongside ensuring that the unmet needs of the Borough are addressed.</p> <p>3.2.5. In order for the housing needs for the whole plan period to be met, it will also be essential to provide sufficient headroom within the housing supply. In this regard, Gladman supports the Home Builders Federation's recommendation that local plan should seek to identify sufficient deliverable sites to provide a 20% buffer between the housing requirement and supply.</p> <p><b>3.3. National Planning Policy Consultations</b></p> <p>3.3.1. On the 6th August 2020, Government published the Planning for the Future White Paper setting out proposals for how it is seeking to 'radically reform' the planning system. The proposals are seeking to streamline and modernise the planning process.</p> <p>3.3.2. Timescales remain uncertain, however subject to the outcomes of this process the Government has signalled its intent to make rapid progress toward this new planning system through the swift introduction of new legislation to implement the changes. In February 2021 a consultation on draft revisions to the NPPF and a new draft National Model Design Code were published with changes focussed on the impact and contribution of design, tree-lined streets and the use of Article 4 directions (National Planning Policy Framework and National Model Design Code: consultation proposals: <a href="https://www.gov.uk/government/consultations/national-planning-policy-framework-and-national-model-design-codeconsultation-proposals">https://www.gov.uk/government/consultations/national-planning-policy-framework-and-national-model-design-codeconsultation-proposals</a>). It will be important that the Council keeps abreast with the implementation of these changes to determine any potential implications for the Local Plan.</p> <p>3.3.3. A further consultation on immediate changes to the current planning system closed on 01 October 2020 (Ministry of Housing, Communities &amp; Local Government: Changes to the Current Planning System Consultation <a href="https://www.gov.uk/government/consultations/changes-to-the-current-planning-system">https://www.gov.uk/government/consultations/changes-to-the-current-planning-system</a>). Of significant note is a proposed revised standard method for calculating local housing need, which proposed to incorporate a percentage of existing stock as the baseline of the calculation.</p> <p>3.3.4. In December 2020 the Government published their response to the 'Changes to the Current Planning System'. This document provides an overview of the consultation responses before highlighting that it has been deemed that the most appropriate approach is to retain the Standard Method in the current form with an additional 35% uplift to the 'post-cap number' for 20 local authorities. The Government's rationale behind this approach is to increase home-building in existing</p>

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			<p>urban areas to make the most of previously developed brownfield land over and above that in the existing standard method.</p> <p>3.3.5. The latest correspondence from Government regarding the revisions to the Standard Method for calculating local housing need will not affect the minimum local housing need which Crawley Borough Council should Plan for.</p> <p>5. Conclusions 5.1. Summary 5.1.1. Gladman welcomes the opportunity to comment on the Crawley Borough Council Regulation 19 consultation. These representations have been drafted with reference to the revised National Planning Policy Framework (NPPF2019) and the associated updates that were made to Planning Practice Guidance.</p> <p>5.1.2. Gladman have provided comments on a number of the issues that have been identified in the Council's consultation material and recommend that the matters raised are carefully explored during the process of undertaking the new Local Plan. Notably, the Council's base does not include a Viability Assessment which should have prepared the Viability Assessment to inform the preparation of the plan, to ensure that the cumulative impact of the proposed policies do not place such additional burdens on development which as a result render them unviable.</p> <p>5.1.3. Furthermore, while Gladman welcome the May 2020 SOCG which confirms cooperation between the Northern West Sussex Authorities in relation to plan making and specifically Crawley's unmet housing need; it would be prudent to publish an updated SOCG which details current and up-to-date figures alongside how the unmet need will be addressed by Mid Sussex and Horsham District Councils, who are set to consult on their Regulation 19 Plan in Autumn 2021.</p> <p>5.1.4. We hope you have found these representations informative and useful towards the preparation of the Crawley Borough Local Plan 2021-2037. Gladman wish to be kept informed of any further updates on progress towards the new Local Plan.</p> <p><b>Suggested Modifications:</b></p>
REP/027	LRM Planning on behalf of WT Lamb Properties, Staminier Group and Elliott Metals/The Simmonds Family	Vision	<p><b>VISION &amp; STRATEGY</b></p> <p>1. We are broadly supportive of the vision set out for Crawley in 2037, indeed it is unobjectionable that Crawley should be a place that people enjoy and want to live, work and visit. A key element of this is based on sustainable economic growth, accordingly we support the Council's approach which is that: <b>Crawley will strive to be the premier town between London and the South Coast providing jobs, learning and development opportunities and a leisure and cultural offer that is attractive to residents and visitors. Crawley will continue to be an economic leader, with a diverse, resilient and productive economy that meets the needs of the borough and supporting the overall prosperity of the region. An environment that supports and encourages new and established businesses to grow and flourish will be developed, and supporting necessary infrastructure, including telecommunications, will be enhanced. Crawley will be the first choice of business location for a variety of sectors and both domestic and international markets. Innovation,</b></p>

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			<p><b>entrepreneurship and advanced technologies will thrive, and our community will benefit from access to high value, sustainable economic growth. Additional jobs will have been created for people living in and around the Crawley area across a diverse range of sectors, including creative industries. Access to jobs will be supported by learning and development opportunities giving people a real choice about the work they can and want to do.</b></p> <p>2. It is clear that a strong approach towards employment land is required more than ever in Crawley with over half of the borough's jobs falling into the vulnerable or very vulnerable sectors. In this regard, we strongly support the Council in its assertion that in light of the COVID 19 pandemic <b>“it is vital to plan positively to support economic recovery, particularly within the most affected aviation related sectors, whilst facilitating an expansion and diversification of Crawley’s economy that will enable it to adapt to unforeseen economic circumstances that could otherwise hinder economic growth”</b>.</p> <p>The plan recognises that there are significant land supply constraints faced by the borough and that a positive approach is required to support economic recovery. We are strongly supportive of this approach given the implications of COVID 19 and the need to significantly increase economic diversification. We note that there is currently an opportunity to increase the supply of employment land to help diversify the economy of the Authority so that it is not so dependent upon the recovery of air travel. This approach underlies our client’s position, the contribution that their land can make to the plan and forms the basis for our representations.</p> <p><b>Suggested Modifications:</b></p>
REP/ 119	Turley on behalf of A2Dominion Group	2.30 – 2.33	<p><b>CRAWLEY LOCAL PLAN REVIEW – REPRESENTATIONS ON BEHALF OF A2DOMINION HOUSING GROUP</b></p> <p>We write to set out representations on behalf of A2Dominion Housing Group to the Regulation 19 Crawley Local Plan Review which has been published for consultation. We note that additional material has been published and the deadline for comments extended. Although we do not expect to do so, we may make further comments if additional material is published after these representations have been published.</p> <p>A2Dominion</p> <p>A2Dominion is a residential property group and award-winning housing developer. They pursue their business with a social purpose, reinvesting profits from private sales into building new affordable homes, managing existing homes and supporting local communities. They deliver on all tenures on their development sites, retaining a long term interest via the ownership and management the affordable housing and open areas.</p> <p>A2Dominion’s vision is to improve people’s lives through high-quality homes and services. A2Dominion has over 38,000 homes across London and southern England and are committed to developing new homes that are genuinely sustainable.</p> <p>A2Dominion have led the development of a new flagship eco town at North West Bicester; a pioneering project backed by environmental integrity and a long-term vision for the area.</p> <p>Cottesmore Village</p>

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			<p>A2Dominion has recently promoted an area of land to the west of Pease Pottage for residential development to Mid Sussex District Council. However more recently, A2Dominion has provided details to Horsham District Council of a wider opportunity referred to as 'Cottesmore Village' where the vision is for a sustainable new community located in close proximity to Crawley.</p> <p>The site is circa 83ha, and is currently in use as Cottesmore Hotel and Country Club. Due to the recent decline in Golf the site opens up a new opportunity to create a sustainable community incorporating the existing Hotel and Country Club, open space, community sports facilities and business hub within a landscaped setting. The site can be separated into two areas of land connected by a pedestrian footpath. Current access into the site is taken from Forest Road to the south, where the current Club main facilities are located including a Club House, Hotel and Spa.</p> <p>A Vision Document, setting out key considerations, and the form of development which could be accommodated, is included at Appendix 1 of this letter.</p> <p>Cottesmore Village is in a strategically significant location on the edge of the major urban area of Crawley (and its range of facilities, employment opportunities and transport connections), close to the strategic highway network and within the 'Gatwick Diamond' which has followed from the consistent recognition of this area's importance in regional planning. The interaction between Horsham District and Crawley was acknowledged in the HDPF which states explains how the 2001 Census showed 40% of working people who live in Horsham District commute outside it to work. Of these, 58% travelled to Crawley and London. The HDPF also explains how the District has been recognised as operating at a pivotal point of a triangle of large urban communities between Crawley/Gatwick and Portsmouth and Brighton on the south coast.</p> <p>A number of local authorities in the area (Surrey County Council, West Sussex County Council, Crawley Borough Council, Horsham District Council, Mid Sussex District Council, Mole Valley District Council, Reigate and Banstead Borough Council, Tandridge District Council) have formed the Gatwick Diamond local authorities. The Authorities published a Gatwick Diamond Local Strategic Statement in 2012, with an updated version published in June 2017. A Memorandum of Understanding (MoU) exists between the Gatwick Diamond authorities as a mechanism for interauthority co-operation to promote the planning of sustainable development across the area. The Local Strategic Statement from 2017 explains that the Vision to 2031 is "By 2031 the Gatwick Diamond will be a worldclass, internationally recognised business location achieving sustainable prosperity and growth."</p> <p>A2Dominion consider that these considerations, allied with the significant unmet housing need arising from within Crawley Borough reinforce the strategic location of the area and the role in which Cottesmore Village could play. The work undertaken by A2Dominion demonstrates that Cottesmore Village could provide:</p> <ul style="list-style-type: none"> <li>• Residential areas totalling circa 19.67ha across the site. There will be differing character areas to each parcel with lower densities around the development edge and set back from a listed building adjoining the site. All residential development is within a landscape country park setting respecting the natural character of the site;</li> <li>• A local centre, which could include uses such as a doctors' surgery, community hall, coffee shop, convenience store and Business and Innovation Hub including a delivery hub as we change to online shopping more and other facilities subject to detailed masterplanning;</li> </ul>



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			<ul style="list-style-type: none"> <li>• A primary school;</li> <li>• Sports/play pitches;</li> <li>• A community food production area; and</li> <li>• Significant levels of open space.</li> </ul> <p>Vehicular access to the site is proposed from Forest Road via a new roundabout junction. The scheme can be designed to facilitate home working, e.g. through ensuring that there is a space within the home where it is possible to work productively in terms of having sufficient room, segregation from the rest of the household as well as having somewhere comfortable, well ventilated and well lit. In addition, fast broadband speeds will be important. Cottesmore Village will bring forward new facilities to offer new and existing residents much greater opportunity to travel locally on foot and by bicycle. The emerging masterplan shows the following connections:</p> <ul style="list-style-type: none"> <li>• A connection eastwards to a signed cycle route to Crawley and off-site enhancements of that cycle route;</li> <li>• A connection northwards to Crawley via Bridleway 1546 which will benefit from improved surfacing, drainage and lighting (particularly the well-used underpass beneath the A264) all of which can be delivered by Cottesmore Village;</li> <li>• A connection north-eastwards via Footpath 1545 through Buchan Country Park and connecting with Horsham Road, Crawley.</li> <li>• A connection south-eastwards via Footpath 1545 to Forest Road. It is proposed to provide a footway in the existing highway verge along the northern side of Forest Road/Horsham Road to connect the site to Pease Pottage and vice versa.</li> </ul> <p>In addition to the site's location close to Crawley, there is good opportunity for future bus routes (e.g. extended and enhanced existing services and/or new services) to be incorporated into Cottesmore Village. The proposed scheme could enhance the public transport connections in a number of ways including:</p> <ul style="list-style-type: none"> <li>• Increasing the frequency of an existing bus route and divert it to serve Pease Pottage and the site e.g.; <ul style="list-style-type: none"> <li>– Extend the existing 271/273 Crawley to Brighton buses from eastern Pease Pottage to the site and increase the frequency from 1 to 2 per hour to every 20-minutes; and/or</li> <li>– Divert the existing 23 Crawley to Worthing via Horsham buses from the A264 to serve Pease Pottage and the site and increase the frequency to every 20-minutes; and/or</li> <li>– Deliver a new hopper bus service between the site, Pease Pottage and central Crawley and/or Horsham (including the station(s)) operating with a circa 20-minute frequency.</li> </ul> </li> <li>• The provision of bus stops with seating, timetable information and shelter within the site so that new residents have a very short walk to access buses.</li> <li>• The provision of real time information at the bus stops and on local buses. The concept of development in the area where Cottesmore Village is located is outside of Crawley Borough and primarily within Horsham District and so A2Dominion acknowledge that it is not the role of the Crawley Borough Local Plan Review to allocate development in this area. However as these representations consider, it is appropriate for the Local Plan Review to include text regarding the scale of unmet housing need, its economic significance and the way in which these matters could be addressed.</li> </ul>

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			<p>Furthermore, we expect that Crawley Borough Council will be familiar with the concept of development in the area where Cottessmore Village is located as this was considered in a document published in September 2005 and titled 'Feasibility Study for Development Options at Crawley'.</p> <p><b>REPRESENTATIONS</b></p> <p>The following section of this letter sets out specific representations on behalf of A2Dominion in response to the content of the Regulation 19 Local Plan consultation document.</p> <p><b>Meeting Housing Needs</b> Paragraph 2.20</p> <p>The text in the Local Plan states that "Crawley's development as a New Town, in addition to the influence of Gatwick Airport, has significant implications for the future of the town in terms of population growth; and the need to accommodate development remains a key challenge for Crawley. By 2037, to meet the needs of its growing population, the town would need a further 12,000 new homes. Accommodating even some of this need involves difficult decisions and invariably places pressure on some of the key features that define Crawley's character."</p> <p>We reserve the opportunity to submit further comments and evidence regarding the extent of the housing requirement as the Plan progresses and further evidence emerges.</p> <p><b>Crawley's Unmet Housing Needs</b> Paragraphs 2.26 – 2.29</p> <p>We welcome the recognition that the Crawley Local Plan is unable to make provision for all of the housing need within the Council's administrative boundaries. Furthermore, we welcome the recognition that "Crawley's housing market functions within a wider geographic area – identified as the Northern West Sussex Housing Market Area, which is predominantly within the local authority administrative areas of Crawley Borough, Horsham and Mid Sussex Districts; extending northwards into the administrative area of Reigate and Banstead Borough to a lesser degree".</p> <p>In our submission, the economic significance of Crawley, and the role that it plays in the HMA and in the wider area (for example the wider Gatwick Diamond area) means that all efforts should be made to accommodate the unmet needs arising from the town. The failure to do so puts the economic growth and success of Crawley and the wider area at risk. We note that the Local Plan identifies that the unmet need to 2037 equates to 6,680 dwellings with this calculated by deducting the planned requirement (5,320 dwellings) from the identified housing need (12,000 dwellings). However we understand that the planned requirement is a 'supply-led' calculation and as such, when calculating the degree of unmet need to be addressed by adjoining authorities, it may be necessary for them to provide a 'buffer' to ensure greater certainty that, in combination, the needs will be addressed.</p> <p>Furthermore, we would encourage dialogue to ensure that it is not just the total numerical housing requirement which is achieved as there remains a significant need for affordable housing in the HMA.</p> <p>We reserve the opportunity to submit further comments and evidence regarding the extent of the unmet need as the Plan progresses and further evidence emerges.</p> <p><b>Development adjacent to Crawley</b> Paragraphs 2.30 – 2.33</p>

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			<p>In combination these paragraphs refer to the growth of Crawley outside of its administrative boundaries and, in turn:</p> <ul style="list-style-type: none"> <li>• Paragraph 2.31 refers to planned development in other authorities.</li> <li>• Paragraph 2.32 states that “Other potential urban extensions to Crawley may include extensions to the east and/or west of the borough boundary. All opportunities are being explored to understand whether these would constitute the most sustainable housing development locations in the context of the wider housing market area and travel to work area and whether the existing infrastructure, and environmental constraints can be resolved.”</li> <li>• Paragraph 2.33 states that “This plan should not be considered as an indicator of the extent of acceptable development adjacent to Crawley.”</li> </ul> <p>In our opinion, the Crawley Local Plan should not seek to identify the potential locations for growth outside of Crawley. However that is what appears to be inferred by paragraph 2.32. It is quite right that the Local Plan does identify a significant unmet housing need, but it is for the adjoining authorities to accommodate this. Further analysis may well indicate that such opportunities exist to the south of Crawley. Our proposed approach is reinforced by the text at paragraph 12.21 of the Local Plan which refers to the complexities associated with the westward expansion of Crawley and the Western Link Road.</p> <p>We consider that paragraph 2.32 should be amended as follows in order to ensure consistency with paragraph 2.33:  <del>“Other potential urban extensions to Crawley may include extensions to the east and/or west of the borough boundary.</del> All opportunities are being explored to understand whether <del>these would constitute the most sustainable housing development</del> <u>locations around Crawley can accommodate its growth</u> in the context of the wider housing market area and travel to work area and whether the existing infrastructure, and environmental constraints can be resolved.”</p> <p>However in looking to accommodate options for the growth of Crawley, it is worth considering the comments set out in the Statements of Common Ground with adjoining authorities, for example:</p> <ul style="list-style-type: none"> <li>• The SoCG with Mole Valley District (January 2021) records that the two authorities are within different HMAs (Mole Valley being in the Kingston and North East Surrey Housing Market Area) and that “Due to the need to undertake site-specific exceptional circumstances testing to determine whether it is appropriate for individual sites to be released from the Green Belt, it is not currently considered possible to meet any of Crawley’s housing needs within Mole Valley.”</li> <li>• The SoCG with Mole Valley District (January 2021) records that the “There is some relationship between the North West Sussex Housing Market Area and the Horley area. However, RBBC as a whole falls within the East Surrey Housing Market Area.” In addition, the SoCG records that “RBBC is not in a position to meet any of CBC’s unmet housing need”</li> </ul> <p>Furthermore, the delays associated with the Tandridge Local Plan are well known, with the Inspector having advised that significant work is required in relation to highways matters for example. In any event, it is relevant to note that the examination version of the Tandridge Local Plan does not make provision for the unmet needs of Crawley Borough Council.</p> <p>There are five authorities surrounding Crawley (Mole Valley, Reigate &amp; Banstead, Tandridge, Mid Sussex and Horsham). Two of those have agreed common ground with Crawley BC that they are unable to accommodate the town’s unmet need, whilst the third makes no such provision in its emerging Local Plan. In addition, the capacity of the land to the north of Crawley is also reduced by the presence of Gatwick Airport. The remaining two (Horsham and Mid Sussex) are at</p>

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			differing stages in the plan-making process. In our submission, this wider context reinforces the fact that the Crawley Local Plan should not include any text which might be taken as suggesting that the growth of Crawley should only occur in certain directions.
			<b>Suggested Modifications:</b>

Chapter 3. Sustainable Development			
Ref. No.	Respondent	Policy/ Para	Comments
REP/023	Savills on behalf of St Catherine's Hospice	SD1	<p>Section 2: Sustainable Development Strategic Policy SD1: Presumption in Favour of Sustainable Development 3.7. St Catherine's Hospice fully supports CBC's commitment to Sustainable Development and welcome the prospect of working positively with the Council to realise sustainable growth in the Borough.</p> <p>3.8. However, paragraph 16 of the NPPF is pertinent, particularly where it states that: "[Plans should] f) serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area (including policies in this Framework, where relevant)" 3.9. Whilst we agree that the Council should set out their intentions to achieve Sustainable Development in the Borough, it is considered that this is explained sufficiently within the first two paragraphs of Strategic Policy SD1. At present, the extensive list of strategic objectives is superfluous and repetitive; by their nature of being strategic objectives, the importance of these policies is implied throughout the Plan.</p> <p><b>Suggested Modifications:</b> 3.10. To be found sound, it is suggested that the Council amends Strategic Policy SD1 to state that: <u>"[...Crawley and the wider Gatwick Diamond and West Sussex and Greater Brighton sub regions.] Development will be supported where it accords with the policies and objective set out in this plan unless material considerations indicate otherwise."</u></p>
REP/087	Woodland Trust	SD1	<p>We welcome the priority given to Crawley's commitment to being carbon neutral by 2050. We strongly welcome the explicit inclusion of ancient woodland and veteran trees as a protected designation in para 3.4, in line with the NPPF para 175c.</p> <p><b>Suggested Modifications:</b> N/A</p>
REP/113	Natural England	SD1	<p>Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.</p> <p><b>Draft Crawley Borough Local Plan 2021 – 2037 January 2021 - For Submission Publication Consultation: January – February 2021</b> We welcome the further opportunity for involvement in your Local Plan process and our comments are given below.</p> <p><b>Overarching comments</b> <b>Plan- Making for Biodiversity in the Climate Emergency</b> Given the severity of the decline in biodiversity and the Climate Change emergency, Local Plans have a key role to play in planning for resilience, forecasting, and making space for nature to adapt to a changing climate. Plans should seize the opportunity to help to reverse this decline through ambitious and integrated Plan-making which demonstrably avoids and</p>

Chapter 3. Sustainable Development			
Ref. No.	Respondent	Policy/ Para	Comments
			<p>minimises impacts and seeks all opportunities to help reverse the biodiversity decline. Plans must adopt a strategic approach through multifunctional Green Infrastructure provision and Nature Recovery Networks.</p> <p>Opportunities for securing strategic resilient and multi-functional solutions to climate change must be secured through the Local Plan. We therefore advise that this section should reflect these requirements which will be essential for resilient Plan making. In this regard, we welcome the aims of your environmental objective, as set out in 3.1 of the above submission draft Local Plan document. However, this objective detail is not fully represented in the strategic objectives set out in the related <b>Strategic Policy SD1: Presumption in Favour of Sustainable Development</b>. Although SD1 objectives 1 and 4 address the aims of carbon neutrality, climate change adaption and green infrastructure (GI) protection, enhancement and expansion; other elements of your sustainable development objective are missing. We therefore recommend that Strategic Policy SD1 be strengthened, so as to comply with the NPPF requirements. Of particular concern is the inclusion of objectives relating to natural resource use and the minimising of pollution; in view of the borough's water resource and air pollution constraints.</p> <p><b>Suggested Modifications:</b> (Our suggested modifications are incorporated in the above advice).</p>
REP/063	Pegasus Group	SD2	<p>4. HEALTH AND WELLBEING</p> <p>4.1 One of the policies that would be more effective as a result of the better response to addressing housing needs that would arise from the allocation of additional sites including the parcels promoted on behalf of Persimmon Homes is Strategic Policy SD2: Enabling Healthy Lifestyles and Wellbeing.</p> <p>4.2 Paragraph 3.6 of the supporting text to the policy states that:          "There is now a strong evidence base that our health is impacted by the environments and places within which we live. Government planning policy is explicit that 'planning for health', achieving healthy and safe places is a material consideration to enable and support healthy lifestyles to address identified local health and wellbeing needs. Creating and enabling healthy places and improving the wider determinants of health can help to promote good health, better lifestyles, prevent poor health and have a positive impact on reducing health inequalities."</p> <p>4.3 The policy however fails to acknowledge that one of the key determinants of health and well-being is access to suitable housing.</p> <p>4.4 As set out in the Strategic Policy H1: Housing Provision the Local Plan makes provision for the development of a minimum of 5,320 net dwellings. The remaining unmet housing need of 6,168 dwellings is not being planned for in Crawley, and the ability of neighbouring authorities to address this is uncertain.</p> <p>4.5 As a result, there will be a substantial under-provision of housing relative to need in at least the short-term with substantial adverse effects on the ability of households to access the housing they need and consequent adverse effects on the health and wellbeing of the population.</p>

Chapter 3. Sustainable Development			
Ref. No.	Respondent	Policy/ Para	Comments
			<p>4.6 In order to make Strategic Policy SD2 more effective it will therefore be necessary to minimise the unmet need as far as is possible including through the allocation of the parcels of land promoted on behalf of Persimmon Homes at Forge Wood.</p> <p><b>Suggested Modifications:</b></p>
REP/068	Sussex Wildlife Trust	SD2	<p>SWT note that our comments relating to the inclusion of the term high quality when discussing open space policy have been incorporated into the policy wording. Therefore we withdraw our comments related to this policy from our March 2020, Regulation 19 response.</p> <p>When reviewing the revised Regulation 19 Submission Plan we have observed that policy <b>Strategic Policy SD3 North Crawley Area Action Plan</b> has been removed from this submission version. It appears that GAT 2 safeguarding land has been bought back into the plan within section 10 of the revised submission plan. Therefore please see comments relating to GAT 2 Safeguarding Land, further down within our Jan 2021 Regulation 19 submission.</p> <p>We note the evidence base for the Local Plan includes a North West Sussex Statement of Common Ground. We note that this statement does not identify Biodiversity or Green infrastructure as a Strategic Matter under section 4 of the document. SWT seek clarity on the reasoning for the absence of these topics when they clearly are cross boundary matters and referenced as so within section 171 of the National Planning Policy Framework 2019.</p> <p>We ask the Inspector to consider our comments in our original Regulation 19 response and our further comments in this Regulation 19 response to ensure there is clarity on the Council's position and we can determine the soundness of this approach for that area of land.</p> <p><b>Suggested Modifications:</b></p>
REP/035 (Mar 21)	Vail Williams on behalf of Ardmore/Windsor Land Consortium	SD3 <b>[no longer in plan]</b>	<p><b>Safeguarding</b></p> <p>As you are aware our clients previously supported the further clarification in Policy SD3 in regard to the Gatwick Airport, and the proposed Area Action Plan. Whilst we appreciate that the 2021 Regulation 19 version removes this designation as a result of legal advice given to the Borough Council, we are understandably disappointed that safeguarding which has historically blighted on our client's land for so long, will appear to be continuing to do so. without any clarity from central government on any further evidence or timeline in regards to the need for this land to facilitate an additional runway at Gatwick.</p> <p>This is despite confirmation from Gatwick Airport Limited (GAL) that they wish to pursue the emergency runway as a second runway within the current airport boundary. We therefore are very disappointed that this Local Plan has been required to reflect safeguarding, and especially to the extent that is shown on the Local Plan Proposals Map. We would query whether there is indeed sufficient evidence to demonstrate that the whole of this land, even larger and altered from the Adopted Local Plan, should be safeguarded for the whole plan period up to 2037 without further evidence, and to this extent in regard to the new boundary. It is not clear how a larger area can be justified further blighting the Borough's ability to provide much needed economic land supply within its own boundaries.</p>

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			<p>However, we agree that if this is required due to national policy, then we agree with paragraph 10.17 of the emerging Local Plan, that confirms that para 10.8 of the Government's Aviation Strategy 'Aviation 2050' published in December 2018, does not provide any certainty in government policy that land at Gatwick is no longer required to be safeguarded. We therefore appreciate the position that Crawley is in, with regards to being consistent with national policy but welcome the caveat that should any national aviation policy on safeguarding provide certainty that the safeguarding is no longer required, this will trigger a new Local Plan Review.</p> <p>We understand that under policy GAT2, the airport operator GAL will continue to be consulted on for all planning applications within the safeguarded area. However, we again query how the Indicative Search Corridor for the CWRR under ST4, is itself consistent with GAT2 when no further information is available to justify the position of this corridor, and that this appears to promote an infrastructure led development which may not be consistent with policies GAT2 or CL8. In regard to safeguarding, we also query paragraph 10.21 of the January 2021 Local Plan which begins to remove land within the safeguarded boundary for other development, including Land East of Balcombe Rd where the Local Plan allocates a new Strategic Employment Location (SEL), on the grounds that Gatwick has identified it as being used for a large area of surface car parking, and this is therefore inefficient use of land.</p> <p>There appears to be inconsistencies in the Jan 2020 Local Plan as currently drafted in regard to safeguarding in the plan and paragraph 9.8 states that the SEL "Gatwick Green" will require the safeguarded boundary to be amended accordingly. We will respond to policies EC1 and EC4 separately, with the search corridor under ST4 and the SEL under EC4.</p> <p><b>Suggested Modifications:</b></p>
REP/035 (Jun 21)	Vail Williams on behalf of Ardmore/ Windsor Land Consortium	SD3 [no longer in plan]	<p><b>Previous Representations Summary</b></p> <p>In summary, as per our reps dated March 2021 we are disappointed that your Area Action Plan has been removed as a mechanism to consider the potential for new strategic employment locations and question if this is a robust, sound and justified approach.</p> <p><i>*see further reps. under Policies CL3 and CL8; Chapter 9, Policies EC1, EC2 and EC4; Policy GAT2; and Chapter 17 and ST4*</i></p> <p><b>Suggested Modifications:</b></p>
REP 066	Mid Sussex District Council	SD3 [no longer in plan]	<p><b>Strategic Policy SD3: North Crawley Area Action Plan (now deleted)</b></p> <p>Mid Sussex notes that this policy has been deleted from the Plan and acknowledges the reasons given behind this change. However, it is disappointing that an opportunity to review the future growth and operational needs of the airport alongside other development needs of Crawley, including economic growth and housing, to enable efficient use of land within Crawley is no longer included.</p> <p><b>Suggested Modifications:</b></p>



<b>Viability Assessment</b>			
<b>Ref. No.</b>	<b>Respondent</b>	<b>Policy/ Para</b>	<b>Comments</b>
REP/124	Gladman Developments		<p><b>Viability Assessment</b></p> <p>4.1.1. A Viability Assessment was published to the Local Plan Review evidence base on the 19th March 2021. This document did not form part of the publicly available evidence documents before this date or during the previous Local Plan consultation in March 2020.</p> <p>4.1.2. The Council should have prepared the Viability Assessment to inform the preparation of the plan and to ensure that the cumulative impact of the proposed policies do not place such additional burdens on development which as a result render them unviable.</p> <p><b>Suggested Modification:</b></p>
REP/133	The Planning Bureau Ltd		<p>REVIEW OF LOCAL PLAN VIABILITY ASSESSMENT FOR SHELTERED &amp; EXTRA CARE HOUSING CRAWLEY BOROUGH COUNCIL LOCAL PLAN REVIEW (REGULATION 19 CONSULTATION) JUNE 2021</p> <p><b>1. Introduction</b></p> <p>1.1.1 This supporting statement has been prepared on behalf of McCarthy Stone and Churchill Retirement Living, two independent and competing housebuilders specialising in housing for older people. Together, they are responsible for delivering approximately 90% of England’s specialist owner-occupied retirement housing.</p> <p>1.1.2 In this statement we critically appraise the evidence underpinning the affordable housing targets detailed in Policy H5: Affordable Housing of the Crawley Borough Local Plan (Regulation 19 Consultation) – namely the Crawley Local Plan Review: Whole Plan Policies &amp; Community Infrastructure Levy Viability Assessment (LPVA) undertaken by the Dixon Searle Partnership.</p> <p>1.1.3 This Statement is a focused document underpinning our representations to the Crawley Borough Local Plan Regulation 19 consultation on Policy H5. In the interest of brevity, it does not comprehensively cover Government policy on viability in Plan preparation or detail the residual land appraisal methodology at length. These matters are comprehensively covered in the LPVA.</p> <p><b>2. Review of Local Plan Viability Study</b></p> <p>2.1.1 The Crawley Borough Local Plan is one of an alarmingly limited number that have set a differential affordable housing rate for Crawley town centre (25%) and the rest of the Borough (40%) housing. This is, of itself, commendable and suggests a greater focus on viability at the Plan making stage.</p> <p>2.1.2 The wording of Policy H5 and its justification makes it clear that a non-policy compliant level of affordable housing will only be allowed in exceptional circumstances and where sites are clearly subject to abnormal costs. It also states in the ‘Exceptions’ sub-section of the Policy that: “The council will only consider relaxing this affordable housing requirement, in part or in full, in exceptional circumstances, where a scheme is clearly subject to abnormal costs, not including land costs, and not otherwise envisaged by the Local Plan Viability Assessment. This must be evidenced by robustly assessed viability appraising various permutations of affordable housing provisions to best address local affordable housing needs which will be independently assessed. Should concessions be agreed by the council then</p>

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Ref. No.	Respondent	Policy/ Para	Comments
			<p>claw-back mechanisms will be expected to be put in place and independently monitored. The scheme must also evidence that it addresses a demonstrative and immediate housing need”</p> <p>2.1.3 It is clear from the wording of the policy and its justification that the Local Authority is cognisant of the increased emphasis on Local Plan viability testing in Paragraph 54 of the NPPF. Given the Council’s stance towards developer contributions and affordable housing, we find aspects of the evidence base underpinning these policies to be concerning.</p> <p>2.2 Older Persons’ Housing Typologies</p> <p>2.2.1 The affordable housing targets set out in Policy H5 are informed by the Crawley Local Plan Review: Whole Plan Policies &amp; Community Infrastructure Levy Viability Assessment (LPVA) undertaken by the Dixon Searle Partnership. We note that the Stage 1 report has assessed the viability of older persons’ housing typologies, which is welcomed.</p> <p>2.2.2 In reviewing the methodology for assessing specialist older persons’ housing, we note that many of the inputs align with the methodology detailed in the Briefing Note on Viability Prepared for the Retirement Housing Group (hereafter referred to as the RHG Briefing Note) by Three Dragons, although a number do not. A copy of the RHG Briefing Note has been provided as part of this submission, which could result in an unrealistic planning obligations burden in the next Local Plan. Our concerns are that the Viability Assessment has overplayed the viability of older persons’ housing.</p> <p>2.2.3 Mindful of the guidance in the PPG that is the responsibility of site owners and developers to engage in the Plan making process, McCarthy Stone and Churchill Retirement Living have undertaken financial viability appraisals for sheltered and extra care older persons’ housing typologies in this report to encourage dialogue with the Council.</p> <p><b>3. Viability Appraisal Inputs</b></p> <p>3.1 Introduction</p> <p>3.1.1 McCarthy Stone and Churchill Retirement Living have considered the inputs and assumptions used in the financial viability appraisals for older persons’ housing in the Tunbridge Wells Local Plan Viability Assessment Stage 1 &amp; Stage 2 (LPVA). A summary table has been provided in the table entitled: Comparison of Appraisal Inputs on page 6 this report.</p> <p>3.1.2 Many of the inputs used in our appraisal of Sheltered and Extra Care housing typologies align with the methodology detailed in the Briefing Note on Viability Prepared for the Retirement Housing Group (hereafter referred to as the RHG Briefing Note) by Three Dragons. Where they differ is clearly stated in this report. A copy of the RHG Briefing Note has been provided as part of this submission.</p> <p>3.2 Unit Sizes</p> <p>3.2.1 Apartments for specialist older persons’ housing tend to be larger than ‘general needs’ open market housing. The unit sizes used in the LPVS do however differ from those recommended in the RHG Briefing Note and no justification has been given for this deviation.</p>

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			<p style="text-align: center;"><b>RHG Briefing Note Recommended Unit Sizes</b></p> <table border="1" style="margin-left: auto; margin-right: auto;"> <thead> <tr> <th></th> <th>1 bed</th> <th>2 bed</th> </tr> </thead> <tbody> <tr> <td>Sheltered</td> <td>55 m<sup>2</sup></td> <td>75 m<sup>2</sup></td> </tr> <tr> <td>Extra Care</td> <td>65 m<sup>2</sup></td> <td>80 m<sup>2</sup></td> </tr> </tbody> </table> <p>3.3 Sales Values</p> <p>3.3.1 There are no sheltered or extra care developments currently selling within Crawley Borough and as such it is not possible to use direct comparables.</p> <p>3.3.2 In Appendix IV – Market Research and Value Assumptions of the LPVS, reference is made to the RHG’s methodology for determining sales values when no direct comparable evidence available. In summary this advises that a 1-bed sheltered flat is 75% of the value of a second hand 3-bed semi-detached property; a 2-bed is 100% of the value and that there is an additional premium of 25% on Extra Care flats above those of sheltered properties.</p> <p>3.3.3 The result of the RHG methodology are found in Table 6- RHG Analysis – Checking of Retirement Figures of Appendix IV.</p> <p style="text-align: center;"><b>Sales Values using RHG Methodology</b></p> <table border="1" style="margin-left: auto; margin-right: auto;"> <thead> <tr> <th></th> <th>£per m<sup>2</sup></th> <th>Unit Price</th> </tr> </thead> <tbody> <tr> <td>1-Bed Sheltered</td> <td>£4,993</td> <td>£274,640</td> </tr> <tr> <td>2-Bed Sheltered</td> <td>£4,882</td> <td>£366,186</td> </tr> <tr> <td>1-Bed Extra Care</td> <td>£5,868</td> <td>£343,300</td> </tr> <tr> <td>2-Bed Extra Care</td> <td>£6,022</td> <td>£457,733</td> </tr> </tbody> </table> <p>3.3.4 DSP assert that the sales values derived from using the RHG methodology corroborates their view that older persons’ housing typologies represent higher value levels in the Borough. DSP advise that sales values for Extra Care and Sheltered Housing are the same as the overall upper range of values as used for the traditional market housing appraisals (£5,500 - £6,500/m<sup>2</sup>) and that even this could be considered conservative in their view.</p> <p>3.3.5 We would however assert that the sales values put forward by DSP are overstated as, particularly in the case of sheltered housing, they significantly exceed the sales values derive using the RHG methodology.</p> <p>3.3.6 McCarthy Stone schemes currently selling in Tunbridge Wells - an Extra Care development (referred to of the LVPS a Retirement Living Plus) at The Dairy, St. John’s Road and a sheltered housing scheme (referred to as Retirement Living) at Southborough Gate, Pinewood Gardens.</p> <p>3.3.7 The achieved sales values for the three closest selling schemes are detailed below:</p>		1 bed	2 bed	Sheltered	55 m <sup>2</sup>	75 m <sup>2</sup>	Extra Care	65 m <sup>2</sup>	80 m <sup>2</sup>		£per m <sup>2</sup>	Unit Price	1-Bed Sheltered	£4,993	£274,640	2-Bed Sheltered	£4,882	£366,186	1-Bed Extra Care	£5,868	£343,300	2-Bed Extra Care	£6,022	£457,733
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			<p>125dph with a 15% allowance for open space would result in a land area of 0.43 hectares. - - a 60 unit extra care scheme built at 125dph with a 15% allowance for open space would result in a land area of 0.85 hectares.</p> <p>3.8.2 While specialist older persons' accommodation is built at higher densities and 125dph is achieved on certain sites it is atypical of areas with a rural / suburban character and highly unlikely on a greenfield site - 80dph is considered more appropriate on greenfield land.</p> <p>3.8.3 This viability assessment is based on a 50 unit sheltered and extra care scheme which is considered a more typically sized development.</p> <table border="1"> <thead> <tr> <th>Site Type</th> <th>Benchmark Land Value</th> <th>Density</th> <th>Site Size* 50 units</th> <th>Site Cost</th> </tr> </thead> <tbody> <tr> <td>Greenfield (lower)</td> <td>£250,000 per hectare</td> <td>80dph</td> <td>0.71</td> <td>£177,500</td> </tr> <tr> <td>Greenfield (upper)</td> <td>£500,000 per hectare</td> <td>80dph</td> <td>0.71</td> <td>£355,000</td> </tr> <tr> <td>Industrial land (lower)</td> <td>£850,000 per hectare</td> <td>125 dph</td> <td>0.46</td> <td>£391,000</td> </tr> <tr> <td>Industrial land (upper)</td> <td>£1,500,000 per hectare</td> <td>125 dph</td> <td>0.46</td> <td>£690,000</td> </tr> <tr> <td>Commercial CBD</td> <td>£2,000,000 per hectare</td> <td>125 dph</td> <td>0.46</td> <td>£920,000</td> </tr> <tr> <td>Residential</td> <td>£2,500,000 per hectare</td> <td>125 dph</td> <td>0.46</td> <td>£1,150,000</td> </tr> </tbody> </table> <p>*Site size includes 15% land area adjustment allowance.</p> <p>3.9 Profit</p> <p>3.9.1 The Local Plan Viability Study allows for a 17.5% profit margin. This does not conform with the recommendations of the RHG Briefing note, but the Planning Inspectorate has also consistently concluded that an acceptable return for risk in respect of retirement living proposals is not less than 20% of gross development value. Examples include:</p> <ul style="list-style-type: none"> <li>• McCarthy and Stone proposal at Redditch (Appeal Ref: 3166677)</li> <li>• Churchill Retirement Living proposal at Cheam (Appeal Ref: 3159137)</li> <li>• Churchill Retirement Living scheme at West Bridgford (Appeal Ref: 3229412)</li> </ul> <p>3.10 Empty Property Costs</p> <p>3.10.1 Empty property costs are a function of council tax payable on finished unsold and empty property as well as the service charge which must be paid owing to longer than average sales periods for this type of proposal.</p> <p>3.10.2 The Crawley Borough Council website details how the Council has applied the Council Tax Empty Property Premium. This advises that properties that are unoccupied are not entitled to any discount. Full council tax is payable on all properties unless specific circumstances apply. It advises that the Council apply a premium on empty properties as follows:</p> <ul style="list-style-type: none"> <li>• 100 per cent premium for properties empty for between two to five years.</li> <li>• 200 per cent for properties empty between five to ten years.</li> </ul>	Site Type	Benchmark Land Value	Density	Site Size* 50 units	Site Cost	Greenfield (lower)	£250,000 per hectare	80dph	0.71	£177,500	Greenfield (upper)	£500,000 per hectare	80dph	0.71	£355,000	Industrial land (lower)	£850,000 per hectare	125 dph	0.46	£391,000	Industrial land (upper)	£1,500,000 per hectare	125 dph	0.46	£690,000	Commercial CBD	£2,000,000 per hectare	125 dph	0.46	£920,000	Residential	£2,500,000 per hectare	125 dph	0.46	£1,150,000
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			<p>3.11.2 There is a cost associated in the preparation of this supporting information. We note that the Crawley Local Plan Review: Whole Plan Policies &amp; Community Infrastructure Levy Viability Assessment (LPVA) allows 10% of build costs for Professional Fees &amp; Reporting; the mid-point in the generally accepted range of 8-12%. We would suggest that in light of the Council's requirements for planning applications, there should be a commensurate uplift to 12% for professional fees in the LPVA accordingly.</p> <p>3.12 Sales &amp; Marketing Costs</p> <p>3.12.1 Sales and marketing allowances for specialist housing proposals for older people are widely acknowledged to differ substantially from mainstream housing. This is due to the restricted occupancy and longer than average sales periods often extending over several years.</p> <p>3.12.2 Sales and marketing activities in respect of this type of proposal are considerably more intensive and long running than mainstream housing and necessitate a sustained campaign with permanent sales staff on site over the course of typically years rather than months for mainstream housing.</p> <p>3.12.3 The RHG Briefing Note advises that "Marketing costs are typically 6% of revenue compared with 3% of revenue for general needs houses and flats." This has been supported by a recent appeal decision in Redditch Appeal Ref: 3166677.</p> <p>3.13 CIL &amp; s106 costs</p> <p>3.13.1 Crawley Borough Council presently has an adopted CIL charging schedule with a Borough-wide residential rate of £122.88 (indexed-linked rate for 2021). Appendix I – Development Appraisal Assumptions of the LPVS advises that there is £1,000 per unit allowance for Section106 contributions.</p>



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			<p>upper and midpoint of the range of Benchmark Land Values in the LPVS (See Chapter 3.8 of this report). Each of the scenarios was also tested with and without CIL.</p> <table border="1"> <thead> <tr> <th colspan="5">Sheltered Typology</th> </tr> <tr> <th rowspan="2">BLV</th> <th colspan="2">RHG Sales Values</th> <th colspan="2">Adjusted East Grinstead Sales Values</th> </tr> <tr> <th>£0 CIL</th> <th>£122.88 CIL</th> <th>£0 CIL</th> <th>£122.88 CIL</th> </tr> </thead> <tbody> <tr> <td>Greenfield (Lower)- £177,000</td> <td>-£863,303</td> <td>-£1,386,154</td> <td>£37,607</td> <td>-£472,664</td> </tr> <tr> <td>Industrial (Lower) - £391,000</td> <td>-£1,085,207</td> <td>-£1,611,139</td> <td>-£178,390</td> <td>-£691,502</td> </tr> <tr> <td>Residential - £1,150,000</td> <td>-£1,890,559</td> <td>-£2,426,458</td> <td>-£963,686</td> <td>-£1,486,489</td> </tr> </tbody> </table> <table border="1"> <thead> <tr> <th colspan="5">Extra Care Typology</th> </tr> <tr> <th rowspan="2">BLV</th> <th colspan="2">RHG Sales Values</th> <th colspan="2">Adjusted East Grinstead Sales Values</th> </tr> <tr> <th>£0 CIL</th> <th>£122.88 CIL</th> <th>£0 CIL</th> <th>£122.88 CIL</th> </tr> </thead> <tbody> <tr> <td>Greenfield (Lower)- £177,000</td> <td>-£642,491</td> <td>-£1,271,057</td> <td>£470,893</td> <td>-£104,942</td> </tr> <tr> <td>Industrial (Lower) - £391,000</td> <td>-£746,440</td> <td>-£1,376,656</td> <td>£329,422</td> <td>-£284,745</td> </tr> <tr> <td>Residential - £1,150,000</td> <td>-£1,539,786</td> <td>-£2,180,570</td> <td>-£444,269</td> <td>-£1,069,374</td> </tr> </tbody> </table> <p>4.1.3 Both the Sheltered Housing and Extra Care typologies we tested using the sales values derived from the RHG method were unviable against all the BLV's without providing either Affordable Housing or CIL contributions.</p> <p>4.1.4 Based on the 'adjusted East Grinstead sales values', both sheltered and extra care typologies were unviable against all the BLVs with a CIL contribution. A surplus could however be achieved with a nil CIL rate on greenfield sites and on lower value industrial land, but this is not considered sufficient to deliver policy compliant levels of affordable housing contributions (40%).</p> <p>4.2 Commentary on LPVS Results</p> <p>4.2.1 McCarthy Stone and Churchill Retirement Living find the basis on which the affordable housing target is recommended across the Authority to be flawed. The results of the viability testing in Chapter 3: Findings Review, Context &amp; Discussion of the LPVS overstates the viability of the older persons' housing typologies.</p> <p>4.2.2 In respect of Sheltered Housing the Stage 1 LPVS advises that:</p> <p><i>3.7.22 For the sheltered/retirement housing typology, the results (Appendix IIIa table 3f) suggest that at tested VL10 (apartment sales at £6,000/sq. m i.e. approx. £557/sq. ft.) greenfield development could support 40% AH on the borough wide (BW) basis. Sales values in excess of this would be needed to support PDL site values, although we can see a residual land value equivalent to almost £2.25m/Ha, so exceeding all but the uppermost</i></p>		Sheltered Typology					BLV	RHG Sales Values		Adjusted East Grinstead Sales Values		£0 CIL	£122.88 CIL	£0 CIL	£122.88 CIL	Greenfield (Lower)- £177,000	-£863,303	-£1,386,154	£37,607	-£472,664	Industrial (Lower) - £391,000	-£1,085,207	-£1,611,139	-£178,390	-£691,502	Residential - £1,150,000	-£1,890,559	-£2,426,458	-£963,686	-£1,486,489	Extra Care Typology					BLV	RHG Sales Values		Adjusted East Grinstead Sales Values		£0 CIL	£122.88 CIL	£0 CIL	£122.88 CIL	Greenfield (Lower)- £177,000	-£642,491	-£1,271,057	£470,893	-£104,942	Industrial (Lower) - £391,000	-£746,440	-£1,376,656	£329,422	-£284,745	Residential - £1,150,000	-£1,539,786	-£2,180,570	-£444,269	-£1,069,374
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Viability Assessment			
Ref. No.	Respondent	Policy/ Para	Comments
			<p><i>BLV indication, is reached using VL11 test – sales at £6,500/sq. m (approx. £604/sq. ft.). Points in between these tests may also be viable.</i></p> <p><i>3.7.23 Overall it is considered that whilst outcomes will vary and negotiations may be involved, with any town centre (TC) developments set to attract a lower 25% AH requirement with adjusted tenure mix, the Council's proposed approach would in any event provide a suitable basis for any necessary decision making (application) stage discussions.</i></p> <p>The results in the LPVS advise that sheltered housing typologies can provide a 40% affordable housing contribution in greenfield location, however this is heavily predicated on achieving a sales value in excess of £6,000 per m<sup>2</sup>. Sales values of 6,500 per m<sup>2</sup> and above are required to deliver an affordable housing contribution on previously developed land. While we agree that specialist older persons' housing does achieve a premium on sales values, it is not to the extent recommended by DSP and the justification for sales values in excess of £6000 per m<sup>2</sup> in the LPVS is anecdotal.</p> <p>4.2.3 In respect of Extra Care accommodation the LPVS advises that:</p> <p><i>3.7.24 The typology results representative of extra care development (60 apartments – Table 3j) do not reach viability with 40% AH and the other assumptions used collectively. The nature of these results appears similar generally to those seen on appraisal of the care home typology reviewed within the scope of the commercial/non-residential tests as reviewed below (results at Appendix IIIc – Table 5k). The indications are that particular consideration may need to be given to such schemes, commencing with an understanding of their characteristics and looking at viability if relevant. From experience there may be a grey area in terms of where these sit between or combining care services and housing. There could be a range of scheme types and within these it may be that some schemes would not be required to provide affordable housing in any event, or might be developed or procured in a way that means they make more accessible provision – meeting a range of needs.</i></p> <p>4.2.4 The results in the LPVS clearly demonstrate that Extra Care accommodation cannot support an affordable housing contribution. The LPVS however advocates testing the viability of extra care developments on a case-by-case basis due to the variety in the level of care provision on site. There is however no reference to this in either the wording of Policy H5 or its justification. We are similarly of the view that the LPVS has overstated the viability of such schemes with an excessive premium on sales values and, most likely, a faster rate of sale.</p> <p><b>5. Conclusion</b></p> <p>5.1.1 The Crawley Borough Local Plan is one of an alarmingly limited number that have set a differential affordable housing rate.</p>

Viability Assessment			
Ref. No.	Respondent	Policy/ Para	Comments
			<p>5.1.2 The evidence we have provided in our viability appraisals for Sheltered Housing and Extra Care Housing typologies, concludes that these forms of development should be exempt from affordable housing provision across the Borough.</p> <p><i>*see further reps. under Policies DD1, DD3, DD4, GI3, ST2, H3, H5, SDC1*</i></p> <p><b>Suggested Modification:</b></p> <p>5.1.3 As a suggestion we would recommend a supplemental sub-clause to Policy H5 which read as follows:</p> <p><i>i. Specialist older persons' housing including sheltered and extra care accommodation will not be required to provide an affordable housing contribution.</i></p>

# Crawley

Local Plan

## Wellbeing & Communities

Regulation 19 January 2021 Representations

Local Plan Chapters 4 – 8

Chapter 4. Character, Landscape and Development Form			
Ref. No.	Respondent	Policy/ Para	Comments
REP/023	Savills on behalf of St Catherine's Hospice	CL1	<p><b>Section 4: Character, Landscape and Development Form Strategic Policy CL1: Neighbourhood Principle</b></p> <p>3.11. St Catherine's supports the retention of the neighbourhood principle in Crawley. This spatial strategy is rooted in the origins of Crawley in the late 1940s and is one of the distinguishing characteristics of the Town.</p> <p>3.12. Notably, Strategic Policy CL1 makes provision for mixed-use and high density development where it outlines that: <i>"Mixed use and higher density development may be compatible with the existing structure of the neighbourhood, particularly if it is situated in sustainable locations such as their neighbourhood centres."</i></p> <p>3.13. Though supported in principle, we consider that CBC have missed an opportunity here to promote higher density development adjacent to key transport corridors in Crawley as well as neighbourhood centres. Representations to the Crawley Local Plan Review Regulation 19 Consultation St Catherine's Hospice February 2020 7</p> <p>3.14. Paragraph 123 of the NPPF emphasises the scope for higher density development to make efficient use of sites, particularly within Authorities where there is an existing or anticipated shortage of land for meeting housing needs.</p> <p><b>Suggested Modifications:</b></p> <p>3.15. To ensure that Strategic Policy CL1 is consistent with National Policy, and therefore found sound, it should be amended to promote higher density development by transport corridors.</p> <p><b>Recommended Changes</b>  <i>"[particularly if it situated in sustainable locations, such as] <del>neighbourhood centres or adjacent to transport corridors.</del>"</i>  <i>assuming new compact development is appropriate and meets the required safeguards set out in policy CL2,3 and 4.</i></p>
REP/035 (Jun 21)	Vail Williams on behalf of Ardmere/Windsor Land Consortium	CL2	<p><b>Masterplan Design principles:</b></p> <p>Whilst this has been covered in our previous reps and is now supported by our Promotion Statement, central to the ethos of the Masterplan is the recognition of <b>Policy CL2: Principles of Good Urban Design</b> and the inclusion of criteria a) which adds the need for development proposals to consider the movement corridors, distant views, landmarks and views into and out of adjoining areas.</p> <p>This is considered to have been important given the existing planning consent for the building on Jersey Farm approved at committee January 2020, and how it transitions from the urban area of Manor Royal to the countryside and rural fringe. This has been central to the development of the Masterplan with the scale and form reflecting the sensitivities to the west and the potential changing form of land to the North should the additional DCO runway be developed.</p> <p><b>Suggested Modifications:</b></p>

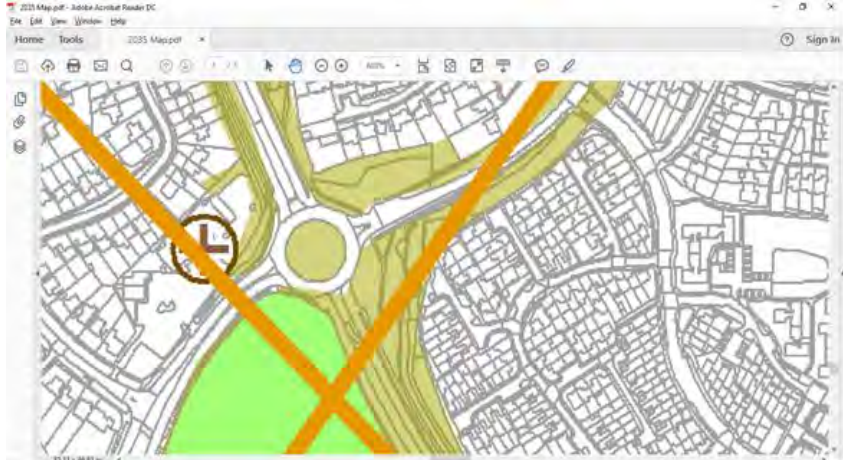
Chapter 4. Character, Landscape and Development Form			
Ref. No.	Respondent	Policy/ Para	Comments
REP/ 123	Barton Willmore on behalf of The Sogno Family Trust	CL2, CL3, CL4	<p><b>Housing requirement and accommodating need within Crawley Borough</b></p> <p>2.16 Draft Policy H1 states that of the 12,000 homes identified from the standard method (assuming no uplift from Gatwick or an extended plan period), 5,320 homes can be met within the Borough, and therefore 6,680 homes will need to be met elsewhere.</p> <p>2.17 As set out in para 123 of the NPPF:  <i>“where there is an existing or anticipated shortage of land for meeting identified housing needs, it is especially important that planning policies avoid homes being built at low densities, and ensure that developments make optimal use of the potential of each site. in these circumstances:</i>  <i>a) plans should contain policies to <b>optimise the use of land in their area and meet as much of the identified need for housing as possible</b>. This will be tested robustly at examination, and should <b>include the use of minimum density standards</b> for city and town centres and other locations that are well served by public transport. These standards should seek a significant uplift density of residential development within these areas, unless it can be shown that here are strong reasons why this would be inappropriate;</i>  <i>b) the use of minimum density standards should also be considered for other parts of the plan area . It may be appropriate to set out a range of densities that reflect the accessibility and potential of different areas, rather than one broad density range;...</i></p> <p>2.18 It is understood that the Borough is significantly constrained by the tight administrative boundary, the presence of Gatwick in the north of the Borough and its respective standoff, and other ecological, historical and environmental constraints.</p> <p>2.19 Given the extent of constraint to delivering homes within the borough’s administrative boundary, it is imperative that the Local Plan policies support the optimisation of housing on all development sites</p> <p>2.20 In this respect, we are supportive of policies CL2, CL3 and CL4 which set a minimum density for development and promote efficient use of land and optimisation of sites (consistent with paragraph 123 of the NPPF).</p> <p><b>Suggested Modifications:</b></p>
REP/ 066	Mid Sussex District Council	CL3	<p>This policy was part of CL4 in the 2020 version, previous comments are still relevant.</p> <p><b>Suggested Modifications:</b></p>
REP/ 023	Savills on behalf of St Catherine’s Hospice	CL4	<p><b>Strategic Policy CL4: Effective Use of Land – Sustainability, Movement and Layout</b></p> <p>3.16. St Catherine’s supports the Council’s promotion of sustainable modes of transport in Strategic Policy CL4, including the promotion of sustainable development with compact layout and scale.</p> <p>3.17. However, it is considered that the 5-8 minute walking distance set out point 8 is too reductionist and does not reflect prevalent research in active transport or account for future trends in sustainable travel. Notably, in their report ‘Planning</p>

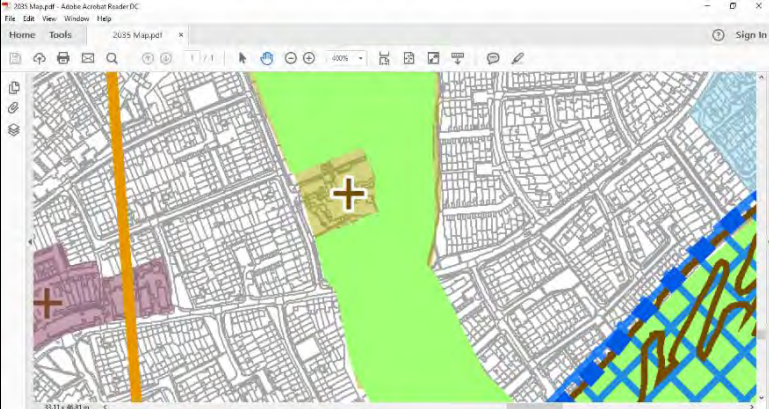
Chapter 4. Character, Landscape and Development Form			
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			<p>for Walking (Planning for Walking, CHIT 2016, <a href="https://www.ciht.org.uk/media/4465/planning_for_walking_-_long_-_april_2015.pdf">https://www.ciht.org.uk/media/4465/planning_for_walking_-_long_-_april_2015.pdf</a> ), the Chartered Institution for Highways and Transportation (CHIT) identified that:            “For bus stops in residential areas, 400 metres has traditionally been regarded as a cut-off point and in town centres, 200 metres (DOENI, 2000). People will walk up to 800 metres to get to a railway station, which reflects the greater perceived quality or importance of rail services.”</p> <p>3.18. St Catherine’s Hospice is located 800m from Crawley Train Station, a circa. 10 minute walk. In accordance with the report above, this is considered an appropriate distance to encourage residents to walk to the Station.</p> <p>3.19. The draft Local Plan does not outline the Council’s rationale for incorporating a 5-8 minute walking distance cut off and it is unclear as to why CBC have quoted this in their policy. As such, St Catherine’s request that Strategic Policy CL4 is modified to reflect research on walking distances, providing flexibility to bring forward schemes that would otherwise be considered less sustainable.</p> <p><b>Suggested Modifications:</b>  <b>Recommended Changes</b>  <del>“Be planned and located adjacent to stations, stops or interchanges along existing segregated, high capacity, high frequent public transport corridors and their stops/interchanges. i.”</del> Development sites within the walking distances outlined in policy CL3”.  <del>A contribution may be required to fund or part fund the expansion of the same (see Policy ST1 and the Planning Obligations Annex); and]</del></p>
REP/ 023	Savills on behalf of St Catherine’s Hospice	CL4	<p><b>Strategic Policy CL4: Compact Development: Layout, Scale and Appearance</b>            St Catherine’s supports the proposed changes to the policy wording of Section 4, and commend the Council’s commitment to the principles of Compact Development, including the introduction of minimum density standards to targeted areas in Crawley.</p> <p>Policy CL4 stipulates a minimum density range of 60-200 dwellings per hectare in areas of the town with good access to public transport and local facilities. As noted in the previous representation, St Catherine’s Hospice is seeking to erect circa. 60-70 dwellings at a density of 96 dwelling per hectare (dph) at Malthouse Road, which accords with the emerging policy and demonstrates the capacity for the site to positively contribute towards housing supply in the Borough.</p> <p><b>Suggested Modifications:</b>            The requirements of Policy CL4 should, however, be more fully reflected in Policy H2, which should be positively re-worded to deliver a <del>‘minimum of 60 dwellings’</del>. Moderate density range of development, as outlined in policy CL4.</p>
REP/ 066		CL4	This policy was part of CL5 in the 2020 version and further comments are provided to reflect changes made to the original policy.

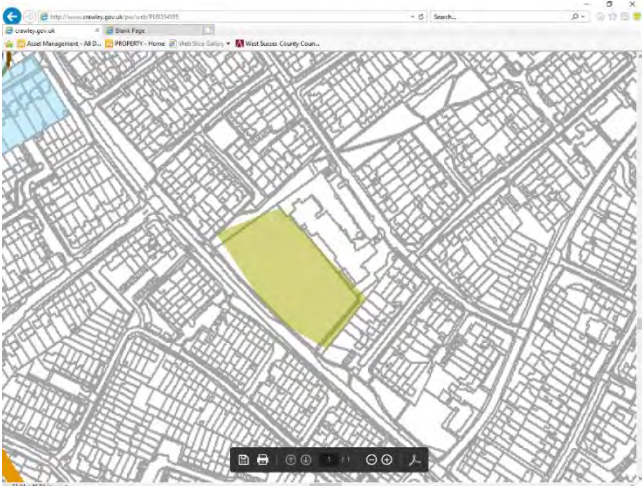
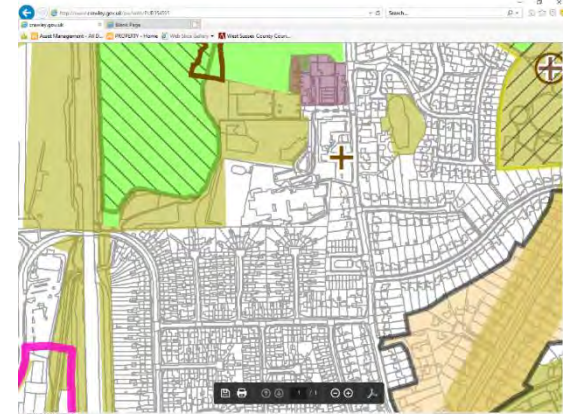


Chapter 4. Character, Landscape and Development Form			
Ref. No.	Respondent	Policy/ Para	Comments
	Mid Sussex District Council		<p>Mid Sussex <b>supports this policy in principle</b> as it seeks to make more efficient use of land. However, the Council consider that the policy could be <b>more effective</b>.</p> <p>Mid Sussex welcomes the changes made to the policy and it is noted that density will no longer be informed by Area Character Assessments. The requirement of a least 45 dwellings per hectare for all residential developments is supported. However, the policy should be strengthened to ensure that development below 45 dph would only be supported in exceptional circumstances, where justified by appropriate evidence.</p> <p><b>Suggested Modifications:</b>  <b>Changes required:</b> Additional wording to the policy to make it explicit that residential development below 45 dph will only be permitted in exceptional circumstances and where justified by appropriate evidence.</p>
REP/106	Crawley Town Centre Bid Board	CL4	<p>The CTCBID CP supports Policy H3c and H3d particularly as the more efficient use of town centre sites will aid sustainability and the aims of policy CL4 to drive up residential densities.</p> <p><b>Suggested Modifications:</b></p>
REP/116	Neame Sutton Limited on behalf of Danescroft (RLP Crawley) LLP	CL4	<p><b>Policy CL4 – OBJECT: Unsound</b></p> <p><i>*see further reps. under Policies H2, Paragraphs 12.47-12.50, Policy EP4, Noise Annex, SA*</i></p> <p><b>Suggested Modifications:</b></p>
REP/023	Savills on behalf of St Catherine's Hospice	CL5	<p>Strategic Policy CL5: Form of New Development: Layout, Scale and Appearance</p> <p>3.20. St Catherine's supports the Council's proposals to introduce minimum density standards to targeted areas in Crawley.</p> <p>3.21. The NPPF clearly supports the use of minimum densities at paragraph 123 where it outlines that:  "Where there is an existing or anticipated shortage of land for meeting identified housing needs, it is especially important that planning policies and decisions avoid homes being built at low densities, and ensure that developments make optimal use of the potential of each site. In these circumstances:  a) plans should contain policies to optimise the use of land in their area and meet as much of the identified need for housing as possible. This will be tested robustly at examination, and should include the use of minimum density standards for city and town centres and other locations that are well served by public transport. These standards should seek a significant uplift in the average density of residential development within these areas, unless it can be shown that there are strong reasons why this would be inappropriate;</p>

Chapter 4. Character, Landscape and Development Form			
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			<p>b) the use of minimum density standards should also be considered for other parts of the plan area. It may be appropriate to set out a range of densities that reflect the accessibility and potential of different areas, rather than one broad density range...”</p> <p>3.22. St Catherine’s Hospice is seeking to erect circa. 60-70 dwellings at a density of 96 dwelling per hectare (dph) at Malthouse Road, as demonstrated in the appended illustrative masterplan (Appendix 2.0 and 3.0). Notably draft Strategic Policy CL5 requires a minimum density of 45-70 dwellings per hectare for all major developments (under 80 units) within the Built-Up Area Boundary. The illustrative proposals therefore accord with this draft policy.</p> <p><b>Suggested Modifications:</b></p>
REP/033	Horsham District Council	CL5	<p>Re: Draft Crawley Borough Local Plan 2021-2037 (January 2021) – Submission Publication Consultation</p> <p>Thank you for consulting Horsham District Council on the Draft Crawley Borough Local Plan 2021-2037. We are grateful for the opportunity to be able to further comment on your emerging plan, having made a number of comments at the previous Regulation 19 stage in early 2020. Overall, we consider that the plan has positively sought to balance the provision of those future needs with other wider objectives in a manner that contributes to achieving sustainable development.</p> <p>I would also take the opportunity to reaffirm Horsham District Council’s commitment to continued close co-operation and joint working between our councils, reflecting our joint housing market area and common functional economic market area.</p> <p>We have a number of further comments on the draft Crawley Borough Local Plan, which follow and build on comments made in our letter dated 02 March 2020 responding to the earlier Regulation 19 consultation.</p> <p><u>Strategic Policy CL5: Form of New Development – Layout, Scale and Appearance</u></p> <p><b>We support this policy in principle, but consider it is not justified as stands.</b></p> <p>We welcome that the policy sets out minimum densities that are higher than previously used. This is an important means of ensuring no stone is unturned in seeking to maximise meeting identified housing needs in Crawley. We note that a Densification Study is being prepared, to explain why particular densities will be appropriate and where, albeit the work is incomplete. The availability of a complete Densification Study is likely to be critical in addressing the concerns of HDC as set out in our further responses below.</p> <p><b>Suggested Modifications:</b></p> <p><b>Change sought:</b> It is considered necessary to complete the Densification Study to justify the policy. This should include spatial illustrations analysis of what is appropriate for, or transparently present the evidence already gathered to evidence this.</p>
		CL6	<p>The land at Cheals Roundabout is held for strategic infrastructure purposes, and to ensure that the road remains safe and can be well maintained. This representation was raised in our earlier response of 22 August 2019 in response to the Local</p>

Chapter 4. Character, Landscape and Development Form			
Ref. No.	Respondent	Policy/ Para	Comments
REP/006	WSCC Property and Assets		<p>Plan Review, and we would request reassurance that our objection has been considered and is reflected in this latest version in order to demonstrate that the plan is Positively Prepared.</p> <p>A copy of the Local Plan Map with areas affected is attached below.</p>  <p>As a consequence we would request:</p> <ul style="list-style-type: none"> <li>• Removal of the designations of 'Structural landscaping' to the areas to the north and east of the roundabout shaded olive green.</li> </ul>
			<p><b>Suggested Modifications:</b></p> <p>In order to demonstrate that the Plan is positively prepared and is informed by agreement with WSCC we would request:</p> <ul style="list-style-type: none"> <li>• Removal of the designations of 'Structural landscaping' to the areas to the north and east of the roundabout shaded olive green.</li> </ul>

Chapter 4. Character, Landscape and Development Form			
Ref. No.	Respondent	Policy/ Para	Comments
REP/006	WSCC Property and Assets	CL6	<p><b>The Oaks Primary School</b> is proposed to be designated as a 'Biodiversity Opportunity Area' (bright green) and an area of 'Structural landscaping' (olive green). An extract of the Local Plan Map with areas affected is attached below. These designations may serve to compromise or constrain (see para 3.4) the statutory obligation placed upon the Council to meet any future need to create additional spaces at the school, particularly in view of the proposed new housing allocations in Tilgate.</p>  <p>We therefore wish to object to the proposed designations for the reasons set out above and in order to demonstrate that the Plan is positively prepared and is informed by agreement with WSCC, namely that the areas are already protected due to their status, and that there may be a future requirement to increase the capacity of the schools to accommodate additional children.</p> <p><b>Suggested Modifications:</b> To remove the school fields and buildings at The Oaks Primary School from the list of proposed designated areas of 'Biodiversity Opportunity Area' (bright green) and an area of 'Structural landscaping' (olive green) within the proposed Local Plan in order to demonstrate that the Plan is positively prepared and is informed by agreement with WSCC.</p>

Chapter 4. Character, Landscape and Development Form			
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REP/006	WSCC Property and Assets	CL6	 <p><b>Our Lady Queen of Heaven School</b> is proposed to be designated as an area of ‘Structural landscaping’. An extract of the Local Plan Map with areas affected is attached below. This designation may serve to compromise or constrain (see para 3.4) the statutory obligation placed upon the Council to meet any future need to create additional spaces at the school.</p> <p>We therefore wish to object to the proposed designations for the reasons set out above, and in order to demonstrate that the Plan is positively prepared and is informed by agreement with WSCC namely that the areas are already protected due to their status, and that there may be a future requirement to increase the capacity of the schools to accommodate additional children.</p> <p><b>Suggested Modifications:</b> To remove the school fields at Our Lady Queen of Heaven School from the list of proposed designated areas of Structural landscaping within the proposed Local Plan in order to demonstrate that the Plan is positively prepared and is informed by agreement with WSCC.</p>
REP/006	WSCC Property and Assets	CL6	 <p>Areas in <b>Milton Mount Primary School</b> are proposed to be designated as areas of ‘Structural landscaping’. An extract of the Local Plan Map with areas affected is attached below. This designation may serve to compromise or constrain (see para 3.4) the statutory obligation placed upon the Council to meet any future need to create additional spaces at the school.</p> <p>We therefore wish to object to the proposed designations for the reasons set out above, and in order to demonstrate that the Plan is positively prepared and is informed by agreement with WSCC namely that the areas are already protected due to their status, and that there may be a future requirement to increase the capacity of the schools to accommodate additional children.</p> <p><b>Suggested Modifications:</b></p>

Chapter 4. Character, Landscape and Development Form			
Ref. No.	Respondent	Policy/ Para	Comments
			To remove the school fields at Milton Mount Primary School from the list of proposed designated areas of Structural landscaping within the proposed Local Plan in order to demonstrate that the Plan is positively prepared and is informed by agreement with WSCC.
REP/006	WSCC Property and Assets	CL6	<p>Areas within <b>Oriel High School</b> are proposed to be designated as areas of 'Structural landscaping'. An extract of the Local Plan Map with areas affected is attached below. This designation may serve to compromise or constrain (see para 3.4) the statutory obligation placed upon the Council to meet any future need to create additional spaces at the school.</p> <p>We therefore wish to object to the proposed designations for the reasons set out above, and in order to demonstrate that the Plan is positively prepared and is informed by agreement with WSCC namely that the areas are already protected due to their status, and that there may be a future requirement to increase the capacity of the schools to accommodate additional children.</p> <p><b>Suggested Modifications:</b> To remove the school fields at Oriel High School from the list of proposed designated areas of Structural landscaping within the proposed Local Plan in order to demonstrate that the Plan is positively prepared and is informed by agreement with WSCC.</p>
REP/068	Sussex Wildlife Trust	CL6	<p><b>Strategic Policy CL6: Structural Landscaping</b> We note our comments relating to first regulation 19 stated that: <i>Strategic Policy CL6: Structural Landscaping This policy was previously within section 5 under policy LC1. We note that our proposed amendments have been incorporated and now sit within section 4.70.</i></p> <p>SWT notes this amendment still stands, but now sit with paragraph 4.56</p> <p><b>Suggested Modifications:</b></p>
REP/123	Barton Willmore on behalf of The Sogno Family Trust	CL6	<p><b>Policy CL6: Structural Landscaping</b> 4.2 Whilst not a matter of soundness, for clarity it is recommended that the Policy Map is updated to include the Structural Landscaping referenced within Policy CL6 within the key.</p> <p><b>Suggested Modifications:</b></p>

<b>Chapter 4. Character, Landscape and Development Form</b>			
<b>Ref. No.</b>	<b>Respondent</b>	<b>Policy/ Para</b>	<b>Comments</b>
Rep/ 055	Savills on behalf of Wilky Group	CL7	<p>1.0 Introduction</p> <p>1.1 This representation is submitted on behalf of The Wilky Group (TWG), which has a longstanding interest in the promotion of strategic employment land within the Crawley Borough Council (CBC) area. This representation relates to Policy CL7 Important and Valued Views in the draft Crawley Borough Local Plan, 2021 (DCBLP).</p> <p>1.2 TWG owns about 48 ha (119 acres) of land east of Gatwick Airport. The land has been promoted by TWG as a strategic employment opportunity known as Gatwick Green (the Site). The Site is proposed for allocation as a Strategic Employment Location (SEL) of 47 ha (116 acres) in the DCBLP under Strategic Policy EC4 as a comprehensive industrial-led development of predominantly storage and distribution uses under use class B8.</p> <p>1.3 This representation notes that Policy CL7 is broadly in accordance with the advice in the National Planning Policy Framework (NPPF, 2019) and the Planning Practice Guidance (PPG). It also confirms that Gatwick Green can be masterplanned and designed so as to be in accordance with the key objectives contained in Policy CL7.</p> <p><b>2.0 Policy CL7 – intent of policy and compliance</b></p> <p><b>Intention of the policy</b></p> <p>2.1 The purpose of Policy CL7 is to protect and/or enhance important views across the Borough. The change in levels from the High Weald to the Low Weald allow views across the area, contributing to its character.</p> <p>2.2 Policy CL7 has three sections identifying Linear Contained Views, Long Distance Views and Valued Views. It also sets out that Area Character Assessments will further identify valued localised views and that the visual impact of proposals affecting Important and Valued Views must be clearly and accurately demonstrated.</p> <p><b>National planning policy and guidance</b></p> <p>2.3 The policy is considered to be in accordance with the policy and guidance contained in the National Planning Policy Framework (NPPF) and Planning Practice Guidance (PPG). The NPPF sets out the objectives of the planning system with regard to achieving well designed places (paras 127 and 130), and specifically with regard to the need for development to be sympathetic to the landscape setting of a site (para 127(c)). Policy CL7 embodies these national planning policy objectives, tailored to the local circumstances pertaining to the High Weald and the Low Weald and locally defined long distance and linear contained views on the Local Plan Map.</p> <p>2.4 The NPPF policy is supplemented by more detailed guidance in Planning Practice Guidance (PPG) on planning for well-designed places. PPG sets out more detailed guidance on processes and tools that can be used through the planning system and how to engage local communities effectively. In relation to landscape considerations, it states that these are key matters for masterplans, design-codes and parameter plans so as to achieve well-designed places.</p> <p>2.5 It is considered that Policy CL7 provides appropriate and proportionate protection for important and valued views in the Borough, consistent with national planning policy and guidance. Policy CL7 has been constituted to ensure that these matters are addressed in the planning process – in relation to Gatwick Green, this will include the preparation of the</p>

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			<p>masterplan, and an outline planning application with a supporting landscape and visual assessment in accordance with the requirements in Strategic Policy EC4.</p> <p><b>Suggested Modifications:</b></p> <p><b>3.0 Implications for Gatwick Green</b></p> <p>3.1 A Long Distance View Splay crosses the north western half of the Gatwick Green allocation. The overall masterplanning of the Site under Strategic Policy EC4 will have regard to this view splay and any other landscape / visual considerations that arise from more detailed work. There will be a range of landscape and visual considerations taken into account in the design and operation of the proposals for the Site. These will include:</p> <ul style="list-style-type: none"> <li>• A layout and design that respects the interface between the surrounding residences and countryside areas within the North East Crawley Rural Fringe landscape character area.</li> <li>• The inclusion of landscape buffers and public open space to address separation of Gatwick Green from Gatwick Airport, Horley and the wider countryside.</li> <li>• The integration of trees, hedgerows and biodiversity into the layout and design and enhance blue/green infrastructure in the context of the Gatwick Woods Biodiversity Opportunity Area.</li> <li>• Minimising the impacts of lighting on neighbouring residences.</li> </ul> <p>3.2 The Appendices to TWG's representation on Policy EC1 of the DCBLP (2020) (2020 Appendices) form part of the Council's evidence base (Consultation appendix 4b: Wilky Group appendices combined). The environmental considerations relating to landscape / visual matters are addressed in the 2020 Appendices and subject to Addenda contained at Appendices 3 – 7 of TWG's representation on Strategic Policy EC4. These Addenda confirm that the original recommendations remain valid in the context of the proposed allocation of Gatwick Green under Strategic Policies EC1 and EC4 and any other changes in circumstances.</p> <p>3.3 More especially, the Addendum to the Landscape Character and Visual Appraisal confirms that the Site can be developed whilst respecting the various landscape and visual values in and around it, and includes recommendations on appropriate avoidance and mitigation measures. These matters will be addressed at the planning application stage and set out in a Design and Access Statement.</p> <p><b>4.0 Conclusions</b></p> <p>4.1 TWG acknowledges the need for the Gatwick Green proposals to address the landscape and visual amenity considerations relating to the Site and referenced in Policy CL7. All feasibility investigations to date indicate that the 24.1ha minimum requirement can be delivered in accordance with these requirements. The masterplan proposals for the Site required under Strategic Policy EC4 will have regard to these considerations in achieving a sustainable and well-designed scheme for the Site.</p> <p>4.2 It is considered that Policy CL7 provides appropriate and proportionate requirements for addressing landscape and visual matters, consistent with national policy. Development at Gatwick Green as allocated in Strategic Policy EC4 will be</p>



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			designed to incorporate landscaping to provide visual buffers, enhance amenity and ensure the proposals can be accommodated in the wider landscape.
REP/132	Quod on behalf of Aberdeen Standard Investments	CL7	<p><b>1 Introduction and Background</b></p> <p>1.1 These representations are made by Quod on behalf of our client Aberdeen Standard Investments (“ASI”) who are the freeholders of the County Mall Shopping Centre (“the Mall”). The Mall is a key destination within Crawley Town Centre and makes a significant contribution to Crawley’s role as a sub-regional centre for retail and leisure purposes. Like many town centres across the country, there is a need for the role of Crawley town centre to adapt in response to structural changes in the retail sector. A key focus of Government is to enable town centres to diversify their offer to help ensure their vitality and viability over the longer-term. Against this context, ASI are currently considering the future role of the Mall.</p> <p>1.2 It is therefore important that Local Plan policies embrace the flexibility that is necessary to ensure that town centre environments can respond to changing market requirements and ensure the long term vitality and viability of Crawley Town Centre. The challenges facing town centres as a result of changes in the retail sector have also been exacerbated by the economic impacts arising from the Covid-19 pandemic. The NPPF is clear that adaption and flexibility is required within town centres if these challenges are to be overcome, and Crawley is no exception.</p> <p>1.3 Our client’s representations to the Draft Local Plan are made within this context as set out below.</p> <p><b>Section 4 – Character, Landscape &amp; Development Form</b></p> <p>2.18 Section 4 is concerned with character, landscape &amp; development form within the borough and draft Policy CL7 deals specifically with important and valued views.</p> <p>2.19 The policy notes that ‘Important Views’ identified on the Local Plan Map should be “protected and/or enhanced and development proposals should not result in a direct adverse impact or lead to the erosion of these views”.</p> <p>2.20 The views includes ‘Linear Contained Views’ where it is noted that “all new buildings, structures, signs and advertisements, parked vehicles and hard surfaced areas must be well-screened by trees and other soft landscaping”. In addition, the policy states that development proposals at the end of the view corridor must demonstrate that the view would be “protected and/or enhanced”.</p> <p><b>Suggested Modifications:</b></p> <p>2.21 The Local Plan Map identifies a Linear Contained View running across the Mall from the south west to the north east. Whilst it is recognised that the protection of important views is a key principle, it is considered that the policy wording is too restrictive as currently drafted. Given the nature of the Mall, which is an existing large shopping centre building, it may not always be practical, or indeed possible, to screen new structures or signs etc. with trees and landscaping. As such, we would request that the policy wording is amended to include reference to screening by trees and other soft landscaping being incorporated ‘where possible having regard to site specific circumstances’.</p>

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REP/035 (Mar 21)	Vail Williams on behalf of Ardmore Land Consortium	CL8	<p>Policy CL8 relates to Development Outside the Built Up Area boundary (BUAB) and paragraph 4.62 states that the Crawley Borough Council Landscape Character Assessment has been used to set the criteria based policy that requires proposals to respect the character and role of the different landscape areas.</p> <p>(Please note we believe that the Proposals Map states that built up area boundaries policy CL8 and EC13 are relevant in this area in regard to small scale economic development, however the text in 4.62 current states this relates to policy EC12 (which now on neighbourhood centres).</p> <p>As per our previous representations, our wider 24 ha masterplan site is identified in the Upper Mole Farmlands Rural Fringe as identified on the Proposals Map.</p> <p>Policy CL8 states that proposals should mitigate visual and noise intrusion and that this area outside the BUAB has an important role in maintaining the separation of Gatwick Airport from Crawley, as well as providing valuable recreation links from the northern neighbourhoods of Crawley into the countryside.</p> <p>Whilst we appreciate that the Landscape Character Assessment and Policy CL8 provide a criteria based policy for which development and proposals must be individually assessed, we believe that our potential Masterplan development could meet those criteria, utilising existing land forms to the south and east as context, grouping buildings together and reflecting a development that can successfully transition from Manor Royal to the countryside.</p> <p>Our illustrative Masterplan could also enhance access into the currently private land, increasing valuable recreational links both for Manor Royal and Langley Green, and specifically the provision and network of walks from Cherry Lane.</p> <p>We therefore believe that our proposals, especially when considered against the identification of the proposed corridor of search of the CWRR in Policy ST4, could realign the boundary of the BUAB to encompass the new road and facilitate a new successful extension to Manor Royal that achieves economic development in a sustainable location, which respects its setting and context.</p> <p>As you are aware, we already have consent for building 1 as shown on the attached masterplan. This was granted consent in 2020 and the relevant conditions have been discharged in 2020 in order to facilitate implementation.</p> <p>We also note that para 4.64 aims to ensure that the rural fringe does not become more suburban in nature and that the presumption in favour of sustainable development will be the over-arching principle. However, we believe that an urban extension into the current countryside, by extending the built up area boundary beyond the boundary for our approved site, or future up to the proposed CWRR, could allow commercial development to be properly planned, to ensure that the contribution of the rural landscape and setting for Crawley is enhanced and not lost in regard to visual, spatial, and environmental aspects as part of the landscape setting and strategy for our masterplan.</p>

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			<p>We believe that your inclusion of the search corridor already indicates change in use for this area of land in regard to travel patterns and form, and whilst a precise boundary is not yet identified, this should form part of the new BUAB to facilitate much needed development.</p> <p>We appreciate that in the Plan's current form, any formal planning submission would need to demonstrate a Landscape Visual Impact Assessment as well as consideration for how the development is consistent with emerging policy CL8 criteria.</p> <p>In regard to the specific BUAB line, previous versions of the Local Plan have supported small scale extensions to Manor Royal and in particular the 2015 Adopted Local Plan and the Employment Land Trajectory identified that our application under CR/2015/ 0435/FUL (and then amended under CR/2019/0696/FUL) for a new B8 warehouse building at Jersey Farm, was included as part of the economic land supply. However, the boundary identified on the Reg 19 January 2021 draft Local Plan map still does not reflect our 2019 consent and therefore we would request that the boundary is at least realigned to be consistent with the planning application and alters the Built Up Area Boundary accordingly.</p> <p>Whilst we appreciate that the January 2021 version of the Local Plan Review has retained Gatwick safeguarding, we believe it's important that should safeguarding be lifted at any point or the boundaries be amended by GAL or any Local Plan Inspector or central government, that our comments on the potential for a masterplan in this countryside area are provided as part of our representation.</p> <p>The next section considers our response to the retention of safeguarding in this January 2021 version, especially given that this was removed in the previous Regulation 19 version.</p> <p><b>Suggested Modifications:</b></p>
REP/035 (Jun 21)	Vail Williams on behalf of Ardmore/ Windsor Land Consortium	CL8	<p>In regard to our overarching Masterplan, we appreciate that the Landscape Character Assessment and Policy CL8 provide context for development currently outside the Built Up Area Boundary (BUAB), and we believe we can adequately demonstrate that our potential Masterplan development could meet those criteria. It can do so by utilising existing landforms to the south and east as context, grouping buildings together and therefore reflects a development that can successfully transition from Manor Royal to the countryside, retaining a 50% site coverable to reflect its unique location.</p> <p>To assist, our previous rep also identified that our illustrative Masterplan could also enhance access into the currently private land, increasing valuable recreational links both for Manor Royal and Langley Green neighbourhood, and specifically the provision and network of walks from Cherry Lane &amp; Manor Royal.</p> <p>We therefore believe that our proposals, especially when considered against the identification of the proposed 'Corridor of Search' of the CWRR in Policy ST4, could realign the boundary of the BUAB to encompass the new road and facilitate a new successful extension to Manor Royal that achieves economic development in the most sustainable location, which respects its setting and context.</p>

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			<p>As you are aware, we already have consent for Building A as shown on the attached Masterplan. This was approved in 2020 and the relevant conditions have been discharged in May 2020 in order to facilitate implementation (June 2020). We therefore repeat our comment that the BUAB should reflect this an amendment to the Proposals Map.</p> <p>We also note that para 4.64 of the Jan 2020 Reg. 19 plan aims to ensure that the rural fringe does not become more suburban in nature and that the presumption in favour of sustainable development will be the over-arching principle. However, we believe that an urban extension into the countryside, by extending the BUAB to include the boundary for our approved site, and beyond the proposed CWRR/link road, could allow commercial development to be properly planned. This will ensure that the contribution of the development and its juxtaposition to the rural landscape and setting for Crawley is enhanced and not lost in regard to visual, spatial, and environmental aspects as part of the landscape setting and strategy for our Masterplan.</p> <p>We believe that our site is a highly logical and sustainable extension of the urban area, particularly compared to the site currently identified to be allocated at Gatwick Green and therefore our proposals more clearly align with Policies CL3 and CL8 of the emerging local plan on development outside the BUAB, impact on Countryside and Movement Patters, Layout and Sustainable Urban Design.</p> <p><b>Suggested Modifications:</b> As you are aware, we already have consent for Building A as shown on the attached Masterplan. This was approved in 2020 and the relevant conditions have been discharged in May 2020 in order to facilitate implementation (June 2020). We therefore repeat our comment that the BUAB should reflect this an amendment to the Proposals Map.</p>
REP/041	IVCAAC	CL8	<p>IVCAAC is pleased that West of Ifield Rural fringe has been identified as a particularly sensitive area and the need to protect the positive relationship between the urban fringe and wider countryside. Although nature conservation is mentioned in the description, the fact that Ifield Brook meadows have SNCI status is not.</p> <p>We note that the Upper Mole Farmlands Rural Fringe, is acknowledged as a buffer between Gatwick and the town, is much used for recreational purposes and has biodiversity opportunities. However, a western link road is being sought through it.</p> <p><b>Suggested Modifications:</b></p>
REP/066	Mid Sussex District Council	CL8	<p>Response from January 2020 continues to apply.</p> <p><b>Suggested Modifications:</b></p>
REP/091	Brunel Planning on behalf of COIF Nominees	CL8	<p>4.12 COIF Nominees Limited strongly objects to the site's partial location within the defined 'Built Up Area' on the Draft Proposals Map 2021.</p> <p><b>Suggested Modifications:</b> The site in its entirety clearly forms part of the built up area and not countryside. The Built Up Area designation should be expanded to include the entire site.</p>

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	LTD c/o CCLA		
REP/ 113	Natural England	CL9	<p>Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.</p> <p><b>Draft Crawley Borough Local Plan 2021 – 2037 January 2021 - For Submission Publication Consultation: January – February 2021</b> We welcome the further opportunity for involvement in your Local Plan process and our comments are given below.</p> <p><b>Policy CL9: High Weald Area of Outstanding Natural Beauty (AONB)</b> We welcome the inclusion of this policy but again, are disappointed that this constraint has not been recognised as such in relation to some of the site allocations (see specific site comments below). In addition, we advise that in order to fully comply with the provisions of the NPPF (para 172) and to demonstrably protect the statutory purpose of the AONB, your Local Plan Landscape Policy needs to be strengthened. A robust policy needs to not only protect and enhance the AONB and its setting but also its statutory purpose and Special Qualities.</p> <p>We further note that your policy refers to potential development within the AONB. To be robust, the policy should include a requirement for alternative options for development to be included before proposing development which deleteriously affects nationally significant landscapes, for example by providing higher densities and/or different locations within your plan area.</p> <p><b>Suggested Modifications:</b> (Our suggested modifications are incorporated in the above advice).</p>

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Ref. No.	Respondent	Policy/ Para	Comments
REP/025	Resident 10	DD1	<p>I am concerned, however, about the continued tie-in between an adopted new Local Plan Policy Number and a Supplementary Planning Document that might still refer to a 2016 Local Plan Policy reference. For example, unless the Green Infrastructure SPD is updated to accord with new policy numbering, an unscrupulous applicant/developer might seek to avoid compliance with BS5837 tree survey and assessment procedures referred to in the current GI SPD on the basis that its CH3 and CH6 policy references are defunct (although they seem to be reincorporated as DD1 and DD4.)</p> <p><b>Suggested Modifications:</b></p>
REP/033	Horsham District Council	DD1	<p>We <b>support</b> this policy which is clear in its encouragement of efficient use of land as part of good design.</p> <p><b>Suggested Modifications:</b></p>
REP/068	Sussex Wildlife Trust	DD1	<p><b>Strategic Policy DD1: Normal Requirements of All New Development</b></p> <p>The comments submitted in SWT's original Regulation 19 response (March 2020) seem to suggest that our Regulation 18 comments had been incorporated in Strategic Policy DD1: Normal Requirements of All New Development. In the amended Regulation 19 version we note that the wording now no longer fully reflects our original amendments, but we do acknowledge that bullet point (g) does reference that all development should meet Biodiversity Net Gain requirements set out in Policy GI3.</p> <p><b>Suggested Modifications:</b></p>
REP/087	Woodland Trust	DD1	<p>We welcome the policy in g) that existing trees, green spaces and hedges should be integrated, protected and enhanced in new developments, to retain existing trees that contribute positively to the area and allow sufficient space for trees to reach maturity, and the reference to policy DD4 on tree replacement and policy GI3 on biodiversity net gain. Trees can play a significant aesthetic role helping integrate new developments into existing ones and creating a local identity, and integrating trees and green spaces into developments early on in the design process reduces the risk of tree removal. We recommend the guidance published by the Woodland Trust Residential developments and trees - the importance of trees and green spaces (January 2019).</p> <p>We welcome the commitment in 5.14 that tree losses through development should be mitigated by new planting, as set out in detail in policy DD4.</p> <p>However we would like to see the policy strengthened to ensure that development sites play their part in addressing the need to increase tree canopy cover in order to achieve carbon neutrality and sustainable development as set out in Policy SD1.</p> <p><b>Suggested Modifications:</b></p> <p>We therefore recommend adding that a target for tree canopy cover on development sites be set (the Woodland Trust recommends a 30% target), to be pursued through the retention of important trees, appropriate replacement of trees lost through development, ageing or disease in line with policy DD4, and by new planting to support green infrastructure (policy GI1) and biodiversity net gain (policy GI3).</p> <p>Further information can be found in the Woodland Trust's Emergency Tree Plan (2020).  <a href="https://www.woodlandtrust.org.uk/publications/2020/01/emergency-tree-plan/">https://www.woodlandtrust.org.uk/publications/2020/01/emergency-tree-plan/</a></p>

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Ref. No.	Respondent	Policy/ Para	Comments
REP/ 132	Quod on behalf of Aberdeen Standard Investments	DD1	<p><b>Section 5 – Design &amp; Development Requirements</b></p> <p>2.22 Chapter 4 deals with design and draft Policy DD1 sets out the ‘normal requirements for all development’. The draft policy contains a set of criteria that all development proposals must adhere to including using land efficiently and not unduly restricting the development potential of adjoining land, nor prejudicing the proper planning and phasing of development over a wider area. ASI are supportive of these principles which recognise the need for flexibility within the planning system in accordance with national planning policy.</p> <p>2.24 Criteria (g) is concerned with trees and states that all proposals for development will be required to “retain existing individual or groups of trees and green infrastructure and biodiversity assets that contribute positively to the area”. The policy wording is inconsistent with Policy DD4 which recognises the potential for tree loss and furthermore the absence of any caveat regarding net gain or enhancement sets unrealistic requirements that may result in compromised planning outcomes. The policy should therefore be amended to better reflect the intent of Policy DD4.</p> <p>2.25 Draft Policy DD2 relates to Inclusive Design and requires development proposals to achieve “the highest standards of accessible and inclusive design possible”. The principle of delivering high quality inclusive design is supported, however, the reference to the ‘highest’ standards is not sufficiently precise. We would therefore request that this is amended to ‘high standards’.</p> <p><b>Suggested Modifications:</b></p> <p>2.23 Notwithstanding this, there are concerns regarding other criteria listed within draft Policy DD1, specifically criterion (c) and (g). The former requires all proposals for development in Crawley to “Retain and reuse existing buildings occupying a site or demonstrate why this is not feasible, viable or desirable”.</p> <p>Whilst the general aspiration to re-use buildings is supported, the wording of Policy DD1 creates an inappropriate presumption of retention. This presumption could lead to the retention of unsuitable buildings which would be detrimental in terms of delivering high quality development and placemaking. We would therefore request the policy be amended to remove the presumption of retention/re-use.</p> <p><b>3 Summary</b></p> <p>3.1 On the whole, our client is supportive of the Council’s approach to the draft Local Plan. However, it is important that the emerging Plan does not constrain the ability for Crawley Town Centre to overcome the challenges that all town centres are facing and to ensure that policies contain sufficient flexibility to allow for a healthy, vibrant and competitive town centre.</p> <p>3.2 We trust that you will fully consider our client’s comments and ensure that any emerging policy does not prevent the successful future of the Town Centre from being realised.</p>
REP/ 113	Natural England	DD1	<p>We welcome the inclusion of this policy and note that our previous comments have been addressed.</p> <p><b>Suggested Modifications:</b> (Our suggested modifications are incorporated in the above advice).</p>

Chapter 5. Design & Development Requirements																									
Ref. No.	Respondent	Policy/ Para	Comments																						
REP/ 133	The Planning Bureau Ltd	DD1	<p>The respondents recognise the Council's commitment to high quality design and note the significant focus and level of detail attributed to this in the emerging policies.</p> <p>The level of professional reports and the need to demonstrate adherence to third party standards required in Local Plan policies is considered extensive when compared to other Councils. Following our review of the Local Plan we found reference to the following requirements /standards:</p> <table border="1"> <thead> <tr> <th>Standard / Statement</th> <th>Policy Referenced</th> </tr> </thead> <tbody> <tr> <td>Health Impact Assessment</td> <td>Policy SD2</td> </tr> <tr> <td>Adhere to the Neighbourhood Principle</td> <td>Policy CL1</td> </tr> <tr> <td>3D Modelling</td> <td>Policy CL2</td> </tr> <tr> <td>Development Briefs / Masterplans</td> <td>Policy CL5</td> </tr> <tr> <td>Design Reviews</td> <td>Justification to CL5</td> </tr> <tr> <td>Verified Visual Montages</td> <td>Policy CI7</td> </tr> <tr> <td>Demonstrate 'Secured by Design'</td> <td>Policy DD1</td> </tr> <tr> <td>Demonstrate 'Building for Life 12'</td> <td>Policy DD1</td> </tr> <tr> <td>Inclusive Design Statement</td> <td>Policy DD2</td> </tr> <tr> <td>Sustainability Statement</td> <td>Policy SDC1</td> </tr> </tbody> </table> <p>The thresholds for many of the reports and standards is low, even extending to change of use applications in some instances.</p> <p>We respectfully remind the Council that paragraph 44 of the NPPF advises that: 'Local planning authorities should publish a list of their information requirements for applications for planning permission. These requirements should be kept to the minimum needed to make decisions, and should be reviewed at least every two years. Local planning authorities should only request supporting information that is relevant, necessary and material to the application in question.'</p> <p>We would query if the level of reporting being requested by the Council was necessary, relevant and material in all instances and if Council's Planning Officers have the requisite time and expertise to review and properly consider all the information being presented to them.</p> <p>Additionally, there is a cost associated in the preparation of this supporting information. We note that the Crawley Local Plan Review: Whole Plan Policies &amp; Community Infrastructure Levy Viability Assessment (LPVA) allows 10% of build costs for Professional Fees &amp; Reporting; the mid-point in the generally accepted range of 8-12%.</p> <p>We would suggest that in light of the Council's requirements for planning applications, there should be a commensurate uplift to 12% for professional fees in the LPVA accordingly.</p> <p><b>Suggested Modifications:</b></p>	Standard / Statement	Policy Referenced	Health Impact Assessment	Policy SD2	Adhere to the Neighbourhood Principle	Policy CL1	3D Modelling	Policy CL2	Development Briefs / Masterplans	Policy CL5	Design Reviews	Justification to CL5	Verified Visual Montages	Policy CI7	Demonstrate 'Secured by Design'	Policy DD1	Demonstrate 'Building for Life 12'	Policy DD1	Inclusive Design Statement	Policy DD2	Sustainability Statement	Policy SDC1
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Chapter 5. Design & Development Requirements			
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			<p>1. To review whether the level of reporting and requirement to meet third party design standards detailed in the Local Plan is proportionate and justified.</p> <p>2. To increase the allowance for Professional Fees in the Crawley Local Plan Review: Whole Plan Policies &amp; Community Infrastructure Levy Viability Assessment (LPVA) to 12%.</p>
REP/122	Inspired Villages	DD2	<p>Dear Strategic Planning, Please find attached and below representations made on behalf of Inspired Villages to the Crawley Draft Local Plan Regulation 19 Consultation, the deadline for which has been extended to 30<sup>th</sup> June 2021.</p> <p>The accompanying representation form has been completed, however the main body of the representation is below for formatting reasons. This representation specifically responds to Policies DD2 and H2 of the draft Local Plan. I also attach a Local Plan representation document for your attention which discusses specialist housing for older people, the Use Class (C2) and be read alongside the below response.</p> <p><b><u>Who is Inspired Villages?</u></b> Inspired Villages is a developer and operator of retirement communities in the UK. We are majority owned and fully funded by Legal &amp; General. We currently have six operating villages, with a further 14 sites legally secured with a number of those under construction, consented or in planning/pre-planning. Our business plan is to have 60 operational villages within the next ten years providing purpose built housing for 12,000 residents.</p> <p>A retirement community falls under the extra care model and our developments are within the C2 use class. Inspired Villages is a member of Associated Retirement Communities Operators (ARCO) and we encourage Crawley Borough Council to engage with ARCO to assist with your understanding of the Retirement Community Sector, and would recommend you view their website:- <a href="https://www.arcouk.org/what-retirement-community">https://www.arcouk.org/what-retirement-community</a></p> <p>Recent consents we have secured / or resolution to approve include:-</p> <ul style="list-style-type: none"> <li>• Land at Chandlers Ford in Test Valley Borough Council – LPA accepted development as Use Class C2 (construction starts in 2021)</li> <li>• Land at Leeds village in Maidstone Borough Council – LPA accepted development as Use Class C2 (under construction)</li> <li>• Land at Turvey Station in Bedfordshire Borough Council – LPA accepted development as Use Class C2 (under construction)</li> <li>• Land at Caddington in Central Bedfordshire Council – LPA accepted development as Use Class C2 (under construction)</li> <li>• Land at Kingswood in Reigate &amp; Banstead Borough Council – LPA accepted development as Use Class C2 (construction starts in 2021)</li> </ul>

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			<ul style="list-style-type: none"> <li>Land at Frant in Wealden District Council – LPA accepted development as Use Class C2 (construction starts in 2021)</li> </ul> <p><b><u>Representation to the Draft Local Plan Policies H2 and DD2</u></b></p> <p>It is welcomed that Crawley Borough Council are able to acknowledge some of the benefits of specialist housing for older people at Paragraph 12.26 of the Draft Local Plan, including the freeing up of family homes as well as lower traffic generation resulting from such developments. However we would also like to draw attention to some of the additional benefits outlined within the attached representation document particularly the health and wellbeing benefits such as savings to the NHS, as well as reduced mental and physical health problems. Please refer to paragraphs 3.14 to 4.15 of the attached representation for further details.</p> <p>Policy DD2 'Inclusive Design' stipulates that new developments should meet Building Regulations Part M Category 2 to adapt to the changing needs of residents in the Borough. The policy does not however include any detail on how specialist housing for older people will be planned for outside of the Building Regulations requirements. This is however, further referenced within the draft Local Plan at Paragraph 12.28 discussed below. Conversely, the Draft Local Plan acknowledges at paragraph 5.19 that those within the population over 65 is expected to increase by 55% in 20 years, with those with health or disability problems increasing by 7,000 persons by 2039. Whilst it is accepted as per paragraph 5.20, some older people will wish to remain in their own homes, National Planning Practice Guidance identifies that the need to provide housing for older people is 'critical', the only group identified as such in national policy guidance (Paragraph: 001 Reference ID: 63-001-20190626).</p> <p>Housing has been recognised as one of the key outputs of the Local Plan, a target of 5,320 new homes will be delivered over the lifetime of the plan. Outside of the enhanced Building Regulations at Policy DD2, Paragraph 12.28 of the Draft Local Plan identifies a need for an additional 1,027 units to meet the population's specialist accommodation need for older people and a further 1,029 residential/ nursing bedspaces. This is welcomed and is in line with PPG advising that plan-making authorities "<i>could also provide indicative figure figures or a range for the number of units of specialist housing for older people needed across the plan area throughout the plan period</i>" (Paragraph: 006 Reference ID: 63-006-20190626). However, Inspired Villages would suggest that this target should be included within the policy wording of Strategic Policy H1 to ensure delivery. The provision of housing for older people is also recommended to be included in the monitoring process when preparing the Annual Monitoring Report (AMR) (NPPG Paragraph: 007 Reference ID: 63-007-20190626).</p> <p><b>Suggested Modifications:</b>  <i>See representations under Paragraphs 12.26-12.28 and Policy H1.</i></p>
Rep/ 124	Gladman Developments	DD2	4.2.1. Policy DD2 states that all new dwellings must be built to optional M4(2) Accessible and Adaptable' Building Standards. While Gladman support the principle of the approach to provide quality living environments for future generations, the Written Ministerial Statement makes clear that M4(2) and M4(3) are optional technical standards which

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			<p>local authorities may wish to introduce under the provision that any requirement seeking to adopt the higher optional technical standards is fully evidenced on an assessment of need and viability (Written Ministerial Statement by Eric Pickles: Planning Update Statement made on 25 March 2015).</p> <p>4.2.2. The 2019 SHMA highlights the projected growth of the population of people aged 65+, alongside the increasing number of people with a limiting long-term health problem or disability, noting the appropriateness to deliver new housing that meets the optional accessible and adaptable standards. No consideration is given to the proportion of the current housing stock which could be converted to meet such building standards, nor does it appear to differentiate between delivering new homes that meet the optional building standards and specialist housing.</p> <p>4.2.3. While Gladman do not object to the principle of the above policy, if the Council intends to continue its approach, then the evidence base will need to be updated to justify the strategy.</p> <p><b>Suggested Modifications:</b></p>
REP/130	Home Builders Federation	DD2	<p><b>Response by the Home Builders Federation to the consultation on the amendments to the Submission Draft of the Crawley Local Plan</b></p> <p>1. Thank you for consulting the Home Builders Federation (HBF) on the amendments to the submission draft of the Crawley Local Plan. The HBF is the principal representative body of the housebuilding industry in England and Wales and our representations reflect the views of discussions with our membership of national and multinational corporations through to regional developers and small local housebuilders. Our members account for over 80% of all new housing built in England and Wales in any one year.</p> <p><b>Plan period</b></p> <p>2. The HBF welcomes the extension of the plan period to 2037. This reflects paragraph 22 of the NPPF requiring strategic policies to look ahead over a minimum of 15 years.</p> <p><b>Suggested Modifications:</b></p> <p><b>DD2: Inclusive design</b></p> <p>3. The HBF agree with the amendment to this policy removing the requirement for 5% of homes to be built to part M4(3). However, we remain concerned, as set out in our previous representations, that the Council have not justified that all homes be built to part M4(2).</p>
REP/131	SMB Town Planning Limited	DD3 & H3b	<p>Naturally, there are a number of draft detailed development management policies that would be used by the Council to assess planning applications. Oxford Match Limited have concerns specifically with draft Policies DD3 section i to v and consequentially that sentence of draft Policy H3b which refers to DD3(i to v) as currently drafted.</p> <p>Our objection to draft Policy DD3 is on the grounds that it is too prescriptive. In particular, the draft policy contains criteria that are beyond the scope of Central Government's nationally described space standard for high and medium-density schemes, notably requiring a minimum floor to ceiling height of 2.7m (as opposed to 2.3m) for 3-person, 2-</p>

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			<p>bedroom units and above. In addition, private outdoor open space (2.5m deep by 4m wide = 10sqm) to be associated with residential development is far too large for town centre schemes.</p> <p>Policy DD3 as drafted will not make the most efficient use of deliverable land, particularly constrained town centre sites. The Policy as drafted could undermine and conflict with Policy CL2 (principles of good urban design) and CL3 (using land more efficiently and sustainably), as well as, more importantly, those policies seeking further residential development in the town centre such as Policy TC1 to meet the Council's identified housing needs.</p> <p>Policy DD3 should be modified accordingly by stipulating minimum floor to ceiling height of 2.3m is acceptable and that in town centre residential schemes the minimum acceptable depth for private outdoor amenity space is 1.5m with the minimum area being 5sqm for 1 and 2 person flats plus an extra 1sqm each additional occupant.</p> <p><b>Suggested Modifications:</b></p> <p>Add clarification that this encouragement section applies to residential schemes of apartments which by their nature rely on shared communal access and need to compete with the attributes offered by the traditional semi D.</p>
REP/133	The Planning Bureau Ltd	DD3	<p>The policies in the Local Plan try and deliver a wide-ranging number of objectives and in combination it does not appear feasible that new development, particularly on constrained urban sites, can meet them all. For example, is it credible to expect development with a minimum density of 200 dph (as detailed in Policy CL4) to be wholly NDSS compliant and have; dual aspect or single aspect where south facing; a minimum clear floor to ceiling height of 2.7m for 3 person 2 bedroom units; and, usable private outdoor space, at least 2.5m in depth x 4m wide? While it is noted that some flexibility is implied in the wording of the policy to some of the required standards, there is a concern that the Council has failed to properly consider the cumulative impact of what it expects new development to achieve, and if it is feasible, or indeed, credible.</p> <p><b>Suggested Modifications:</b></p> <p>1. That the cumulative impact of the design and policy requirement are considered in conjunction with the Council's stated ambitions for development, notably density.</p>
REP/025	Resident 10	DD1	<p>I am concerned, however, about the continued tie-in between an adopted new Local Plan Policy Number and a Supplementary Planning Document that might still refer to a 2016 Local Plan Policy reference. For example, unless the Green Infrastructure SPD is updated to accord with new policy numbering, an unscrupulous applicant/developer might seek to avoid compliance with BS5837 tree survey and assessment procedures referred to in the current GI SPD on the basis that its CH3 and CH6 policy references are defunct (although they seem to be reincorporated as DD1 and DD4.)</p> <p><b>Suggested Modifications:</b></p>
REP/087	Woodland Trust	DD4	<p>We welcome the clear policy in DD1 in support of tree retention, with removal and replacement as a last resort. We strongly welcome the proposed ratio of tree replacement in policy DD4, which reflects the Woodland Trust's guidance</p>

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			<p>on Local Authority Tree Strategies (July 2016) with a ratio of at least 2:1 for all but the smallest trees and ratios of up to 8:1 for the largest trees.</p> <p>We strongly welcome the guidance in 5.36 that where possible, UK sourced and grown tree stock should be used to support biodiversity and resilience.</p> <p><b>Suggested Modifications:</b> N/A</p>
REP/ 133	The Planning Bureau Ltd	DD4	<p>The benefits of tree planting and their role in the Government's target to reach net zero by 2050 has been widely publicised. It is commendable that the Council is looking to engage proactively with this matter in the Local Plan.</p> <p>We note that the number of replacement trees is based on the trunk diameter measurement and that up 8 trees may be required to replace one, large, specimen. It is also noted that the replacement tree planting requirements would normally be expected to be met within the development site, unless the LPA agrees this is not feasible or desirable. A significant on-site replanting requirement can therefore be generated through the loss of very few trees and particularly when taken in conjunction with the tree planting standard of 1 new tree per dwelling 'suggested' in Policy GI3: Biodiversity &amp; Net Gain.</p> <p>The aim of the replacement tree planting standards would appear to a long-term increase in tree cover rather than like-for-like replacement, which will be an impediment to building at higher densities, particularly on previously developed sites in urban areas. The policies in the Local Plan try and deliver a wide-ranging number of objectives and in combination it does not appear feasible that new development, particularly on constrained urban sites, can meet them all. Is it credible to expect development with a minimum density of 200 dph (as detailed in Policy CL4) to increase the level of tree cover on site?</p> <p>We note that the local planning authority will waiver the on-site requirement in instances it agrees are not feasible or desirable and that commuted sums will be sought in lieu, on a per tree basis. This appears to be taken on a case-by-case basis with input from Council stakeholders, however in the absence of clear guidance it is unknown which of the numerous policy requirements will take precedence.</p> <p>Finally, we note that the Crawley Local Plan Review: Whole Plan Policies &amp; Community Infrastructure Levy Viability Assessment incorporates the cost of replacement tree planting are incorporated into the 5% contingency for sustainable design &amp; construction costs. We would suggest that this contingency is stretched quite thin as it covers 10% biodiversity net gain and a reduction in CO<sub>2</sub> emissions.</p> <p>While we appreciate there are benefits to providing trees in urban areas, building at higher densities in urban areas is reduces greenfield land-take and is a highly sustainable outcome accordingly. A reduced tree standard for sites in urban areas would be more appropriate.</p> <p><b>Suggested Modifications:</b></p>

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			<p>1. Reduce the requirement for additional tree planting in urban locations.</p> <p>2. To include a separate cost for tree planting in the Crawley Local Plan Review: Whole Plan Policies &amp; Community Infrastructure Levy Viability Assessment (LPVA).</p>
REP/056	Gatwick Airport Limited	DD5	<p>42. We supported the inclusion of Policy DD6 in the 2020 Reg19 DCLP but suggested some minor revisions to the policy and supporting text. We note that the policy and supporting text has not been amended but we continue to support the policy.</p> <p><b>Suggested Modifications:</b></p>
REP/056	Gatwick Airport Limited	DD6	<p>43. We continue our support for this policy (previously Policy DD7 in the 2020 Reg19 DCLP), for reasons set out in para. 8.1 of our representations on the 2020 Reg19 DCLP.</p> <p><b>Suggested Modifications:</b></p>
REP/068	Sussex Wildlife Trust	DD7	<p>We question whether this policy or supporting text should also acknowledge the potential biodiversity and or flooding impacts of increasing hard standings, if the cross overs result in the loss of grass verges. We note Policy HA2: Conservation Areas, does reference the importance of grass verges.</p> <p><b>Suggested Modifications:</b></p>

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REP/041	IVCAAC	HA1 – HA8	<p><b>Heritage Strategies HA1 – HA8</b> IVCAAC supports the full range of Heritage Strategies. We support the policies with respect to Conservation Areas, Listed Buildings and Areas of Special Local Character.</p> <p>We note that Ifield Village retains its status as a conservation area and that a stretch of Rusper Road retains its status as an Area of Special Local Character.</p> <p><b>Suggested Modifications:</b> We would, however, like to have Village Greens included in the list of Heritage assets (HA1). In your heritage statements there is no mention of Ifield Village Green, which is the only registered village green in Crawley.</p> <p>The designation of the Ifield Brook Meadows as a Local Green space (Strategic Policy 14) is important. The meadows make a much-used rural environment, invaluable for general health and well-being of the community.</p>
REP/055	Savills on behalf of Wilky Group	HA1	<p><b>1.0 Introduction</b></p> <p>1.1 This representation is submitted on behalf of The Wilky Group (TWG), which has a long-standing interest in the promotion of strategic employment land within the Crawley Borough Council (CBC) area. This representation relates to Policy HA1 Heritage Assets in the draft Crawley Borough Local Plan, 2021 (DCBLP).</p> <p>1.2 TWG owns about 48 ha (119 acres) of land east of Gatwick Airport. The land has been promoted by TWG as a strategic employment opportunity known as Gatwick Green (the Site). The Site is proposed for allocation as a Strategic Employment Location (SEL) of 47 ha (116 acres) in the DCBLP under Strategic Policy EC4 as a comprehensive industrial-led development of predominantly storage and distribution uses under use class B8.</p> <p>1.3 This representation notes that Policy HA1 is broadly in accordance with the advice in the National Planning Policy Framework (NPPF, 2019) and the Planning Practice Guidance (PPG). It also confirms that Gatwick Green can be masterplanned and designed so as to be in accordance with the key objectives contained in Policy HA1.</p> <p><b>2.0 Policy HA1 – intent of policy and compliance</b></p> <p><b>Intention of the policy</b></p> <p>2.1 The purpose of Policy HA1 is to identify the list of designated and non-designated heritage assets, and set out the key considerations for any development that may affect them. The core guidance is that the key features or significance of heritage assets are conserved and enhanced as a result of development. Great weight is given to the conservation of designated heritage assets pursuant to the statutory requirements of the Listed Building Act 1990; harm to, or the loss of, their significance will require justification in accordance with the importance of the asset and the degree of loss or harm, in line with local and national policy.</p> <p>2.2 Separate guidance is set out on the approach to addressing harm to non-designated heritage assets, taking account of the scale of harm and the assets significance, including any harm to an asset’s setting. Further guidance is provided</p>

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			<p>on the scope of, and matters to be addressed in Heritage Impacts Assessments required at the planning application stage.</p> <p><b>National planning policy and guidance</b></p> <p>2.4 Chapter 16 of the NPPF sets out how planning policy should provide a positive strategy for the conservation and enjoyment of the historic environment and how development affecting heritage assets should be assessed. In relation to designated assets, the policy guidance places much emphasis on determining if harm represents a total loss, is substantial or less than substantial, with guidance on how to decide on the impacts of development proposals. In relation to proposals 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. The policy guidance is broadly reflected in the wording of Policy HA1.</p> <p>2.5 The NPPF policy is supplemented by more detailed guidance in Planning Practice Guidance (PPG) on the heritage environment (<a href="https://www.gov.uk/guidance/conserving-and-enhancing-the-historic-environment">https://www.gov.uk/guidance/conserving-and-enhancing-the-historic-environment</a>). The PPG sets out more detailed guidance on the historic environment, including the approach to plan-making and guidance on decision-making, including the meaning of significance of an asset.</p> <p>2.6 It is considered that Policy HA1 provides appropriate and proportionate protection for heritage assets in the Borough, consistent with national planning policy and guidance. Policy HA1 has been designed to ensure that these matters are addressed in the planning process – in relation to Gatwick Green, this will include the preparation of the masterplan, and an outline planning application with a supporting Heritage Impact Assessment in accordance with the requirements in Strategic Policy EC4.</p> <p><b>3.0 Implications for Gatwick Green</b></p> <p>3.1 Based on the Council's recent review of its heritage assets (Heritage Assets Review, Place Services, Crawley Borough Council, December 2020), there are a number of Listed and Locally Listed Buildings near the boundaries of the Gatwick Green allocation, but no Conservation Areas would be affected. The overall masterplanning of the Site under Strategic Policy EC4 will need to have regard to these assets and any other heritage features that arise from more detailed work. There will therefore be a range of heritage considerations taken into account in the design and operation of the proposals for the Site. These will include respecting the setting of these Listed Buildings and Locally Listed Buildings and conserving, through appropriate means, any archaeology within the Site.</p> <p>3.2 The Appendices to TWG's representation on Policy EC1 of the DCBLP (2020) (2020 Appendices) form part of the Council's evidence base (Consultation appendix 4b: Wilky Group appendices combined). The environmental considerations relating to heritage matters are addressed in the 2020 Appendices and subject to Addenda contained at Appendices 3 - 7 of TWG's representation on Strategic Policy EC4. These Addenda confirm that the original recommendations remain valid in the context of the proposed allocation of Gatwick Green under Strategic Policies EC1 and EC4 and any other changes in circumstances.</p>



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			<p>3.3 The Addendum to the Heritage Constraints Appraisal confirms that the Site can be developed whilst respecting the various heritage assets adjacent to the Site, and includes recommendations on appropriate avoidance and mitigation measures. These matters will be addressed at the planning application stage and set out in a Heritage Impact Assessment and a Design and Access Statement.</p> <p><b>Suggested Modifications:</b></p> <p><b>4.0 Conclusions</b></p> <p>4.1 TWG acknowledges the need for the Gatwick Green proposals to address the heritage considerations relating to the Site and referenced in Policy HA1. All feasibility investigations to date indicate that the 24.1ha minimum requirement can be delivered in accordance with these requirements. The masterplan proposals for the Site required under Strategic Policy EC4 will have regard to these considerations in achieving a sustainable and well-designed scheme for the Site.</p> <p>4.2 It is considered that Policy HA1 provides appropriate and proportionate requirements for addressing heritage and matters, consistent with national policy. Development at Gatwick Green as allocated in Strategic Policy EC4 will be designed in a way so as to avoid or mitigate any harmful impacts on the setting of the heritage assets in the area.</p>
REP/134	Rusper Parish Council	HA1	<p>Rusper PC feels that Rusper Road should be included on the local heritage list.</p> <p><b>Suggested Modifications:</b></p>
REP/023	Savills on behalf of St Catherine's Hospice	HA2	<p>Section 6: Heritage Strategic Policy HA2: Conservation Areas</p> <p>3.23. In the Regulation 18 representations we highlighted the capacity for redevelopment to improve the setting of Conservation Areas. Whilst we welcome Policy HA2's recognition of opportunities to improve conservation areas by remediating ungainly buildings, it is considered that the Local Plan can develop this by specifying areas that will enhance the setting of these heritage asset.</p> <p>3.24. Notably, Planning Practice Guidance (ref: 18a-003-20190723), states that:          "... Plan-making bodies should identify specific opportunities within their area for the conservation and enhancement of heritage assets, including their setting. This could include, where appropriate, the delivery of development that will make a positive contribution to, or better reveal the significance of, the heritage asset, or reflect and enhance local character and distinctiveness with particular regard given to the prevailing styles of design and use of materials in a local area.</p> <p>3.25. Currently, the draft Local Plan allocates Land East of Balcombe Road, Poundhill and St Catherine's Hospice, Malthouse for development in Strategic Policy H2 (Key Housing Sites). However, neither Strategic Policy HA2 or Strategic Policy H2 highlight the potential for these developments to enhance the setting of the Conservation Areas.</p> <p>3.26. Strategic Policy HA2 could be strengthened in accordance with paragraph 127 of the NPPF, specifically where it states that planning policies should facilitate development that is: "sympathetic to local character and history, including</p>

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			<p>the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities.)”</p> <p>3.27. Significantly, paragraph B5 of the Sustainability Appraisal (SA) notes that “despite having grown considerably over a short period of time, Crawley’s neighbourhoods have retained distinctive characters.” Paragraph B6 also comments that “there are currently eleven conservation areas in the borough, defined as areas of special architectural or historic interest, the character or appearance of which it is desirable to preserve or enhance.”</p> <p>3.28. The site analysis in the SA notes that the St Catherine’s Hospice site will have a significant positive impact on the Built Environment, stating that is “is previously developed and its reuse will address a vacant site, part of which lies within a Conservation Area so will need appropriate design.”</p> <p>3.29. This implies that the Council acknowledges that there is potential for the redevelopment of St Catherine’s Hospice to enhance the setting of Malthouse Road Conservation Area, and also demonstrates that despite high levels of growth in the past, neighbourhoods in Crawley have retained their special characteristics. This sentiment should be drawn into Policy to highlight the positive impact new development and good design can have on Conservation Areas in Crawley.</p> <p>3.30. As previously noted in paragraph 3.16 of this representation, the NPPF promotes the implementation of policy mechanisms to promote higher density development in constrained Authorities. CBC should reconsider the policy to outline support for sensitive and innovative redevelopments within, or adjacent to, Conservation Areas and explicitly encourage higher densities, good design and appropriate change across Crawley. This will provide more confidence to developers looking at these sites and will help to realise housing delivery whilst conserving heritage assets in the Borough.</p> <p><b>Suggested Modifications:</b>  <b>Recommended Changes</b>  [Conformity with the requirements of this Policy should be demonstrated as part of the Heritage Impact Assessment as part of the Heritage Impact Assessment]</p> <p><u>The Council supports the redevelopment of suitable sites found within, or adjacent to, Conservation Areas where it can be demonstrated that the proposals will contribute to an improvement to the setting of the Conservation Area and promote well designed, innovative and higher density development in these sensitive locations.</u></p>
REP/055	Savills on behalf of Wilky Group	HA5	<p>1.1 This representation is submitted on behalf of The Wilky Group (TWG), which has a longstanding interest in the promotion of strategic employment land within the Crawley Borough Council (CBC) area. This representation relates to Policy HA5 Locally Listed Buildings in the draft Crawley Borough Local Plan, 2021 (DCBLP).</p> <p>1.2 TWG owns about 48 ha (119 acres) of land east of Gatwick Airport. The land has been promoted by TWG as a strategic employment opportunity known as Gatwick Green (the Site). The Site is proposed for allocation as a Strategic</p>

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			<p>Employment Location (SEL) of 47 ha (116 acres) in the DCBLP under Strategic Policy EC4 as a comprehensive industrial-led development of predominantly storage and distribution uses under use class B8.</p> <p>1.3 This representation notes that Policy HA5 is broadly in accordance with the advice in the National Planning Policy Framework (NPPF, 2019) and the Planning Practice Guidance (PPG). It also confirms that Gatwick Green can be masterplanned and designed so as to be in accordance with the key objectives contained in Policy HA5.</p> <p><b>2.0 Policy HA5 – intent of policy and compliance</b></p> <p><b>Intention of the policy</b></p> <p>2.1 The purpose of Policy HA5 is to ensure that development seeks to retain any Locally Listed Buildings, including maintaining features of interests and preserving the character and setting of the building. Development proposals must demonstrate that they take account of the heritage significance of the building and its setting in relation to a number of defined heritage attributes.</p> <p><b>National planning policy and guidance</b></p> <p>2.2 Chapter 16 of the NPPF sets out how planning policy should provide a positive strategy for the conservation and enjoyment of the historic environment and how development affecting heritage assets should be assessed. In relation to proposals 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. The policy guidance is broadly reflected in the wording of Policy HA5.</p> <p>2.5 The NPPF policy is supplemented by more detailed guidance in Planning Practice Guidance (PPG) on the heritage environment (<a href="https://www.gov.uk/guidance/conserving-and-enhancing-the-historic-environment">https://www.gov.uk/guidance/conserving-and-enhancing-the-historic-environment</a>). The PPG sets out more detailed guidance on the historic environment, including the approach to plan-making and guidance on decision-making, including the meaning of significance of an asset.</p> <p>2.6 It is considered that Policy HA5 provides appropriate and proportionate protection for non-designated heritage assets in the Borough, consistent with national planning policy and guidance. Policy HA5 has been designed to ensure that these matters are addressed in the planning process – in relation to Gatwick Green, this will include the preparation of the masterplan, and an outline planning application with a supporting Heritage Impact Assessment in accordance with the requirements in Strategic Policy EC4.</p> <p><b>3.0 Implications for Gatwick Green</b></p> <p>3.1 Based on the Council’s recent review of its heritage assets (Heritage Assets Review, Place Services, Crawley Borough Council, December 2020), there are a number of Locally Listed Buildings near the boundaries of the Gatwick Green allocation. The overall masterplanning of the Site under Strategic Policy EC4 will need to have regard to these assets and any other heritage features that arise from more detailed work. There will therefore be a range of heritage</p>

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			<p>considerations taken into account in the design and operation of the proposals for the Site. These will include respecting the setting of these Locally Listed Buildings near the Site.</p> <p>3.2 The Appendices to TWG's representation on Policy EC1 of the DCBLP (2020) (2020 Appendices) form part of the Council's evidence base (Consultation appendix 4b: Wilky Group appendices combined). The environmental considerations relating to heritage matters are addressed in the 2020 Appendices and subject to Addenda contained at Appendices 3 - 7 of TWG's representation on Strategic Policy EC4. These Addenda confirm that the original recommendations remain valid in the context of the proposed allocation of Gatwick Green under Strategic Policies EC1 and EC4 and any other changes in circumstances.</p> <p>3.3 More especially, the Addendum to the Heritage Constraints Appraisal confirms that the Site can be developed whilst respecting the various heritage assets adjacent to the Site, and includes recommendations on appropriate avoidance and mitigation measures. These matters will be addressed at the planning application stage and set out in a Heritage Impact Assessment and a Design and Access Statement.</p> <p><b>4.0 Conclusions</b></p> <p>4.1 TWG acknowledges the need for the Gatwick Green proposals to address the non-designated heritage considerations relating to the Site and referenced in Policy HA5. All feasibility investigations to date indicate that the 24.1ha minimum requirement can be delivered in accordance with these requirements. The masterplan proposals for the Site required under Strategic Policy EC4 will have regard to these considerations in achieving a sustainable and well-designed scheme for the Site.</p> <p>4.2 It is considered that Policy HA5 provides appropriate and proportionate requirements for addressing heritage and matters, consistent with national policy. Development at Gatwick Green as allocated in Strategic Policy EC4 will be designed in a way so as to avoid or mitigate any harmful impacts on the setting of the non-designated heritage assets in the area.</p> <p><b>Suggested Modifications:</b></p>

<b>Chapter 7. Open Space, Sport &amp; Recreation</b>			
<b>Ref. No.</b>	<b>Respondent</b>	<b>Policy/ Para</b>	<b>Comments</b>
REP/087	Woodland Trust	OS2	<p>We welcome this policy, in particular the reference in 7.23 to applying Natural England’s Accessible Natural Green Space Standard and the Woodland Trust’s Woodland Access Standard for accessible natural green space and woodland.</p> <p><b>Suggested Modifications:</b> N/A</p>
Rep/032	West Sussex County Council	OS3	<p>We are pleased to see the importance of Public Rights of Way recognised in the Crawley Local Plan and the contribution they make, as part of the Borough’s Green Infrastructure network, towards promoting active travel, reducing car journeys, improving residents’ mental and physical wellbeing, providing safe, alternative routes for non-motorised users, achieving carbon-neutral status, improving air quality and reducing pollution.</p> <p>We agree that providing and improving access to the countryside beyond Crawley’s urban borders is of particular importance to its residents (Reasoned Justifications 7.27 and 7.28 within Policy OS3), especially to the south and east of the town. Crawley is also a major employment hub for the area. Any, and all opportunities to protect and enhance the network should be taken therefore (as stated in Crawley’s Infrastructure Plan January 2021, Green Infrastructure, Current Findings). Policy OS3: ‘Rights of Way and Access to the Countryside’ falls short of this however and is not in keeping with NPPF which requires LPAs to protect and enhance PRow and seek opportunities to provide better facilities for users.</p> <p>As recognised in Strategic Policy SD1 (4), sustainable development offers opportunities for positive outcomes. Strategic Policy SD2 states that new development must prioritise the use of and provide greater levels of safe and attractive opportunities for active travel. Policy CL3 (2ii) outlines how new development should connect with areas of rural open space and goes on to justify this in 4.35 that new development should be seen as an opportunity to integrate improvements to active travel. Policy CL8 (xi) describes how development should ensure access to the countryside is maintained and enhanced from Crawley’s neighbourhoods. 17.1 within the Section on Sustainable Transport points out that the provision of additional facilities and services to support new development is a key objective of the planning system and it is important to retain, and where possible enhance, opportunities in the Borough for increasing active travel as an alternative to the car.</p> <p>Sustainable development approved through these policies provides Crawley Borough Council with the chance to enhance existing and surrounding PRow networks through surface improvements (to mitigate against the effects of increased usage), upgrading footpaths to bridleways and creating new paths, improving links and connectivity within the Borough and across its borders. Policy OS3 is negatively worded however to assume development will always adversely affect the network and only then should mitigation measures be sought. We would like to see more emphasis on the positive net gains that can be achieved.</p> <p><b>Suggested Modifications:</b> It is suggested that the first sentence of Policy OS3 be amended to include the words ‘<b>and enhanced</b>’ (as set out below) to be consistent with para. 98 of NPPF with more emphasis on opportunities to provide better facilities for users of Public Rights of Way.</p>

<b>Chapter 7. Open Space, Sport &amp; Recreation</b>			
<b>Ref. No.</b>	<b>Respondent</b>	<b>Policy/ Para</b>	<b>Comments</b>
			“Public Rights of Way will be protected <b>and enhanced</b> by ensuring that development does not result in the loss of, or adversely affect, a Right of Way or other recreational route, unless a new route is provided of equal or better value”.
REP/113	Natural England	OS3	<p>Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.</p> <p><b>Draft Crawley Borough Local Plan 2021 – 2037 January 2021 - For Submission Publication Consultation: January – February 2021</b></p> <p>We welcome the further opportunity for involvement in your Local Plan process and our comments are given below. Please note that we have only provided comments on policies that are within our remit. However, please don't hesitate to contact us again, if you would like our comments on matters not covered in this response.</p> <p><b>Policy OS3: Rights of Way and Access to the Countryside</b></p> <p>We welcome the inclusion of this policy but are disappointed that this constraint has not been recognised as such in relation to some of the site allocations (see specific site comments below).</p> <p><b>Suggested Modifications:</b></p>

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Ref. No.	Respondent	Policy/ Para	Comments
REP/ 023	Savills on behalf of St Catherine's Hospice	IN1	<p><b>Section 8: Infrastructure Provision</b>  <b>Strategic Policy IN1: Infrastructure Provision</b></p> <p>3.31. Strategic Policy IN1 stipulates that existing services and facilities will be protected unless a replacement is provided or there is sufficient alternative provision available. Whilst we support this policy in principle, it is considered that the Council should recognise opportunities to replace lost infrastructure adjacent to the CBC's boundary.</p> <p>3.32. As previously noted, St Catherine's Hospice is currently undergoing the process of relocating to an enhanced facility in Pease Pottage. Whilst this will relocate the services to the neighbouring District of Mid Sussex, the facility will be relocated within 2.5 miles of its present location, enabling the provision of improved palliative care services to Crawley residents. Therefore, there will be no net loss of care in this area.</p> <p>3.33. As such, CBC should adopt a more flexible approach to the provision of infrastructure, recognising the unique land constraints within CBC. And the capacity for neighbouring areas to absorb some services, subsequently facilitating the redevelopment of key housing sites. Notably, within policy IN1, the Council make provision for new development to coordinate with the delivery of infrastructure on and off the site "including where infrastructure is located outside of Crawley but serves development within Crawley."</p> <p>3.34. In accordance with this, the principle of provisioning services outside, but close to, Crawley should be expanded across the Policy.</p> <p><b>Suggested Modifications:</b>  <b>Recommended Changes</b>  "[Existing infrastructure services and facilities will be protected where they contribute to the neighbourhood or town overall, unless]  <u>There is sufficient alternative provision of the same type in the area or an equivalent replacement or improvement is provided (including where this infrastructure is located outside of Crawley, but serves the town overall)."</u></p>
REP/ 032	West Sussex County Council	IN1	<p>West Sussex County Council are supportive of Policy IN1 (Infrastructure Provision) as it is worded flexibly to secure CIL contributions or S106 for the funding of education infrastructure.</p> <p>The methodology used in the 'Whole Plan Policies and Community Infrastructure Levy Viability Assessment' (March 2021) excludes education contributions on the basis that it is assumed they would be sought through CIL (page 50). This does not reflect the approach taken in Policy IN1 which is worded flexibly to seek both in accordance with CIL regulations for a site as it comes forward. Therefore, the viability of the plan policies seeking education contributions through s106 has not been tested through the evidence. However, it is noted that housing delivery in Crawley Borough is more likely to cumulatively generate the need for school places rather than seeking site specific contributions and this should be explained in the evidence base as suggested below.</p> <p><b>Suggested Modifications:</b></p>

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			<p>It is therefore recommended that further text is added to the viability assessment to explain the specific circumstances in Crawley Borough, why education has been excluded in the evidence preparation and that Policy IN1 allows for s106 contributions if an unallocated site came forward, subject to a separate site specific viability assessment.</p> <p>Further to this, West Sussex County Council would support the preparation of a Statement of Common Ground setting out the joint working that is ongoing between Crawley Borough Council, Horsham Borough Council and West Sussex County Council towards meeting the education requirements arising from new housing development in Crawley Borough.</p>
REP/055	Savills on behalf of Wilky Group	IN1	<p><b>Background</b></p> <p>1.1 This representation is submitted on behalf of The Wilky Group (TWG), which has a longstanding interest in the promotion of strategic employment land within the Crawley Borough Council (CBC) area. This representation relates to Strategic Policy IN1 Infrastructure Provision in the draft Crawley Borough Local Plan, 2021 (DCBLP / the Plan).</p> <p>1.2 TWG owns about 48 ha (119 acres) of land east of Gatwick Airport as shown the plan at <b>Appendix 1</b>. The land has been promoted by TWG as a strategic employment opportunity known as Gatwick Green (the Site). The Site is proposed for allocation as a Strategic Employment Location (SEL) of 47 ha (116 acres) in the DCBLP under Strategic Policy EC4 as a comprehensive industrial-led development of predominantly storage and distribution uses under use class B8. The extent of the SEL allocation is identified on the plan at <b>Appendix 1</b>.</p> <p><b>Scope of representation</b></p> <p>1.3 This representation sets out the evidence in support of Strategic Policy IN1 with reference to:</p> <ul style="list-style-type: none"> <li>• The National Planning Policy Framework (NPPF, 2019).</li> <li>• The planning Practice Guidance (PPG).</li> </ul> <p><b>2.0 Strategic Policy IN1</b></p> <p><b>Intention of policy</b></p> <p>2.1 The purpose of Strategic Policy IN1 is to ensure that development on specific sites and across Crawley is accompanied by the delivery and maintenance of on-site and off-site infrastructure, including any infrastructure provided outside the Borough. 'Infrastructure' is defined in the DCBLP glossary and covers a wide range of physical public facilities (includes transport facilities; such as roads, rail stations and bus stations; utility services, including water supply and wastewater and its treatment; waste management and disposal; telecommunications infrastructure; social and community infrastructure such as educational facilities and health facilities, cultural facilities, sports and recreational facilities and open space, parks and play space, libraries, cemeteries, and places of worship; emergency services; and flood defences), but does not include services, although this is referenced in the Reasoned Justification at paragraph 8.7 – for consistency, the definition ought to be adjusted. The policy has four parts:</p>



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			<p>1. Development will be permitted where it is supported by, and coordinated with, the delivery and maintenance of infrastructure on or off-site or outside Crawley Borough, including the need to address any cumulative effects of development.</p> <p>2. Protects existing infrastructure facilities and services from loss to development, unless an equivalent replacement can be provided.</p> <p>3. Community Infrastructure Levy (CIL) applies to certain development as required in the Council's adopted CIL charging schedule.</p> <p>4. Where appropriate, developer contributions will be sought in the form of Planning Obligations to address site-specific issues in accordance with the tests in the CIL Regulations – the anticipated contributions are set out in the Planning Obligations Annex associated with policies in the DCBLP.</p> <p>2.2 The cross reference to the Planning Obligations Annex is important – the policy must be read and interpreted as an integrated policy with the Annex to ensure development within Crawley is served by, and helps provide, infrastructure of a suitable scale, quality and location so as to avoid harmful impacts. The Annex sets out the basis for planning obligations under various policies in the form of works, derived from contribution amounts based on formulas or generic approaches. This includes a formula for a sustainable transport contribution, which applies to all residential and commercial developments outside of the Gatwick Airport Boundary.</p> <p><b>National planning policy and guidance</b></p> <p>2.3 Strategic Policy IN1 is considered to be in accordance with the policy and guidance contained in the National Planning Policy Framework (NPPF) and Planning Practice Guidance (PPG). The need to plan for and protect infrastructure features throughout the NPPF. In relation to strategic infrastructure related to strategic land use policies such as Strategic Policies EC1 and EC4, it requires strategic policies to make sufficient provision for, inter alia, infrastructure to serve strategic development; such infrastructure includes transport, telecommunications, security, waste management, water supply, wastewater, flood risk and coastal change management, the provision of minerals and energy (including heat), and community facilities (such as health, education and cultural infrastructure) (para 20). The NPPF requires joint working between strategic policymaking authorities and other bodies to determine where additional infrastructure is necessary (para 26).</p> <p>2.4 Local Plans should set out the contributions expected from development, including for infrastructure such as that needed for education, health, transport, flood and water management, green and digital infrastructure. Such policies should not undermine the deliverability of the Plan (para 34). Paragraphs 54 – 57 deal with planning obligations to bring about the delivery of infrastructure related to new development. The policy guidance states that planning authorities should use conditions on a planning permission where possible, or otherwise, where a condition is not appropriate, use planning obligations. Where planning obligations must be secured, they must only be sought where they meet the tests set out in Regulation 122(2) of the Community Infrastructure Levy Regulations</p>

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			<p>2010, i.e. they are necessary to make the development acceptable in planning terms, directly related to the development and fairly and reasonably related in scale and kind to the development.</p> <p>2.5 NPPF paragraph 57 goes on to confirm the importance of up-to-date policies that identify contributions expected from development – planning applications in accordance with such policies will be treated as being viable in line with the viability assessment of the Local Plan. The weight to be given to scheme-specific viability assessments at the application stage will depend on how up-to-date the Plan and related viability assessment are and any changes in the circumstances of the site since the Plan was adopted.</p> <p>2.6 The importance of providing infrastructure features throughout the NPPF in relation to achieving sustainable development (para 8a); building a strong and competitive economy (para 81); promoting healthy and safe communities (para 91c); promoting sustainable transport (Section 9); supporting high quality communications (Section 10), and meeting the challenges of climate change (Section 14).</p> <p>2.7 The NPPF policy is supplemented by more detailed guidance in Planning Practice Guidance (PPG) on planning obligations (<a href="https://www.gov.uk/guidance/planning-obligations">https://www.gov.uk/guidance/planning-obligations</a>). PPG sets out guidance on the scope, nature and use of planning obligations under CIL or developer contributions. On planning policy, PPG states that policies should be set out in plans and examined in public and informed by evidence of infrastructure and viability assessments.</p> <p>2.8 It is considered that Strategic Policy IN1 provides an appropriate basis for securing reasonable and proportionate planning obligations from new development. It is therefore consistent with national policy and guidance on infrastructure and planning obligations, and so represents a <u>sound policy in the context of the tests at paragraph 35 of the NPPF.</u></p> <p><b>The need to retain flexibility in application</b></p> <p>2.9 PPG states that the evidence of need for infrastructure can be standardised or formulaic, and plan-makers should consider how needs and viability may differ between site typologies and may choose to set differential requirements. Policy requirements should be clear so that they can be accurately accounted for in the price paid for land. It states that developers may be asked to provide contributions for infrastructure in several ways (Paragraph: 003 Reference ID: 23b-003-20190901), implying that there should be flexibility in how that is achieved.</p> <p>2.10 PPG goes on to state that <i>“...if a formulaic approach to developer contributions is adopted, the levy can be used to address the cumulative impact of infrastructure in an area, while planning obligations will be appropriate for funding a project that is directly related to that specific development”</i>. Whilst this guidance implies a binary approach to the funding and delivery of infrastructure, in reality the picture will be somewhat less clear. In the case of Gatwick Green, some infrastructure ‘projects’ may be clearly required, whilst others may in part/full be triggered by past/future underlying growth or other development; in such cases, this may require a more nuanced approach. This therefore implies that the DCBLP should include some text that reflects the need for a flexible approach to the</p>

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			<p>application of Policy IN1 and the Planning Obligations Annex. This supports the wording in Strategic Policy IN1 that:</p> <ul style="list-style-type: none"> <li>• Developer contributions will be sought 'where appropriate'.</li> <li>• That contributions should be in accordance with the tests in the CIL Regulations.</li> <li>• That the Planning Obligations Annex collates the 'anticipated' planning obligations associated with the DCBLP policies.</li> </ul> <p>2.11 The policy therefore offers suitable room for reasonable and flexible application in the context of the tests in the CIL Regulations and other factors relevant at the time a planning application is made.</p> <p>2.12 However, this flexibility is not reflected in the reasoned justification for Strategic Policy IN1. Paragraph 8.9 of the DCBLP sets out the approach to planning obligations and CIL, but it is considered that the Plan would benefit from some text to summarise the core of the Council's approach and its role in working with developments to bring infrastructure forward. Aligned with the need for some flexibility, TWG has made representations to Strategic Policy EC4, Policy EC5 and the planning Obligations Annex variously seeking adjustments to policy/supporting text to provide more flexibility in the means by which infrastructure is to be secured, and the need for the developer and the Council to work together in that regard.</p> <p><b>Suggested Modifications:</b>  <b>3.0 Proposed changes to Reasoned Justification to Strategic Policy IN1</b>  3.1 In order to reflect the need to ensure a flexible approach to the identification of the most appropriate form of planning obligations and the Council's role, it is proposed that the following text be added to the end of paragraph 8.9 of the DCBLP:  <i>"In summary, infrastructure will be funded via CIL or development contributions under s106, or otherwise provided as works undertaken by developers so as to make development acceptable in planning terms. Crawley Borough Council will work with developers to secure the delivery of infrastructure."</i>  3.2 Consistent with the above change, it is considered that the Infrastructure Plan (IP - part of the Councils evidence base) should contain the text noted above under the section headed 'How will infrastructure be delivered?'. The IP should also be updated with regard to any specific infrastructure projects required to make Gatwick Green acceptable in planning terms.</p>
REP/056	Gatwick Airport Limited	IN1	<p>44. We continue our support for this policy for reasons set out in para 10.1 of our representations on the 2020 Reg19 DCLP.</p> <p><b>Suggested Modifications:</b></p>
REP/056	Gatwick Airport Limited	IN2	<p>45. We continue our support for this policy for reasons set out in para 11.1 of our representations on the 2020 Reg19 DCLP.</p> <p><b>Suggested Modifications:</b></p>

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REP/032	West Sussex County Council	IN3	<p>The gigabit ambitions have moved on and we should capture that correctly in the Local Plan. I've tried to make small amendments to keep the original spirit of our thinking, and to reflect that more broadly it is now more about gigabit-capable technologies and attracting inward investment rather than solely about connectivity for individual premises.</p> <p><b>Suggested Modifications:</b></p> <p>Please consider a new paragraph 8.23: West Sussex Councils have invested in new duct and dark fibre infrastructure linking key urban centres from Crawley in the north of the county to Brighton on the South Coast which is available to the market to lease. The network has the potential to unlock further fibre deployments to premises but could also be a significant enabler for regional connectivity as the demand for scalable, cost-effective bandwidth with low latency increases. The network links economic hubs and sites of strategic development and will enable businesses to access internet services and also form private networks that support innovation and collaboration.</p> <p>Please consider amending the following two paragraphs as below:</p> <p>8.23 As the demand for digital services increases from consumers alongside business demand for <u>gigabit</u>-capable infrastructure in order to innovate, differentiate and add value, it will be important to provide full fibre deployment to every premise. Consumers will demand more choice of suppliers. Increased speeds and data transmission and the demands of future technologies such as 5G will rely on accessible high quality fibre infrastructure.</p> <p>8.24 West Sussex Councils share an exciting ambition to increase coverage of digital infrastructure providing <u>gigabit</u>-capable broadband speeds and connectivity. Working together the councils recognise that high quality digital infrastructure is a significant factor in attracting inward investment and enabling economic growth.</p>

# Crawley

Local Plan

## Economic Growth

Regulation 19 January 2021 Representations  
Local Plan Chapters 9 – 11 and Economic Growth Assessment

<b>Chapter 9. Economic Growth</b>			
<b>Ref. No.</b>	<b>Respondent</b>	<b>Policy/ Para</b>	<b>Comments</b>
REP/035 (Jun 21)	Vail Williams on behalf of Ardmore/ Windsor Land Consortium	Chpt 9	<p><b>Chapter 9: Economic Growth</b></p> <p>We continue to support the recognition that Manor Royal is the focus for business led economic growth in the Borough and that the Main Employment Areas will be required to make effective use of the land within them.</p> <p>The Northern West Sussex Area EGA (January 2020) states that further growth would exist in an unconstrained land supply position, and that for employment land a Strategic Employment Location (SEL) to the north of Manor Royal and south and/or east of the Airport, would be the most likely location.</p> <p>Our client wishes to support the recognition of the Local Plan and the EGA, that in an unconstrained scenario 113 ha of B-class business land would be required. However, we would argue that the SEL proposed at Gatwick Green is at odds with many internal policies of the emerging local plan in regards to layout, landscape setting and transport and that Jersey Farm provides a better opportunity to provide a SEL location, adjacent to Manor Royal with enhanced connectivity with the existing main employment area. This is also less intrusive through design and mitigation than the location of Gatwick Green. We therefore believe our Promotion Statement provides a more thorough explanation of how we are a more sustainable and deliverable SEL alternative site, building on the success of Manor Royal.</p> <p><b>Conclusions</b></p> <p>We are grateful for the opportunity to comment on the additional Regulation 19 Consultation and would seek further to engage directly with the Council in regard to the key matters regarding safeguarding, Crawley Western Relief/Link Road and general economic policies.</p> <p>We also reserve the right to provide, as agreed, further representations as we complete our own traffic modelling work beyond the 30<sup>th</sup> June deadline, given the ongoing dialogue with CBC and Stantec and the additional information and points of clarification we are continuing to have dialogue on. We therefore intend to submit further reps as this strategic modelling is assessed further/ we would also wish to assess and provide comment on the recently commissioned SYSTRA work as part of the Local Plan Review, ahead of any submission.</p> <p>Please note that we would also wish to participate at any Local Plan Examination regarding the emerging framework for the Borough.</p> <p><b>Suggested Modifications:</b></p>
REP/027	LRM Planning on behalf of WT Lamb Properties, Staminier	EC1	<p><b>STRATEGIC POLICY EC1: SUSTAINABLE ECONOMIC GROWTH</b></p> <ol style="list-style-type: none"> <li>1. Our clients object to the policy in its current form as it leads to an under estimation of the amount of employment land that is required over the course of the plan period. It does not comply with the requirements of NPPF nor NPPG and would not meet the requirements of NPPF para 35 in that it is not justified, effective or positive.</li> <li>2. Furthermore, given our findings in its current form the policy would not support the overarching vision of the Plan which is to inter alia encourage sustainable economic growth and make Crawley a place that people want to live and work.</li> </ol>

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	Group and Elliott Metals/The Simmonds Family		<p><b>National Planning Policy</b></p> <p>3. Chapter 6 of the National Planning Policy Framework (NPPF) sets out the Government’s requirements for “Building a strong, competitive economy”, Para. 80 is clear that planning policies should help create the conditions in which “businesses can invest, expand and adapt”.</p> <p>4. It places significant weight on supporting economic growth and productivity taking account of local business needs and wider opportunities for development. Such that each area builds on its strengths, counters any weaknesses and addresses the challenges of the future. It is clear that areas with high levels of productivity should be allowed to capitalise on their potential so that Britain can be a global leader in innovation. In this regard, Para. 81 sets out that Policies should:</p> <ul style="list-style-type: none"> <li>• proactively and positively encourage sustainable economic growth with regard to Local Industrial Strategies and other policies for economic development;</li> <li>• identify strategic sites for local and inward investment to match the strategy and to meet anticipated need;</li> <li>• address any barriers to investment; and</li> <li>• be flexible enough to accommodate needs not anticipated in the plan, allow for new and flexible working practices and to enable a rapid response to changes in economic circumstances.</li> </ul> <p>5. Para. 82 requires that policies should recognise and address the specific locational requirements of different sectors which includes for storage and distribution operators at a variety of scales and in suitably accessible locations.</p> <p>6. Further guidance on providing for economic development needs is set out in Planning Practice Guidance (PPG – 025 Ref IDs: 2a-025-20190220 to 2a-032-20190722). To ensure robust evidence on business needs, local authorities should liaise closely with the business community and take account of Local Industrial Strategies. Councils should take a ‘best fit’ Functional Economic Market Area (FEMA) and then assess the existing employment land stock; the pattern of land supply and loss; evidence of market demand from local data, market intelligence, surveys of business needs, discussions with developers/agents and evidence from business forums; wider market signals on growth, diversification and innovation, and any evidence of market failure.</p> <p>7. This requires close liaison with the business community to understand current and future requirements. In relation to market signals, PPG states that Councils need to look at: Current and robust data on labour demand (jobs/employment forecasts); Labour supply (demographically derived forecasts of the economically active population, i.e. future employees); the trends in take-up of employment land; future property market requirements, and consultation with relevant organisations and study business trends, models and employment statistics, taking account of longer term economic cycles. This work will reveal any quantitative or qualitative mismatches in demand and supply and which market segments are under or over-supplied. Councils should look at a range of</p>

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			<p>robust data to understand the requirements for office, general business and distribution space and which market segments are over/under supplied.</p> <p>8. PPG contains specific guidance on the needs of the logistics sector given its role in the efficient supply of goods, and therefore economic productivity which is a key part of the UK Industrial Strategy. It goes on to note that strategic logistics facilities need significant amounts of land with access to strategic transport networks and that where a need exists, councils should collaborate with infrastructure providers and other interested parties to identify the scale of need.</p> <p>9. Overall therefore, the NPPF and PPG requires that plan-making authorities must address their economic needs in their local plans, which requires an overriding strategy on how and where those needs are to be met. This is critical to achieving a Plan that is sound in accordance with the tests in the NPPF (para 35) and has been considered in more detail by HJA on behalf of our clients.</p> <p><b>Employment Land Requirement</b></p> <p>10. HJA is a specialist economic development consultancy, with particular expertise in advising both public and private sector clients on employment land matters. They have been appointed by our clients to review employment land matters, accordingly they have undertaken a review of employment land matters within the Submission Draft Crawley Local Plan and supporting evidence base (attached at appendix 1). This review has identified a number of issues which lead to the Local Plan under-providing land for industrial and warehousing (B2/B8) uses and they conclude that a minimum of 3.7 to 4.6 ha of additional industrial and warehousing land should be provided.</p> <p>11. Their appraisal and findings are based on a review of available documentation including:</p> <ul style="list-style-type: none"> <li>• Crawley Submission Draft Local Plan (January 2021).</li> <li>• Northern West Sussex Economic Growth Assessment (January 2020).</li> <li>• Economic Growth Assessment Focused Update for Crawley (September 2020).</li> <li>• Topic Paper 5 – Employment Needs and Supply (January 2021).</li> <li>• Employment Land Trajectory (January 2021).</li> <li>• Submissions made to the Crawley Local Plan process by the Wilky Group.</li> </ul> <p><b>Crawley Submission Draft Local Plan Summary</b></p> <p>12. HJA note that Crawley is a key economic driver for a functional economic market area that extends beyond the borough's boundaries. Particular drivers include Gatwick Airport and the large Manor Royal employment area, as well as Crawley Town Centre. The sub-regional role of the Crawley economy is recognised with the presence of the Gatwick Diamond Initiative, as well as being a core location within the Coast to Capital Local Enterprise Partnership (LEP) area.</p>



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			<p>13. The Emerging Local Plan seeks to plan positively for economic growth in the Crawley area despite the impact of Covid-19 on the area. The Borough has been identified as significantly vulnerable to the economic impact of Covid-19, given its reliance on the passenger air transport sector. Nevertheless, the importance of delivering the sites and premises required for employment purposes is clearly highlighted. For example:  “Key to achieving this [economic ambition] is the supporting of economic growth through the delivery of new business space and facilities”  “It is anticipated that Crawley’s economy will respond and recover, with significant need for new business land and floorspace identified over the period to 2036. Given the significant land supply constraints faced within the borough, the Local Plan sets out a pro-active and ambitious economic strategy to support economic recovery in the shorter-term, whilst planning positively for economic growth and diversification, consistent with LEP and Gatwick Diamond priorities, and national planning policies, to ensure that sustainable economic growth can be delivered over the Plan period.”  “The scope to accommodate identified employment land needs in Crawley has been severely constrained by the limited available land supply, which is significantly affected by the requirement to safeguard land in the north of the borough for a possible southern runway at Gatwick Airport. There remains a risk that if Crawley’s employment needs cannot be accommodated within the borough, investment may be lost outside of Crawley, and indeed the sub-region entirely.”</p> <p>14. The proposals for employment land provision draw heavily on the underpinning evidence base. The overarching policy position is of a need for 38.7ha of employment land. The residual requirement for industrial uses, after making allowance for existing pipeline supply and removing office requirements is 24.1ha and is stated to be primarily for B8 type uses.</p> <p>15. In order to meet the identified shortfall, a strategic employment allocation at Gatwick Green is made (48ha). This follows a site selection process drawing on the Housing and Employment Land Availability Assessment (HELAA). It is noted that there were a number of sites promoted for employment purposes located on land safeguarded for airport expansion to the south of the existing Gatwick Airport site boundary. These sites were discounted on the basis that the safeguarded land might still be required for a second runway at the airport and should not therefore be released for other uses.</p> <p>16. Policy EC4 and its supporting text notes that any further industrial floorspace beyond the 24.1ha requirement would need to be demonstrated through appropriate evidence. The policy also highlights a range of landscaping and environmental considerations that will impact upon the net developable area of the site as well as the potential to accommodate a range of ancillary employment and amenity uses.</p> <p><b>Local Plan Evidence Base Summary</b></p>

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			<p>17. The most relevant documents are the Northern West Sussex Economic Growth Assessment Update (January 2020) [EGA] and the Economic Growth Assessment Focused Update for Crawley (September 2020) [EGA Update]. Both documents were prepared by Lichfields.</p> <p>18. The later study provides an update to take some account of the Covid-19 pandemic and generates the estimates which are taken forward to the Local Plan.</p> <p><b>Northern West Sussex EGA</b></p> <p>19. The EGA looks at the whole Functional Economic Market Area (FEMA). The assessment of future requirements for Crawley Borough includes a very wide range of -1.1ha to +113ha. The study recommends adopting a figure of +33ha based on a projection of past development trends.</p> <p>20. Overall the report sets out a positive analysis of the Crawley economy (pre-Covid) and the role of the Crawley Borough within the wider FEMA.</p> <p>21. The analysis notes commercial agent feedback indicating a need for additional land to accommodate strong levels of market driven demand, particularly for industrial sites and premises. However, no uplift is applied.</p> <p>22. The analysis of future requirements does not set out any consideration of replacing losses of employment sites and premises to other uses.</p> <p>23. The approach that is preferred in this study draws on analysis of past trends. There is no consideration of whether past take up might have been suppressed as a result of constrained supply or whether the demand profile in the past period was similar to expectations for the future.</p> <p>24. Given the strength of agent opinion and the failure to consider the implications of losses of employment sites and premises to other uses the final requirements figures put forward can be considered an underestimate of total objectively assessed needs.</p> <p><b>EGA Focused Update for Crawley</b></p> <p>25. This report is positioned as a post Covid check and draws on revised economic forecasts. The level of growth that is forecast is lower than historic growth rates and is from a respected source. The relevant differences in the considered economic forecasts are discussed on a sectoral basis in order to come to a balanced view.</p> <p>26. The assessment of future B8 warehousing requirements is primarily driven by forecast employment change (and therefore changes substantially as a result of revised forecasts). In the commentary set out within the EGA Update (paragraph 2.48) it is noted that the Oxford Economics forecasts make allowance for more rapid automation. Whilst the process of automation will have implications for employment and economic development policy more generally, this does not necessarily impact on sites and premises requirements. This actually confirms</p>

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			<p>the requirement in the latest Planning Practice Guidance (PPG), to make a broader assessment of B8 uses on the basis that employment alone has known weaknesses as a predictor for this sector.</p> <p>27. There is no clear evidence of any attempt at this wider assessment as part of the EGA. This links across to comments made above on the original EGA, with commercial agent sentiment not being fully reflected.</p> <p>28. The EGA Update assessment leads to an overall requirement of 38.7ha, which is the figure carried forward to the Pre Submission Local Plan. This is slightly greater than the figure emerging from the original assessment. In the EGA Update the emerging requirements from both baseline job growth and past take-up approaches are very similar (38.7ha and 39.6ha).</p> <p><b>Headline Employment Land Requirement</b></p> <p>29. The summary review set out above identifies a number of weaknesses with the overarching analysis. In particular:</p> <ul style="list-style-type: none"> <li>a. A failure to actively consider the potential need for land to replace losses to other uses; and</li> <li>b. A failure to take full account of agent views, particularly for B2/B8 uses</li> </ul> <p><b>Replacements</b></p> <p>30. The recommendation of a need for 38.7ha of employment land emerging from the EGA Update is drawn from the baseline job growth approach. This considers only the net change in employment over the plan period, and applies an average employment density for the relevant Use Classes to derive an additional floorspace requirement.</p> <p>31. This approach is helpful in considering some of the net changes in the economy. However, it fails to consider any of the issues within the existing economy or commercial market. Inherent in the approach is that the entirety of the existing stock of commercial employment sites and premises remains in its appropriate use and fit for purpose for the entirety of the plan period.</p> <p>32. However, there is highly likely to be a loss of some stock to non-employment uses, or becoming redundant through dilapidation, or no longer being aligned to modern occupier requirements. Further, this approach fails to fully consider whether there are changing property requirements within sectors. There may also be changing employment densities over time. This is already recognised in the evidence base with regards to automation in some sectors, and is recognised in PPG specifically in regard to B8 uses where a wider view of future storage and distribution requirements is instructed.</p> <p>33. These effects will lead to additional requirements for employment sites and premises that are not captured in the current evidence base.</p> <p><b>Agent Views</b></p> <p>34. As noted at para 7 earlier within this representation, this second issue is a specific requirement of PPG Paragraph: 031 Reference ID: 2a-031-20190722. The Submission Draft Local Plan includes specific references to</p>

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			<p>this market sentiment, as set out at paragraph 135 above, but with no action taken. The EGA also highlighted strong commercial agent opinion as summarised at paragraph 22 above.</p> <p>35. HJA has consulted with local industrial agent Robert Bradley-Smith who confirmed the views set out within the EGA remain highly relevant. Industrial, and particularly logistics demand is extremely strong and current and future requirements are expected to be ahead of past trends. The Covid19 pandemic has accelerated the move to e-retail. The premises requirements of e-tailers and third party logistics operators are growing rapidly. The growth is expected to continue as new market areas are added to the portfolios of e-tailers, as well as through increasing demands for ever shorter delivery times. The Gatwick area was also highlighted for its excellent location at the heart of the South East and able to service both the south coast and south London.</p> <p>36. In considering an approach aligned to the requirements of PPG, and drawing on the agent views as set out within the evidence base, there is very clear evidence of a need to provide an uplift to the stated requirements for warehousing space. We believe that it is appropriate for the Authority to consider this urgently and prior to submission of the Plan.</p> <p><b>Shortfall in Employment Land Trajectory</b></p> <p>37. Notwithstanding the issues set out above, Table 2.5 of the EGA update (p10) identifies a net floorspace requirement of 121,550sq.m of industrial (B1c/B2/B8) uses before the 10% flexibility allowance is applied. With the flexibility added this increases the required provision to 133,700sq.m. In land terms this equates to 33.4ha on the basis of the 4,000sq.m per hectare development density assumption.</p> <p>38. A potential shortfall in provision is identified within the Employment Land Trajectory (January 2021) which includes a total provision for B1c/B2/B8 floorspace of 118,920sq.m. This falls below the total requirement. This indicates a shortfall of 14,780sq.m.</p> <p>39. The trajectory document also suggests the proposed allocation at Gatwick Green will deliver 77,800sq.m on 24.1ha (we consider the capacity of the sites separately in respect of our representations in relation to Policy EC4). This equates to a density of 32%. On that basis the additional 14,780sq.m would require a further area of land.</p> <p><b>Conclusion</b></p> <p>40. Crawley is a key economic hub for a wider hinterland. The Submission Draft Local Plan seeks to plan positively for economic and employment growth.</p> <p>41. The Council's own evidence and the Submission Draft Local Plan both acknowledge the strength of market demand highlighted by commercial agents, but make no adjustment for this clear evidence of strong market signals and the specific requirement of PPG to take account of logistics needs in a more rounded way. Coupled with a failure to make any provision for replacing losses of existing employment sites and premises to other uses,</p>

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			<p>and through dilapidation and changing occupier requirements, there is a clear under provision in the assessment of future needs. The scale of this uplift is uncertain.</p> <p>42. The Employment Land Trajectory set out alongside the Submission Draft Local Plan indicates a shortfall in anticipated floorspace when compared to the identified needs and the claimed capacity within the plan. The shortfall equates to a need for a further 3.7ha of industrial and warehouse land across the plan period. This could increase to a minimum 4.6ha based on the identified density at Gatwick Green and is subject to increase to reflect a market and replacement uplift.</p> <p><b>Table 1: Revised Industrial &amp; Warehousing Requirement – Summary</b></p> <table border="1"> <tr> <td>Current stated outstanding requirement</td> <td>24.1ha</td> </tr> <tr> <td>Employment land trajectory shortfall</td> <td>3.7-4.6ha</td> </tr> <tr> <td>Additional market and replacement uplift</td> <td>TBC</td> </tr> <tr> <td><b>Total</b></td> <td><b>27.8-28.7ha</b></td> </tr> </table> <p><b>Suggested Modifications:</b>  <b>CHANGES REQUIRED IN ORDER TO ENSURE THAT THE PLAN IS COMPLIANT WITH NPPF</b></p> <p>43. Whilst we are supportive of the general approach of the Council, currently the plan is contrary to National guidance, it does not:</p> <ul style="list-style-type: none"> <li>• reflect the most up to date trends or market signals;</li> <li>• proactively and positively encourage sustainable economic growth with regard to Local Industrial Strategies and other policies for economic development;</li> <li>• identify strategic sites for local and inward investment to match the strategy and to meet anticipated need; or</li> <li>• provide flexibility to accommodate needs not anticipated in the plan, allow for new and flexible working practices and to enable a rapid response to changes in economic circumstances.</li> </ul> <p>44. Based on the analysis undertaken by HJA and in order to achieve the vision of the plan and to comply with National guidance the level of Industrial land required over the plan period should be increased to a minimum of 28.7ha with a further uplift TBC to reflect market circumstances and a replacement uplift. This would enable a robust supply of land and will reflect local circumstances as required by national guidance. It was also help to ensure diversification of the local economy and move away from reliance upon Gatwick Airport.</p> <p>45. As such in order to make the plan sound, as a minimum the following amendment to Policy EC1 is required with further consideration given to the required market and replacement uplift:</p> <p><b>Strategic Policy EC1: Sustainable Economic Growth</b>  <b>Crawley’s role as the key economic driver for the Coastal to Capital and Gatwick Diamond areas will be protected and enhanced. Suitable opportunities are identified within the borough to enable existing and new businesses to grow and prosper.</b></p>	Current stated outstanding requirement	24.1ha	Employment land trajectory shortfall	3.7-4.6ha	Additional market and replacement uplift	TBC	<b>Total</b>	<b>27.8-28.7ha</b>
Current stated outstanding requirement	24.1ha										
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			<p><b>There is need for a minimum of 43.3 hectares new business land in the borough which, taking off the opportunities identified in the Employment Land Trajectory, results in an outstanding requirement for a minimum of 28.7 hectares of new industrial land over the period to 2036.</b></p> <p>Crawley's recognised economic role and function will be maintained and enhanced through:</p> <ul style="list-style-type: none"> <li>i) Building upon and protecting the established role of Manor Royal as the key mixed business location for Crawley at the heart of the Gatwick Diamond and Coast to Capital areas;</li> <li>ii) Ensuring that the borough's Main Employment Areas are protected as locations for sustainable economic growth;</li> <li>iii) Encouraging the redevelopment and intensification of under-utilised sites in Main Employment Areas for employment use;</li> <li>iv) Supporting small extensions to Manor Royal, outside of safeguarding, where this would deliver additional business land, and can be achieved in a manner that is consistent with other Local Plan policies; and</li> <li>v) Allocation of an industrial-led Strategic Employment Location at Gatwick Green, on land east of Balcombe Road and south of the M23 spur.</li> </ul> <p><b>*See representation for Appendix 1*</b></p>
REP/033	Horsham District Council	EC1	<p>We support this policy and note that the focus of new land allocations is to provide industrial units at Gatwick Green, whereas mixed business growth will be supported at Manor Royal and at existing employment sites. This is likely to complement Horsham's employment strategy which supports smaller business spaces and start-ups. We envisage that the two authorities will continue to work closely to ensure appropriate economic growth strategies in our respective areas.</p> <p><b>Suggested Modifications:</b></p>
REP/035 (Mar 21)	Vail Williams on behalf of Ardmore Land Consortium	EC1	<p>As the Council are aware, our clients have historically been promoting Jersey Farm as a potential extension to Manor Royal, through a number of Core Strategies, Local Plans and other planning framework consultations with Crawley Borough Council over the last 20+ years. The site sits on the boundary with Manor Royal and even has direct existing access from County Oak Way, with large scale development to the East and North immediately abutting our site. The site also forms part of the Council ELAA.</p> <p>The principle of our site being available and deliverable was established in regard to the consented development in 2015 and 2019. We are now looking to implement this decision Spring 2021, and the building is being actively marketed.</p> <p>The Council themselves have also historically acknowledged that there are significant land supply issues and this is still acknowledged in paragraphs 10.21 9.7 which confirm that Crawley requires 38.7 ha of new employment land over the Plan period to 2036.</p>

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			<p>Para 9.7 also recognises that the scope to accommodate identified employment needs in Crawley is severely constrained by the requirement to safeguard land in the North of the Borough for the possible runway at Gatwick Airport. We support this paragraph that also identifies the risk that if Crawley's own employment needs cannot be met within the borough, investment may indeed be lost for Crawley or the sub region entirely. Therefore, we wholeheartedly, agree that there is a need for <i>"a robust strategy which plans to positively meet Crawley's employment needs, supporting the wider Gatwick Diamond and Coastal to Capital areas"</i>.</p> <p>However, paragraph 9.8 states that the Local Plan strategy focuses on <i>"the protection and intensification of the Borough's existing main employment areas and the identification of new employment land. Manor Royal will remain the economic heart of the Gatwick Diamond and is protected and promoted for business led economic growth that builds upon its established function and role as the Gatwick Diamonds leading business destination"</i>. The Plan also acknowledges that appropriate extensions to Manor Royal located outside of the Gatwick safeguarding area will be supported, however it then goes on to say that <i>"to accommodate Crawley's significant requirements for industrial and warehouse land, a Strategic Employment Location is allocated at Gatwick Green with the safeguarded land boundary amended accordingly"</i>.</p> <p>We believe that the SEL allocation away from Manor Royal, with the loss of countryside and its significant policy constraints and infrastructure issues, is at odds with the Council's aims to ensure Crawley's main employment areas will remain the focus for employment uses. Indeed, the ST4 allocation may not be able to ensure that the Main Employment Area's economic function is not undermined, as this introduces a site that is disconnected and away from Manor Royal itself.</p> <p>Paragraph 9.13 confirms that there is a need for a B8 led SEL with an outstanding need of 24.1 ha of employment land, and we agree that this should be a plan led requirement to ensure that the site is suitable and appropriate to meet business needs. Para 9.14 continues by stating <i>"to supplement the employment land supply position and deliver new floor space at Manor Royal, small extensions to Manor Royal outside of the safeguarded land will be supported where this would contribute positively to business led economic growth."</i></p> <p>However, we would argue that the Council is being forced to consider less sustainable locations without significant evidence that safeguarding cannot be amended accordingly, especially on the periphery of Manor Royal and in particular, in the area where they are already identifying a need for alternative development that would override safeguarding, such as the Crawley western link road. We therefore believe further consideration of alternative strategies are needed especially relating to criteria (v) that looks to provide 24.1 hectares of new industrial land over the Plan period to 2036, by allocating the SEL at Gatwick Green, and how this may complement the established role of Manor Royal as required in paragraph 9.23.</p> <p>Whilst we recognise the extensive policy criteria requirements that would need to be met for the allocated site at Gatwick Green, as set out in policy EC4, we would argue that given that the safeguarded boundary has to be</p>

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			<p>amended in order for this to come forward, the Council is not correct that in paragraph 9.15 this is “<i>the only location in Crawley that is capable of providing the required quantum of industrial land and floor space without prejudicing the possible future delivery of the southern runway on the safeguarded land</i>”.</p> <p>In addition, we would argue that the comments in paragraph 9.2 regarding an urban extension to Crawley, suggest that this is most likely to be provided on the western boundaries of the town, hence the need to provide the western link Relief Road.</p> <p>We would suggest therefore, that such an urban extension could increase the requirements for employment needs, especially to the west of the town, and that these could be more appropriately met in a more sustainable location on our site, as this would enable better connectivity and sustainable transport movements on the edge of the Manor Royal Business District (MRBD). Our site is better located in a closest to the western Borough boundary with Horsham and could be supported by the necessary infrastructure to the west of the Borough.</p> <p>We note and welcome that para 9.22 provides additional clarity that following any implementation of new extensions to Manor Royal should form part of the Manor Royal main employment area, and therefore this supports our justification for the Built Up Area Boundary and Manor Royal Main Employment Area boundaries to include our new development as consented.</p> <p>In regard to policy EC3, relating to Manor Royal, we agree that the business district is instrumental to the success of the wider Gatwick diamond and that development at Manor Royal should contribute positively to the overall setting and environment of the main employment area in accordance with the Manor Royal Design Guide SPD. Again, we believe that our masterplan has the merit of a successful transition between existing buildings on Manor Royal and the aspirations of a high quality environment especially in the area around the potential new western relief link road.</p> <p>In regard to policy EC4 on the SEL, this states that 24.1 hectares of new industrial land must be provided as a minimum, predominantly for B8 storage and distribution use. However, policy EC1 has required 24.1 hectares to be provided across the whole Local Plan, and therefore it is unclear how any additional potential industrial land or developments would be viewed across the rest of the town if Gatwick Green were not able to satisfy all of the requirements of Policy EC4 or be implemented.</p> <p>We agree that the provision should be predominately industrial/ B8 but there is concern how any additional mix may undermine rather than complement MRBD given its separate location. The policy also recognises the need for a comprehensive mobility strategy and improvements to public transport facilities links and infrastructure, which all requires a robust transport assessment required. Again, we believe this allocation is for a disconnected site from the Main Employment Area of Manor Royal but also further away from those potential employees that reside in the neighbourhoods around it.</p>



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			<p>Policy EC4 also recognises that particular regard should be had to the location of the site in regard to the North East Crawley Rural Fringe Landscape Character Area, recognising that design is critical to how this SEL will sit within the countryside location. Again, we would argue this may be more easily achieved in a site adjacent to existing development at Manor Royal.</p> <p>In summary, we believe our proposal could allow an area on the periphery of the safeguarding area to be removed from safeguarding without undermining the future delivery of safeguarding. The safeguarding boundary could be amended accordingly as the Council are suggesting they would do so with EC4. We believe our sites affords established continuity between the potential Crawley western relief road to relieve access and transport issues across the North and West of the Borough and would meet the 24.1 ha requirement whilst providing and enhancing the main employment area of Manor Royal in a more sustainable manner.</p> <p>This is because the location of our site on the northern boundary of the established main employment area, provides a sustainable extension to Manor Royal as the economic heart of the town. Indeed, previous Local Plan Inspectors have encouraged extensions to Manor Royal to provide essential employment needs and have rejected proposals for a SEL at Land East of Balcombe Road.</p> <p>In our view if the whole area is to be safeguarded for future needs then this should be consistent across the Borough, or the Council and GAL should openly review land take requirements in line with the principles within the NPPF regarding sustainable development in sustainable locations, releasing areas where development can support the economic activity of the town, Manor Royal and Gatwick Airport alike.</p> <p>We therefore would like to engage further with the Council in regard to further assessments on more sustainable alternative locations to be considered for the SEL under EC1.</p> <p>Whilst we appreciate that any aviation policy changes will trigger a new Local Plan review on both the principle of safeguarding and the extent of safeguarding, this would only occur after the release of the land under policy EC1 Land East of Balcombe Rd.</p> <p>As per our meetings with the Council as part of both of the Regulation 19 consultation, we wish to continue to engage as a viable alternative location to land East of Balcombe Road, and have included indicative Masterplans to enable the council to understand how such development could be provided on the Jersey Farm site.</p> <p><b>Suggested Modifications:</b></p>
REP/055	Savills on behalf of Wilky Group	EC1	<p><b>1.0 Introduction</b></p> <p>1.1 This representation is submitted on behalf of The Wilky Group (TWG), which has a longstanding interest in the promotion of strategic employment land within the Crawley Borough Council (CBC) area. It relates to Chapter 9 on Economic Growth and Social Mobility and specifically Strategic Policy EC1, Sustainable Economic Growth in the draft Crawley Borough Local Plan, 2021 (DCBLP).</p>

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			<p>1.2 TWG owns about 48 ha (119 acres) of land east of Gatwick Airport as shown the plan at Appendix 1. The land has been promoted by TWG as a strategic employment opportunity known as Gatwick Green (the Site). The Site is proposed for allocation as a Strategic Employment Location (SEL) of 47 ha (116 acres) in the DCBLP under Strategic Policy EC4 as a comprehensive industrial-led development of predominantly storage and distribution uses under use class B8. The extent of the SEL allocation is identified on the plan at Appendix 1.</p> <p><b>Background</b></p> <p>1.3 These are TWG's representations made in the light of the updated DCBLP 2020, which was published following the advice from the Planning Inspectorate to Crawley Borough at the Advisory Visit in April 2020: the advice was that the Local Plan had to include a strategy to address Crawley's employment needs and that the removal of safeguarding could not be regarded as certain. Accordingly, the representations revise TWG's position, given the changes in the draft Plan and the revised / updated evidence base since the original representations were made.</p> <p><b>Scope of representation</b></p> <p>1.4 This representation sets out the evidence in support of Strategic Policy EC1 with reference to:</p> <ol style="list-style-type: none"> <li>1. National planning policy and guidance.</li> <li>2. Existing regional and sub-regional economic/transport strategies and policy.</li> <li>3. The Council's North West Sussex Economic Growth Assessment Update (EGA1) and related focused Crawley update (EGA CU2).</li> <li>4. A report by Savills on the Industrial &amp; Logistics (I&amp;L) market, the Crawley employment land supply and the complementarity of Gatwick Green with other employment areas at/near Crawley.</li> <li>5. A report by Savills on the economic benefits and social value of Gatwick Green.</li> <li>6. The benefits of Gatwick Green as a SEL.</li> <li>7. The need to address Crawley's pre-existing and current unmet employment land needs.</li> <li>8. The need to address the critical and urgent economic issues faced by Crawley as a result of the significant economic and social impacts from the COVID-19 pandemic, which are predicted to endure for many years.</li> </ol> <p><b>Executive Summary</b></p> <p>1.5 There is an urgent need for additional strategic employment land in Crawley to meet the long-standing economic needs of the Borough. This was identified in, but not addressed by, the adopted DCBLP (2015), and has been re-confirmed in the Council's EGA CU. The DCBLP has expressed these needs as a minimum requirement to reflect the need for a flexible policy response that can enable the Plan to adapt to changing circumstances and in so doing, future-proof the economy. This positive and pro-active approach is consistent with national planning policy and guidance.</p> <p>1.6 Evidence from Savills Economics has identified a series of trends and structural changes in the economy that are driving growth in the Industrial and Logistics (I&amp;L) market. The market is growing in the more peripheral parts of the country away from the traditional midlands base and providing a greater diversity, and enhanced quality, of</p>

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			<p>employment opportunities. Against this background, the I&amp;L sector is severely underrepresented in Crawley compared to other markets and areas, and in particular when compared to markets around major airports. In these circumstances, and given the constrained supply of suitable sites for major B8 uses around Crawley, the demand for a high-profile site in Crawley with access to the Strategic Road Network (SRN) is very strong. This market analysis supports the empirical assessment of employment land needs contained in the Council's EGA CU and the expression of that need as a minimum in policy in the DCBLP.</p> <p>1.7 The land supply (excluding Gatwick Green) comprises a range of development sites focused on redevelopment and intensification opportunities at Manor Royal. The supply provides a limited, though important, part of the provision to meet part of the Borough's future industrial needs – the sites would deliver a range of I&amp;L unit sizes, with a focus on medium sized units, but with some small and large units, the latter catering the data storage segment of the market. In contrast, a significant part of the future requirement is for larger / very large B8 storage and distribution units (100,000 sqft+) to serve the needs of new generation logistics occupiers. Gatwick Green will fulfil the identified need given its strategic location with access to the M23 and its ability to accommodate larger storage and distribution units as part of an industrial mix of predominantly B8 uses.</p> <p>1.8 Savills Economics has also assessed the degree to which Gatwick Green is complementary to the key Main Employment Areas in Crawley (the town centre and Manor Royal) and the nearest significant planned employment area to Crawley (the Horley Business Park). The assessment concluded that there is a high degree of complementarity between these employment locations, which all serve different market sectors / segments. Maintaining this complementarity is a key policy objective in the DCBLP and any proposals for Gatwick Green will need to demonstrate that this balance will endure – the predominately strategic B8 focus of Gatwick Green will ensure this will be the case.</p> <p>1.9 A number of regional and sub-regional economic studies / strategies support focusing growth at Crawley/Gatwick in recognition of the area's current role and future potential. Importantly, the evidence base for the Coast to Capital LEP Local Industrial Strategy, which planning policy should reflect, supports the identification of major economic development adjacent to Gatwick, identifying sites within the land safeguarded for an additional runway comprising about 150 ha east of the Airport.</p> <p>1.10 This representation supports the assessed need for strategic employment land in Crawley, which lies at the economic heart of the Coast to Capital area and the 'Gatwick Diamond'. The evidence therefore supports the Council's decision to allocate Gatwick Green as a SEL for industrial-led development, primarily for storage and distribution uses. This recognises the development potential of the Site as a highly sustainable location capable of meeting Crawley's unmet needs.</p> <p>1.11 The Gatwick Green allocation also provides for development at a scale that can address the significant impacts on the local economy as a result of the sharp fall in aviation activity at Gatwick Airport, as a result of the COVID-</p>

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			<p>19 pandemic, the impacts of which are likely to be felt for many years. The Council's Covid Recovery Plan identifies the 'flagship intervention' of the EC4 allocation as a key part of its response to diversify away from an over-reliance on the aviation and airport sectors.</p> <p>1.12 The development of Gatwick Green, therefore, offers significant socio-economic benefits for Crawley and the sub-region, together with the significant infrastructure benefits that will flow from its development. The creation of high-quality jobs and other benefits will assist the residents of Crawley, especially those affected by the economic downturn associated with the COVID-19 pandemic.</p> <p>1.13 Strategic Policy EC1 is therefore considered to be sound in that it addresses the future employment needs of the Crawley in a way that ensures that the Plan can respond flexibly to future needs so as to future-proof the economy – crucially, it does this by providing for a minimum of employment land, subject to the demonstration of market / needs evidence. Strategic Policy EC1 is therefore in accordance with the four soundness tests contained in the NPPF (para 35). The representation also sets out the case for some minor adjustments to the policy and the supporting text:</p> <ol style="list-style-type: none"> <li>Express the outstanding employment land requirement of 24.1 ha in Strategic Policy EC1 as a 'minimum' so as to ensure consistency within the policy and with Strategic Policy EC4.</li> <li>Amend paragraphs 9.13, 9.20 and 9.23 of the supporting text to Strategic Policy EC1 to reflect that the overall and outstanding requirements of 38.7 ha and 24.1 ha of new industrial land are a 'minimum'.</li> </ol> <p><b>See submission for representation</b></p> <p><b>Suggested Modifications:</b></p>
REP/056	Gatwick Airport Limited	EC1 (V)	<p>9. We objected to Policy EC1 of the 2020 Reg19 DCLP because it related the proposal to bring forward a North Crawley Area Action Plan on land safeguarded for second runway (2020 Reg19 DCLP Policy SD3). Whilst the revised plan has removed Policy SD3, the revised economic growth strategy now provides for the allocation of an industrial-led Strategic Employment Location at Gatwick Green, on land east of Balcombe Road and south of the M23 spur. This is referred to at para (v) of Policy EC1 with further detailed policy provision for this allocation at Policy EC4.</p> <p>10. We object to this aspect of the economic growth strategy and therefore object to para (v) of Policy EC1 and to Policy EC4 as a whole. The reasons for our objections are set out below.</p> <p><b>a) The allocation prejudices safeguarded land</b></p> <p>11. Gatwick Green is proposed to be constructed on land that remains safeguarded for the expansion of Gatwick Airport. The Government's draft Aviation Strategy concludes "It is prudent to continue with a safeguarding policy to maintain a supply of land for future national requirements and to ensure that inappropriate developments do not hinder sustainable aviation growth". This stance is recognised in the National Planning Policy Framework (NPPF) which restates the government's commitment to "identify and protect, where there is robust evidence, sites and</p>

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			<p>routes which could be critical in developing infrastructure to widen transport choice". The development of Gatwick Green for employment purposes would conflict with that safeguarding and the Gatwick Masterplan.</p> <p>12. The matter of safeguarding was addressed in the Inspector's Notes of the PINS advisory video conference (April 2020) in respect of land 'North of Crawley'. The Inspector concluded that the removal of safeguarding cannot be regarded as certain, there is no known timescale for its removal and that GAL continues to object to its removal. Consequently, the proposal to remove safeguarded land was, in that case, as a consequence considered "...unlikely to be effective". We consider that the circumstances which lead to that conclusion apply in this case. Furthermore, the Inspector's conclusion treats safeguarded land as a whole and does not give any support for parts of it to be nibbled away in a piecemeal fashion.</p> <p><b>b) The scale of the allocation is not justified</b></p> <p>13. <b>Annex 1</b> examines the economic growth evidence base which includes two studies which produce a wide range of employment land requirements ranging from a negative requirement based on employment projections to a requirement of 38ha based upon one of the sets of forecasts. The wide disparity in the conclusions undermines confidence in their reliability.</p> <p>14. The fact that the forecast level of need is of the same magnitude as that based upon past take up rates is cited as an indicator that the forecast is acceptable. The assessment itself nevertheless acknowledges that past take up rates have been inflated by two very recent completions. In addition, the Update report also examines the impact of Covid-19 on rates of employment growth. Whilst both the forecasters, Oxford Economics and Experian, both conclude there will be lower levels of employment growth for Crawley due to a fairly significant 'rebasing' of local employment levels which effectively reduces the scale of expected job growth. These findings are not taken into account in the conclusions. Consequently, rather than providing support for the forecast, the fact that the allocation is of the same scale as past trends indicates that it overstates the level of need.</p> <p>15. The Update report acknowledges that the employment land requirements may need to be reconsidered closer to the Local Plan examination, depending on how the economic situation changes. Given the dismissal of the conclusions on the impact of Covid-19 on job growth, the need for a review of the employment growth findings becomes even more apparent.</p> <p>16. It is intended in the local plan that the Gatwick Green allocation of 47ha should provide, "as a minimum", 24.1ha new industrial land, predominantly for B8 storage and distribution use to meet the identified need. Any additional floorspace would have to be justified through appropriate evidence.</p> <p>17. Gatwick Green is consequently very nearly twice the size of the employment land requirement of 24.1ha it is intended to meet. No justification or evidence is advanced for this larger scale of development, which is a significant omission, especially when the site is already protected for an alternative use.</p>

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			<p>18. In the absence of any further employment development, it is unclear what happens to the remaining 22.9ha. There has been no investigation as to whether a smaller release, so as to minimise the impact on safeguarded land, would be a preferable solution.</p> <p><b>c) The allocation will prejudice the delivery of a full second runway</b></p> <p>19. The allocation of Gatwick Green is based upon a simple but ultimately uninformed assessment as to whether land shown in the Gatwick Masterplan for surface parking produces an 'efficient' use of land. This assumption was not based upon any discussions with GAL. The decision to make the allocation was made on the basis of an uninformed and incorrect assumption.</p> <p>20. Arup have undertaken a more detailed review of the expected impact of the allocation of Gatwick Green and the resulting reduction of Safeguarded Land for a second runway. Their report and findings are attached hereto as Annex 2.</p> <p>21. The assessment demonstrates that in order to achieve the required level of car parking, an efficient use of the existing safeguarded land was already required with a combination of decked and block parking. With the loss of the Gatwick Green safeguarded land, the remaining area would need to be developed with multi-storey car parks (MSCP) with at least ground plus four storeys across the whole of the remaining land. However, the area to the west of the A23 would be limited to providing up to one deck due to aerodrome safeguarding height constraints. This would mean that even higher density MSCPs, with a greater number of stories would be required in other parts of the residual land. It is not viable for long stay parking products to be provided through constructing multi storey car parks, given the added construction costs and lower financial returns from passenger charges for long stay parking. This is a substantial change from the R2 scheme in terms of construction and operation.</p> <p>22. In addition, the configuration of the residual land does not produce an efficient layout for airport car parking provided as MSCPs. The configuration of the land will therefore further reduce the efficiency of the parking layout which can be achieved and consequently the capacity of the residual site.</p> <p>23. The proposed allocation will also have a harmful impact on the access to the retained land. The primary access junction serving the presently safeguarded land to the east of the realigned A23 is a significant grade separated junction commensurate with the level of use expected. The Gatwick Green allocation disconnects this primary high capacity access from the remaining safeguarded land east of the A23 and creates segregation between the remaining parcels of land for parking. This would result in a substantial change from the R2 scheme in terms of access strategy, highway design, construction, and car park operation which has not been tested in the local plan evidence base.</p> <p><b>d) There has been no assessment as to whether the employment land requirement could be met elsewhere</b></p> <p>24. The PINS advice note also states that with the safeguarding of land at North Crawley still in place, the Council should be proactively seeking to accommodate unmet economic needs in nearby authority areas through the Duty</p>

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			<p>to Cooperate. There is no evidence that this the council undertook such action post the April 2020 conference and prior to allocating Gatwick Green.</p> <p>25. Similarly, there is no evidence that CBC investigated whether it was possible to meet the requirement by looking for other sites within the Borough. As a first step, we consider that an updated Built-Up Area Boundary Review should have been undertaken.</p> <p><b>e) The Allocation cannot be accessed without severe detriment to highway network</b></p> <p>26. Arup have reviewed the transport modelling for Gatwick Green and set out their analysis and conclusions at <b>Annex 3</b>. Their key areas of concern are:</p> <ul style="list-style-type: none"> <li>(i) The quantum of Gatwick Green development assessed within the traffic model;</li> <li>(ii) The assumptions made between the proportion of B8 warehouse and B8 parcel distribution for Gatwick Green and their effect on the traffic generated;</li> <li>(iii) The lack of highway mitigation identified, with reference to (i) and (ii);</li> <li>(iv) No clear allowance for Gatwick Airport growth having been made.</li> </ul> <p>27. The Crawley Transport Study is calculated on the assumption that Gatwick Green will provide a total of 77,500 sq. m of mixed employment floorspace across the 24.1ha development area. This is less than the 96,400 sq. m that the Employment Update report assumed would be accommodated on this area (calculated at 4,000s sq. m per ha which is the basis for the scale of the Gatwick Green allocation). The Transport Study is consequently failing to model the full quantum of floorspace intended for the Gatwick Green allocation under the employment policies.</p> <p>28. Whilst the model correctly assumes that the site will be predominately for B8 storage and distribution use, within the Crawley Transport Study, it is acknowledged that the vehicle trip generation is sensitive to the type of the proposed B8 uses assumed (i.e. the B8 parcel distribution has much higher vehicle trip rates, around 10 times that of B8 warehousing). Therefore, the split assumed between these uses has great bearing on the overall vehicle generation and the assessment of the development impacts. The model assumes only a very low proportion of floor space (10%) will be for distribution. Consequently, the model does not test the worst-case scenario or even the sensitivity of the split between these uses which is important given the substantial difference in vehicle traffic generated.</p> <p>29. Notwithstanding the assumptions could be significantly underestimating the Gatwick Green vehicle trips, the highway modelling work shows that a number of junctions will be overcapacity. This is both with and without sustainable travel mitigation measures.</p> <p>30. For modelling scenario 2 with Gatwick Green, even with sustainable travel mitigation measures, six junctions are modelled as being overcapacity. This includes two junctions on A2011 Crawley Avenue to the south of Gatwick Green. For modelling scenario 3 with Gatwick Green and additional housing, further junctions are recorded as</p>

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			<p>being overcapacity, including along Balcombe Road / Radford Road and along M23 Spur / A23 corridor. No specific highway mitigation measures are identified and a Manage and Monitor approach is proposed.</p> <p>31. The Crawley Transport Study includes an explanation of the committed and consented schemes the traffic generation for which are included in the reference case and forecast models. The models also include an allowance for general background growth.</p> <p>32. It is not clear, however, whether any account of Gatwick Airport passenger growth with the existing runway has been accounted for in the assessment and consequently the impacts understood and suitable mitigation, if required, provided.</p> <p>33. We are concerned that the assumptions adopted in the Transport Modelling are not only inconsistent with the assumptions adopted elsewhere within the evidence base but, due to their sensitivity, could mean the vehicle trip generation of Gatwick Green is actually many times greater than assessed within the Crawley Transport Study. The inconsistency in terms of the plot ration assumption, also means that the 24.1ha allocation would not meet the floorspace requirement identified in the economic growth assessment.</p> <p><b><i>Annex 1-3 set out under GAL Representation to Policy EC4.</i></b></p> <p><b>Suggested Modifications:</b></p> <p><b>Conclusions</b></p> <p>34. The allocation of Gatwick Green is a reaction to the PINS advice on the unacceptability of the proposal to remove safeguarding for the North Crawley Action Area Plan. It is not an allocation informed by a comprehensive strategy review of how to meet employment requirements as part of borough-wide development strategy. There is no evidence that any analysis was undertaken to understand the impacts of that allocation or to investigate how the employment land requirement could have been met through alternative means.</p> <p>35. We consequently conclude that the Gatwick Green allocation is unsound on the basis it:</p> <ul style="list-style-type: none"> <li>(i) It has not been positively prepared as the strategy of meeting employment land needs at Gatwick Green has not been informed through either an appropriate understanding or evidence base of the impact of the allocation nor has there has been any examination of whether the unmet employment space need could be accommodated elsewhere in the district or in other districts;</li> <li>(ii) It is not justified as the size of the allocation is too large and the need for scale of the employment land requirement is not proven. Additionally, the impact of the removal of Gatwick Green from the safeguarded area on the ability to implement the Gatwick Masterplan has not been investigated or understood, and the transport modelling underestimates the potential highway impacts and fails to address the access impacts;</li> <li>(iii) It would not be effective given the removal of safeguarding cannot be regarded as certain, there is no known timescale for its removal and that GAL continues to object to its total or partial removal;</li> <li>(iv) Would not respect national policy in respect of safeguarding land for airport expansion.</li> </ul>



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			36. We request that this allocation is deleted from the draft plan and that further work is undertaken, including through the Duty to Cooperate, to examine whether the allocation can be met elsewhere.
REP/131	SMB Town Planning Limited	EC1 & EC2	<p>Oxford Match Limited have aspirations for the development of their freehold property interests within Crawley town centre.</p> <p>Therefore, the following draft policies relating to development within Crawley town centre are directly relevant:</p> <ul style="list-style-type: none"> <li>• EC1 and EC2,</li> <li>• TC1 to TC5, and</li> <li>• H2, H3c and H5.</li> </ul> <p>Taken together these above policies are generally supportive of the principle of, inter alia, development comprising the conversion of the upper floors of existing properties for residential use together with appropriate upward extensions of buildings to provide additional dwellings. This is particularly in the situation that Crawley Borough Council find themselves in being heavily reliant on neighbouring local planning authorities and windfall sites to assist in meeting the identified housing need over the period of the Local Plan.</p> <p><b>Suggested Modifications:</b></p>
REP/035 (Jun 21)	Vail Williams on behalf of Ardmore/ Windsor Land Consortium	EC2	<p>We believe that our site will best reflect the council's commitment to retaining economic growth and supporting the economic function of the Borough's Main Employment Areas, especially Manor Royal and partnership working with MRBG has already begun.</p> <p><b>Suggested Modifications:</b></p>
REP/055	Savills on behalf of Wilky Group Agent	EC2	<p><b>1.0 Introduction</b></p> <p><b>Background</b></p> <p>1.1 This representation is submitted on behalf of The Wilky Group (TWG), which has a longstanding interest in the promotion of strategic employment land within the Crawley Borough Council (CBC) area. This representation relates to Policy EC2 Economic Growth in the Main Employment Areas (MEAs) in the draft Crawley Borough Local Plan, 2021 (DCBLP).</p> <p>1.2 TWG owns about 48 ha (119 acres) of land east of Gatwick Airport as shown the plan at Appendix 1. The land has been promoted by TWG as a strategic employment opportunity known as Gatwick Green (the Site). The Site is proposed for allocation as a Strategic Employment Location (SEL) of 47 ha (116 acres) in the DCBLP under Strategic Policy EC4 as a comprehensive industrial-led development of predominantly storage and distribution uses under use class B8. The extent of the SEL allocation is identified on the plan at Appendix 1.</p> <p><b>Scope of representation</b></p>

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			<p>1.3 Gatwick Green is not included in the list of MEAs in Policy EC2, even though once developed, it would be of a scale and importance comparable to many of the MEAs in Crawley and perform a key role and function in the town's economy. This also applies to the value of the Site to the wider Coast to Capital LEP area and the Gatwick Diamond. TWG therefore considers that Gatwick Green should be included in the list of MEAs given that it will be a key part of Crawley's economic infrastructure and make a significant contribution to the growth, diversification, resilience and quality of Crawley's economic base. Further evidence on the importance and socio-economic value of Gatwick Green is contained in Savills' representation on behalf of TWG to Policy EC1 (Sustainable Economic Growth).</p> <p>1.4 This representation sets out the evidence in support of the inclusion of Gatwick Green in the list of MEAs under Policy EC2 with reference to:</p> <ul style="list-style-type: none"> <li>• The National Planning Policy Framework (NPPF, 2019).</li> <li>• The economic function and role of Gatwick Green in the economy of Crawley and the wider region.</li> <li>• Evidence on Strategic Policy EC1 by Savills on behalf of TWG.</li> <li>• The scale and nature of Gatwick Green relative to other MEAs.</li> <li>• Appropriate controls over development at Gatwick Green.</li> </ul> <p><b>2.0 Justification for Gatwick Green as a Main Employment Area Strategic role and function of MEAs</b></p> <p>1.2 MEAs have a strategic role and function in Crawley's economy – this is embedded in Strategic Policy EC1 in which Crawley's economic role and function is centred on optimising the economic value of the MEAs, with Manor Royal identified as the key mixed business location at the Heart of the Gatwick Diamond and Coast to Capital areas. Strategic Policy EC1 also references the allocation of Gatwick Green as an industrial-led <u>Strategic Employment Location</u> (SEL), which is then allocated under Strategic Policy EC4.</p> <p>2.3 The DCBLP states that Crawley's economy is characterised by a range of employment areas, each with an established character and function, performing an identified role. The MEAs therefore represent the focus for sustainable economic growth. Policy EC2 seeks to protect and improve the existing economic areas, maximising the potential to utilise existing employment sites (DCBLP, para 9.24). Manor Royal, Gatwick Airport and Crawley Town Centre represent the key MEAs.</p> <p>2.4 The role and function of Gatwick Green is emphasised in Topic Paper 5 (Employment Needs and Land Supply, January 2021), which states that "Allocation of Gatwick Green for industrial-led employment will help to reinvigorate Crawley's economy, supporting existing businesses, attracting new and diverse growth, and reinforcing the key economic role of Crawley within the Gatwick Diamond" (para 4.64). The Topic Paper goes on to conclude that the economic strategy of the DCBLP is centred on two interconnected elements, (1) protecting and maximising the efficient use of the MEAs, and (2) identifying opportunities for new business land, most significantly through the allocation of a Strategic Employment Location at Gatwick Green (para 5.1). The Topic</p>

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			<p>Paper goes on to state that through this twin-pronged approach, the DCBLP will be able to maintain “Crawley’s role and function at the heart of the Gatwick Diamond and Coast to Capital LEP” (para 5.2).</p> <p>2.5 It is therefore clear that Gatwick Green is a strategic site that is a key part of the economic strategy for Crawley in order to maintain its strategic role in the wider region. It is therefore anomalous not to identify Gatwick Green in the list of MEAs in Policy EC2. The MEAs are a core part of the economic strategy for Crawley and Gatwick Green is a Strategic Employment Location that forms a core part of that strategy. Including Gatwick Green in the list of MEAs is therefore both logical in policy terms and consistent with the status of Strategic Policies EC1 and EC4 as ‘strategic’ policies within the meaning given in the NPPF (paras 17 &amp; 20-23).</p> <p><b>Importance, role and function</b></p> <p>2.6 The representation by Savills on behalf of TWG on Strategic Policy EC1 sets out the case for Gatwick Green in employment and economic terms. This evidence underlines the strategic importance of Gatwick Green and its role and function in addressing:</p> <ul style="list-style-type: none"> <li>• The unmet need for employment land and a Strategic Employment Location identified in the adopted DCBLP (2015).</li> <li>• The current outstanding need for a minimum of 24.1 ha of land for industrial uses (B1c/B2/B8).</li> <li>• The outstanding need for a Strategic Employment Location to the north of Crawley within the Area of Search identified in the adopted DCBLP (2015) and not required for critical airport infrastructure associated with a possible additional wide-spaced runway at Gatwick Airport.</li> <li>• The market requirements for Industrial &amp; Logistics (I&amp;L) floorspace at Crawley contained in evidence by Savills Economics.</li> <li>• The wider regional / sub-regional strategy that focuses economic growth and development at Crawley/Gatwick at the heart of the Coast to Capital and Gatwick Diamond areas.</li> <li>• The underlying problems with Crawley’s economy related its dependence on Gatwick Airport for employment; high levels of net out-commuting; relatively narrow range of employment and opportunities for career progression, and relatively low levels of productivity.</li> </ul> <p>2.7 Gatwick Green has a central role in addressing the above structural economic issues, giving it a strategic function in the Crawley and wider sub-regional economy. This role and function must be acknowledged in policy through its identification as a MEA in Policy EC2. This role is reinforced by the significant and strategic socio-economic benefits offered by Gatwick Green: these relate to supporting the growth and diversification of the area’s economy; widening Crawley’s employment base; delivering quality employment opportunities in the context of Crawley’s growing workforce, and addressing the impacts of the COVID-19 pandemic.</p> <p><b>Complementarity with the MEAs</b></p>

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			<p>2.8 TWG's representation on Strategic Policy EC1 also provides evidence to demonstrate that Gatwick Green would be complementary to the other MEAs, and in particular Manor Royal, the Town Centre and the planned Horley Business Park in Reigate and Banstead Borough. The complementarity of the MEAs with each other is an important pre-requisite for MEAs. This is borne out by the requirement for Gatwick Green to be complementary with the MEAs (Strategic Policy EC4) and in the justification for Policy EC2, which states that <i>"Each performs a different but vital role in helping to meet economic needs in Crawley. The largest Main Employment Areas are Manor Royal, the leading business destination in the Gatwick Diamond; Crawley Town Centre, a focus for Main Town Centre uses and a sub-regionally significant centre; and Gatwick Airport, a key location for airport-related employment. The borough's other Main Employment Areas perform an important complementary role, supporting a range of employment uses that includes small businesses, offices, and high quality leisure facilities"</i> (para 9.28).</p> <p>2.9 Gatwick Green is an industrial-led allocation for predominantly B8 storage and distribution uses, offering good access to the M23 and in a high-profile and sustainable location – it is also uniquely placed to provide for the new generation logistics market and the evidenced demand for units in excess of 75,000 sqft (c 7,000 sqm). No other MEA has the potential to offer sites that can meet this segment of the I&amp;L market, though there may be some very limited opportunities at Manor Royal. This makes Gatwick Green highly complementary to the other MEAs and other key employment sites in the wider north West Sussex FEMA such as north of Horsham and the Horley Business Park.</p> <p><b>Relative scale and profile</b></p> <p>2.10 Table 2.1 below shows the size and use profile of some of the core business areas in Crawley against the proposed profile for Gatwick Green based on the provisions of Strategic Policy EC4. Gatwick Airport, the Hawth, Broadfield Stadium &amp; K2 Crawley and the town centre are excluded given the more specialist function of these areas. The data shows that Gatwick Green is the second largest employment area behind Manor Royal and significantly larger than any of the other areas. The data also shows that Gatwick Green will serve a very distinct segment of the business market, namely for new generation logistics uses requiring a high profile location with good access to the Strategic Road Network (M23/M25). Gatwick Green is also the only area that can offer large floorspace units over 75,000 sqft (7,000 sqm), where there is an evidenced gap in the market.</p> <table border="1"> <thead> <tr> <th>Employment Area</th> <th>Size (ha)</th> <th>Predominant Use Classes</th> </tr> </thead> <tbody> <tr> <td>Manor Royal</td> <td>240 ha</td> <td>B1/B2/B8</td> </tr> <tr> <td>Lowfield Heath</td> <td>16 ha</td> <td>B1c</td> </tr> <tr> <td>Three bridges Corridor</td> <td>27 ha</td> <td>B1 (a), B8, Sui Generis</td> </tr> <tr> <td>Maidenbower Business Park</td> <td>6.3 ha</td> <td>B1 (a), Sui Generis, D2</td> </tr> <tr> <td>Broadfield Business Park</td> <td>1.48 ha</td> <td>B1 (a), Suit Generis, D2</td> </tr> <tr> <td>Tilgate Forest Business Park</td> <td>3.33 ha</td> <td>B1 (a), Suit Generis, D2</td> </tr> <tr> <td>Gatwick Green</td> <td>47 ha</td> <td>B8</td> </tr> </tbody> </table>	Employment Area	Size (ha)	Predominant Use Classes	Manor Royal	240 ha	B1/B2/B8	Lowfield Heath	16 ha	B1c	Three bridges Corridor	27 ha	B1 (a), B8, Sui Generis	Maidenbower Business Park	6.3 ha	B1 (a), Sui Generis, D2	Broadfield Business Park	1.48 ha	B1 (a), Suit Generis, D2	Tilgate Forest Business Park	3.33 ha	B1 (a), Suit Generis, D2	Gatwick Green	47 ha	B8
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			<p>2.11 Based on this comparative assessment, there is a clear case to identify Gatwick Green as a MEA based on its size and specific market position in the overall Crawley economy</p> <p><b>Application of Policy EC2 to Gatwick Green</b></p> <p>2.12 MEAs are a focus for sustainable economic growth and where development is supported under Policy EC2 – this is a permissive policy that supports development where it makes an efficient use of land and contributes to the economic function of Crawley. The inclusion of Gatwick Green in the list of MEAs in Policy EC2 would mean that this permissive policy would apply – such an approach is not only consistent with the economic metrics noted in this representation, but can also be reconciled with the environmental considerations that apply to the Gatwick Green allocation and its setting. These environmental considerations are addressed fully in Strategic Policy EC4, with which development of the allocation must have regard. In addition, other environmental protection policies in the Plan addressing such matters as biodiversity and heritage would continue to apply to the Gatwick Green site once developed-out in accordance with the masterplan required under Strategic Policy EC4.</p> <p>2.13 The purpose of Policy EC2 is to identify, and provide a policy framework for, the Main Employment Areas (MEAs) in Crawley such as Manor Royal, Gatwick Airport and the town centre. The policy makes the MEAs the focus for sustainable economic growth. It goes on to state that employment generating development will be supported in the MEAs provided it makes efficient use of the land or buildings and contributes positively to the sustainable economic growth of the MEAs and Crawley. It then sets out the preconditions for supporting any development that involves a net loss of land or floorspace, comprising the wider socio-economic benefits for the site / Crawley and the avoidance of adverse economic impacts on the function of the MEA or Crawley.</p> <p>2.14 If Gatwick Green was included in the list of MEAs, it is important to understand that whilst Policy EC2 would apply a fairly permissive approach to supporting growth and development within the MEAs, such support is tempered by the need to have regard to other policies in the Plan. The different environmental characteristics of the MEAs therefore results in a differential level of development control being applied through the various topic-specific policies in the DCBLP. MEAs with a very urban character would be less likely to be subject to many additional development controls and so Policy EC2 would dictate a fairly permissive approach to development. Other MEAs may have specific environmental / amenity considerations that need to be taken into account, with the result that other development control policies would apply that may influence the scale and nature of new development.</p> <p>2.15 In addition to the other development control policies in the Plan, Policy EC2 fits into a wider economic strategy in the DCBLP so these strategic policy objectives also apply. When applying Policy EC2 therefore, the following policy framework would be applied:</p>

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			<ul style="list-style-type: none"> <li>• Presumption in favour of sustainable development under Strategic Policy SD1 – supports development that meets the strategic objectives, which includes, inter alia, conserving heritage and green infrastructure and accords with all other policies in the Plan unless material considerations indicate otherwise.</li> <li>• Healthy living and wellbeing Strategic Policy SD2 – this requires new development to meet a range of design objectives including, inter alia, incorporating biodiversity, green infrastructure and climate change resilience (Policies GI1 and GI3).</li> <li>• Heritage Policies HA1 to HA7</li> <li>• Landscape and development form Policies CL6 and CL7.</li> <li>• Design Policies DD1, DD4 and DD5. • Green infrastructure and biodiversity Policies GI, GI2 and GI3</li> <li>• Sustainable design and construction Policies SDC1 and SDC3.</li> <li>• Environmental protection Policies EP1 – EP6 • Sustainable transport Policies ST1 and ST2.</li> </ul> <p>2.16 The Gatwick Green site has a specific range of characteristics that distinguish it from the MEAs identified in Policy EC2. This includes the designated Biodiversity Opportunity Area under Policy GI2 (Gatwick Woods BOA); green infrastructure (hedgerows/trees) (Policy GI1); nearby Listed and Locally Listed Buildings (Policies HA4 and HA5) and important and valued views (Policy CL7). These environmental assets / characteristics mean any development proposals, including those that may come forward following the development of the Site in accordance with the Masterplan approved under Strategic Policy EC4, must also have regard to these policies.</p> <p>2.17 The policy framework that applies to all the MEAs therefore ensures that the development of each can be optimised in line with Policy EC2, whilst ensuring that account is taken of any significant and important environmental characteristics. The inclusion of Gatwick Green in the list of MEAs in Policy EC2 will therefore acknowledge its key role and function in the economic growth and recovery of Crawley and the wider area, but also ensure that such growth is accommodated in manner that has had regard to the environmental characteristics of the Site.</p> <p><b>Suggested Modifications:</b></p> <p><b>3.0 Conclusions</b></p> <p>3.1 It is concluded that against the tests of soundness at para 35 of the NPPF, <b>Policy EC2 is not sound</b> as it excludes Gatwick Green from the list of Main Employment Areas (MEAs). In doing so, it fails to acknowledge the strategic role, function, scale and relative importance of Gatwick Green in the future of the Crawley and sub-regional economies. More specifically, Policy EC2 is not sound for the following reasons:</p> <ul style="list-style-type: none"> <li>• <b>Positively prepared</b> – The policy does not represent a positive response to the economic needs of the Borough and wider sub-region or acknowledge the strategic nature of Gatwick Green, which is embedded in Strategic Policies EC1 and EC4.</li> <li>• <b>Justified</b> – The policy does not acknowledge the status of Gatwick Green as a SEL, which was identified following an assessment of the reasonable alternatives.</li> </ul>

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			<ul style="list-style-type: none"> <li>• <b>Effective</b> – Gatwick Green is the most effective option for a SEL in the context of the Council’s collaborative approach to assessing the needs of the economy across the North West Sussex area (Crawley Borough and Mid-Sussex and Horsham Districts), but this is not reflected in Policy EC2.</li> <li>• <b>Consistent with national policy</b> – The NPPF provides for Local Plans to include strategic policies that identify the strategy of the pattern, scale and quality of major development. To allocate Gatwick Green under a strategic policy (Strategic Policy EC4), but then omit it from the list of strategic employment areas (MEAs) under Policy EC2 is therefore contrary to national planning policy.</li> </ul> <p>3.2 For the reasons noted in this representation, including Gatwick Green in the list of MEAs is reconcilable with the need to have regard to the environmental characteristic of the Site addressed in other policies in the DCBLP. This is consistent with the approach that applies to all MEAs.</p> <p>3.3 In order to make Policy EC2 sound, Gatwick Green should be added to the list of MEAs – on this basis, Policy EC2 should be reworded as follows (additional text underlined):</p> <p><i>“As a key economic driver in the sub-region, Crawley’s Main Employment Areas make a significant contribution to the economy of the town and the wider area, and are designated as a focus for sustainable economic growth.</i></p> <p><i>The Main Employment Areas are:</i>  <i>Manor Royal;</i>  <u><i>Gatwick Green;</i></u>  <i>Crawley Town Centre;</i>  <i>Gatwick Airport;</i>  <i>Three Bridges Corridor (including Denvale Trade Park, Spindle Way, Stephenson Way and Hazelwick Avenue);</i>  <i>Maidenbower Business Park;</i>  <i>Tilgate Forest Business Centre;</i>  <i>Broadfield Business Park;</i>  <i>Lowfield Heath;</i>  <i>Broadfield Stadium and K2 Crawley;</i>  <i>The Hawth.</i>  ...”</p>
REP/056	Gatwick Airport Limited	Policy EC2	<p><b>EC2: Economic Growth in Main Employment Areas</b></p> <p>37. We objected to this policy in 2020 Reg19 DCLP because Lowfield Heath, which is within land safeguarded for a second runway, was included as one of the main employment areas where major economic related development would be allowed.</p> <p>38. We recognise that Lowfield Heath is a main employment area. We note that, in line with new Policy GAT2, references to Lowfield Heath in the supporting text now refer to Policy GAT2. However, in view of the fact that</p>

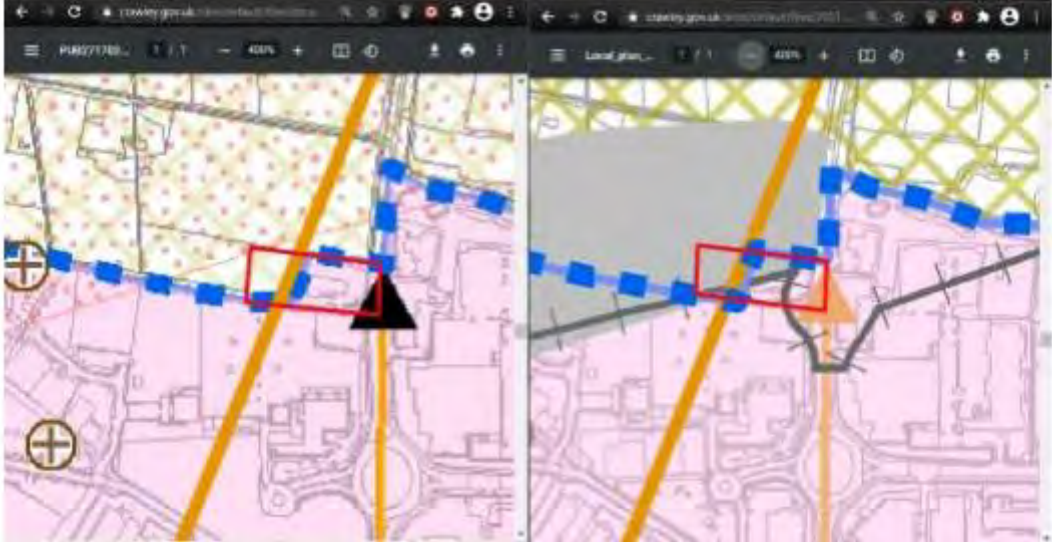
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			<p>Lowfield Heath is within the safeguarded land we consider that the policy should make it clear that the provisions of policy GAT2 would take precedent over Policy EC2 in respect of Lowfield Heath. This will ensure that a primary consideration in assessing any major employment development in Lowfield Heath would be the need to protect the safeguarded land from development that would add to the costs or complexity of the development of a second runway.</p> <p>39. Further support for such additional control on development in Lowfield Heath derives from the inherent unsustainability of permitting major development only for it to subsequently have to be removed in the event a second runway is brought forward. This would not represent sustainable approach to development.</p> <p><b>Suggested Modifications:</b></p> <p>40. We therefore suggest inserting a new paragraph in the policy before the final paragraph that allows some scope for development and redevelopment in Lowfield Heath to enable modernisation and continued use of existing premises, but not to allow major development:</p> <p><i>“In Lowfield Heath, employment generating development, including extensions, improvements and redevelopment of existing premises will be permitted provide it would not lead to a significant intensification or increase of development.”</i></p>
REP/091	Brunel Planning on behalf of COIF Nominees LTD c/o CCLA	Policy EC2/ Para 9.25, 9.28	<p><b>Introduction</b></p> <p>1.1 These representations have been prepared on behalf of COIF Nominees Ltd c/o CCLA (‘the client’) to the ‘Draft Crawley Borough Local Plan 2021 – 2037 January 2021 for Submission Public Consultation January – February 2021’ which is out for consultation by Crawley Borough Council until 31 March 2021.</p> <p>1.2 These representations have been prepared in particular, in relation to the client’s land interest at The Atrium, London Road, Crawley, RH10 9TB which is a commercial building on a site within the Manor Royal Industrial Estate and at the heart of the Gatwick Diamond.</p> <p>1.3 The Atrium has also historically been known as Groundstar House. For the purposes of these representations we refer to ‘The Atrium’ or ‘the site.’</p> <p><b>The Site and Surroundings</b></p> <p>2.1 The Atrium building is a ground plus five-storey modern office building located on London Road (A23) within the Borough of Crawley.</p> <p>2.2 There is car parking to the front and rear of the site, able to accommodate 156 vehicles.</p> <p>2.3 The site is located on the northern boundary of the Manor Royal Business District and falls within the Gatwick Diamond.</p>



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			<p>2.4 The wider area is a mix of commercial uses, with Crawley Town Centre 1.5 miles away.</p> <p>2.5 The site is very well served by public transport with a bus stop located immediately in front of the site on London Road, Three Bridges railway station located two miles away, and to the north of the site is Gatwick Airport which is approximately three miles away.</p> <p><b>The Representations to Draft Local Plan 2021</b></p> <p>3.1 Set out below are the representation into the Draft Local Plan 2021 on behalf of COIF Nominees Ltd c/o CCLA ('COIF Nominees Ltd').</p> <p>3.2 The online Crawley Council forms ask for separate representations to be made against each of the individual policies, paragraphs and plans. It also allows documents to be attached to those individual representations.</p> <p>3.3 For convenience we have therefore set out a composite version of those representations in this document, which is attached to the representations.</p> <p>3.4 We have clearly stated where the Client Supports particular policies and associated paragraphs, and where the client Objects to particular policies and paragraphs, and where these are considered to be Not Sound.</p> <p><b>National Planning Policy Framework</b></p> <p>3.5 The National Planning Policy Framework (NPPF) was published on 19 February 2019. This is a key part of the Government's reforms to make the planning system less complex and more accessible and promote sustainable growth.</p> <p>3.6 Paragraph 15 states that 'The planning system should be genuinely plan-led. Succinct and up-to-date plans should provide a positive vision for the future of each area; a framework for addressing housing needs and other economic, social and environmental priorities and a platform for local people to shape their surroundings.'</p> <p>3.7 Criterion a) of paragraph 16 states that 'Plans should: be prepared with the objective of contributing to the achievement of sustainable development...'</p> <p>3.8 Paragraph 23 states that 'Broad locations for development should be indicated on a key diagram, and land-use designations and allocations identified on a policies map. Strategic policies should provide a clear strategy for bringing sufficient land forward, and at a sufficient rate, to address objectively assessed needs over the plan period, in line with the presumption in favour of sustainable development. This should include planning for and allocating sufficient sites to deliver the strategic priorities of the area...'</p> <p><b>The Development Plan</b></p>

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			<p>3.9 The Development Plan relevant to the site comprises the following: a. West Sussex Structure Plan 2001-2016; b. Crawley Borough Local Plan 2015 – 2030, (December 2015). Emerging Local Plan out for Consultation</p> <p>3.10 Crawley Borough Council has published the latest version of its draft Local Plan, The Draft Crawley Borough Local Plan 2021 – 2037 January 2021 for Submission Public Consultation January – February 2021.</p> <p>3.11 The Consultation Period has been extended until 31 March 2021. We understand this is due to some of the underlying evidence base being unfinished and therefore not yet made available for public scrutiny and comment.</p> <p>3.12 These representations relate to the published material. Our client reserves the right to submit a further representation once the unfinished material is completed, published and made available for public consultation.</p> <p><b>Site Designations in Adopted and Draft Local Plans</b></p> <p>3.13 The Atrium site has the following designations as set out in the adopted Proposals Map 2015 and the Draft Proposals Map 2021:</p> <p>Adopted Proposals Map 2015</p> <ul style="list-style-type: none"> <li>• (Partially within) Built-Up Area Boundary;</li> <li>• (Partially within) Manor Royal.</li> </ul> <p>Draft Proposals Map 2021</p> <ul style="list-style-type: none"> <li>• (Partially within) Built-Up Area Boundary;</li> <li>• (Partially within the expanded) Gatwick Airport Safeguarded Land;</li> <li>• (Partially within) Manor Royal; and</li> <li>• (Partially within) Indicative Search Corridor for a Western Link Road;</li> </ul>

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			 <p>Figure 1: Extract from (i) Adopted Proposals Map 2015 &amp; (ii) Draft Proposals Map 2021, with broad site location marked in red, to show the site designations including the expanded Gatwick Airport Safeguarded Land boundary.</p> <p><b>The Importance of the site within Manor Royal and the Gatwick Diamond and the continued need for employment in the Borough</b></p> <p>3.14 The Atrium is located within Manor Royal and is recognised as being at the heart of the Gatwick Diamond.</p> <p><b>Support:</b>  <b>Policy EC2 – Economic Growth in Main Employment Areas</b>  <b>Paragraph 9.25</b>  <b>Paragraph 9.28</b>          Draft Policy EC2 – Economic Growth in Main Employment Areas states that ‘Crawley’s Main Employment Areas make a significant contribution to the economy of the town and the wider area and are designated as a focus for sustainable economic growth.’ As such the policy states that ‘employment generating development will be supported in the Main Employment Areas where it makes for an efficient use of land or buildings and contributes positively to sustainable economic growth in the Main Employment Area...’</p>

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			<p>COIF Nominees Limited supports Policy EC2. The Atrium site is an employment generating site with the potential for expansion and intensification in the future and Policy EC2 promotes employment generating development which is therefore welcome.</p> <p>COIF Nominees Limited supports paragraph 9.25 which confirms that Manor Royal 'represents a key economic location' and paragraph 9.28 which notes that Manor Royal is one of the largest Main Employment Areas and is 'the leading business destination in the Gatwick Diamond...' This demonstrates the importance of Manor Royal, the Gatwick Diamond the employment generating role that The Atrium site has to play within these areas.</p> <p><b>Conclusions</b></p> <p>4.1 These representations have been prepared on behalf of COIF Nominees Ltd c/o CCLA relating to the 'Draft Crawley Borough Local Plan 2021 – 2037 January 2021 for Submission Public Consultation January – February 2021' which is out for consultation by Crawley Borough Council until 31 March 2021.</p> <p>4.2 COIF Nominees Ltd own The Atrium, London Road within Crawley which is a ground plus five storey modern office building with car parking. The site falls within Manor Royal and the Gatwick Diamond.</p> <p>4.3 The site is highly accessible with good public transport links.</p> <p>4.4 The online Crawley Borough Council forms ask for separate representations to be made against each of the individual policies, paragraphs and plans. It also allows documents to be attached to those individual representations.</p> <p>4.5 For convenience we have therefore set out a composite version of those representations in this document, which is attached to the representations.</p> <p>4.6 We have clearly stated where the Client Supports particular policies and associated paragraphs, and where the client Objects to particular policies and paragraphs, and where these are not considered to be Not Sound.</p> <p>4.7 On the draft Proposals Map 2021 the site is located partially within the Built Up Area Boundary, partially within the expanded Gatwick Airport Safeguarded Land, within Manor Royal and partially within the Indicative Search Corridor for a Western Link Road.</p> <p>4.8 COIF Nominees Limited supports Policy EC2, The Atrium site is an employment generating site with the potential for expansion and intensification in the future and Policy EC2 promotes employment generating development.</p> <p>4.9 COIF Nominees Limited supports paragraph 9.25 which confirms Manor Royal 'represents a key economic location' and paragraph 9.28 which notes that Manor Royal is one of the largest Main Employment Areas.</p> <p><b>Suggested Modifications:</b> N/A</p>

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		Para 9.29	<p>Support:</p> <p>COIF Nominees Limited supports the recognition that 'Manor Royal is the Gatwick Diamond's leading business district...' and that 'The Local Plan has a key role to play in supporting the business-led economic role of Manor Royal, supporting its key business focus, and setting in place a framework for wider improvements that will enable Manor Royal to go from strength to strength.'</p> <p>It is important that the Local Plan, through its policies and site designations, sets in place the framework for wider improvements to Manor Royal which includes The Atrium site.</p> <p>4.10 COIF Nominees Limited supports paragraph 9.29 which recognises the Manor Royal as the Gatwick Diamond's leading business district.</p> <p><b>Suggested Modifications:</b> N/A</p>
REP/129	Planning Potential on behalf of Aldi Stores Ltd	EC2	<p><b>1. introduction</b></p> <p>1.1. These representations are submitted on behalf of Aldi Stores Ltd to the Regulation 19 consultation on the Draft Crawley Borough Local Plan (DCBLP).</p> <p>1.2. Aldi have an existing store on the Acorn Retail Park, however, are looking for further representation within Crawley. At the present time a site has not been identified. The emerging Policy has been reviewed within the context of Aldi seeking additional representation and whether there is a planning policy framework to support the delivery of additional convenience goods retail floorspace.</p> <p>1.3. The Regulation 19 consultation relates to the 'Tests of Soundness' as set out in the National Planning Policy Framework 2018 (NPPF), paragraph 35. Plans are 'sound' if they are:</p> <ol style="list-style-type: none"> <li>a) positively prepared – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;</li> <li>b) justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;</li> <li>c) effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and</li> <li>d) consistent with national policy enabling the delivery of sustainable development in accordance with the policies in this Framework.</li> </ol>

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			<p>1.4. These representations consider the objective need and community benefits of foodstore development in light of the jobs that will be created both during construction and operation and the economic benefits that developments of this type deliver, and recognise the consistency with national policy of the commercial nature of retail development in the recent changes to the Use Classes Order. A foodstore development delivers significant economic growth and productivity and is therefore in accordance with paragraph 80 of the NPPF this should be afforded significant weight in plan making. Therefore, based on the relevant tests established in the NPPF we consider that facilitation of foodstore development in emerging policy is paramount to the soundness of the DCBLP.</p> <p><b>2. Job Creation</b></p> <p>2.1. To ensure the soundness of the DCBLP compliance with national policy it must be positively prepared and provide a strategy to meet the area’s objectively assessed needs.</p> <p>2.2. As set out in the Economic Growth – Key Issues section (para 9.6) of the submission DCBLP “<i>it is also important that the Local Plan looks forward, planning pro-actively to meet Crawley’s significant job growth, business land and floorspace needs as the economy recovers, whilst supporting delivery of the upskilling, connectivity and infrastructure needs to support economic growth</i>”. Retail jobs make a significant contribution to the economy of Crawley and therefore such uses should be enabled through policy.</p> <p>2.3. An Aldi foodstore typically creates around 50 new jobs a well as other investment within the surrounding areas a result of the multiplier effect that occurs during the construction phase and ultimately through provision of additional jobs in the area. The soundness of the DCBLP should be considered in terms of consistency with local ambitions and national policy, as well as the objectively assessed needs of the borough. Retail job opportunities should be recognised as contribution towards meeting the job growth target and allowed for within policy in order for the plan to be considered.</p> <p><b>3. Class E – Commercial Development</b></p> <p>3.1. To ensure the soundness of the DCBLP compliance with national policy must be demonstrated.</p> <p>3.2. The Government has made a number of revisions to the Use Classes Order, including the introduction of Class E (Commercial, Business and Service) this includes amongst others the following uses:</p> <ul style="list-style-type: none"> <li>• The display of retail sale of goods to visiting members of the public;</li> <li>• An office to carry out any operational or administrative function;</li> <li>• The research and development of products or processes; and</li> <li>• Any industrial processes (being a use which can be carried out in any residential area without detriment to the amenity of that area by reason of noise, vibration, smell, fumes, smooth, soot, ash, dust or git).</li> </ul>

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			<p>3.3. The Explanatory Guidance published in connection with the amended Use Classes Order notes at paragraph 7.3. that: <i>“Bringing these uses together and allowing movement between them will give business greater freedom to adapt to changing circumstances and response more quickly to the needs of their communities.”</i></p> <p>3.4. it is therefore clear that the introduction of the revisions to the Use Classes Order and other changes being brought forward by the Government are designed to enable flexibility and encourage development that responds quickly to the needs of their communities. This is also set out in the spatial context for Crawley in the DCBLP, which seeks to ensure sustainable economic growth and supports greater <i>“flexibility to help Crawley’s economy adapt to future change”</i> (para 2.15). Development which responds to the needs of local communities and contributes to a sustainable, diverse and thriving economy is supported and consistent with policy at both a national and local level and should be considered in assessing the soundness of the DCBLP. The DCBLP fails to incorporate the revised use classes and therefore policies and allocations are not consistent with national policy and cannot be considered sound.</p> <p><b>4. Positively and proactively encouraging sustainable economic growth</b></p> <p>4.1. The NPPF is clear that: <i>“Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. The approach taken should allow each area to build on its strengths, county any weaknesses and address the challenges of the future.”</i> (paragraph 80)</p> <p>4.2. This was written before the recent Covid pandemic which has further highlighted the valuable contribution that the retail sector makes both in terms of providing employment opportunities and ensuring that communise have easy access to healthy and affordable food. With the increasing drive towards a more sustainable future providing crucial facilities such as food sopping in accessible locations is increasingly important. Crawley Borough Council declared a Climate Emergency on 17 July 2019, and recommendations from the Climate Change Scrutiny Panel Final Report published in February 2021 indicate that there needs to be a change in the type of vehicles used for travel and the promotion of active and sustainable transport options. The success of active transport depends on the distance to be travelled; therefore, the provision of accessible food shopping facilities is key to meeting this objective.</p> <p>4.3. The NPPF states that planning policies should: <i>“set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth, having regard to Local Industrial Strategies and other local policies for economic development and regeneration.”</i> (Paragraph 81a)</p>

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			<p><i>Planning policies should be flexible enough to accommodate needs not anticipated in the plan, allow for new and flexible working practice (such as live-work accommodation), and to enable a rapid response to changes in economic circumstances.”</i> (Paragraph 81d)</p> <p>4.4. The DCBLP acknowledges this, as set out in the Economic Growth – Key Issues sections (paragraph 9.6.), ‘<i>The NPPF is clear that planning policies should help create the conditions in which businesses can invest, expand and adapt, setting out a clear economic vision and strategy that positively and proactively encourages sustainable economic growth. Recognising the immediate economic situation facing the borough as a result of the Covid-19 pandemic, it is vital to plan positively to support economic recovery.</i>’</p> <p>4.5. It is clear that there have been a number of macro and micro changes since the Retail, Commercial Leisure &amp; Town Centre Neighbourhood Needs Assessment was prepared and published in January 2020. The development aspirations within the borough and wider area need to be considered within the context of changes that have occurred. When considering the existing supply and land allocated for employment generating floorspace and town centre uses the current approach is not justified and effective in light of the recent changes of the Use Classes Order, therefore the DCBLP cannot be considered sound.</p>
			<p><b>Suggested Modifications:</b></p> <p><b>5. Retail Considerations in the Crawley Local Plan</b></p> <p>5.1. In light of the changes that have occurred and the need to proactively encourage sustainable economic growth, the potential economic contribution in terms of investment and job creation offered by the retail sector should be considered more positively in the DCBLP.</p> <p>5.2. Policy EC2 ‘Economic Growth in Main Employment Areas’ covers the development of allocated employment sites within the borough. This states that ‘<i>Employment generating development will be supported in the Main Employment Areas where it makes for an efficient use of land or buildings and contributes positively to sustainable economic growth in the Main Employment Area, and to the overall economic function of Crawley.</i>’</p> <p>5.3. This policy acknowledges the need for use of land that contributes positively to sustainable economic growth and the policy text directs employment generating uses to the Main Employment Areas. We again highlight the recent introduction of Class E which has merged Class A uses with B1, amongst others, and is recognition of the importance of the rail sector of the UK’s economic success. Therefore, this policy is not justified and effective in the light of recent economic changes or consistent with national policy as it is not clear how Class E is addressed. As such the DCBLP cannot be considered sound.</p> <p>5.4. Given the economic considerations in the current climate and the economic contribution for retail development, it is considered that proposed retail uses align with the overall objective of this policy and should therefore be considered positively in this policy.</p>



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			<p>5.5. Policy TC3 'Town Centre Key Opportunity Sites' covers the development of allocated underutilised town centre sites. This states that '<i>Town Centre Key Opportunity Sites are identified for development that enhances town centre vitality and viability and helps to meet the economic and housing needs of the borough</i>' and that '<i>development will be supported where it is for: main town centre uses, or mixed-use development for residential and main town centre uses and/or town centre neighbourhood facilities.</i>'</p> <p>5.6. These policies cannot be considered justified in light of recent economic changes or compliant with national policy in light of revisions to the use classes order, therefore the DCBLP cannot be considered sound.</p> <p><b>6. Summary</b></p> <p>6.1. As set out in this document the background position has changed significantly since the Retail, Commercial Leisure &amp; Town Centre Neighbourhood Needs Assessment was published. Recent changes to the Use Classes Order have clearly signalled a change, offices and retail development are now both considered to be commercial uses, recognition of the contribution that retail makes to the local economy and the fact that the jobs created by retailers are equal to those created by more traditional employment generating uses.</p> <p>6.2. Considering these changes, a test of the soundness of the DCBLP should consider whether proposed policies are positively prepared in terms of consistency with national policy and the objectively assessed needs of the borough are still effective and justified. As such, policies which fail to acknowledge the necessity of commercial development to meet the local need in light of economic changes or policies which fail to recognise revisions to the use classes order cannot be considered positively prepared, justified, or consistent with national policy. Considering this the DCBLP cannot be considered sound.</p> <p>6.3. This DCBLP provides an opportunity which will enable higher levels of employment in the borough, creating jobs and investment while providing many other economic benefits associated with introducing a popular national retailer to an area. As such we highlight the need to ensure the soundness of the DCBLP to provide the necessary facilities in allocations and policies for foodstore development, that will be required to support economic growth and secure investment and jobs in the borough across the plan period.</p>
REP/132	Quod on behalf of Aberdeen Standard Investments	EC2	<p><b>2 Representations</b> <b>Key Matters</b> Section 9 – Economic Growth &amp; Social Mobility</p> <p>2.1 Section 9 of the draft Local Plan discusses economic growth and is concerned with satisfying Crawley's employment land and floorspace needs over the next 15 years.</p> <p>2.2 Draft Policy EC2 is concerned specifically with 'Economic Growth in Main Employment Areas' and seeks to "protect and improve the existing economic areas, maximising the potential to utilise existing employment sites.". The draft policy notes that as a key economic driver in the sub-region, Crawley's Main Employment Areas make a</p>

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			<p>significant contribution to the economy of the town and the wider area and are designated as a focus for sustainable economic growth.</p> <p>2.3 The Main Employment Areas are listed, including sites that have been specifically identified for the delivery of employment floorspace. However, it is also confirmed within the text that draft Policy EC2 also applies to the designated Main Employment Area of Crawley Town Centre in its entirety.</p> <p>2.4 Within the Main Employment Areas, Policy EC2 sets a strong presumption for, and against the loss of, employment generating development. The policy specifically states:  <i>“Employment generating development will be supported in the Main Employment Areas where it makes for an efficient use of land or buildings and contributes positively to sustainable economic growth in the Main Employment Area, and to the overall economic function of Crawley. Development that would involve a net loss of employment land or floorspace in any Main Employment Area will only be permitted where it is demonstrated that:</i></p> <ul style="list-style-type: none"> <li><i>i. the site is no longer suitable, nor viable, nor appropriate for employment purposes, or that a limited loss of employment floorspace will support the wider economic use of the site; and</i></li> <li><i>ii. the loss of any land or floorspace will result in wider social, environmental or economic benefit to the town which clearly outweighs the loss; and</i></li> <li><i>iii. there would be no adverse impact on the economic function of the Main Employment Area, nor the wider economic function of Crawley.”</i></li> </ul> <p>2.5 In respect of the above, it is unclear as to the precise definition of ‘Employment generating development’. In particular, whether the definition refers to more ‘traditional’ office or industrial employment uses, or if it also includes other uses that generate employment within town centres, for example, retail or leisure related floorspace.</p> <p>2.6 If the former is correct, then we would request that this be specifically clarified within the policy wording. However, if the latter is the case, concerns are raised in respect of the application of the tests set out in criterion (i)-(iii) within draft Policy EC2 in relation to Crawley Town Centre.</p> <p>2.7 The National Planning Policy Framework (NPPF) sets out detailed guidance for the development of town centres at Chapter 7. Paragraph 85 states that planning policies and decisions should support the role that town centres play at the heart of local communities, taking a positive approach to their growth, management and adaptation. The key test that must be met to achieve this is to promote the “long-term vitality and viability of town centres.” Paragraph 85(a) confirms that planning policies should support the vitality and viability of town centres by “allowing them to grow and diversify in a way that can respond to rapid changes in the retail and leisure industries, allows a suitable mix of uses (including housing) and reflects their distinctive characters”</p>

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			<p>2.8 This approach is also reflected elsewhere in the draft Local Plan. For example, within the first paragraph of Policy TC1 which states that “Development that enhances the vitality and viability of Crawley Town Centre as a competitive sub-regional town centre will be supported.”</p> <p>2.9 It is considered that the requirements set out within criterion (i)-(iii) of draft Policy EC2 are in conflict with this guidance within the NPPF, as well as other town centre related policies within the draft Local Plan.</p> <p>2.10 Whilst town centres provide employment generating uses, this is by no means their sole function, and the NPPF recognises that planning for a variety of Main Town Centre uses, including residential uses, is integral to achieving the long-term vitality and viability of town centres. As currently drafted, draft Policy EC2 would unnecessarily restrict the provision of the variety of uses required to assist ensure the long-term vitality and viability of Crawley Town Centre, as well restricting the flexibility required for the town centre to grow and diversify in a way that can respond to rapid changes in the retail and leisure industries.</p> <p>2.11 We therefore request clarity on the above and strongly suggest that the inclusion of this policy is reconsidered in relation to Crawley Town Centre.</p> <p><b>Suggested Modifications:</b></p>
REP/032	West Sussex County Council	EC3/ 9.46	<p>Suggested modification to Para. 9.46 and Appendix B – reference to the ‘West Sussex Joint Minerals Local Plan (2018)’ should now read ‘West Sussex Joint Minerals Local Plan July 2018 (Partial Review March 2021)’.</p> <p><b>Suggested Modifications:</b></p> <p>Suggested modification to Para. 9.46 and Appendix B – reference to the ‘West Sussex Joint Minerals Local Plan (2018)’ should now read ‘West Sussex Joint Minerals Local Plan July 2018 (Partial Review March 2021)’.</p>

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REP/091	Brunel Planning on behalf of COIF Nominees LTD c/o CCLA	EC3 9.39	<p>Support: Draft Policy EC3 – Manor Royal states that: 'Manor Royal is the principal business location for Crawley, and instrumental to the success of the wider Gatwick Diamond. Development that is compatible with the area's economic function and role in the wider sub-region will be permitted where it falls within the business sectors of office, research and development, light industry, general industrial and storage or distribution and would result in the reuse, intensification, or change of use of the land or buildings.</p> <p>Development outside of the sectors identified above will be permitted where it can be demonstrated that it is of a scale and function that supports, and does not undermine, the established business role and function of Manor Royal...'</p> <p>COIF Nominees Limited supports Policy EC3 and the land uses listed as appropriate for The Atrium site which is currently in office use but has plans to expand and intensify the employment generating use in the future.</p> <p>COIF Nominees Limited notes that paragraph 9.39 recognises that 'positive planning' can facilitate business-led development in the area through 'providing an environment that supports and encourages business growth; (builds) on the unique business and physical attributes afforded by its location and history; and (enables) an attractive and desirable working environment.' COIF Nominees Limited strongly supports this approach – it is vital that the Local Plan promotes positive planning to allow for the continuation and expansion of employment generating uses in Main Employment Areas such as Manor Royal.</p> <p>4.11 COIF Nominees Limited supports Policy EC3 and the land uses listed as appropriate for The Atrium site and also supports paragraphs 9.37, 9.38 and 9.39 which recognises that 'positive planning' can facilitate business-led development in the area. It is vital that the Local Plan promotes positive planning to allow for the continuation and expansion of employment generating uses in Main Employment Areas such as Manor Royal.</p> <p>4.13 COIF Nominees Limited strongly objects to the site's partial location within the defined 'Manor Royal' area on the Draft Proposals Map 2021. The site in its entirety clearly functions as part of the Manor Royal area.</p> <p><b>Suggested Modifications:</b> The proposed Manor Royal designation should be expanded to include the entire site, and not just part of the site.</p>
REP/027	LRM Planning on behalf of WT Lamb Properties, Staminier	EC4	<p><b>STRATEGIC POLICY EC4: STRATEGIC EMPLOYMENT LOCATION</b></p> <ol style="list-style-type: none"> <li>1. On behalf of our clients, we are supportive of the principle of allocating Gatwick Green as a Strategic employment site. Indeed, the allocation can provide a substantive contribution towards future economic growth in a suitable location that is of regional importance.</li> <li>2. However, as set out in our representations in respect of Policy EC1 we believe that the minimum amount of land required in order to meet needs is between 27.8ha and 28.7ha (before additional market and replacement uplift is considered) due to the shortfall in the trajectory. The current area of land allocated will not achieve this amount of development land alone due to the significant infrastructure, landscaping and other elements that are required to</li> </ol>

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	Group and Elliott Metals/The Simmonds Family		<p>be provided as part of the gross development area. As such in order to ensure the requirements can be met the area to be allocated must be extended to include the missing section of land that forms part of the wider area envisaged by The Wilky Group (TWG) in their representations.</p> <p>3. Our clients control 8.8 ha of the missing section of Gatwick Green and confirm that it is available for employment uses in line with the requirements of the Plan. Accordingly, our clients are of the view that the allocation area should be extended to cover the missing section of the area to the east of Balcombe Road that is within their control.</p> <p>4. They support the proactive and positive view that the Council have taken towards allocating land in this area and are committed to a comprehensive approach to the master planning of Gatwick Green in order to ensure a robust approach is taken. This supersedes previous representations that have been made in relation to the area.</p> <p>5. Significant technical work has previously been undertaken in the area including in respect of highways, landscape, ecology and drainage. Accordingly the following additional information is submitted as an appendices to this representation:</p> <ol style="list-style-type: none"> <li>1. Red line plan;</li> <li>2. Illustrative master plan;</li> <li>3. Development Framework Document;</li> <li>4. Transport Note Prepared by Miles White Transport;</li> <li>5. Ecology Note Prepared by GE;</li> <li>6. Landscape Note prepared by Pegasus; and</li> <li>7. Drainage Strategy prepared by PHG.</li> </ol> <p>6. Indeed, our clients believe that a positive response is required locally in order to ensure the future economic recovery and growth of Crawley such that the authority is no longer entirely reliant upon the fortunes of Gatwick Airport.</p> <p><b>The site</b></p> <p>7. Our clients control land shown within the accompanying red line plan (appendix 1) that lies to the east of Balcombe Road and occupies the substantive “missing section” of the proposed allocation of EC4 which is crucial to facilitating a comprehensive and well planned approach to development.</p> <p>8. The total site area is 8.8 ha, and comprises three elements:</p> <ul style="list-style-type: none"> <li>• The WT Lamb site (3.1ha) comprises an existing residential bungalow at the front and the rear of the site was previously used for horticultural purposes and comprised over 17,000 sqft of glass greenhouses and other ancillary structures associated with its commercial nursery use. However, the greenhouses were unused for some time and fell into considerable disrepair with significant glass and fly tipping across the site</li> </ul>

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			<ul style="list-style-type: none"> <li>• Land and buildings controlled by the Staminier Group (5ha) which is formed by three distinct parcels of land to the north and south of Hunters Lodge and MSL Heat Treatment – a manufacturing company operating from the buildings to the rear of Hunters Lodge who intend to remain on site. The land surrounding is generally flat and the three fields are in an agricultural use.</li> <li>• Land under the ownership of Elliott Metals/The Simmonds Family (0.7 ha) that lies to the rear of the family metal recycling centre (Elliott Metals). This is a family business that has operated at the premises for over 80 years. The land to the rear of the metal business is vacant, flat and suitable for redevelopment. It is yet to be determined whether the metal business would relocate or remain at the site. However if they decided to remain it would be complimentary to future employment opportunities.</li> </ul> <p>9. The three landholdings comprise a significant landholding that totals 8.8 ha. It is bound:</p> <ul style="list-style-type: none"> <li>• to the east the boundary is formed by a line of trees along Donkey Lane which a small residential lane beyond which is the proposed allocation SE4 along with incremental businesses and landholdings. Further to the East lies the M23;</li> <li>• to the south by Fernhill Road and Elliott Metals along with a number of small residential dwellings with allocation SE4 further to the south of Fernhill Road;</li> <li>• to the north the site is bounded by an existing fields which are part of proposed allocation SE4 and a residential dwelling. Slightly further to the north lies the M23 Spur; and</li> <li>• to the west the site is found by the Balcombe Road, immediately beyond which is the vast complex of Gatwick Airport (as defined by policies in respect of Gatwick Airport) which comprises offices, hotels as well as the airport itself.</li> </ul> <p>10. It is clear that the site and wider Gatwick Green proposal lies within a highly urbanised part of the District with major infrastructure of national significance forming the overarching land use in the local area. Our clients sites form left over land that is perfectly suited to help capitalise on these national infrastructure linkages.</p> <p>11. Our client’s landholdings provide a logical and important part of the future Gatwick Green proposals.</p> <p><b>Gatwick Green</b></p> <p>12. As noted, we are supportive in general of the allocation of Gatwick Green for employment purposes. The Wilky Group (TWG) submitted the proposed employment opportunity to the Council as part of the previous consultation version of the plan. The site submitted by TWG comprised about 59 ha (146 acres), including 8.8 ha controlled by our clients.</p> <p>13. In this regard, TWG set out that Gatwick Green as a whole represents a regionally and nationally significant opportunity for high quality mixed-use economic growth that will solve Crawley Borough’s growing deficit of employment land as identified in its employment land evidence base. They sought to provide sufficient information</p>

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			<p>to confirm that it will be delivered during the plan period and that it therefore address the five considerations identified by Crawley Borough Council in its Regulation 18 consultation, of note they covered:</p> <ul style="list-style-type: none"> <li>• Suitability of the site for employment development.</li> <li>• Availability or likely availability of the site for employment development.</li> <li>• The economic viability of delivering employment on the site.</li> <li>• The amount of employment development which can be delivered on the site.</li> <li>• The likely time-frame for any employment delivery projected for the site.</li> </ul> <p>14. In the context of the urgent need to plan and provide for the unmet and long-standing employment and economic needs of the Borough TWG have submitted evidence to indicate that Gatwick Green would meet the Policy tests of the Council (plainly only part of the wider area has been indicated to be available to date). Our clients support the position in respect of the suitability of the site, availability and viability of the site as a whole, indeed, they confirm that the land within their control is available.</p> <p>15. Indeed, our clients consider that Gatwick Green is a highly suitable site for strategic employment. In view of its close proximity and accessibility to Gatwick Airport, it is well suited to bringing forward a high-quality business hub to optimise the potential of this strategic location at the confluence of several national transport infrastructure networks – Gatwick Airport, London Brighton Mainline Rail, the Gatwick Express service, the M23 motorway and the Crawley-Gatwick-Horley Fastway bus service.</p> <p>16. It is noted that the site is not affected by any significant environmental, physical or heritage constraints and could be developed within the current / future aircraft noise environment and aerodrome safeguarding requirements relating to the Airport.</p> <p><i>Site capacity</i></p> <p>17. A Development Framework Plan (DFP) has been prepared by TWG to assess the high-level capacity of the site and demonstrate its ability to incorporate a range of sustainability and environmental requirements arising out of national and local planning policy and other statutory requirements. The DFP has assessed the land and floorspace potential of the entire site of 59 ha to provide mixed employment floorspace in use classes B8, B1, B2 and C1, including ancillary uses within use classes A1 - A4 and D1.</p> <p>18. It is stated that Gatwick Green is a proposed integrated mixed-use development and co-ordinated infrastructure solution. They anticipate that the development could comprise the following:</p> <ul style="list-style-type: none"> <li>• B8, B1(c), B2, industrial, warehousing, distribution and logistics.</li> <li>• B1 office/R&amp;D.</li> <li>• GEA of C1 hotel use.</li> <li>• Supporting education uses for apprenticeships &amp; staff training.</li> <li>• An integrated amenity centre including ancillary shopping, leisure, dining and community uses.</li> </ul>

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			<ul style="list-style-type: none"> <li>• High quality open space with mobility interchange hub.</li> <li>• Sustainable mobility at the heart of the masterplan design, with dedicated public transport, pedestrian and cycle infrastructure.</li> <li>• Ancillary car parking with Electric Vehicle Charging facilities.</li> </ul> <p>19. It is further noted that <b><i>“Gatwick Green represents a strategic opportunity to bring forward a highly sustainable mixed-use employment area, offering a unique opportunity to deliver significant benefits to all three of the key components of sustainability. Whilst the site will be a focus for B8 and B2 class floorspace, it has the benefit given its highly accessible location, of being attractive to a mix of non-B class employment uses such as education and training. This will help the site to come forward more quickly given its wider appeal to a number of different sectors and investors (delivery partners). It will also enable the site to deliver a greater variety of jobs to help transform and rebalance the economy and benefit the local community.”</i></b></p> <p>20. It is clear that TWG consider that the entire area of Gatwick Green (59ha) is suitable for development as supported by their evidence base and as supplemented by our clients. We support this position and confirm that their combined sites are available to contribute towards this wider allocation.</p> <p>21. In its current form it is notable that TWG do not control all of the site and as such its ability to provide a comprehensive development solution is undermined. This has left an area of 48 ha controlled by TWG Group that is allocated by Policy EC4 rather than the comprehensive approach that their submission was based on. As a result the area proposed to be allocated for development includes piecemeal parcels and strips of land that have limited potential for employment purposes and are constrained by surrounding land uses.</p> <p>22. The assumptions made within TWG submission in respect of the amount of development that could be achieved across the entire site assumes a significant density of development achieving up to 60% site coverage. This is not reflected in local take up rates and delivery trends nor is it reflective of the approach taken in TWG’s development framework (which is predicated on a landscape led approach and we consider below). Indeed, from analysis of the approach taken by TWG in their submission it is clear that the Council’s indicative floorspace of c.77,800 sq.m is more in line with capacity and the master planning approach sought in the policy text.</p> <p>23. Based on the actual (over) development framework submitted by TWG it is clear that strategic elements mean that it will struggle to achieve 24 ha of B2/B8 land uses due to:</p> <ol style="list-style-type: none"> <li>a. Approximately 24ha of landscape buffers (including c 2ha of surface water attenuation, 10% BNG and associated open space). In addition this will include separate space / buffers with existing residential properties particularly along the eastern edge of the site;</li> <li>b. Linear development plots that aren’t suitable for B8 use and are constrained;</li> </ol>



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			<p>c. Possible restrictions in the main runway public safety zone (identified on TWG development framework to the south of Fernhill Road);</p> <p>d. Approximately 2.46 ha of roads; and</p> <p>e. 0.85 ha for bus “super hubs”.</p> <div data-bbox="651 448 1375 943" style="text-align: center;"> </div> <p><b>Our client's site</b></p> <p>24. Of the current proposed allocation, given landscaping, open space, highways/bus super hubs, open space, ancillary uses, biodiversity net gain and surface water attention etc then the net developable area will not be able to accommodate the plan's requirements. Furthermore, as set out in our representations in respect of Policy EC1, it is clear that the actual amount of employment land required is a minimum of 28.7 ha rather than 24.1 ha.</p> <p>25. Accordingly in order to achieve the requirement figure and a comprehensive approach to the area, then a combination of reviewing the Development Framework and with the addition of our clients site, a larger and more comprehensive allocation of 57ha would allow for a net development area of around 28.7ha to be achieved and provide the required B2/B8 floorspace figure.</p> <p>26. As shown within the supporting Development Framework Document, our client's site comprises 8.8 ha of land that could accommodate:</p> <ul style="list-style-type: none"> <li>- B8 employment uses (c.5 ha of development parcels enabling the required amount of floorspace to be provided across the area) including frontage development along Balcombe Road;</li> <li>- The potential for a high quality “gateway” with access provided to the very heart of the site;</li> <li>- A new access from Balcombe Road that could serve the subject site but would also be able to link in to the wider TWG proposals;</li> <li>- Green infrastructure on site including necessary open space, landscape / ecology buffers; and</li> <li>- Surface water attenuation if required.</li> </ul>

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			<p>27. Our client's site could be developed on its own, however, they recognise the strategic importance of the wider Gatwick Green Allocation and as such envisage that it would come forward as part of the comprehensive proposals for the site and are committed to this approach.</p> <p><b>Comprehensive Approach to Development</b></p> <p>28. A significant amount of technical work has been undertaken to date in respect of the site, in addition to the submission made as part of TWG submission, it is noted that further work has been prepared in respect of the 8.8ha site in respect of Design, Landscape, Ecology, Accessibility, Transport and Drainage. A summary of this is set out below.</p> <p><b>Design</b></p> <p>29. The National Planning Policy Framework makes clear that creating high quality buildings and places is fundamental to what the planning and development process should achieve. The National Design Guide, illustrates how well-designed places that are beautiful, enduring and successful can be achieved in practice. The Guide is clear that "Well-designed places have individual characteristics which work together to create its physical Character. The ten characteristics help to nurture and sustain a sense of Community. They work to positively address environmental issues affecting Climate. They all contribute towards the cross-cutting themes for good design set out in the National Planning Policy Framework."</p> <p>30. The guidance identifies 10 characteristics of good design which summarily cover the following elements and must form the starting point for the future design of the proposals:</p> <ol style="list-style-type: none"> <li>1. Context: well-designed places are based on a sound understanding of the features of the site and the surrounding context. They are integrated into their surroundings so they relate well to them;</li> <li>2. Identity: well-designed places have a positive and coherent identity that everyone can identify with and a character that suits the context;</li> <li>3. Built Form: relates to the pattern / arrangement of development blocks, streets, buildings and open spaces which together create the built environment rather than individually;</li> <li>4. Movement: whereby well designed spaces provide a clear pattern of streets and encourage access for all via a wide range of means of sustainable travel;</li> <li>5. Nature: which requires natural features and biodiversity to be integrated into future proposals.</li> <li>6. Public Spaces: with well design and well located public spaces within a hierarchy of locations and available to ensure an excellent environment;</li> <li>7. Uses: with support given to a range of mixes that support everyday activities;</li> <li>8. Buildings: that provide high quality living and working conditions;</li> <li>9. Resources: places that limit their environmental impact; and</li> <li>10. Lifespan: places that are designed over the longer term.</li> </ol>

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			<p>31. Furthermore, the National Planning Policy Framework expects local planning authorities to develop local design guides, taking account of the National Design Guide and the National Model Design Code. Given the issues that we have raised in respect of site capacity and the development framework plan proposed by TWG, we are of the view that it is appropriate to undertake a thorough master planning exercise. Indeed, the National Model Design Code is clear that for larger schemes such an approach <b>“can help to maintain consistency in the delivery of development over a longer period of time.”</b> Government policy would expect this to provide more specific and visual guidance than is possible within policy wording to include: the layout of new development, how landscaping should be approached, factors to consider in the design of building, environmental performance and approach to local vernacular and heritage, architecture and materials.</p> <p>32. Indeed, it is clear from national guidance that a comprehensive approach to larger developments such as Gatwick Green is required that deals with the longer term (which may even fall outside of the plan period). This will be particularly important for Gatwick Green given that our clients “missing section” is a logical starting point for development along the Balcombe Road (adjacent to the airport) and ought to be phased ahead of the more remote parts of the eastern section of the site that are constrained by residential properties and parcel shapes (for B2/B8 uses).</p> <p>33. It is noted therefore that consideration of our clients site as part of the allocation and a more thorough design process (as considered important by TWG in their regulation 18 submission) includes:</p> <ul style="list-style-type: none"> <li>• A comprehensive approach to development and the creation of an appropriate environment in line with Government policies on design and master planning;</li> <li>• Provision of sufficient gross area to safeguard the approach to green infrastructure identified within TWG development framework and ensure sufficient developable land to deliver the required amount of B2/B8 uses;</li> <li>• An additional access from Balcombe Road with options to link into TWG site to the south and north;</li> <li>• A more logical phasing of development meaning that land at our clients site along the Balcombe Road and adjacent to the airport is delivered earlier within the development period than the eastern parts of the wider site that are more sensitive to existing residential properties;</li> <li>• Scope for seeking low energy forms of development and improving access to the area to ensure a “green” development in terms of energy efficiency;</li> <li>• A joined up approach to landscape, ecological enhancement and surface water attenuation which will help provide a master plan that is predicated on the delivery of significant green infrastructure; and</li> <li>• A comprehensive framework for the future of the area rather than simply moving forward on the basis of the area of land considered available in 2020.</li> </ul> <p><b>Landscape</b></p>

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			<p>34. A baseline landscape note has been undertaken by Pegasus based on more detailed technical work already carried out. It has considered a number of key issues and will form the basis for a future more detailed study that would feed into an outline planning application.</p> <p>35. The Site is comprised of a number of fields that are either vacant or in agricultural use interspersed with trees and hedgerows. The site is not covered by any designation at a national or regional level that recognises a specific landscape importance.</p> <p>36. The site is located between Fernhill Road and Balcombe Road, to the east of Gatwick Airport and close to the M23 motorway, including a spur which provides a connection to the airport. The site is made up of a series of mostly irregular shaped agricultural fields, with the inclusion of a number of buildings including Hunters Lodge and an agricultural outbuilding to the west and Fernlands and a residential building between Fernhill Road and Donkey Lane to the south-east.</p> <p>37. The site is surrounded by a number of residential, farm and employment buildings off the surrounding road network. Land to the north and south of Fernhill Road is predominantly agricultural, with the M23 forming a prominent visual detractor in the surrounding landscape. The landscape to the west is dominated by car parking, employment buildings, hotels and retail uses.</p> <p>38. A public right of way (3675Sy) is located adjacent to the eastern site boundary, which provide a rural link between Fernhill Road and Balcombe Road to the north-west of the site. Close to the south-east corner of the site, another public right of way (359sy) follows a fenced off track adjacent to car parking associated with Gatwick Airport, before heading further southward and connecting to Radford Road. The Sussex Border Path long distance footpath is located to the east and north of the site, where it follows Peeks Brook Lane to the east before crossing the M23 and heading westward adjacent to the motorway. The Tandridge Border Path long distance footpath links with the Sussex Border Path east of the M23 and to the north-east of the site.</p> <p>39. A dense network of mature trees surrounds Fernlands and the residential building to the southeast, which follow Donkey Lane and the public right of way. A tree lined hedgerow aligns most of Fernhill Road, coupled with residential properties and their associated garden vegetation, limits visibility into the site. Where the site abuts Balcombe Road (B2036) the site is defined by clipped field boundary hedgerows, with occasional matures trees within the hedgerows further to the south, which provides a more open aspect from the road. A mature tree belt defines the northeastern and northern boundaries, which provides visual enclosure. The internal field boundaries are of variable quality, with those most established appearing to the north.</p> <p>40. Views towards the site from surrounding areas are well contained by the surrounding network of mature vegetation. Therefore, views are limited to the network of roads and footpaths either adjacent to or in the vicinity of the site, and do not extend beyond the M23 or the areas of woodland to the south and south-west.</p>

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			<p>41. The following landscape and visual opportunities and constraints are shown on the supporting plan and set out below.</p> <p><b>Opportunities</b></p> <p>42. The principal landscape and visual opportunities for the site comprise:</p> <ul style="list-style-type: none"> <li>• the potential to manage and enhance the existing field boundaries and mature trees, to provide visual enclosure and to enhance wildlife benefits;</li> <li>• the potential to manage and enhance the internal network of field boundary hedgerows;</li> <li>• the potential to enhance the local wildlife and biodiversity through new planting and the introduction of new landscape features;</li> <li>• the potential to provide improved connections to the surrounding roads and public footpaths; and</li> <li>• the potential to enhance the intimate landscape area to the south-east for recreation and/or local wildlife.</li> </ul> <p><b>Constraints</b></p> <p>43. The principal landscape and visual constraints for the site comprise:</p> <ul style="list-style-type: none"> <li>• Openness of Balcombe Road with clear and unobstructed views over western parts of the site;</li> <li>• The potential for the area of biodiversity enhancement to the north of the site to restrict development;</li> <li>• potential loss of existing site features including trees and hedgerows, in particular, to the south-east;</li> <li>• potential to adversely affect the visual amenity of local residences, particularly those abutting the site along Fernhill Road and Balcombe Road; and</li> <li>• potential to adversely affect the visual amenity of vehicles and walkers using surrounding rural roads and the network of public footpaths.</li> </ul> <p><b>Design Considerations</b></p> <p>44. To assist the design development of future design proposals that mitigate the landscape and visual constraints identified, a number of design considerations are set out below.</p> <p><b>Vegetation Pattern</b></p> <ul style="list-style-type: none"> <li>• Existing vegetation to the north and east and adjacent to Fernhill Road must be retained and respected, as well as augmented wherever possible.</li> <li>• The internal network of field boundary vegetation must be respected by any development layout and enhanced.</li> <li>• Any development needs to be set back from Balcombe Road (B2036), to allow for the addition of new structural planting along the western and south-western edges of the site.</li> <li>• Development proposals must adhere to the guidance set out in the county and local landscape character assessments. The creation of a recreational or wildlife area to the south-east should be considered in order to respect the existing trees and vegetation and respect the intimate setting of the landscape.</li> </ul>

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			<ul style="list-style-type: none"> <li>Any new planting or landscape features should aim to enhance the value of the site to local wildlife, in particular, where located within Biodiversity Opportunity Areas to the north as defined by Policy ENV2 of the local plan and shown on the landscape and visual opportunities and constraints plan.</li> <li>Any trees lost as a result of the development must adhere to tree replacement in accordance with Crawley District Councils Policy CH6, based upon tree replacement tree planting in relation to trunk diameter of the tree lost.</li> <li>Development should avoid any impacts upon trees and vegetation within adjacent properties.</li> <li>All landscape proposals must adhere to the guidance in relation to planting in proximity to airports, and in accordance with CAP 772: Wildlife Hazard Management at Aerodromes.</li> </ul> <p><b>Built Form</b></p> <ul style="list-style-type: none"> <li>The development should reflect the height, scale and massing of similar surrounding buildings in the vicinity of the site and be minimised wherever possible.</li> <li>The development should allow for sustainable movement around the site and look for opportunities to improve pedestrian and cycle links in the local area.</li> </ul> <p><b>Surrounding Land Uses</b></p> <ul style="list-style-type: none"> <li>Any development must be appropriately offset from the adjacent residential properties to respect their visual amenity.</li> <li>The development must respect the setting of the listed buildings to the east of the site, as well as other surrounding locally listed buildings further to the east and those listed buildings to the west.</li> <li>Any development must ensure that the setting of the public right of way is respected, with mitigation within the site to limit views toward development proposals.</li> </ul> <p><b>Ecology</b></p> <p>45. GE Consulting has been commissioned to prepare a Ecology Technical Note to accompany representations to the draft local plan consultation in relation to land at. It aims to</p> <ul style="list-style-type: none"> <li>Draw together previous ecological survey work and provide an overview of baseline conditions; Evaluate the requirements of a proposal in terms of biodiversity planning policy and legislation;</li> <li>Review initial constraints and opportunities for the Site and propose likely mitigation measures/design considerations; and</li> <li>Detail further ecological survey work required to inform detailed proposals and a future planning application.</li> </ul> <p>46. In summary it is concluded that there are no in principle ecological constraints preventing allocation of this Site for future development.</p>

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			<p>47. Furthermore, they note that the Site is unlikely to be constrained by the presence of statutory designated sites for nature conservation in the local area, subject to further assessment and possible mitigation including:</p> <ul style="list-style-type: none"> <li>• Habitat retention should focus on those features of highest ecological value, contributing to local conservation strategies/priorities where possible;</li> <li>• Development should aim to retain and incorporate features for protected and notable species, including a network of wildlife corridors through and around the Site;</li> <li>• Development proposals seeking to ensure that biodiversity net gain can be achieved; and</li> <li>• Detailed design and any future planning applications should be informed by further ecological survey work as recommended however there unlikely to be any overarching constraints.</li> </ul> <p><b>Transport</b></p> <p>48. Miles White Transport (MWT) have been appointed to provide traffic and transportation advice in relation to the proposed development of land close to Gatwick Airport between Crawley and Horley in West Sussex. MWT have formulated a proposed Transport Strategy that will enable the site to be developed as part of the adjacent Gatwick Green Strategic Employment Location.</p> <p>49. They propose that the 8.8 ha site can be accessed from a new traffic signal controlled junction on Balcombe Road approximately 150m north of Fernhill Road. The proposed signal controlled junction would provide two lanes on Balcombe Road on the approaches to the junction and accords with highway design guidance for the speeds recorded on this part of Balcombe Road. In addition linkages can be provided to TWG site.</p> <p>50. The provision of a new signal controlled junction in this location will help reduce vehicle speeds (possibly in conjunction with a Traffic Regulation Order to formally reduce the speed limit) and improve road safety on this part of Balcombe Road.</p> <p>51. New footway and cycleway infrastructure and facilities will be provided as part of the development of the Fernlands site that will seek to maximise pedestrian and cycling links to the existing transport network and also to the wider Gatwick Green site area.</p> <p><b>Integration with Wider Gatwick Green Site</b></p> <p>52. The proposed access to the site could provide one of the additional access points that TWG are considering. The internal access road could link directly into the TWG land or connect via the north-south multi-modal transport link shown in green in TWG's development framework. Such an approach would enable the development and sustainable transport infrastructure at Gatwick Green to be provided in a comprehensive manner as suggested by TWG.</p> <p><b>Mobility Strategy</b></p>

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			<p>53. A package of travel planning measures and initiatives will be formulated to reduce the need to travel using the private car (single occupancy trips) and maximise travel by sustainable modes of transport. This could include the following:</p> <ul style="list-style-type: none"> <li>• Provision of a Mobility Station/Hub to integrate the various forms of transport proposed to/from/within the site and provide “first and last mile solutions” to connect communities to frequent public transport services.</li> <li>• Provision of hire schemes (electric bike, pedal cycle, e-scooter, e-cargo bike etc.).</li> <li>• Electric car club and car sharing scheme.</li> <li>• Dynamic Demand Responsive Transport (DDRT) using advanced and real time requests (dial-a-ride, shared taxis).</li> <li>• Use of new mobility technology (e.g. Mobility as a Service – Maas – platform).</li> </ul> <p>54. These travel planning measures would be formulated in conjunction with others (TWG, Crawley Borough Council, West Sussex County Council etc.) to ensure they fully align with the desired mobility strategy for the wider Gatwick Green area.</p> <p><b>Impact</b></p> <p>55. An assessment considers that the proposed site access will operate well within capacity with minimal delays and queues in the 2026 design year with the traffic associated with the subject site.</p> <p>56. A minimum of 3.7-4.6ha of additional industrial and warehousing land should be provided to make up the identified shortfall of 14,780 sqm in the employment land trajectory. 14,780 sqm of additional employment land (split as per the CTS) would generate 63 and 52 vehicle trips in the AM and PM peaks respectively, i.e. approximately 1 vehicle per minute. It is considered unlikely that the addition of 1 vehicle trip per minute will result in additional junctions being in need of physical mitigation.</p> <p>57. Whilst the impact of the 14,780 sqm employment land shortfall has not been modelled in the CTS, it is our view that the mitigation identified in the CTS will adequately cater for the relatively small number of additional vehicle trips associated with this land and thus the conclusions of the CTS will not alter with the addition of our clients site.</p> <p><b>Drainage</b></p> <p>58. PHG Consulting Engineers have reviewed the available information to assess the hydrology in the area of the proposed development site. It has been concluded that there is a very low risk of fluvial flooding and the low risk of surface water flooding can be reduced with the introduction of site-specific positive drainage.</p> <p>59. They note that the surface water drainage strategy for the site should restrict discharge to the calculated QBAR greenfield runoff rate, this would ensure that during rainfall events greater than the predicted 1 in 2 year event discharge from the site post-development would be reduced. Base on the site area of 9.18ha consisting of 60%</p>






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			<p>impermeable surfacing the QBAR greenfield runoff rate has been calculated to be 28.6l/s. To maximise the benefits of a SuDS approach to surface water management, the use of swales to convey water should be considered and the final attenuation should be provided in a landscaped basin (or basins). This will ensure the surface water drainage network maximises amenity and biodiversity benefits whilst reducing the volume and rates of runoff. The masterplan should allow space within landscaped areas for attenuation basins to be provided. Any attenuation feature within the site should be designed to accommodate flows up to and including the 1 in 100 year with a 40% increased for climate change. To ensure exceedance can be managed, a minimum freeboard of 300mm should be included. Given the above parameters, a 1.5m deep basin with 1 in 3 banks covering a surface area of approximately 3,670m<sup>2</sup> and providing 4,500m<sup>3</sup> storage would be required. Further SuDS techniques such as porous surfaces can be utilised to reduce the overall size of surface water attenuation required.</p> <p>60. Foul Sewer records have been obtained from Thames Water and show few existing foul sewers with the vicinity of the development. The development is surrounded by green fields, Gatwick Airport and some smaller development/dwellings. The dwellings in the vicinity of the site are likely to have individual treatment plants and Gatwick Airport would be served by a private drainage system. The nearest Public Sewers are located approximately 600m south of the development in Balcombe Road. Sewer records show that the existing manhole (7801) at the start of this run has an invert level of 57.54m and the public sewer discharges to a pumping station. The pumping station is assumed to have a direct discharge to Crawley Sewerage Treatment Works located 300m to the west. Due site levels and the invert level of the existing manhole, a pumping station will be required to discharge to the Thames Water network. The pumping station would also include an offsite rising main being laid in Balcombe Road, approximately 500m long.</p> <p>61. It is expected that both foul and surface water could be dealt with either through a standalone scheme for the site or as part of a coordinated approach with TWG land.</p> <p>The following additional information is submitted as an appendices to this representation:</p> <ol style="list-style-type: none"> <li>1. Red line plan;</li> <li>2. Illustrative master plan;</li> <li>3. Development Framework Document;</li> <li>4. Transport Note Prepared by Miles White Transport;</li> <li>5. Ecology Note Prepared by GE;</li> <li>6. Landscape Note prepared by Pegasus; and</li> <li>7. Drainage Strategy prepared by PHG.</li> </ol>

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			<div data-bbox="645 284 1146 638"> </div> <div data-bbox="1167 316 1379 344"> <p><b>1. Red Line Plan</b></p> </div> <div data-bbox="1379 352 1944 754"> </div> <div data-bbox="645 646 1223 1054"> </div> <div data-bbox="645 1062 965 1091"> <p><b>2. Illustrative Master Plan</b></p> </div> <div data-bbox="645 1123 1128 1152"> <p><b>3. Development Framework Document</b></p> </div> <div data-bbox="645 1158 831 1187"> <p><b>1. Introduction</b></p> </div> <div data-bbox="645 1193 846 1222"> <p><b>1.1 Background</b></p> </div> <div data-bbox="645 1225 2002 1337"> <p>This document has been prepared by LRM Planning on behalf of WT Lamb, Staminier Group and Elliott Metals/The Simmonds Family and sets out how their combined landholdings can contribute towards the Gatwick Green proposals. Between them, our clients own 8.8ha of land that in effect form the missing section of the Gatwick Green Proposals.</p> </div>

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			<p>Our clients consider that there is an opportunity to plan comprehensively for the entire Gatwick Green area not just elements of it and confirm that the site is available for B2/B8 employment purposes.</p> <p>The impact of COVID 19 through the course of 2020 and into 2021 have had an unparalleled effect upon the aviation industry, Gatwick Airport and the wider local economy. The necessity to diversify the Borough's economy and insulate it against future over reliance on the Airport's commercial success will be dependent upon attracting emerging businesses to the locality.</p> <p>A comprehensive approach towards Gatwick Green will significantly help to fulfil this objective and place the Borough on track to fully recover economically and secure the future of its residents.</p> <p><b>2. The Site</b> <b>2.1 Introduction</b></p> <p>The total site (figure 2) area is 8.8ha, and comprises three elements:</p> <ul style="list-style-type: none"> <li>• The WT Lamb site (3.1ha) comprises an existing residential bungalow at the front and the rear of the site was previously used for horticultural purposes and comprised over 17,000 sq.ft of glass greenhouses and other ancillary structures associated with its commercial nursery use. However, the greenhouses were unused for some time and fell into considerable disrepair with significant glass and fly tipping across the site.</li> <li>• Land and buildings controlled by the Staminier Group (5ha) which is formed by three distinct parcels of land to the north and south of Hunters Lodge and MSL Heat Treatment – a manufacturing company operating from the buildings to the rear of Hunters Lodge who intend to remain on site. The land surrounding is generally flat and the three fields are in an agricultural use.</li> <li>• Land under the ownership of Elliott Metals/The Simmonds Family (0.7ha) that lies to the rear of the family metal recycling centre (Elliott Metals). This is a family business that has operated at the premises for over 80 years. The land to the rear of the metal business is vacant, flat and suitable for redevelopment. It is yet to be determined whether the metal business would relocate or remain at the site. However, it is currently outside of the red line area and given its use would be complementary to future employment opportunities.</li> </ul> <p>The three landholdings comprise a significant landholding that totals 8.8ha. It is bound:</p> <ul style="list-style-type: none"> <li>• to the east the boundary is formed by a line of trees along Donkey Lane which is a small residential lane beyond which is the proposed allocation SE4 along with incremental businesses and landholdings. Further to the East lies the M23;</li> <li>• to the south by Fernhill Road and Elliott Metals along with a number of small residential dwellings with allocation SE4 further to the south of Fernhill Road;</li> </ul>

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			<ul style="list-style-type: none"> <li>• to the north the site is bounded by an existing fields which are part of proposed allocation SE4 and a residential dwelling. Slightly further to the north lies the M23 Spur; and</li> <li>• to the west the site is found by the Balcombe Road, immediately beyond which is the vast complex of Gatwick Airport (as defined within the Local Plan) which comprises offices, hotels as well as the airport itself.</li> </ul> <p>It is clear that the site and wider Gatwick Green proposal lies within a highly urbanised part of the District with major infrastructure of national significance forming the overarching land use in the local area. Our clients sites form left over land that is perfectly suited to help capitalise on these national infrastructure linkages.</p> <p><b>Location</b> The site forms part of the wider Gatwick Green area as promoted by the Wilky Group, it is located adjacent to Gatwick Airport operational land with the M32 Spur to the north and the M23 to the west. Crawley lies to the south. It is framed by infrastructure of national significance.</p> <p>It is located east of the B2036 Balcombe Road and west of Peeks Brook Lane. The site area is bounded to the north by the M23 Spur and the south by the B2037 Antlands Lane.</p> <p>The B2036 Balcombe Road provides a broadly north-south link between the A23 to the north of Horley town centre and Balcombe to the south, and beyond as London Road/Brook Street to the A272 close to Cuckfield.</p> <p>Balcombe Road is a single carriageway road and is subject to the national speed limit (60mph). The speed limit decreases to 40mph approximately 400m south and 450m north of the site frontage.</p> <p>Fernhill Road runs east-west along much of the south of the Fernlands site between Peeks Brook Lane and Balcombe Road. It is a rural single lane road with no footways or street lighting.</p> <div style="display: flex; justify-content: space-around;">    </div>

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			             <p>Fig 8: aerial view within the site previously used as a large scale nursery</p> <p>Fig 9: aerial view of the site</p> <p>Fig 10: elements of the site in use for agricultural purposes</p> <p>Fig 11: fields in the western part of the site</p> <p>Fig 12: low quality land with features on site to be retained where possible.</p> <p>Fig 13: view from the site towards the north</p> <p>Fig 14: Fennell House along Fennell Road</p> <p>Fig 15: buildings off Fennell Road</p> <p>Fig 16: existing bungalow on Fennell Road to be demolished</p> <p>Fig 17: industrial units within the ownership of Elliott Metals</p>
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			<div data-bbox="645 316 1317 788"> <p>Fig 18: buildings off Fenhill Road</p> </div> <div data-bbox="1391 316 2047 788"> <p>Fig 19: empty car park at Gatwick</p> </div> <div data-bbox="645 799 1258 1015"> <p>Fig 20: the site with empty car parking and major infrastructure at Gatwick airport in the background</p> </div> <div data-bbox="645 1043 1258 1262"> <p>Fig 21: the site with traffic on Balcombe Road visible over Gatwick airport beyond</p> </div> <div data-bbox="1339 804 2047 1230"> <p>Google Earth</p> </div> <div data-bbox="1339 1241 1518 1262"> <p>Fig 22: Gatwick airport at full capacity during 2019</p> </div>

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			<div data-bbox="1043 280 1632 632" data-label="Image"> </div> <div data-bbox="1043 639 1245 655" data-label="Caption"> <p>Fig 23: Gatwick airport following the impacts of COVID 19 during 2021</p> </div> <p data-bbox="640 691 1252 719"><b>3. Gatwick Green Proposals by The Wilky Group</b></p> <p data-bbox="640 722 842 751"><b>3.1 Introduction</b></p> <p data-bbox="640 754 2018 844">The Wilky Group (TWG) submitted the proposed Gatwick Green employment opportunity to the Council as part of the previous consultation version of the plan. The Site is identified on the plan at figure 24 which shows the extent of the Gatwick Green opportunity, comprising about 59ha (146 acres). Including c. 8.8ha controlled by our clients.</p> <p data-bbox="640 863 2011 1013">Our clients support TWG view that Gatwick Green represents a regionally and nationally significant opportunity for high quality economic growth that will solve Crawley Borough’s growing deficit of employment land as identified in its employment land evidence base. However, we are strongly of the view that the current proposed allocation (EC4) must reflect the comprehensive area in order to ensure the proper planning of the area over the long term and to deliver the required employment land supply.</p> <p data-bbox="640 1032 831 1061">TWG Proposals</p> <p data-bbox="640 1064 2007 1153">A Development Framework Plan (DFP) has been prepared by TWG to assess the high-level capacity of the site and demonstrate its ability to incorporate a range of sustainability and environmental requirements arising out of national and local planning policy and other statutory requirements.</p> <p data-bbox="640 1173 1939 1230">It is stated that Gatwick Green is a proposed integrated mixed-use development and coordinated infrastructure solution. They anticipate that the development could comprise the following:</p> <ul data-bbox="640 1233 1760 1385" style="list-style-type: none"> <li>• B8, B1(c), B2, industrial, warehousing, distribution and logistics.</li> <li>•B1 office / R&amp;D. •C1 hotel use.</li> <li>•Supporting education uses for apprenticeships &amp; staff training.</li> <li>•An integrated amenity centre including ancillary shopping, leisure, dining and community uses.</li> <li>•High quality open space with mobility interchange hub.</li> </ul>

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			<ul style="list-style-type: none"> <li>•Sustainable mobility at the heart of the masterplan design, with dedicated public transport, pedestrian and cycle infrastructure.</li> <li>•Ancillary car parking with Electric Vehicle Charging facilities.</li> </ul> <p>It is further noted that “Gatwick Green represents a strategic opportunity to bring forward a highly sustainable mixed-use employment area, offering a unique opportunity to deliver significant benefits to all three of the key components of sustainability. Whilst the site will be a focus for B8 and B2 class floorspace, it has the benefit given its highly accessible location, of being attractive to a mix of non-B class employment uses such as education and training. This will help the site to come forward more quickly given its wider appeal to a number of different sectors and investors (delivery partners). It will also enable the site to deliver a greater variety of jobs to help transform and rebalance the economy and benefit the local community.”</p> <p><b>Suitability</b>  TWG considered that Gatwick Green is a highly suitable site for strategic employment. In view of its close proximity and accessibility to Gatwick Airport, it is well suited to bringing forward a high-quality business hub to optimise the potential of this strategic location at the confluence of several national transport infrastructure networks – Gatwick Airport, London Brighton Mainline Rail, the Gatwick Express service, the M23 motorway and the Crawley-Gatwick-Horley Fastway bus service.</p> <p>The site is not affected by any significant environmental, physical or heritage constraints and could be developed within the current/future aircraft noise environment and aerodrome safeguarding requirements relating to the Airport.</p> <p>A number of evidence based documents have been prepared to support the allocation of Gatwick Green for strategic employment. These include in respect of transport, ecology and landscape.</p> <p>The site is also considered to be complementary to Gatwick Airport’s growth plans in its Master Plan 2019, including the DCO for the use of the standby runway. Overall, the site is considered to be highly suitable for strategic employment, supported by evidence from Savills review of employment land requirements.</p> <p><b>Delivery timeframe</b>  TWG indicate that Gatwick Green could be developed as a mixed-use proposal that achieves a higher density and a better site optimisation than other locations; an appropriate build out rate; parcelled up and phasing to de-risk delivery; benefit from agglomeration, and deliver wider economic benefits. On this basis, it is considered that the market could support a build out over 7 to 10 years finishing around 2035.</p> <p><b>Key Considerations</b>  It is clear that TWG consider that the entire area of Gatwick Green (59ha) is suitable for development as supported by their evidence base and as supplemented by our clients. We support this position and confirm that their combined sites are available to contribute towards this wider allocation.</p>



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			<p>In its current form it is notable that TWG do not control all of the site and as such its ability to provide a comprehensive development solution is undermined. This has left an area of 48ha controlled by TWG Group that is allocated by Policy EC4 rather than the comprehensive approach that their submission was based on. As a result the development framework prepared includes piecemeal parcels and strips of land that have limited potential for employment purposes and are constrained by surrounding land uses.</p> <p>The assumptions made within TWG submission in respect of the amount of development that could be achieved across the entire site assumes a significant density of development achieving up to 60% site coverage. This is not reflected in local take up rates and delivery trends nor is it reflective of the approach taken in TWG development framework (which is predicated on a landscape led approach and we consider below). Indeed, from analysis of the approach taken by TWG in their submission it is clear that the Council's indicative floorspace of c.77,800 sq.m is more in line with capacity and the master planning approach sought in the policy text.</p> <p>Based on the actual (over) development framework submitted by TWG it is clear that strategic elements mean that it will struggle to achieve 24 ha of B2/ B8 land use due to:</p> <ol style="list-style-type: none"> <li>1. Approximately 24ha of landscape buffers (including c.2ha of surface water attenuation, BNG and associated open space). In addition this will include separate space/buffers with existing residential properties particularly along the eastern edge of the site;</li> <li>2. Restrictions in the main runway public safety zone (identified on TWG development framework);</li> <li>3. Approximately 2.46 ha of roads; and</li> <li>4. 0.85 ha of bus super hubs.</li> </ol>

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As such, of the current allocation, given the incorporation of landscaping, open space, highways/bus super hubs, open space, ancillary uses, biodiversity net gain and surface water attention, the net developable area will struggle to accommodate the plan’s requirements. Furthermore, as set out in our representations in respect of Policy EC1, the actual amount of employment land required is a minimum of 27.6ha to 28.7 ha rather than 24.1ha.

Accordingly in order to achieve the requirement figure and a comprehensive approach to the area, then a combination of reviewing the Development Framework and with the addition of our clients site, a larger and more comprehensive allocation of 57ha would allow for a net development area of around 28.7ha to be achieved and provide the required B2/B8 floorspace figure.



**4. Gatwick Green Missing Section**  
**4.1 Introduction**

The proposal forms a key missing “section” of the wider Gatwick Green Proposals to enable a comprehensive rather than piecemeal approach to the planning of the area.

- The proposed contribution that the site can make includes:
- B8 employment uses (c.5 ha of development parcels enabling the required amount of floorspace to be provided) including frontage development along Balcombe Road;
  - The potential for a high quality “gateway” with access the heart of the site;
  - A new access from Balcombe Road that could serve the subject site but also link in to the wider TWG proposals;
  - Green infrastructure on site including necessary open space, landscape/ ecology buffers; and
  - Surface water attenuation if required.

- Key design principles
- A number of key principles have guided the proposals, which include:
- A comprehensive approach to development and the creation of an appropriate environment taking account of local context in line with Government policies on design and master planning;
  - Provision of sufficient gross area to safeguard the approach to green infrastructure identified within TWG development framework and ensure sufficient developable land to deliver the required amount of B2/B8 uses;

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			<ul style="list-style-type: none"> <li>• Access from Balcombe Road with additional options to link into TWG site to the south and north;</li> <li>• A more logical phasing of development meaning that land at our clients site along the Balcombe Road and adjacent to the airport is delivered earlier within the development period than the more remote eastern parts of the wider site that are more sensitive to existing residential properties;</li> <li>• Scope for seeking low energy forms of development and improving access to the area to ensure a “green” development in terms of energy efficiency;</li> <li>• A joined up approach to landscape, ecological enhancement and surface water attenuation which will help provide a master plan that is predicated on the delivery of significant green infrastructure; and</li> <li>• A comprehensive framework for the future of the area rather than simply moving forward on the basis of the area of land considered available in 2020. In this regard our clients are committed to working jointly with the Council and TWG in order to ensure that the future employment aspirations are achieved.</li> </ul> <div style="display: flex; justify-content: space-around; margin-top: 20px;">   </div>

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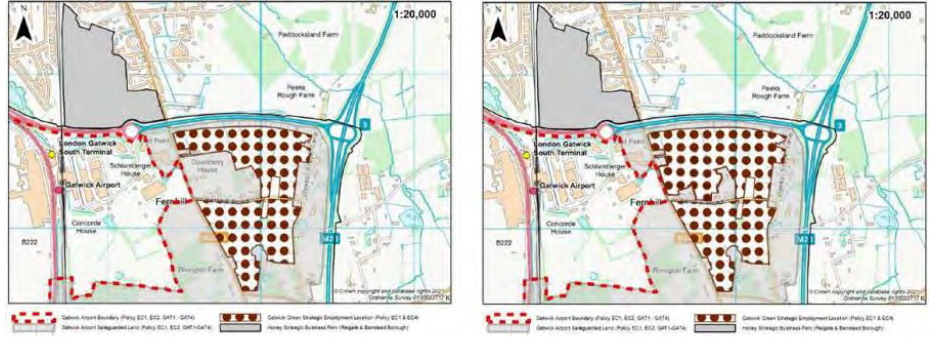


Fig 28: the gap in policy EC4 (left) and EC4 redrawn (right) with our clients site

**5. Technical Considerations**

**5.1 Introduction**

In order to help shape proposals, a range of background studies and investigations have been undertaken.

This section sets out a summary of the key findings of these assessments. Full details are set out within the various reports prepared. It considers the initial potential impacts of the proposals to give an overview of their acceptability, including:

- National Policy (LRM Planning);
- Economic considerations (Hardisty Jones Associations);
- Landscape Impact (Pegasus)
- Ecology (GE);
- Transport (Miles White Transport); and
- Hydrology (PHG)

**National Planning Policy**

**Employment Land**

Chapter 6 of the National Planning Policy Framework (NPPF) sets out the Government’s requirements for “Building a strong, competitive economy”, Para. 80 is clear that planning policies should help create the conditions in which businesses can invest, expand and adapt”.

It places significant weight on supporting economic growth and productively taking account of local business needs and wider opportunities for development. Such that each area builds on its strengths, counters any weaknesses and addresses the challenges of the future. It is clear that areas with high levels of productivity should be allowed to

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			<p>capitalise on their potential so that Britain can be a global leader in innovation: driving productivity improvements is the core vision contained in the Government's Industrial Strategy.</p> <p>Para. 81 sets out that Policies should:</p> <ul style="list-style-type: none"> <li>• proactively and positively encourage sustainable economic growth with regard to Local Industrial Strategies and other policies for economic development;</li> <li>• identify strategic sites for local and inward investment to match the strategy and to meet anticipated need;</li> <li>• address any barriers to investment; and</li> <li>• be flexible enough to accommodate needs not anticipated in the plan, allow for new and flexible working practices and to enable a rapid response to changes in economic circumstances.</li> </ul> <p>Para. 82 requires that policies should recognise and address the specific locational requirements of different sectors which includes for storage and distribution operators at a variety of scales and in suitably accessible locations.</p> <p>Further guidance on providing for economic development needs is set out in Planning Practice Guidance (PPG – 025 Ref IDs: 2a-025-20190220 to 2a-032-20190722). To ensure robust evidence on business needs, local authorities should liaise closely with the business community and take account of Local Industrial Strategies. Councils should take a 'best fit' Functional Economic Market Area (FEMA) and then assess the existing employment land stock; the pattern of land supply and loss; evidence of market demand from local data, market intelligence, surveys of business needs, discussions with developers/agents and evidence from business forums; wider market signals on growth, diversification and innovation, and any evidence of market failure.</p> <p>Above all, this requires close liaison with the business community to understand current and future requirements. In relation to market signals, PPG states that Councils need to look at current and robust data on labour demand (jobs/employment forecasts); Labour supply (demographically derived forecasts of the economically active population, i.e. future employees); the trends in take-up of employment land; future property market requirements, and consultation with relevant organisations and study business trends, models and employment statistics, taking account of longer term economic cycles. This work will reveal any quantitative or qualitative mismatches in demand and supply and which market segments are under or over-supplied. Councils should look at a range of robust data to understand the requirements for office, general business and distribution space and which market segments are over/under supplied.</p> <p>PPG contains specific guidance on the needs of the logistics sector given its role in the efficient supply of goods, and therefore economic productivity which is a key part of the UK Industrial Strategy. It goes on to note that strategic logistics facilities need significant amount of land with access to strategic transport networks and that where a need exists. Councils should collaborate with infrastructure providers and other interested parties to identify the scale of need. Likewise, Councils need to understand the needs of specialist or new sectors including through clustering of certain industries to support collaboration, innovation, productivity and sustainability.</p>

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			<p>Overall therefore, the NPPF and PPG requires that plan-making authorities must address their economic needs in their local plans, which requires an overriding strategy on how and where those needs are to be met. This is critical to achieving a Plan that is sound in accordance with the tests in the NPPF (para 35).</p> <p><b>Design</b> The National Planning Policy Framework makes clear that creating high quality buildings and places is fundamental to what the planning and development process should achieve. The National Design Guide, illustrates how well-designed places that are beautiful, enduring and successful can be achieved in practice.</p> <p>The Guide is clear that “Well-designed places have individual characteristics which work together to create its physical Character. The ten characteristics help to nurture and sustain a sense of Community. They work to positively address environmental issue affecting Climate. They all contribute towards the cross-cutting themes for good design set out in the National Planning Policy Framework.”</p> <p>The guidance identifies 10 characteristics of good design which summarily cover:</p> <ol style="list-style-type: none"> <li>1. Context: well designed places are based on a sound understanding of the features of the site and the surrounding context and are integrated into their surroundings so they relate well to them;</li> <li>2. Identity: well designed places have a positive and coherent identify that everyone can identify with and a character that suits the context.</li> <li>3. Built Form: relates to the pattern/arrangement of development blocks, streets, buildings and open spaces which together create the built environment rather than individually.</li> <li>4. Movement: whereby well designed spaces provide a clear pattern of streets and encourage access for all via a wide range of means of sustainable travel.</li> <li>5. Nature: which requires natural features and biodiversity to be integrated into future proposals.</li> <li>6. Public Spaces: with well design and well located public spaces within a hierarchy of locations and available to ensure an excellent environment.</li> <li>7. Uses: with support given to a range of mixes that support everyday activities.</li> <li>8. Homes and Buildings: that provide high quality living and working conditions.</li> <li>9. Resources: places that limit their environmental impact.</li> <li>10. Lifespan: places that are designed over the longer term.</li> </ol> <p>Furthermore, the National Planning Policy Framework expects local planning authorities to develop local design guides, taking account of the National Design Guide and the National Model Design Code. Given the issues that we have raised in respect of site capacity and the development framework plan proposed by TWG, we are of the view that it is appropriate to undertake a thorough master planning and design code exercise, indeed, the National Model Design Code is clear that It indicates that “For larger schemes, design codes can help to maintain consistency in the delivery of development over a longer period of time.”</p>

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			<p>Government policy would expect this to provide more specific and visual guidance than is possible within policy wording to include: the layout of new development; how landscaping should be approach, factors to consider in the design of building, environmental performance and approach to local vernacular and heritage, architecture and materials.</p> <p><b>Employment Land Supply</b>  Hardisty Jones Associates (HJA) has undertaken a review of employment land matters within the Submission Draft Crawley Local Plan and supporting evidence base. This review has identified a number of issues which lead to the Local Plan under-providing land for industrial and warehousing (B2/ B8) uses and they conclude that A minimum of 3.7ha to 4.6ha of additional industrial and warehousing land should be provided.</p> <p>Crawley Submission Draft Local Plan Summary  HJA note that Crawley is a key economic driver for a functional economic market area that extends beyond the borough's boundaries. Particular drivers include Gatwick Airport and the large Manor Royal employment area, as well as Crawley Town Centre. The sub-regional role of the Crawley economy is recognised with the presence of the Gatwick Diamond Initiative, as well as being a core location within the Coast to Capital Local Enterprise Partnership (LEP) area.</p> <p>The Emerging Local Plan seeks to plan positively for economic growth in the Crawley area despite the impact of Covid-19 on the area. The Borough has been identified as significantly vulnerable to the economic impact of Covid-19, given its reliance on the passenger air transport sector. Nevertheless, the importance of delivering the sites and premises required for employment purposes is clearly highlighted.</p> <p>The proposals for employment land provision draw heavily on the underpinning evidence base. The overarching policy position is of a need for 38.7ha of employment land. The residual requirement for industrial uses, after making allowance for existing pipeline supply and removing office requirements is 24.1ha and is stated to be primarily for B8 type uses.</p> <p>In order to meet the identified shortfall, a strategic employment allocation at Gatwick Green is made (48ha). This follows a site selection process drawing on the Housing and Employment Land Availability Assessment (HELAA). It is noted that there were a number of sites promoted for employment purposes located on land safeguarded for airport expansion to the south of the existing Gatwick Airport site boundary. These sites were discounted on the basis that the safeguarded land might still be required for a second runway at the airport and should not therefore be released for other uses.</p> <p>Policy EC4 and its supporting text notes that any further industrial floorspace beyond the 24.1ha requirement would need to be demonstrated through appropriate evidence. The policy also highlights a range of landscaping and</p>

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			<p>environmental considerations that will impact upon the net developable area of the site as well as the potential to accommodate a range of ancillary employment and amenity uses.</p> <p>Local Plan Evidence Base Summary The most relevant documents are the Northern West Sussex Economic Growth Assessment Update (January 2020) [EGA] and the Economic Growth Assessment Focused Update for Crawley (September 2020) [EGA Update]. Both documents were prepared by Lichfields.</p> <p>The later study provides an update to take some account of the Covid-19 pandemic and generates the estimates which are taken forward to the Local Plan.</p> <p>Northern West Sussex EGA The EGA looks at the whole Functional Economic Market Area (FEMA). The assessment of future requirements for Crawley Borough includes a very wide range of -1.1ha to +113ha. The study recommends adopting a figure of +33ha based on a projection of past development trends.</p> <p>Overall the report sets out a positive analysis of the Crawley economy (pre Covid) and the role of the Crawley Borough within the wider FEMA.</p> <p>The analysis notes commercial agent feedback indicating a need for additional land to accommodate strong levels of market driven demand, particularly for industrial sites and premises. However, no uplift is applied.</p> <p>The analysis of future requirements does not set out any consideration of replacing losses of employment sites and premises to other uses.</p> <p>The approach that is preferred in this study draws on analysis of past trends. There is no consideration of whether past take up might have been suppressed as a result of constrained supply or whether the demand profile in the past period was similar to expectations for the future.</p> <p>Given the strength of agent opinion and the failure to consider the implications of losses of employment sites and premises to other uses the final requirements figures put forward can be considered an underestimate of total objectively assessed needs.</p> <p>EGA Focused Update for Crawley This report is positioned as a post Covid check and draws on revised economic forecasts. The level of growth that is forecast is lower than historic growth rates and is from a respected source. The relevant differences in the considered economic forecasts are discussed on a sectoral basis in order to come to a balanced view.</p>



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			<p>The assessment of future B8 warehousing requirements is primarily driven by forecast employment change (and therefore changes substantially as a result of revised forecasts). In the commentary set out within the EGA Update (paragraph 2.48) it is noted that the Oxford Economics forecasts make allowance for more rapid automation. Whilst the process of automation will have implications for employment and economic development policy more generally, this does not necessarily impact on sites and premises requirements. This actually confirms the requirement in the latest Planning Practice Guidance (PPG), to make a broader assessment of B8 uses on the basis that employment alone has known weaknesses as a predictor for this sector.</p> <p>There is no clear evidence of any attempt at this wider assessment as part of the EGA. This links across to comments made above on the original EGA, with commercial agent sentiment not being fully reflected.</p> <p>The EGA Update assessment leads to an overall requirement of 38.7ha, which is the figure carried forward to the Pre Submission Local Plan. This is slightly greater than the figure emerging from the original assessment. In the EGA Update the emerging requirements from both baseline job growth and past take-up approaches are very similar (38.7ha and 39.6ha).</p> <p><b>Headline Employment Land Requirement</b>  The summary review set out above identifies a number of weaknesses with the overarching analysis. In particular:</p> <ol style="list-style-type: none"> <li>1. A failure to actively consider the potential need for land to replace losses to other uses; and</li> <li>2. A failure to take full account of agent views, particularly for B2/B8 uses.</li> </ol> <p><b>Replacements</b>  The recommendation of a need for 38.7ha of employment land emerging from the EGA Update is drawn from the baseline job growth approach. This considers only the net change in employment over the plan period, and applies an average employment density for the relevant Use Classes to derive an additional floorspace requirement.</p> <p>This approach is helpful in considering some of the net changes in the economy. However, it fails to consider any of the issues within the existing economy or commercial market. Inherent in the approach is that the entirety of the existing stock of commercial employment sites and premises remains in its appropriate use and fit for purpose for the entirety of the plan period.</p> <p>However, there is highly likely to be a loss of some stock to non-employment uses, or becoming redundant through dilapidation, or no longer being aligned to modern occupier requirements. Further, this approach fails to fully consider whether there are changing property requirements within sectors. There may also be changing employment densities over time. This is already recognised in the evidence base with regards to automation in some sectors, and is recognised in PPG specifically in regard to B8 uses where a wider view of future storage and distribution requirements is instructed.</p>

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			<p>These effects will lead to additional requirements for employment sites and premises that are not captured in the current evidence base.</p> <p>Agent Views Seeking agent views is a specific requirement of PPG Paragraph: 031 Reference ID: 2a-031-20190722. The Submission Draft Local Plan includes specific references to this market sentiment, but with no action taken. The EGA also highlighted strong commercial agent opinion.</p> <p>HJA has consulted with local industrial agent Robert Bradley-Smith who confirmed the views set out within the EGA remain highly relevant. Industrial, and particularly logistics demand is extremely strong and current and future requirements are expected to be ahead of past trends. The Covid-19 pandemic has accelerated the move to e-retail. The premises requirements of e-tailers and third party logistics operators are growing rapidly. The growth is expected to continue as new market areas are added to the portfolios of e-tailers, as well as through increasing demands for ever shorter delivery times. The Gatwick area was also highlighted for its excellent location at the heart of the South East and able to service both the south coast and south London.</p> <p>In considering an approach aligned to the requirements of PPG, and drawing on the agent views as set out within the evidence base, there is very clear evidence of a need to provide an uplift to the stated requirements for warehousing space. We believe that it is appropriate for the Authority to consider this urgently and prior to submission of the Plan.</p> <p>Shortfall in Employment Land Trajectory Notwithstanding the issues set out above, Table 2.5 of the EGA update (p10) identifies a net floorspace requirement of 121,550 sq.m of industrial (B1c/B2/B8) Uses before the 10% flexibility allowance is applied. With the flexibility added this increases the required provision to 133,700 sq.m . In land terms this equates to 33.4ha on the basis of the 4,000 sq.m per hectare development density assumption.</p> <p>A potential shortfall in provision is identified within the Employment Land Trajectory (January 2021) which includes a total provision for B1c/B2/B8 floorspace of 118,920 sq.m. This falls below the total requirement. This indicates a shortfall of 14,780 sq.m. The trajectory document also suggests the proposed allocation at Gatwick Green will deliver 77,800 sq.m on 24.1ha (we consider the capacity of the sites separately in respect of our representations in relation to Policy EC4). This equates to a density of 32%. On that basis the additional 14,780 sq.m would require a further 4.6ha.</p> <p>Conclusion Crawley is a key economic hub for a wider hinterland. The Submission Draft Local Plan seeks to plan positively for economic and employment growth.</p>

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			<p>The Council's own evidence and the Submission Draft Local Plan both acknowledge the strength of market demand highlighted by commercial agents, but make no adjustment for this clear evidence of strong market signals and the specific requirement of PPG to take account of logistics needs in a more rounded way. Coupled with a failure to make any provision for replacing losses of existing employment sites and premises to other uses, and through dilapidation and changing occupier requirements, there is a clear under provision in the assessment of future needs. The scale of this uplift is uncertain.</p> <p>The Employment Land Trajectory set out alongside the Submission Draft Local Plan indicates a shortfall in anticipated floorspace when compared to the identified needs and the claimed capacity within the plan. The shortfall equates to a need for a further 3.7ha of industrial and warehouse land across the plan period. This could increase to a minimum 4.6ha based on the identified density at Gatwick Green and is subject to increase to reflect a market and replacement uplift.</p> <p><b>Landscape</b></p> <p>A baseline landscape note has been undertaken by Pegasus based on more detailed technical work already carried out. It has considered a number of key issues and will form the basis for a future more detailed study that would feed into an outline planning application.</p> <p>The Site is comprised of a number of fields that are either vacant or in agricultural use interspersed with trees and hedgerows. The site is not covered by any designation at a national or regional level that recognises a specific landscape importance.</p> <p>The site lies within the corridor of a long distance view from Target Hill Park to the south-west of Crawley, as identified under Policy CH8 of Crawley District Council's Local Plan. The aim of the policy is to ensure the view remains unobstructed by development in the foreground, however, it is noted that the site is approximately 8km to the north-east of the corridor.</p> <p>The site is located within an area defined as the North East Crawley Rural Fringe, as identified under Policy CH9 of Crawley District Council's Local Plan. The policy states:  'To ensure that Crawley's compact nature and attractive setting is maintained, development should:</p> <ol style="list-style-type: none"> <li>i. Be grouped where possible with existing buildings to minimise impact on visual amenity;</li> <li>ii. Be located to avoid the loss of important on-site views and off-site views towards important landscape features;</li> <li>iii. Reflect local character and distinctiveness in terms of form, height, scale, plot shape and size, elevations, roofline and pitch, overall colour, texture and boundary treatment (walls, hedges, fences and gates);</li> <li>iv. Minimise the impact of lighting to avoid blurring the distinction between urban and rural areas and in areas which are intrinsically dark to avoid light pollution to the night sky;</li> <li>v. Ensure the building and any outdoor storage and parking areas are not visually prominent in the landscape;</li> </ol>

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			<p>vi. Does not generate an unacceptable level and/or frequency of noise in areas relatively undisturbed by noise and valued for their recreational or amenity value;</p> <p>vii. Does not generate traffic of a type or amount inappropriate to the rural roads; and</p> <p>viii. Does not introduce a use which by virtue of its operation is not compatible with the countryside.</p> <p>Where harm to the landscape character cannot be avoided appropriate mitigation and, as a last resort, compensation, will be required as part of a planning application. Applicants are advised to consider the enhancement opportunities identified in the Crawley Borough Council Landscape Character Assessment.'</p> <p>Under Policy CH9, it specifically states in relation to North East Crawley Rural Fringe that 'Proposals which do not create or are able to adequately mitigate visual/noise intrusion are generally supported. This area has an important role in maintaining the separation of the distinct identities of Gatwick Airport, Crawley and Horley.'</p> <p>Northern most fields within the site are located within a Biodiversity Opportunity Area as defined by Policy ENV2 of Crawley District Council's Local Plan. The policy states that '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.'</p> <p>Landscape Character</p> <p>The site lies within National Character Area 121: Low Weald. At a regional level, the site is located to the north-east of the Northern Vales Landscape Character Area as set out in the West Sussex County Council Landscape Character Assessment. The land management guidelines overarching goal is to 'Conserve the mostly rural character of the area', with specific guidelines of relevance to the site as follows:</p> <ul style="list-style-type: none"> <li>• 'Conserve, manage and restore woodlands, hedgerows, hedgerow trees, field ponds, species rich grassland and meadows, unimproved grassland and meadows.</li> <li>• Maintain historic character including small scale field patterns, earthworks and historic parkland.</li> <li>• Establish a framework of new woodland and hedgerow planting.</li> <li>• Promote the establishment of field margins in arable areas.</li> <li>• Conserve historic lanes with their ancient oaks and unimproved roadside verges.</li> <li>• Focus on the enhancement of the major transport corridors, seeking better integration into the existing field pattern of the wider landscape.</li> <li>• Ensure any small scale development responds to the historic dispersed settlement pattern and local design and materials.</li> <li>• Ensure any new development around the urban edges, in particular ... Crawley...is well integrated with the wider landscape pattern. Encourage bold native woodland and hedgerow planting. Buildings should also blend in with the landscape in scale, form, colour and design.</li> </ul>

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			<ul style="list-style-type: none"> <li>• Encourage screen planting of native trees and woodland around roadside buildings and service areas, and industrial and commercial development, including Gatwick Airport.</li> </ul> <p>At a local level, the site is located within Area 6 – High Woodland Fringes Landscape Character Area. The area is identified as having high landscape value, but a moderate sensitivity to change, being sensitive to elements such as large scale commercial and residential development and the condition of the landscape is considered to be declining due to increasing visual/noise intrusion in some parts. The planning guidelines for the landscape character area are as follows:</p> <ul style="list-style-type: none"> <li>• Proposals must respect the important role of the area to maintaining the separate identities of Gatwick Airport, Crawley and Horley.</li> <li>• Incremental development should be resisted to prevent the actual and perceived reduction in the highly valued open character of this area.</li> <li>• Proposals should follow the wider planning and land management guidelines of the Low Weald Northern Vales character area.</li> </ul> <p>Context</p> <p>The site is located between Fernhill Road and Balcombe Road, to the east of Gatwick Airport and close to the M23 motorway, including a spur which provides a connection to the airport. The site is made up of a series of mostly irregular shaped agricultural fields, with the inclusion of a number of buildings including Hunters Lodge and an agricultural outbuilding to the west and Fernlands and an office building between Fernhill Road and Donkey Lane to the south-east.</p> <p>The site is surrounded by a number of residential, farm and employment buildings off the surrounding road network. Land to the north and south of Fernhill Road is predominantly agricultural, with the M23 forming a prominent visual detractor in the surrounding landscape. The landscape to the west is dominated by car parking, employment buildings, hotels and retail uses.</p> <p>A public right of way (3675Sy) is located adjacent to the eastern site boundary, which provide a rural link between Fernhill Road and Balcombe Road to the north-west of the site. Close to the south-east corner of the site, another public right of way (359sy) follows a fenced off track adjacent to car parking associated with Gatwick Airport, before heading further southward and connecting to Radford Road. The Sussex Border Path long distance footpath is located to the east and north of the site, where it follows Peeks Brook Lane to the east before crossing the M23 and heading westward adjacent to the motorway. The Tandridge Border Path long distance footpath links with the Sussex Border Path east of the M23 and to the north-east of the site.</p> <p>A dense network of mature trees surrounds Fernlands and the office building to the south-east, which follow Donkey Lane and the public right of way. A tree lined hedgerow aligns most of Fernhill Road, coupled with residential properties and their associated garden vegetation, limits visibility into the site. Where the site abuts Balcombe Road</p>

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			<p>(B2036) the site is defined by clipped field boundary hedgerows, with occasional mature trees within the hedgerows further to the south, which provides a more open aspect from the road. A mature tree belt defines the north-eastern and northern boundaries, which provides visual enclosure. The internal field boundaries are of variable quality, with those most established appearing to the north.</p> <p>Views towards the site from surrounding areas are well contained by the surrounding network of mature vegetation. Therefore, views are limited to the network of roads and footpaths either adjacent to or in the vicinity of the site, and do not extend beyond the M23 or the areas of woodland to the south and south-west.</p> <p>Opportunities and Constraints The following landscape and visual opportunities and constraints are shown on the supporting plan and set out below.</p> <p>Opportunities The principal landscape and visual opportunities for the site comprise:</p> <ul style="list-style-type: none"> <li>• the potential to manage and enhance the existing field boundaries and mature trees, to provide visual enclosure and to enhance wildlife benefits;</li> <li>• the potential to manage and enhance the internal network of field boundary hedgerows;</li> <li>• the potential to enhance the local wildlife and biodiversity through new planting and the introduction of new landscape features;</li> <li>• the potential to provide improved connections to the surrounding roads and public footpaths; and</li> <li>• the potential to enhance the intimate landscape area to the south-east for recreation and/or local wildlife.</li> </ul> <p>Constraints The principal landscape and visual constraints for the site comprise:</p> <ul style="list-style-type: none"> <li>• Openness of Balcombe Road with clear and unobstructed views over western parts of the site;</li> <li>• The potential for the area of biodiversity enhancement to the north of the site to restrict development;</li> <li>• potential loss of existing site features including trees and hedgerows, in particular, to the south-east;</li> <li>• potential to adversely affect the visual amenity of local residences, particularly those abutting the site along Fernhill Road and Balcombe Road; and</li> <li>• potential to adversely affect the visual amenity of vehicles and walkers using surrounding rural roads and the network of public footpaths.</li> </ul> <p>Design Considerations To assist the design development of future design proposals that mitigate the landscape and visual constraints identified, a number of design considerations are set out below. Vegetation Pattern Existing vegetation to the north and east and adjacent to Fernhill Road must be retained and respected, as well as augmented wherever possible. The internal network of field boundary vegetation must be respected by any development layout and enhanced. Any development needs to be set back from Balcombe Road (B2036), to allow for the addition of new structural planting</p>

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			<p>along the western and southwestern edges of the site. Development proposals must adhere to the guidance set out in the county and local landscape character assessments, as set out in paragraphs 6 and 7 above.</p> <p>The creation of a recreational or wildlife area to the south-east should be considered in order to respect the existing trees and vegetation and respect the intimate setting of the landscape.</p> <p>Any new planting or landscape features should aim to enhance the value of the site to local wildlife, in particular, where located within Biodiversity Opportunity Areas to the north as defined by Policy ENV2 of the local plan and shown on the landscape and visual opportunities and constraints plan.</p> <p>Any trees lost as a result of the development must adhere to tree replacement in accordance with Crawley District Councils Policy CH6, based upon tree replacement tree planting in relation to trunk diameter of the tree lost. Development should avoid any impacts upon trees and vegetation within adjacent properties.</p> <p>All landscape proposals must adhere to the guidance in relation to planting in proximity to airports, and in accordance with CAP 772: Wildlife Hazard Management at Aerodromes.</p> <p><b>Built Form</b> The development should reflect the height, scale and massing of similar surrounding buildings in the vicinity of the site and be minimised wherever possible.</p> <div data-bbox="645 837 1339 1316" data-label="Figure"> </div> <p>The development should allow for sustainable movement around the site and look for opportunities to improve pedestrian and cycle links in the local area.</p> <p><b>Surrounding Land Uses</b> Any development must be appropriately offset from the adjacent residential properties to respect their visual amenity.</p> <p>The development must respect the setting of the listed buildings to the east of the site, as well as other surrounding locally listed buildings further to the east and those listed buildings to the west.</p> <p>Any development must ensure that the setting of the public right of way is respected, with mitigation within the site to limit views toward development proposals.</p>
			<p><b>Ecology</b></p>

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			<p>GE Consulting has been commissioned to prepare a Ecology Technical Note to accompany representations to the draft local plan consultation in relation to land at. It aims to:</p> <ul style="list-style-type: none"> <li>• Draw together previous ecological survey work and provide an overview of baseline conditions; Evaluate the requirements of a proposal in terms of biodiversity planning policy and legislation;</li> <li>• Review initial constraints and opportunities for the Site and propose likely mitigation measures/design considerations; and</li> <li>• Detail further ecological survey work required to inform detailed proposals and a future planning application.</li> </ul> <p><b>Statutory Designated Sites</b>  There are no National Site Network sites, which includes SACs and SPAs, within 10km. However, a Draft Habitat Regulations Assessment of the Draft Crawley Borough Council Local Plan (Lepus Consulting, January 2021) has screened in specific impacts relating to development at Gatwick Green on:</p> <ul style="list-style-type: none"> <li>• Mole Gap to Reigate Escarpment SAC, 11.3km north-west</li> <li>• Ashdown Forest SAC/SPA, 12.5km south-east;</li> <li>• The Mens SAC, 30km south-west; and</li> <li>• Arun Valley SAC/ SPA/ Ramsar, 33km south-west.</li> </ul> <p>There are no statutory sites (such as SSSIs or LNRs) within 2km of the Site. Furthermore, the Site does not lie within any</p> <p><b>Non-statutory Sites</b>  There are two non-statutory sites of County importance located within 1km:</p> <ul style="list-style-type: none"> <li>• Horleyland Wood Local Wildlife Site (LWS), 0.8km south-west, important for ancient coppice-with- standards bluebell woodland; and</li> <li>• The Roughs LWS, 0.9km north-east, important for ancient semi-natural woodland and locally rare fine-leaved water-dropwort.</li> </ul> <p><b>Local Priorities/ BAP/ Conservation Strategies</b>  <b>Biodiversity Opportunity Areas</b>  Biodiversity Opportunity Areas (BOAs) are landscape scale areas which have been identified as supporting high concentrations of Habitats and Species of Principal Importance (HPI/ SPI) and/or have the potential/greatest opportunities for restoration and creation of habitats. They seek to expand, link and buffer important biodiversity sites to provide an ecological network.</p> <p>The Gatwick Wood BOA lies partially within the Site boundary, excluding the southern and western fields. This area is described within the Crawley Green Infrastructure SPD (2016) as:  “dominated by the Gatwick Airport landscape but contains a small amount of ancient woodland amongst agricultural land where the opportunities for biodiversity gain and landowner liaison are tangible.</p>



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			<ul style="list-style-type: none"> <li>• Woodland management and restoration;</li> <li>• Education and community engagement, including links to health;</li> <li>• Increased site designation;</li> <li>• Working with and attracting new businesses;</li> <li>• Ecological networks;</li> <li>• Visitor facilities.”</li> </ul> <p>Natural England National Habitat Network Natural England have developed an England-wide dataset of zones where action may be undertaken to build greater ecological resilience. These zones are based around existing HPis, or ‘primary habitats’ and comprise:</p> <ul style="list-style-type: none"> <li>• Network Zone 1: land within close proximity to the primary habitat what are more likely to be suitable for creation of the same habitat type.</li> <li>• Network Zone 2: land within close proximity to the primary habitat that are unlikely to be suitable for creation of the primary habitat, but where other types of habitat may be created or green infrastructure delivered.</li> <li>• Fragmentation Action Zone: land immediately adjoining primary habitat patches that are small or have excessive edge to area ratio where habitat creation is likely to help reduce the effects of habitat fragmentation.</li> <li>• Network Expansion Zone: land within relatively close proximity to Zones 1 &amp; 2 identified as possible locations for connecting and linking up networks across a landscape.</li> </ul> <p>The Site does not lie within any National Habitat Network zones.</p> <p>Habitats &amp; Flora Priority Habitats A review of MAGIC shows HPI ‘Deciduous Woodland’ occupying the eastern field and surrounding the property off Fernhill Road (see Appendix 4). The field appears from aerial imagery to comprise grassland and would therefore require ground-truthing.</p> <p>No other HPis are indicated on MAGIC within or adjacent to the Site boundary, however the network of hedgerows within the Site are likely to meet HPI criteria.</p> <p>Onsite Habitats The Site comprises six distinct fields, properties with associated gardens, small areas of woodland and boundary trees and hedgerows. Fields within the north and west of the Site comprise poor semi-improved grassland, managed by cutting (The Ecology Co-op, 2020). A central field, not surveyed as part of previous work, appears to comprise rough grassland and scattered trees, possibly a former orchard. Seasonally wet ditches are present including along the northern, southern and western boundaries of the Site.</p> <p>Two residential properties are present; ‘Hunters Lodge’ along the eastern boundary accessible from Balcombe Road and ‘Fernlands’ along southern boundary accessible from Fernhill Road, along with associated outbuildings. Gardens</p>

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			<p>comprised ornamental planting, scattered ornamental and coniferous trees and regularly mown, species-poor lawns. A further property, 'Fernhill House' is found to the east of Fernlands in an area of unsurveyed land. It is surrounded by car parking, amenity grassland and semi- mature trees.</p> <p>During previous survey work, the field north of Fernlands bungalow has been cleared and comprised bare, disturbed soil with limited areas of poor semi-improved grassland following clearance of waste and former glasshouses (CSA Environmental, 2017). Aerial imagery suggests this previously comprised a mosaic of grassland, trees and scattered scrub and is now likely to comprise grassland habitat. Similarly, the eastern field (mapped as woodland on MAGIC) appears to have been felled since 2015 as indicated on historical imagery, however mature boundaries have been retained.</p> <p>The field boundaries are marked by species-poor hedgerows, many with banks, dominated by blackthorn and hawthorn with occasional standard trees. Some of the inner boundaries of the Site are marked by mature tree lines, scrub, fences or walls. North of Fernlands is a line of mature oak and ash trees.</p> <p>Broadleaved woodland is present to the east of Fernlands, comprising mostly immature/semi-mature oak and silver birch, with occasional ash, hazel, holly and conifer species.</p> <p>In terms of value, hedgerows (and their associated trees) and broadleaved woodland are Habitats of Principal Importance listed on Section 41 of the NERC Act 2006.</p> <p>Flora Previous survey work has not identified any notable or invasive plants within the Site.</p> <p>Protected and Notable Fauna Based on the desk-based study and walkover surveys, the following protected and notable faunal species were considered to be present/have potential to be present:</p> <ul style="list-style-type: none"> <li>•Badger – no setts found however footprints and dead badger recorded at Balcombe Road in 2020 indicates local presence. There may be setts in unsurveyed parts of the Site and the fields offer foraging potential.</li> <li>• Bats – A residential bungalow (Hunters Lodge) and agricultural barn off Balcombe Road provide moderate and low potential for roosting bats respectively (The Ecology Co-op, 2020). Fernlands bungalow and outbuildings offer negligible/low potential (CSA Environmental, 2017) and the property in the south-east corner has not been assessed. These categories are based on external assessments only, therefore internal assessments would be required to confirm. Numerous trees within the Site offer roosting potential, including mature oaks with high potential towards the eastern end of the Site. Previous emergence surveys did not record roosts within trees north of Fernlands. Local records (all over 1km from Site) indicate the presence of common pipistrelle, noctule, brown long-eared bat, whiskered bat, Natterer's bat and the rare barbastelle and Bechstein's bat. Both the latter species favour woodland habitats, but could utilise the mature hedge/tree lines particularly around the peripheries of the Site. Additionally,</li> </ul>

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			<p>foraging soprano pipistrelle, serotine, myotis and big bats (<i>Nyctalus</i> or <i>Eptesicus</i> sp.) have been recorded along a mature tree line within the east of the Site and it is considered that the network of hedgerows and woodland edge throughout the Site is likely to be of value for local bat species for both commuting and foraging.</p> <ul style="list-style-type: none"> <li>• Birds – Hedgerows, scrub, trees, woodland and buildings within the Site provide suitable habitat for a variety of widespread birds to nest and forage, including priority species under the NERC Act 2006 and Birds of Conservation Concern (BoCC)9.</li> <li>• Dormouse – There are records within 1km of the Site, including three Natural England dormouse mitigation licences c.200m north-west. 2016 surveys of the southern part of the site did not record dormice, however given the age of data and small area surveyed it is recommended that update surveys are undertaken. Woodland, hedgerows and dense scrub provide suitable habitat for dormice and are connected to more extensive habitat beyond the Site boundary.</li> <li>• Great crested newt (GCN) – There are two Natural England GCN mitigation licences c.850m south- west and there are older records (before 1996) from within 300m. There are at least two ponds within 250m of the Site, and a further three within 500m (excluding any north of the M23 motorway), but none within the Site itself. Should great crested newts be present in surrounding ponds, it is considered relatively unlikely that they would utilise the Site due to the relatively large dispersal distances between ponds, the presence of major roads acting as barriers to dispersal and the presence of suitable terrestrial habitat in closer proximity to off-site ponds.</li> <li>• Invertebrates - Habitats on Site present opportunities for a broad range of common invertebrates with some notable species possible, such as brown hairstreak due to the presence of suckering blackthorn. Mature trees may also support notable deadwood invertebrates.</li> <li>• Riparian mammals – No records of water vole within 2km were returned as part of the data search in 2015. Possible evidence of burrows along the banks of the western watercourse suggest that water vole could be present, although the lack of emergent vegetation makes the Site sub-optimal. Other surveyed ditches were considered unsuitable due to size, lack of flowing water and isolation. No suitable habitat for otter is present.</li> <li>• Reptiles - Suitable terrestrial habitat for common reptiles is present, particularly for common lizard and slow-worm. The dense tussocky sward structure and deep thatch within the western fields, and likely within the unsurveyed central and eastern fields, combined with bordering scrub and woodland, provide suitable refuge and invertebrate food resource.</li> <li>• Hedgehog – The fields, scrub, woodland and garden habitats on Site provide good habitat for hedgehog and records are present within the area.</li> </ul> <p>Constraints and Opportunities</p>

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			<p>This section seeks to identify where the presence of designated areas, habitats or the potential for protected or notable species to be present will be a material consideration for the LPA when considering future development proposals. It is based on the assumption that detailed further survey work would be completed to inform detailed design and accompany any future planning application for development of the Site (see Section 6). Designated Sites A screening assessment of Likely Significant Effects (LSEs) within the Draft HRA of the Crawley Local Plan (Lepus Consulting, 2021) indicates alone and in-combination effects of the Gatwick Green development on air quality, potentially impacting:</p> <ul style="list-style-type: none"> <li>• Ashdown Forest SAC and SPA; and</li> <li>• Mole Gap to Reigate Escarpment SAC.</li> </ul> <p>In addition, in relation to hydrology, it may increase discharges to Wastewater Treatments Works or increase pressure on public water supply abstraction. The HRA predicts changes in water quality and water quantity at:</p> <ul style="list-style-type: none"> <li>• Mole Gap to Reigate Escarpment SAC;</li> <li>• Arun Valley SPA/ SAC/ Ramsar; and</li> <li>• The Mens SAC.</li> </ul> <p>The HRA indicates that detailed air quality modelling, water quality and water quantity assessments are currently underway to further define impacts associated with increased traffic movements. It is anticipated that policy wording may require expanding to include sustainability measures, measures for water efficiency and protection of water quality to reduce impacts to negligible. Given the distances of these designations from the Site, it is anticipated that this will be achievable.</p> <p><b>Local Priorities/ BAP/ Conservation Strategies</b>          Whilst the Biodiversity Opportunity Area which covers part of the Site receives no statutory protection, it indicates where there are opportunities to provide net gains for biodiversity and can be used to inform opportunities for habitat creation and restoration. In addition, BOA's are recognised within the Crawley Green Infrastructure SPD and for 'impacts which reduce, block or harm green infrastructure, the applicant should clearly explain this, why it can't be avoided and how they have been mitigated and/or compensated for'.</p> <p>Development of this Site could therefore offer opportunities to contribute to the Gatwick Woods BOA, ensuring that ecological (habitat) networks are maintained and enhanced. For example, the existing network of outgrown hedges/ treelines around the north and east of the Site could be expanded and enhanced, linking to small blocks of woodland in the south-east corner, north and west of the Site. The ecological network can be multi-functional, providing ecological benefits as well as creating an attractive setting for the development, providing space for recreation and encouraging sustainable travel e.g. cycle paths.</p> <p>Habitats and Flora</p>

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			<p>In order to be compliant with planning policy and protect features of ecological value, the 'Mitigation Hierarchy' needs to be applied during development of proposals. This is a set of principals which are followed in sequential order: avoidance, mitigation and, as a last resort, compensation. HPIs should form the basis of habitat retention where possible. At this Site, retention should therefore focus on:</p> <ul style="list-style-type: none"> <li>• Hedgerows;</li> <li>• Woodland; and</li> <li>• Mature trees.</li> </ul> <p>These habitats, with suitable buffer zones could form wildlife networks as well as Green Infrastructure (GI) through the Site. As these habitats are mainly focused around the Site peripheries and eastern areas, this offers good opportunities to tie in with the BOA enhancements discussed above. A full survey of the Site will be required to identify the habitats outside the previously surveyed areas and identify their value.</p> <p>If ancient woodland is present, a minimum 15m buffer will required between the development and the ancient woodland, including through the construction phase. A comprehensive Arboricultural survey should be undertaken prior to the detailed design stage.</p> <p>Unavoidable losses of habitats will need to be adequately compensated for in accordance with national and local policy.</p> <p>New habitat creation should focus on areas with high biodiversity value. This could include new woodland and hedgerows, orchards, species-rich grassland and wildlife-friendly SuDS schemes/ wetlands (bearing in mind potential constraints relating to Gatwick Airport and bird strike).</p> <p>Ditches, including those adjacent to Site should be buffered and measures employed to prevent pollution.</p> <p><b>Protected and Notable Fauna</b>  Appropriate design opportunities and constraints relating to fauna will be based on up-to-date survey work for these species; however, a summary of possible design considerations is provided below.</p> <ul style="list-style-type: none"> <li>• As a preliminary assessment, hedgerows, trees and woodland edge may form important bat, bird and dormouse habitat. Mature trees may be important for notable deadwood invertebrates. These habitats should be retained where possible. Retained and created habitat should be designed to provide connectivity across the landscape (e.g. north to south and east to west);</li> <li>• Wildlife corridors should be protected from light-spill. As a guide, a buffer of 10 – 15m between important habitat and built development is usually sufficient to mitigate light-spill; Buildings and suitable trees within the Site have the potential to support roosting bats and will require an assessment to determine presence/likely absence. If roosts are</li> </ul>

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			<p>found, retention of the roost or a like-for-like replacement roosts will be required (in accordance with the conditions of a suitable Natural England EPS derogation licence);</p> <ul style="list-style-type: none"> <li>• If reptiles are found to be present, GI can be designed to act as a 'receptor area' for populations found within the build area. The habitat within GI can be enhanced through the creation of tussocky grassland, sunny banks and habitat piles for refuge;</li> <li>• Planting schemes should incorporate plants that support invertebrates. There are opportunities to support the West Sussex Pollinator Action Plan 2019 – 2022 by protecting and enhancing important pollinator habitat (e.g. trees and hedgerows) and creating pollinator-friendly environments as part of GI. To include native plants or those listed on RHS Plants for Pollinators, habitat piles, structurally diverse habitats and reduced cutting regimes via long-term management principles;</li> <li>• Include integrated or surface mounted boxes for bats, birds and invertebrates on new buildings; #</li> <li>• Given the proximity to Gatwick Airport consideration will need to be given to bird species that could be attracted to new buildings (such as gulls which nest on flat roofs) and appropriate mitigation/ management designed in;</li> <li>• The presence of badger setts on the Site (to be confirmed within unsurveyed areas) will require minimum 20m buffers in which no construction/excavation occurs. If present, adequate wildlife</li> <li>• Corridors and foraging habitat will need to be provided. These spaces can form part of landscaping/open space/green infrastructure. It may be possible to close setts if required, although new artificial setts may be required (e.g. for main breeding setts)</li> <li>• A planning application is likely to require a Landscape and Ecology Management Plan (LEMP) and Construction Environmental Management Plan (CEMP) prior to works/ occupation.</li> </ul> <p><b>Biodiversity Net Gain</b>  There is already policy requirement to enhance nature conservation and the Government are planning to roll out a legislative requirement for achieving a net gain in biodiversity for all developments. This gain relates to both linear habitats (e.g. hedgerows) and non-linear habitats (e.g. grassland/woodland) and requires the use of a 'metric' to calculate the required biodiversity units.</p> <p>It is important that BNG is considered early in the design stage to ensure that proposals can meet this requirement.</p> <p>High distinctiveness habitats (woodland, mature trees, hedgerows) should be favoured for retention as opposed to low distinctiveness habitats (hard standing and improved grassland), which are easier to replace. New habitat creation should focus on those with high biodiversity value, for example wetlands, ponds, meadows and orchards.</p> <p>Conclusions</p>

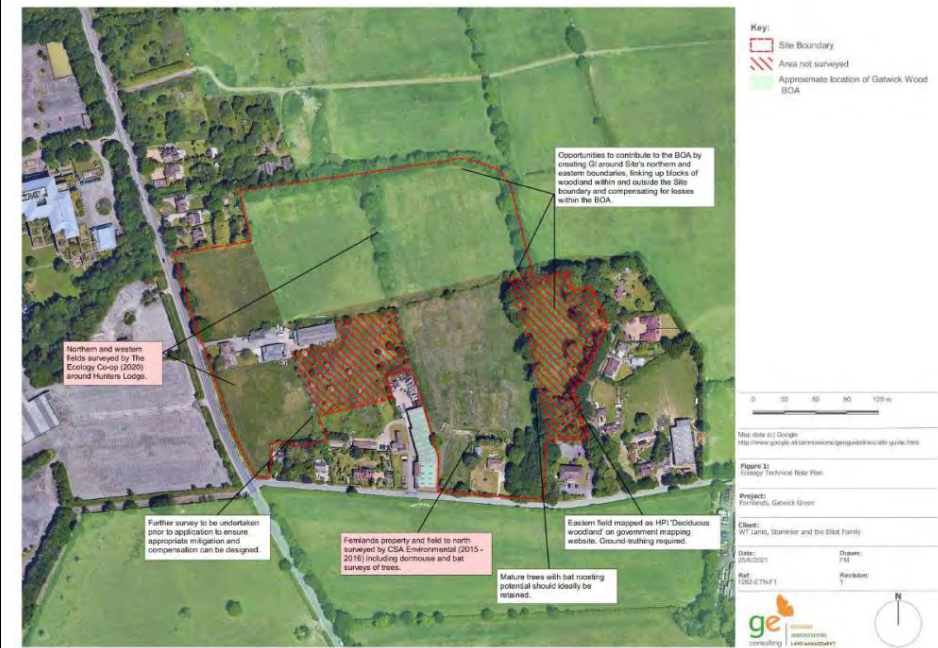
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In summary it is concluded that there are no in principle ecological constraints preventing allocation of this Site for future development. Furthermore;

- The Site is unlikely to be constrained by the presence of statutory designated sites for nature conservation in the local area, subject to further assessment and possible mitigation;
- Habitat retention should focus on those features of highest ecological value, contributing to local conservation strategies/priorities where possible;
- Development should aim to retain and incorporate features for protected and notable species, including a network of wildlife corridors through and around the Site;
- Development proposals should ensure biodiversity net gain can be achieved; and
- Detailed design and any future planning applications should be informed by further ecological survey work.

Fig 30: ecological work summary



**Transport**

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			<p>Miles White Transport (MWT) have been appointed to provide traffic and transportation advice in relation to the proposed development of land close to Gatwick Airport between Crawley and Horley in West Sussex. MWT have formulated a proposed Transport Strategy that will enable the site to be developed as part of the adjacent Gatwick Green Strategic Employment Location.</p> <p><b>Local Highway Network</b> The wider Gatwick Green site area, within which the Fernlands site sits, is located east of the B2036 Balcombe Road and west of Peeks Brook Lane. The site area is bounded to the north by the M23 Spur and the south by the B2037 Antlands Lane.</p> <p>The B2036 Balcombe Road provides a broadly north-south link between the A23 to the north of Horley town centre and Balcombe to the south, and beyond as London Road/Brook Street to the A272 close to Cuckfield.</p> <p>In the vicinity of the Fernlands site, Balcombe Road is a single carriageway road and is subject to the national speed limit (60mph). The speed limit decreases to 40mph approximately 400m south and 450m north of the site frontage.</p> <p>Balcombe Road is unlit and provides a footway on the western side of the road only in the vicinity of the site.</p> <p><b>Traffic Volumes</b> Traffic survey information was collected for the Transport Assessment (TA) prepared by PJA to support the now withdrawn planning application at the former Fernlands Nursery site located north of Fernhill Road (CR/2017/0810/FUL).</p> <p>This data was collected in December 2015 and January 2016 and includes an Automatic Traffic Count (ATC) on Balcombe Road, a turning count at the Balcombe Road/Fernhill Road junction and a speed survey on Balcombe Road. The recorded vehicle speeds on Balcombe Road in the vicinity of the Fernlands site were well below the existing 60mph speed limit.</p> <p><b>Road Safety</b> 'Crashmap' data identifies that 4 personal injury accidents have occurred on Balcombe Road in the vicinity of the Fernlands site during the most recent five-year period where data is available (2016 to 2020). Overall, this section of Balcombe Road has a relatively good safety record.</p> <p><b>Public Transport</b> Bus stops are located and operate on Balcombe Road to the north of the site and on Antlands Road to the south of the site. These bus stops provide different opportunities to travel to a range of destinations including Horley, Crawley, Reigate and Redhill.</p> <p>However, whilst there are bus services which operate within the local area, the existing level of local bus infrastructure is relatively poor due to limited development in the immediate vicinity of the proposed site. The site is located within</p>



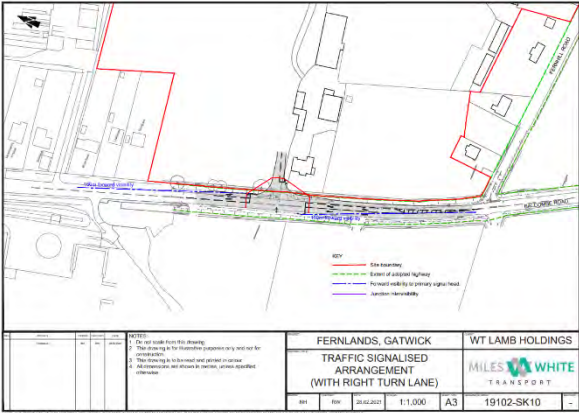
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			<p>the vicinity of three local railway stations, with the closest being Gatwick Airport to the west. Horley Railway Station is located to the north, whilst Three Bridges Railway Station is located to the south.</p> <p>As identified within the Local 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.</p> <p>Gatwick Airport station 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.</p> <p><b>Walking and Cycling</b>  The site is well located to the existing centre of Crawley and its northern suburbs, central Horley, the emerging residential areas such as Forge Wood, and complementary employment areas of Manor Royal and Gatwick Airport.</p> <p>It is generally accepted that walking offers the potential to substitute short car journeys, in particular those that are less than 2 kilometres. The location of existing residences (potential workforce) and day to day services and facilities in relation to a proposed site is therefore of key consideration.</p> <p>All of Horley, Gatwick Airport and the northeastern parts of Crawley are well within the 5km cycling distance widely considered to be appropriate to encourage day to day use and can be easily reached by bicycle. Cycling is therefore considered to be a viable travel choice for future employees at the site.</p> <p>All three railway stations referred to earlier are within a 10 to 20 minute bicycle ride, making cycling a favourable option as part of a multi-modal journey when travelling from the wider area.</p> <p><b>Summary</b>  Therefore, it is evident that the proposed Fernlands site is accessible by noncar modes of travel including walking, cycling, bus and train. GATWICK GREEN TWG controls 48ha 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.</p> <p>TWG propose to bring forward an integrated mixed-use development with co-ordinated infrastructure solution to deliver the site, which currently forms part of the land that is proposed to be allocated as a Strategic Employment Location under Policy EC4 in the CBLP.</p> <p>The TS identifies that it is anticipated that the development could comprise 265,000 sq.m split between B8 (Warehousing, distribution and logistics), B1 (Office) and C1 (Hotel) uses.</p>

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			<p>However, it remains to be proven if this is realistic or not and, in any event, is at odds with the quantum of development identified in the CBLP/CTS and our representations on the capacity of the site, which we would suggest is vastly over estimated by TWG.</p> <p>TWG also state that Gatwick Green provides the opportunity to plan development and sustainable transport comprehensively (our emphasis) with new employment and residential locations linked, to avoid “piecemeal” growth which focusses on the exclusive needs of individual sites and occupiers.</p> <p>TWG propose to access the site from two locations on Balcombe Road with no direct access to the M23, M23 spur or Junction 9A. The northern land parcel is proposed to be accessed from a new traffic signal controlled junction and the southern land parcel from a new three arm roundabout.</p> <p>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.</p> <p>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.</p> <p>TWG are also exploring access opportunities using the frontage of Balcombe Road, Fernhill Road, Peeks Brook Lane (emergency only) and Antlands Road.</p> <p>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.</p> <p>TWG consider that 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.</p> <p>The Crawley Transport Study (2021) Stantec were commissioned by Crawley Borough Council (CBC) to undertake a transport study to inform the Draft Crawley Local Plan Review for the Crawley Borough Area.</p> <p>The resultant Crawley Transport Study: Transport Study of Strategic Development Options and Sustainable Transport Measures was published in May 2021 to inform the Draft Crawley Local Plan 2021 – 2037.</p>

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			<p>This document reports on the transport modelling undertaken to inform the potential impacts of three Draft Crawley Local Plan Scenarios for Crawley Borough for the period 2020 to 2035. The Local Plan period has since been extended to 2037.</p> <p>Stantec consider that the modelling is sufficiently robust to be representative of impacts to 2037, the end of the draft Local Plan period. The quantum of development tested matches that proposed in the Local Plan period to 2037.</p> <p>The Crawley SATURN Transport Model, which has a base year of 2015, has been used to undertake the transport modelling. The Local Plan development for each scenario has been added on top of the Reference Case and the resultant demands assigned to a future Crawley network of Crawley that included committed schemes.</p> <p>By comparing the performance of the network with the Local Plan proposals in place against the Reference Case, overcapacity junctions potentially requiring mitigation were identified.</p> <p>The emphasis has been to consider sustainable mitigation to support the Draft Crawley Local Plan rather than prioritise highway capacity mitigation.</p> <p>The emphasis away from physical mitigation, marks a shift towards managing demand by prioritising sustainable travel including recognising the potential that virtual mobility will increasingly play alongside active modes, walking and cycling, public transport, rail and buses and car sharing and hence help in tackling the Climate Change emergency.</p> <p><b>Gatwick Green</b> Gatwick Green is an industrial-led Strategic Employment Location located to the east of Gatwick Airport. Additional information was also provided in relation to this, from the landowner's consultant (TWG) and was used to inform the transport modelling in respect of access arrangements to the wider network off Balcombe Road.</p> <p>Development quanta assumptions provided by CBC were used for the Gatwick Green site. The Gatwick Green assumptions comprise 77,500 sq.m (GFA) split into:</p> <ul style="list-style-type: none"> <li>• B8 Parcels Distribution (10%) or 7,750 sq.m</li> <li>• B8 Commercial Warehousing (60%) or 46,500 sq.m</li> <li>• B2 Industrial estate (30%) or 23,250 sq.m</li> </ul> <p>It is noted that the quantum of development suggested by CBC is significantly below that identified by TWG in March 2020.</p> <p><b>Employment Land Shortfall</b> As noted earlier in this document Hardisty Jones Associates identified a number of issues which lead to the Local Plan under-providing land for industrial and warehousing (B2/B8) uses. In particular, a minimum of 3.7 to 4.6ha of additional industrial and warehousing land should be provided to make up the identified shortfall of 14,780 sq.m in the employment land trajectory.</p>

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			<p>If the employment land shortfall (14,780 sq.m) is split into the three land uses identified in the CTS and in the same proportions, this equates to the following additional floorspace potentially being provided on the 'Gatwick Green Missing Section' site:</p> <ul style="list-style-type: none"> <li>• B8 Parcels 1,478 sq.m</li> <li>• B8 Warehousing 8,868 sq.m</li> <li>• B2 Industrial Estate 4,434 sq.m</li> </ul> <p>Scenarios Modelled</p> <p>The CTS models 3 development scenarios as detailed on pages 27-30 of the report. Scenarios 2 and 3 both include the Gatwick Green site but Scenario 3 includes additional floorspace in Horley district and so Scenario 2 is the best scenario to look at further to understand the potential traffic effects of the employment land shortfall (14,780 sq.m).</p> <p>The CTS firstly assesses the impact of the three scenarios upon the surrounding transport network without any mitigation and then applies "sustainable mitigation" measures (a shift away from single occupancy vehicle trips to more sustainable modes of transport) to identify any junctions of concern prior to considering any physical mitigation (junction improvements).</p> <p>Under Scenario 2, the CTS identifies that only one junction requires physical mitigation, i.e. the Ifield Avenue/A23 Crawley Road roundabout on the northwestern side of the town.</p> <p>Potential effect of Employment land shortfall on mitigation measures</p> <p>It is considered unlikely that the addition of 1 vehicle trip per minute will result in additional junctions being in need of physical mitigation. Indeed, the percentage increase in trips at Gatwick Green, under Scenario 2 (employment) and in total (before sustainable mitigation is applied) as a result of adding the 14,780 sq.m employment land shortfall is below 19%, 7.5% and 3% respectively.</p> <p>Whilst the impact of the 14,780 sq.m employment land shortfall has not been modelled in the CTS, it is our view that the mitigation identified in the CTS will adequately cater for the relatively small number of additional vehicle trips associated with this land and thus the conclusions of the CTS will not alter if the employment land shortfall were allocated in the Local Plan on the 'Gatwick Green Missing Section' site.</p>

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			<p><b>Gatwick Green Missing Section</b>                      Prior to the CTS being published, MWT undertook an assessment of the access requirements of the ‘Gatwick Green Missing Section’ site using a similar range and proportion of employment land uses as TWG proposed for the wider Gatwick Green area in March 2020, which we now know is significantly below that identified by CBC.</p> <p>This approach resulted in the site providing circa 46,290 sq.m of floor space, which was split as per the TWG TS.</p> <p>Whilst the employment land shortfall (14,780 sq.m) is significantly below this potential level of development on the site, this approach provides an extremely robust assessment as if the proposed access arrangements can cater for the high level of development assessed then it will be more than capable of accommodating the lower level of trips associated with the employment land shortfall.</p> <p><b>Vehicular Access</b>                      The ‘Gatwick Green Missing Section’ site is proposed to be accessed from a new traffic signal controlled junction on Balcombe Road approximately 150m north of Fernhill Road.</p> <p>The proposed signal controlled junction would provide two lanes on Balcombe Road on the approaches to the junction and accords with highway design guidance for the speeds recorded on this part of Balcombe Road.</p> <p>The provision of a new signal controlled junction in this location will help reduce vehicle speeds (possibly in conjunction with a Traffic Regulation Order to formally reduce the speed limit) and improve road safety on this part of Balcombe Road.</p> <p><b>Pedestrians and Cyclists</b>                      New footway and cycleway infrastructure and facilities will be provided as part of the development of the site that will seek to maximise pedestrian and cycling links to the existing transport network and also to the wider Gatwick Green site area.</p> <p><b>Trip rates</b>                      The potential number of trips predicted to be generated by the assumed composition of the ‘Gatwick Green Missing Section’ site, which is significantly in excess of the employment land shortfall, has been calculated using the TRICS trip rate database.</p> 

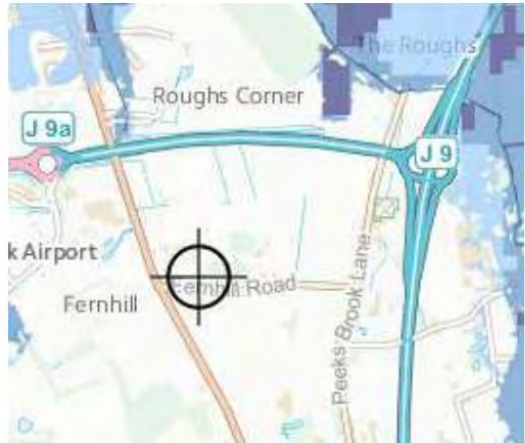

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			<p>The TRICS database has been interrogated to identify the likely vehicle trip generation associated with B1, B8 and C1 uses in a similar location to the site. The TRICS category Business Park best relates to the B1 (now E class) uses that were proposed on the TWG site.</p> <p>The assessed level of development on the 'Gatwick Green Missing Section' site will generate 277 and 236 vehicle movements in the morning and evening peak hours respectively.</p> <p>These additional trips have been assigned onto Balcombe Road assuming a distribution of 70% of trips to/from the north and 30% to/from the south.</p> <p><b>Junction Capacity Analysis</b>  The proposed signal controlled access junction has been assessed using the LINSIG computer program, which is the industry standard tool used to assess the operational performance of traffic signal controlled junctions.</p> <p>The proposed junction has been assessed in 2026, i.e. five years into the future, in the morning and evening peaks hours with the trips associated with the development of the 'Gatwick Green Missing Section' site added.</p> <p>Traffic growth has been calculated using TEMPRO Version 7.2 adjusted regional and local traffic growth forecasts based on National Traffic Model (NTM) AF15 Dataset using the 'Origin and Destination' trip end type. The PJA TA contains 2022 traffic volumes, which were acceptable to West Sussex County Council (WSCC), and so these have been used as the base traffic flows upon which traffic growth has been added.</p> <p>No specific committed development traffic has been added but the TEMPRO data (unadjusted for local development) will include some traffic associated with future development in the local area. 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".</p> <p>The proposed site access will operate well within capacity with minimal delays and queues in the 2026 design year with the application of extremely robust levels of traffic associated with the 'Gatwick Green Missing Section' site. The maximum Degree of Saturation (DoS) for traffic signal controlled junctions is normally taken as 90%. The proposed junction operates with a maximum DoS of just over 60%, which demonstrates that there is plenty of spare capacity in this junction even with significantly more development using the junction than required by the employment land shortfall.</p> <p>Given this level of spare capacity, the 'Gatwick Green Missing Section' site access junction could be used to provide an additional access to the TWG site, if desired.</p> <p><b>Integration with Wider Gatwick Green Site</b></p>

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			<p>The proposed access to the 'Gatwick Green Missing Section' site could provide one of the additional access points that TWG are considering.</p> <p>The internal access road within the 'Gatwick Green Missing Section' site could link directly into the TWG land or connect via the north-south multi-modal transport link shown in TWG's development framework).</p> <p>Such an approach would enable the development and sustainable transport infrastructure at Gatwick Green to be provided in a comprehensive manner as suggested by TWG and identified in the TS.</p> <p><b>Mobility Strategy</b>  A package of travel planning measures and initiatives will be formulated to reduce the need to travel using the private car (single occupancy trips) and maximise travel by sustainable modes of transport.</p> <p>This could include the following:</p> <ul style="list-style-type: none"> <li>• Provision of a Mobility Station/Hub to integrate the various forms of transport proposed to/from/within the site and provide "first and last mile solutions" to connect communities to frequent public transport services.</li> <li>• Provision of hire schemes (electric bike, pedal cycle, e-scooter, e-cargo bike etc).</li> <li>• Electric car club and car sharing scheme. #</li> <li>• Dynamic Demand Responsive Transport (DDRT) using advanced and real time requests (dial-a-ride, shared taxis).</li> <li>• Use of new mobility technology (e.g. Mobility as a Service – Maas – platform).</li> </ul> <p>These travel planning measures would be formulated in conjunction with others (TWG, Crawley Borough Council, West Sussex County Council etc) to ensure they fully align with the desired mobility strategy for the wider Gatwick Green area.</p> <p><b>Hydrology</b>  PHG Consulting Engineers have reviewed the available information to assess the hydrology in the area of the proposed development site. It has been concluded that there is a very low risk of fluvial flooding and the low risk of surface water flooding can be reduced with the introduction of site-specific positive drainage.</p> <p>An existing drainage ditch is shown on online mapping flowing east to west along the northern boundary of the site. Due to the topography of the site any greenfield runoff from the development will flow to this existing ditch. Available Lidar data has been reviewed to determine the topography of the site and fall arrows indicate that further smaller ditches may be present onsite, a detailed topographical survey will be required to determine where any existing drainage ditches flow. The drainage ditch system also runs along the eastern kerbline of Balcombe Road and is culverted under the existing private accesses, any future crossing of this ditch would require a new culvert and Ordinary Watercourse Consent.</p> <p><b>Flood Risk</b></p>


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			<p>Flood maps available at Gov.UK have been reviewed to determine the risk of flooding from various source within the site. Figure 32 below shows the extent of fluvial flooding from rivers and shows the development site to be away from the extents of fluvial flooding.</p> <p>Flood maps also show the risk of surface water flooding within an area, at the development site there is a large area at 'low' risk of surface water flooding as shown in figure 33. Areas of low flood risk have a likelihood of flooding between 0.1% and 1%. The depth of surface water flooding in this area ranges between 0-300mm and 300mm-900mm as shown in figure 34, The velocities of the are generally below 0.25m/s (figure 35) and therefore are not deemed to pose a major hazard.</p> <p>Flooding from surface water can be difficult to forecast due to small differences in rainfall intensity and volumes, local features can also affect the likelihood and severity of flooding. Surface water flooding within the site is mainly contained in the low-lying area at the north western corner. Surface water runoff from the greenfield will add to any surface water flooding shown on the below maps. Therefore, the development of the site can reduce the extent of surface water flooding by reducing rate and volumes of runoff to this area. Given the likelihood of surface water flooding is minimal and anticipated depths are low, the overall risk of surface water flooding post development will be negatable. The proposed drainage strategy should reduce flow rates and volumes and make space for water.</p> <p><b>Reservoir Flooding</b> Part of the northern section of the site is within the extent of reservoir flooding with maximum depths between 300mm-1m. Generally, reservoir flood risk maps are produced to inform reservoir owners and help produce evacuation and early warning plans. The likelihood of reservoir flooding is considered to be minimal and should not affect the use of land.</p>



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Ref. No.	Respondent	Policy/ Para	Comments
			<div style="display: flex; justify-content: space-around;"> <div style="text-align: center;"> <p><small>Fig 32: fluvial extents from www.gov.uk</small></p>  </div> <div style="text-align: center;"> <p><small>Fig 33: Surface water flood extents from www.gov.uk</small></p>  </div> </div> <p><b>Historic Flooding</b>                      The West Sussex SFRA provides an outline of historical flood events, however this information is limited and, in many cases, does not include the type of flooding. There are no known flood events within the site.</p> <p><b>Groundwater Flooding</b>                      The West Sussex SFRA shows the geology of West Sussex and shows the site to be in an area underlain by Clays. Therefore, groundwater flooding may occur from perched water flowing above more impermeable soils. A site-specific site investigation will be required and this should determine whether groundwater is encountered during works.</p> <p><b>Surface Water Drainage</b>                      The surface water drainage strategy for the site should restrict discharge to the calculated QBAR greenfield runoff rate, this would ensure that during rainfall events greater than the predicted 1 in 2 year event discharge from the site post-development would be reduced. Base on the site area consisting of 60% impermeable surfacing the QBAR greenfield runoff rate has been calculated to be 28.6l/s. To maximise the benefits of a SuDS approach to surface water management, the use of swales to convey water should be considered and the final attenuation should be provided in a landscaped basin (or basins). This will ensure the surface water drainage network maximises amenity and biodiversity benefits whilst reducing the volume and rates of runoff. The masterplan should allow space within landscaped areas for attenuation basins to be provided. Any attenuation feature within the site should be designed to accommodate flows up to and including the 1 in 100 year with a 40% increased for climate change. To ensure exceedance can be managed, a minimum freeboard of 300mm should be included. Given the above parameters, a</p>

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			<p>1.5m deep basin with 1 in 3 banks covering a surface area of approximately 3,670m<sup>2</sup> and providing 4,500m<sup>3</sup> storage would be required. Further SuDS techniques such as porous surfaces can be utilised to reduce the overall size of surface water attenuation required.</p> <p><b>Foul Water Drainage</b>                      Sewer records have been obtained from Thames Water and show few existing foul sewers with the vicinity of the development. The development is surrounded by greenfield, Gatwick Airport and some smaller development/ dwellings. The dwellings in the vicinity of the site are likely to have individual treatment plants and Gatwick Airport would be served by a private drainage system. The nearest Public Sewers are located approximately 600m south of the development in Balcombe Road. Sewer records show that the existing manhole (7801) at the start of this run has an invert level of 57.54m and the public sewer discharges to a pumping station. The pumping station is assumed to have a direct discharge to Crawley Sewerage Treatment Works located 300m to the west. Due site levels and the invert level of the existing manhole, a pumping station will be required to discharge to the Thames Water network. The pumping station would also include an offsite rising main being laid in Balcombe Road, approximately 500m long. Once the development scale and uses are determined early discussion should take place with Thames Water to ensure sufficient capacity within the existing network.</p> <p><small>Fig 34: surface water depths from www.gov.uk</small> <span style="margin-left: 200px;"><small>Fig 35: surface water flood velocities from www.gov.uk</small></span> <span style="float: right;"><small>Gatwick Green   Section 5</small></span></p>  <p><b>6. Conclusion</b>  <b>6.1 Introduction</b></p>

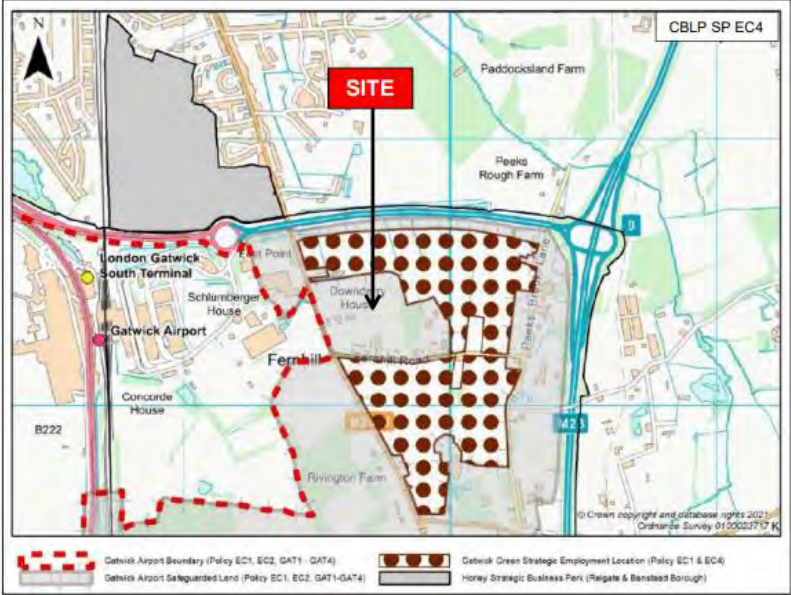
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Ref. No.	Respondent	Policy/ Para	Comments
			<p>This document has been prepared by LRM Planning on behalf of WT Lamb, Staminier Group and Elliott Metals/The Simmonds Family and sets out how their combined landholdings can contribute towards the Gatwick Green proposals.</p> <p>Between them, our clients own 8.8ha of land that in effect form the missing section of the Gatwick Green proposals. Our clients consider that there is an opportunity to plan comprehensively for the entire Gatwick Green area not just elements of it thereby assisting the local economy to transition from the previous reliance upon airport related activities and diversify the economic base in accordance with emerging trends and requirements.</p> <p>Our clients land forms a vital missing section of the allocation that forms the central and focal parts of the area with an opportunity for an access at the very heart of the site and to create a truly unique employment area.</p> <p>Together with the existing 48ha within the ownership of the Wilky Group our clients land provides a significant opportunity to provide a comprehensive approach to the future of Gatwick Green for employment purposes.</p> <p><b>Appendix 4. Transport Note Prepared by Miles White Transport</b>  GATWICK GREEN, WEST SUSSEX  TECHNICAL NOTE 2 – PROPOSED TRANSPORT STRATEGY  1 INTRODUCTION  1.1 Miles White Transport (MWT) have been appointed by WT Lamb Holdings Ltd (WTL), Elliott Metals and Staminier ('the landowners') to provide traffic and transportation advice in relation to the proposed development of land (referred to as the 'Gatwick Green Missing Section' in this Technical Note) close to Gatwick Airport between Crawley and Horley in West Sussex.  1.2 The location of the site is shown below in Figure 1.1.</p>

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Ref. No.	Respondent	Policy/ Para	Comments
			<div data-bbox="645 284 1323 954" data-label="Image"> <p>The map displays the area around Gatwick Airport, showing major roads like the A23, A24, and A24A, and various landmarks such as the airport itself, several parking areas (marked with 'P'), and residential areas like Hookwood and Farnham. A red dot is placed on a road east of the airport, with a red box labeled 'SITE' and an arrow pointing to it. The map is credited to '© openstreetmap contributors'.</p> </div> <p data-bbox="875 970 1106 994"><b>Figure 1.1: Site Location</b></p> <p data-bbox="645 1023 2002 1114">1.3 This Technical Note outlines the proposed Transport Strategy that will enable the site to be developed as part of the adjacent Gatwick Green Strategic Employment Location proposed in the Submission Consultation Draft of the Crawley Borough Local Plan 2021 – 2037 (CBLP).</p> <p data-bbox="645 1129 2002 1193">1.4 The CBLP identifies land east of Balcombe Road and south of the M32 Spur for the comprehensive development of an industrial-led Strategic Employment Location, known as Gatwick Green.</p> <p data-bbox="645 1209 2024 1331">1.5 The area is currently identified under Strategic Policy EC4 and is proposed to provide a minimum of 24.1ha of new industrial land, predominantly for B8 storage and distribution use. The area is shown below in Figure 1.2. This also shows the location of the ‘Gatwick Green Missing Section’ site (‘the site’), which is surrounded on three sides by the proposed CBLP allocation.</p>

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**Figure 1.2: Proposed Gatwick Green Strategic Employment Location**


1.6 Crawley Borough Council (CBC) commissioned a transport study to inform the Draft Crawley Local Plan Review for the Crawley Borough Area (Crawley Transport Study: Transport Study of Strategic Development Options and Sustainable Transport Measures), which was published in May 2021. This is dealt with in more detail in Section 4.

**2 EXISTING TRANSPORT CONDITIONS**

Local Road Network

2.1 The wider Gatwick Green site area, within which the site sits, is located east of the B2036 Balcombe Road and west of Pecks Brook Lane. The site area is bounded to the north by the M23 Spur and the south by the B2037 Antlands Lane as shown in Figure 2.1 below.

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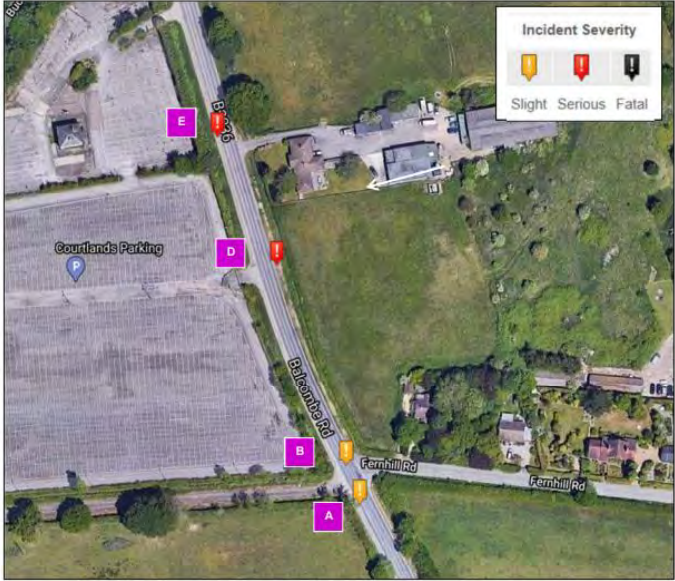
Ref. No.	Respondent	Policy/ Para	Comments
			 <p data-bbox="862 1042 1220 1066"><b>Figure 2.1: Local Transport Network</b></p> <p data-bbox="645 1091 1955 1150">2.2 The B2036 Balcombe Road provides a broadly north-south link between the A23 to the north of Horley town centre and Balcombe to the south, and beyond as London Road/Brook Street to the A272 close to Cuckfield.</p> <p data-bbox="645 1169 2029 1257">2.3 In the vicinity of the ‘Gatwick Green Missing Section’ site, Balcombe Road is a single carriageway road and is subject to the national speed limit (60mph). The speed limit decreases to 40mph approximately 400m south and 450m north of the site frontage.</p> <p data-bbox="645 1276 1955 1305">2.4 Balcombe Road is unlit and provides a footway on the western side of the road only in the vicinity of the site.</p> <p data-bbox="645 1324 2029 1383">2.5 Fernhill Road runs east-west along much of the south of the site between Peeks Brook Lane and Balcombe Road. It is a rural single lane road with no footways or street lighting. Traffic Volumes</p>

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			<p>2.6 Traffic survey information was collected for the Transport Assessment (TA) prepared by PJA to support the outline planning application at the former Fernlands Nursery site located north of Fernhill Road (CR/2017/0810/FUL). This data is contained in Appendix E of the PJA TA.</p> <p>2.7 This data was collected in December 2015 and January 2016 and includes an Automatic Traffic Count (ATC) on Balcombe Road, a turning count at the Balcombe Road/Fernhill Road junction and a speed survey on Balcombe Road. The 2015 peak hour traffic volumes identified in these surveys are summarised below in Table 2.1.</p> <table border="1"> <thead> <tr> <th>Time Period</th> <th>Morning Peak Hour</th> <th>Evening Peak Hour</th> </tr> </thead> <tbody> <tr> <td>Northbound</td> <td>591</td> <td>733</td> </tr> <tr> <td>Southbound</td> <td>492</td> <td>637</td> </tr> </tbody> </table> <p style="text-align: center;"><b>Table 2.1: Traffic Volumes on Balcombe Road</b></p> <p>2.8 The recorded vehicle speeds on Balcombe Road in the vicinity of the 'Gatwick Green Missing Section' site were well below the existing 60mph speed limit as shown below in Table 2.2.</p> <table border="1"> <thead> <tr> <th>Time Period</th> <th>Average Speed (mph)</th> <th>85thile Speed (mph)</th> </tr> </thead> <tbody> <tr> <td>Northbound</td> <td>41.6</td> <td>48.4</td> </tr> <tr> <td>Southbound</td> <td>42.9</td> <td>49.0</td> </tr> </tbody> </table> <p style="text-align: center;"><b>Table 2.2: Vehicle Speeds on Balcombe Road</b></p> <p><u>Existing Personal Injury Accident Records</u></p> <p>2.9 'Crashmap' data identifies that 4 personal injury accidents have occurred on Balcombe Road in the vicinity of the 'Gatwick Green Missing Section' site during the most recent five-year period where data is available (2016 to 2020). The location of these accidents is shown overleaf in Figure 2.2.</p> <p>2.10 Accident A occurred on the 10th October 2016 at the junction with Fernhill Road and involved three vehicles in fine conditions. The accident was a result of driver error as one vehicle attempted to turn left into Fernhill Road. The driver of two of the vehicles sustained slight injuries as did two of the passengers in the car that rear ended the vehicle turning.</p> <p>2.11 Accident B occurred in fine conditions on the 12th November 2017 at the junction with Fernhill Road and involved two cars and two pedal cycles. The accident was a result of driver error as one vehicle attempted to turn right. One of the cyclists sustained a slight injury.</p>	Time Period	Morning Peak Hour	Evening Peak Hour	Northbound	591	733	Southbound	492	637	Time Period	Average Speed (mph)	85thile Speed (mph)	Northbound	41.6	48.4	Southbound	42.9	49.0
Time Period	Morning Peak Hour	Evening Peak Hour																			
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**Figure 2.2: Accident Locations**

2.12 Accident C occurred on the 28th October 2016 in fine conditions on Balcombe Road and involved a car, cyclist and HGV. The accident was a result of driver error as the car was passing the cyclist. The cyclist sustained serious injuries.

2.13 Accident D occurred on the 7th January 2020 in fine conditions on Balcombe Road and involved three cars. The accident was a result of driver error as one vehicle attempted to change lanes. The drivers of two vehicles sustained slight injuries and the driver of the other vehicle serious injuries.

2.14 Overall, this section of Balcombe Road has a relatively good safety record.

2.15 The CrashMap data is contained as Appendix A.

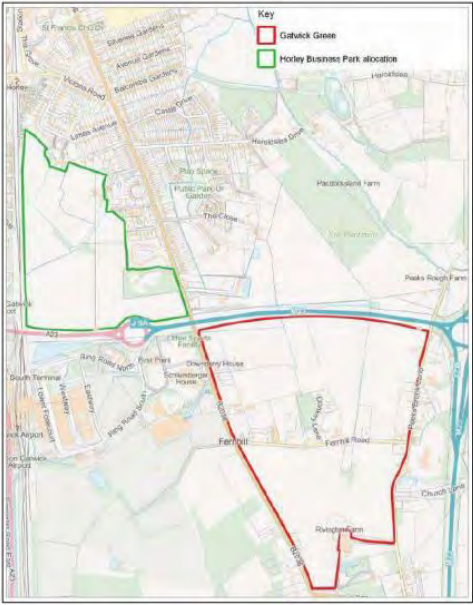
Public Transport

2.16 Bus stops are located and operate on Balcombe Road to the north of the 'Gatwick Green Missing Section' site and on Antlands Road to the south of the site. These bus stops provide different opportunities to travel to a range of destinations including Horley, Crawley, Reigate and Redhill.



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			<p>2.17 However, whilst there are bus services which operate within the local area, the existing level of local bus infrastructure is relatively poor due to limited development in the immediate vicinity of the proposed site.</p> <p>2.18 The 'Gatwick Green Missing Section' 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.</p> <p>2.19 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.</p> <p>2.20 Gatwick Airport station 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.</p> <p><u>Walking and Cycling</u></p> <p>2.21 The 'Gatwick Green Missing Section' site is well located to the existing centre of Crawley and its northern suburbs, central Horley, the emerging residential areas such as Forge Wood, and complimentary employment areas of Manor Royal and Gatwick Airport.</p> <p>2.22 It is generally accepted that walking offers the potential to substitute short car journeys, in particular those that are less than 2 kilometres. The location of existing residences (potential workforce) and day to day services and facilities in relation to a proposed site is therefore of key consideration.</p> <p>2.23 All of Horley, Gatwick Airport and the northeastern parts of Crawley are well within the 5km cycling distance widely considered to be appropriate to encourage day to day use and can be easily reached by bicycle. Cycling is therefore considered to be a viable travel choice for future employees at the 'Gatwick Green Missing Section' site.</p> <p>2.24 All three railway stations referred to earlier are within a 10 to 20 minute bicycle ride, making cycling a favourable option as part of a multi-modal journey when travelling from the wider area.</p> <p><u>Summary</u></p> <p>2.25 Therefore, it is evident that the 'Gatwick Green Missing Section' site is accessible by non-car modes of travel including walking, cycling, bus and train.</p> <p><b>3 GATWICK GREEN</b></p> <p>3.1 The Wilky Group (TWG) owns 47.3 ha (117 acres) 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.</p>

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Ref. No.	Respondent	Policy/ Para	Comments
			<p>3.2 The Transport Strategy (TS) report prepared by i-Transport on behalf of TWG in March 2020 (i.e. over a year before the CTS was published) to support representations to the CBLP identifies the Gatwick Green area as shown below in Figure 3.1. It is evident that this area includes the ‘Gatwick Green Missing Section’ site.</p>  <p><b>Figure 3.1: TWG Gatwick Green Site Area</b></p> <p>3.3 In March 2020, TWG proposed to bring forward an integrated mixed-use development with co-ordinated infrastructure solution to deliver the 47.3 ha (117 acre) site, which currently forms part of the land that is proposed to be allocated as a Strategic Employment Location under Policy EC4 in the CBLP.</p> <p>3.4 The TS identifies that it is anticipated that the development could comprise 265,000 sq.m split between B8 (Warehousing, distribution and logistics), B1 (Office) and C1 (Hotel) uses.</p> <p>3.5 However, it remains to be proven if this is realistic or not and, in any event, is at odds with the quantum of development identified in the CBLP/CTS and our representations on the capacity of the site, which we would suggest is vastly over estimated by TWG.</p>

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3.6 A copy of the emerging development framework plan is included within the TS and is reproduced below as Figure 3.2. Again, it can be seen that the Gatwick Green area includes the 'Gatwick Green Missing Section' site.



**Figure 3.2: TWG Development Framework Plan**

3.7 TWG envisage that Gatwick Green will provide a range of high-quality employment opportunities that 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.

3.8 TWG also state that Gatwick Green provides the opportunity to plan development and sustainable transport comprehensively (our underlining) with new employment and residential locations linked, to avoid “piecemeal” growth which focusses on the exclusive needs of individual sites and occupiers.

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			<p>3.9 TWG propose to access the site from two locations on Balcombe Road as shown in Figure 3.2, i.e. no direct access to the M23, M23 spur or Junction 9A. The northern land parcel is proposed to be accessed from a new traffic signal controlled junction and the southern land parcel from a new three arm roundabout.</p> <p>3.10 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.</p> <p>3.11 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.</p> <p>3.12 TWG are also exploring access opportunities using the frontage of Balcombe Road, Fernhill Road, Peeks Brook Lane (emergency only) and Antlands Road.</p> <p>3.13 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.</p> <p>3.14 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.</p> <p>3.15 TWG consider that 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.</p> <p>3.16 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.</p> <p>3.17 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.</p> <p>4 CRAWLEY TRANSPORT STUDY</p> <p><u>Introduction</u></p>

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Ref. No.	Respondent	Policy/ Para	Comments
			<p>4.1 Stantec were commissioned by Crawley Borough Council (CBC) to undertake a transport study to inform the Draft Crawley Local Plan Review for the Crawley Borough Area.</p> <p>4.2 The resultant Crawley Transport Study: Transport Study of Strategic Development Options and Sustainable Transport Measures was published in May 2021 to inform the Draft Crawley Local Plan 2021 – 2037.</p> <p>4.3 This document reports on the transport modelling undertaken to inform the potential impacts of three Draft Crawley Local Plan Scenarios for Crawley Borough for the period 2020 to 2035. The Local Plan period has since been extended to 2037.</p> <p>4.4 Stantec consider that the modelling is sufficiently robust to be representative of impacts to 2037, the end of the draft Local Plan period. The quantum of development tested matches that proposed in the Local Plan period to 2037.</p> <p>4.5 The Crawley SATURN Transport Model, which has a base year of 2015, has been used to undertake the transport modelling. The Local Plan development for each scenario has been added on top of the Reference Case and the resultant demands assigned to a future Crawley network of Crawley that included committed schemes.</p> <p>4.6 By comparing the performance of the network with the Local Plan proposals in place against the Reference Case, overcapacity junctions potentially requiring mitigation were identified.</p> <p>4.7 The emphasis has been to consider sustainable mitigation to support the Draft Crawley Local Plan rather than prioritise highway capacity mitigation.</p> <p>4.8 The emphasis away from physical mitigation, marks a shift towards managing demand by prioritising sustainable travel including recognising the potential that virtual mobility will increasingly play alongside active modes, walking and cycling, public transport, rail and buses and car sharing and hence help in tackling the Climate Change emergency</p> <p><u>Gatwick Green</u></p> <p>4.9 Gatwick Green is an industrial-led Strategic Employment Location located to the east of Gatwick Airport. Additional information was also provided in relation to this, from the landowner's consultant (TWG) and was used to inform the transport modelling in respect of access arrangements to the wider network off Balcombe Road.</p> <p>4.10 Development quanta assumptions provided by CBC were used for the Gatwick Green site. The Gatwick Green assumptions comprise 77,500 square metres (GFA) split into:</p> <ul style="list-style-type: none"> <li>· B8 Parcels Distribution (10%) or 7,750 sq.m</li> <li>· B8 Commercial Warehousing (60%) or 46,500 sq.m</li> <li>· B2 Industrial estate (30%) or 23,250 sq.m</li> </ul> <p>4.11 It is noted that the quantum of development suggested by CBC is significantly below that identified by TWG in March 2020 as outlined in Section 3.</p>

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			<p><u>Employment Land Shortfall</u></p> <p>4.12 Hardisty Jones Associates were instructed by WTL to review employment land matters within the Submission Draft Crawley Local Plan and supporting evidence base. This review identified a number of issues which lead to the Local Plan under-providing land for industrial and warehousing (B2/B8) uses.</p> <p>4.13 A minimum of 3.7 to 4.6ha of additional industrial and warehousing land should be provided to make up the identified shortfall of 14,780 sq.m in the employment land trajectory.</p> <p>4.14 Additional provision should also be made, in line with the requirements of PPG, for the strength of market opinion in order to deliver a more rounded and robust assessment of future B8 requirements; as well as to allow for potential losses of employment space to other uses and through dilapidation and changing occupier requirements.</p> <p>4.15 If the employment land shortfall (14,780 sq.m) is split into the three land uses identified in the CTS and in the same proportions, this equates to the following additional floorspace potentially being provided on the 'Gatwick Green Missing Section' site:</p> <ul style="list-style-type: none"> <li>· B8 Parcels 1,478 sq.m</li> <li>· B8 Warehousing 8,868 sq.m</li> <li>· B2 Industrial Estate 4,434 sq.m</li> </ul> <p>Trip Rates</p> <p>4.16 The CTS provides vehicle trip rates for each of these uses and enables the number of trips associated with the employment land shortfall to be calculated as shown below in Table 4.1.</p> <table border="1" data-bbox="647 940 1480 1230"> <thead> <tr> <th>Land Use</th> <th>AM Two-Way Trip Rate (per 100 sq.m)</th> <th>PM Two-Way Trip Rate (per 100 sq.m)</th> <th>AM Two-Way Trips (Employment Land Shortfall)</th> <th>PM Two-Way Trips (Employment Land Shortfall)</th> </tr> </thead> <tbody> <tr> <td>B8 Parcels</td> <td>1.508</td> <td>1.705</td> <td>22</td> <td>25</td> </tr> <tr> <td>B8 Warehousing</td> <td>0.170</td> <td>0.093</td> <td>15</td> <td>8</td> </tr> <tr> <td>B2 Industrial Estate</td> <td>0.589</td> <td>0.426</td> <td>26</td> <td>19</td> </tr> <tr> <td><b>TOTAL</b></td> <td></td> <td></td> <td><b>63</b></td> <td><b>52</b></td> </tr> </tbody> </table> <p style="text-align: center;"><b><u>Table 4.1: Trips Generated by Employment Land Shortfall</u></b></p> <p>4.17 Thus, it can be seen that 14,780 sq.m of additional employment land (split as per the CTS) would generate 63 and 52 vehicle trips in the AM and PM peaks respectively, i.e. approximately 1 vehicle per minute.</p> <p><u>Scenarios Modelled</u></p>	Land Use	AM Two-Way Trip Rate (per 100 sq.m)	PM Two-Way Trip Rate (per 100 sq.m)	AM Two-Way Trips (Employment Land Shortfall)	PM Two-Way Trips (Employment Land Shortfall)	B8 Parcels	1.508	1.705	22	25	B8 Warehousing	0.170	0.093	15	8	B2 Industrial Estate	0.589	0.426	26	19	<b>TOTAL</b>			<b>63</b>	<b>52</b>
Land Use	AM Two-Way Trip Rate (per 100 sq.m)	PM Two-Way Trip Rate (per 100 sq.m)	AM Two-Way Trips (Employment Land Shortfall)	PM Two-Way Trips (Employment Land Shortfall)																								
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			<p>4.18 The CTS models 3 development scenarios as detailed on pages 27-30 of the report.</p> <p>4.19 Scenarios 2 and 3 both include the Gatwick Green site but Scenario 3 includes additional floorspace in Horley district and so Scenario 2 is the best scenario to look at further to understand the potential traffic effects of the employment land shortfall (14,780 sq.m).</p> <p>4.20 The CTS firstly assesses the impact of the three scenarios upon the surrounding transport network without any mitigation and then applies “sustainable mitigation” measures (a shift away from single occupancy vehicle trips to more sustainable modes of transport) to identify any junctions of concern prior to considering any physical mitigation (junction improvements).</p> <p>4.21 Under Scenario 2, the CTS identifies that only one junction requires physical mitigation, i.e. the Ifield Avenue/A23 Crawley Road roundabout on the northwestern side of the town. Potential Effect of Employment Land Shortfall upon Mitigation Measures 4.22 It is considered unlikely that the addition of 1 vehicle trip per minute will result in additional junctions being in need of physical mitigation.</p> <p>4.23 Indeed, the percentage increase in trips at Gatwick Green, under Scenario 2 (employment) and in total (before sustainable mitigation is applied) as a result of adding the 14,780 sq.m employment land shortfall is below 19%, 7.5% and 3% respectively as shown in Table 4.2 below.</p> <table border="1" data-bbox="647 831 1561 1281"> <thead> <tr> <th>Site</th> <th>AM Trips</th> <th>PM Trips</th> </tr> </thead> <tbody> <tr> <td>Gatwick Green (CTS)</td> <td>333</td> <td>298</td> </tr> <tr> <td>Employment Land Shortfall</td> <td>63</td> <td>52</td> </tr> <tr> <td>% Increase</td> <td>+ 18.9%</td> <td>+ 17.4%</td> </tr> <tr> <td>Scenario 2 Employment</td> <td>846</td> <td>822</td> </tr> <tr> <td>Employment Land Shortfall</td> <td>63</td> <td>52</td> </tr> <tr> <td>% Increase</td> <td>+ 7.4%</td> <td>+ 6.3%</td> </tr> <tr> <td>Scenario 2 Total</td> <td>2,228</td> <td>2,270</td> </tr> <tr> <td>Employment Land Shortfall</td> <td>63</td> <td>52</td> </tr> <tr> <td>% Increase</td> <td>+ 2.8%</td> <td>+2.8%</td> </tr> </tbody> </table> <p><b>Table 4.2: Percentage Increase of Addition of Employment Land Shortfall</b></p>	Site	AM Trips	PM Trips	Gatwick Green (CTS)	333	298	Employment Land Shortfall	63	52	% Increase	+ 18.9%	+ 17.4%	Scenario 2 Employment	846	822	Employment Land Shortfall	63	52	% Increase	+ 7.4%	+ 6.3%	Scenario 2 Total	2,228	2,270	Employment Land Shortfall	63	52	% Increase	+ 2.8%	+2.8%
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			<p>4.24 Whilst the impact of the 14,780 sq.m employment land shortfall has not been modelled in the CTS, it is our view that the mitigation identified in the CTS will adequately cater for the relatively small number of additional vehicle trips associated with this land and thus the conclusions of the CTS will not alter if the employment land shortfall were allocated in the Local Plan on the 'Gatwick Green Missing Section' site.</p> <p>5 GATWICK GREEN MISSING SECTION</p> <p><u>Development Composition</u></p> <p>5.1 Prior to the CTS being published, MWT undertook an assessment of the access requirements of the 'Gatwick Green Missing Section' site using a similar range and proportion of employment land uses as TWG proposed for the wider Gatwick Green area in March 2020, which we now know is significantly below that identified by CBC.</p> <p>5.2 This approach resulted in the site providing circa 46,290 sq.m of floor space, which was split as per the TWG TS.</p> <p>5.3 Whilst the employment land shortfall (14,780 sq.m) is significantly below this potential level of development on the site, this approach provides an extremely robust assessment as if the proposed access arrangements can cater for the high level of development assessed then it will be more than capable of accommodating the lower level of trips associated with the employment land shortfall.</p> <p><u>Vehicular Access</u></p> <p>5.4 The 'Gatwick Green Missing Section' site is proposed to be accessed from a new traffic signal controlled junction on Balcombe Road approximately 150m north of Fernhill Road. The location of this junction is shown in Figure 5.1.</p> <p>5.5 The proposed signal controlled junction would provide two lanes on Balcombe Road on the approaches to the junction and accords with highway design guidance for the speeds recorded on this part of Balcombe Road as noted in Table 2.2.</p> <p>5.6 A preliminary design of the proposed access junction is shown overleaf in Figure 5.2. This is also shown in drawing 19102-SK10 in Appendix B.</p> <p>5.7 The provision of a new signal controlled junction in this location will help reduce vehicle speeds (possibly in conjunction with a Traffic Regulation Order to formally reduce the speed limit) and improve road safety on this part of Balcombe Road.</p> <p><u>Trip Rates</u></p> <p>5.8 The potential number of trips predicted to be generated by the assumed composition of the 'Gatwick Green Missing Section' site, which is significantly in excess of the employment land shortfall, has been calculated using the TRICS trip rate database.</p>



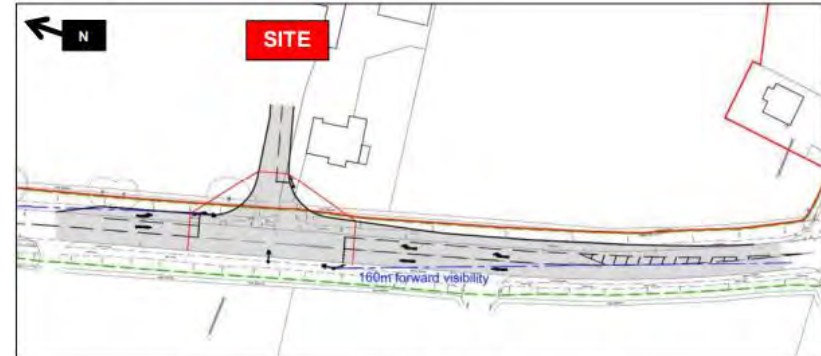
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5.9 The TRICS database has been interrogated to identify the likely vehicle trip generation associated with B1, B8 and C1 uses in a similar location to the site. The TRICS category Business Park best relates to the B1 (now E class) uses that were proposed on the TWG site. The TRICS output is attached as Appendix C.



**Figure 5.1: Illustrative Masterplan**



**Figure 5.2: Proposed Site Access Arrangement**

5.10 Table 5.1 below provides the trip rates and trips generated for the assessed quantum of development.

Trips per 100 sq.m	Morning Peak Hour		Evening Peak Hour	
	Arrivals	Departures	Arrivals	Departures
B8 Warehousing	0.142	0.092	0.071	0.145
B1 Business Park	1.362	0.217	0.189	1.084
C1 Hotels	0.250	0.482	0.408	0.237

**Table 5.1: Vehicle Trip Rates**

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Ref. No.	Respondent	Policy/ Para	Comments																													
			<p>5.11 Table 5.2 below provides the trip rates and trips generated for the assessed quantum of development.</p> <table border="1"> <thead> <tr> <th rowspan="2">Trips</th> <th colspan="2">Morning Peak Hour</th> <th colspan="2">Evening Peak Hour</th> </tr> <tr> <th>Arrivals</th> <th>Departures</th> <th>Arrivals</th> <th>Departures</th> </tr> </thead> <tbody> <tr> <td>B8 Warehousing</td> <td>40</td> <td>26</td> <td>20</td> <td>41</td> </tr> <tr> <td>B1 Business Park</td> <td>125</td> <td>19</td> <td>17</td> <td>99</td> </tr> <tr> <td>C1 Hotels</td> <td>23</td> <td>44</td> <td>20</td> <td>41</td> </tr> <tr> <td><b>TOTAL</b></td> <td><b>188</b></td> <td><b>89</b></td> <td><b>74</b></td> <td><b>162</b></td> </tr> </tbody> </table> <p><b>Table 5.2: Vehicle Trips Generated</b></p> <p>5.12 Table 5.2 shows that the assessed level of development on the ‘Gatwick Green Missing Section’ site will generate 277 and 236 vehicle movements in the morning and evening peak hours respectively.</p> <p>5.13 These additional trips have been assigned onto Balcombe Road assuming a distribution of 70% of trips to/from the north and 30% to/from the south.</p> <p><u>Junction Capacity Assessment</u></p> <p>5.14 The proposed signal controlled access junction has been assessed using the LINSIG computer program, which is the industry standard tool used to assess the operational performance of traffic signal controlled junctions.</p> <p>5.15 The proposed junction has been assessed in 2026, i.e. five years into the future, in the morning and evening peaks hours with the trips associated with the development of the ‘Gatwick Green Missing Section’ site added.</p> <p>5.16 Traffic growth has been calculated using TEMPRO Version 7.2 adjusted regional and local traffic growth forecasts based on National Traffic Model (NTM) AF15 Dataset using the ‘Origin and Destination’ trip end type. The PJA TA contains 2022 traffic volumes, which were acceptable to West Sussex County Council (WSCC), and so these have been used as the base traffic flows upon which traffic growth has been added. The resultant growth factors are provided in Table 5.3 below:</p>	Trips	Morning Peak Hour		Evening Peak Hour		Arrivals	Departures	Arrivals	Departures	B8 Warehousing	40	26	20	41	B1 Business Park	125	19	17	99	C1 Hotels	23	44	20	41	<b>TOTAL</b>	<b>188</b>	<b>89</b>	<b>74</b>	<b>162</b>
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Scenario	Area	Growth Figure
2022 to 2026 AM Peak	Crawley 002	1.0477
2022 to 2026 PM Peak	Crawley 002	1.0485

**Table 5.3: TEMPRO Growth Factors**

5.17 No specific committed development traffic has been added but the TEMPRO data (unadjusted for local development) will include some traffic associated with future development in the local area. 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 (as shown in Figure 3.1) 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”.

5.18 Table 5.4 below shows that the proposed site access will operate well within capacity with minimal delays and queues in the 2026 design year with the application of extremely robust levels of traffic associated with the ‘Gatwick Green Missing Section’ site.

Road	Morning Peak Hour			Evening Peak Hour		
	Queue (PCU)	Delay (s/PCU)	Degree of Sat (DoS)	Queue (PCU)	Delay (s/PCU)	Degree of Sat (DoS)
Balcombe Road North	8.7	12.9	50.9%	11.9	14.2	60.1%
Site Access	2.5	54.5	45.9%	4.5	51.6	59.6%
Balcombe Road South	5.8	10.5	49.3%	9.7	9.9	58.7%

**Table 5.4: LINSIG Results for Basic Traffic Signal Layout**

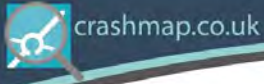


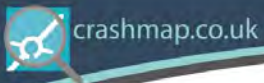

5.19 The maximum Degree of Saturation (DoS) for traffic signal controlled junctions is normally taken as 90%. The proposed junction operates with a maximum DoS of just over 60%, which demonstrates that there is plenty of spare capacity in this junction even with significantly more development using the junction than required by the employment land shortfall.

5.20 Given this level of spare capacity, the ‘Gatwick Green Missing Section’ site access junction could be used to provide an additional access to the TWG site, if desired.

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Ref. No.	Respondent	Policy/ Para	Comments
			<p>5.21 The LINSIG output data is attached as Appendix D.</p> <p><u>Pedestrians and Cyclists</u></p> <p>5.22 New footway and cycleway infrastructure and facilities will be provided as part of the development of the 'Gatwick Green Missing Section' site that will seek to maximise pedestrian and cycling links to the existing transport network and also to the wider Gatwick Green site area. Integration with Wider Gatwick Green Site</p> <p>5.23 The proposed access to the 'Gatwick Green Missing Section' site could provide one of the additional access points that TWG are considering.</p> <p>5.24 The internal access road within the 'Gatwick Green Missing Section' site could link directly into the TWG land or connect via the north-south multi-modal transport link shown in green in Figure 5.1 (as shown in TWG's development framework).</p> <p>5.25 Such an approach would enable the development and sustainable transport infrastructure at Gatwick Green to be provided in a comprehensive manner as suggested by TWG and identified in the TS.</p> <p><u>Mobility Strategy</u></p> <p>5.26 A package of travel planning measures and initiatives will be formulated to reduce the need to travel using the private car (single occupancy trips) and maximise travel by sustainable modes of transport.</p> <p>5.27 This could include the following:</p> <ul style="list-style-type: none"> <li>· Provision of a Mobility Station/Hub to integrate the various forms of transport proposed to/from/within the site and provide "first and last mile solutions" to connect communities to frequent public transport services.</li> <li>· Provision of hire schemes (electric bike, pedal cycle, e-scooter, e-cargo bike etc).</li> <li>· Electric car club and car sharing scheme.</li> <li>· Dynamic Demand Responsive Transport (DDRT) using advanced and real time requests (dial-a-ride, shared taxis).</li> <li>· Use of new mobility technology (e.g. Mobility as a Service – Maas – platform).</li> </ul> <p>5.28 These travel planning measures would be formulated in conjunction with others (TWG, CBC, WSCC etc) to ensure they fully align with the desired mobility strategy for the wider Gatwick Green area.</p> <p>6 SUMMARY AND CONCLUSIONS</p> <p><u>Summary</u></p> <p>6.1 In summary, the key points arising from the work undertaken are as follows:</p> <ul style="list-style-type: none"> <li>· The CBLP identifies land east of Balcombe Road and south of the M32 Spur for the comprehensive development of an industrial-led Strategic Employment Location, known as Gatwick Green.</li> <li>· The area currently identified under Strategic Policy EC4 surrounds the 'Gatwick Green Missing Section' site on three sides. Indeed, the TS prepared by TWG relates to a larger site, including the 'Gatwick Green Missing Section' site.</li> </ul>

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Ref. No.	Respondent	Policy/ Para	Comments
			<ul style="list-style-type: none"> <li>· A minimum of 3.7-4.6ha of additional industrial and warehousing land should be provided to make up the identified shortfall of 14,780 sq.m in the employment land trajectory.</li> <li>· 14,780 sq.m of additional employment land (split as per the CTS) would generate 63 and 52 vehicle trips in the AM and PM peaks respectively, i.e. approximately 1 vehicle per minute.</li> <li>· It is considered unlikely that the addition of 1 vehicle trip per minute will result in additional junctions being in need of physical mitigation.</li> <li>· Whilst the impact of the 14,780 sq.m employment land shortfall has not been modelled in the CTS, it is our view that the mitigation identified in the CTS will adequately cater for the relatively small number of additional vehicle trips associated with this land and thus the conclusions of the CTS will not alter if the employment land shortfall were allocated in the Local Plan on the 'Gatwick Green Missing Section' site.</li> <li>· A robust quantum of development on the 'Gatwick Green Missing Section' site, which is significantly greater than the employment land shortfall, was assessed using the TWG mix of uses in advance of the publication of the CTS.</li> <li>· The 'Gatwick Green Missing Section' site is proposed to be accessed from a new traffic signal controlled junction on Balcombe Road approximately 150m north of Fernhill Road, which would operate with a maximum DoS of just over 60%, which demonstrates that there is plenty of spare capacity in this junction even with significantly more development than that identified as the employment land shortfall using the junction.</li> <li>· The TWG site is proposed to be accessed from two locations on Balcombe Road and TWG are exploring access opportunities using the frontage of Balcombe Road, Fernhill Road, Peeks Brook Lane (emergency only) and Antlands Road. Given the level of spare capacity, the access junction could be used to provide an additional access to the TWG site, if desired.</li> <li>· New footway and cycleway infrastructure and facilities will be provided as part of the development of the 'Gatwick Green Missing Section' site that will seek to maximise pedestrian and cycling links to the existing transport network and also to the wider Gatwick Green site area.</li> <li>· This would enable the development and sustainable transport infrastructure at Gatwick Green to be provided in a comprehensive manner as suggested by TWG and identified in their TS.</li> </ul> <p><u>Conclusions</u> 6.2 It is concluded that the 'Gatwick Green Missing Section' site is capable of accommodating the identified employment land shortfall and that the additional traffic impact of this on the wider highway network is likely to be negligible.</p>

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Ref. No.	Respondent	Policy/ Para	Comments																																																																																
			<div data-bbox="645 284 1361 810">  <p><b>Crash Date:</b> Monday, October 10, 2016    <b>Time of Crash:</b> 8:40:00 PM    <b>Crash Reference:</b> 2016471606160</p> <p><b>Highest Injury Severity:</b> Slight    <b>Road Number:</b> B2036    <b>Number of Casualties:</b> 4  <b>Highway Authority:</b> West Sussex    <b>Number of Vehicles:</b> 3  <b>Local Authority:</b> Crawley Borough    <b>OS Grid Reference:</b> S29571 141175</p> <p><b>Weather Description:</b> Fine without high winds  <b>Road Surface Description:</b> Dry  <b>Speed Limit:</b> 60  <b>Light Conditions:</b> Darkness: no street lighting  <b>Carriageway Hazards:</b> None  <b>Junction Detail:</b> T or staggered junction  <b>Junction Pedestrian Crossing:</b> No physical crossing facility within 50 metres  <b>Road Type:</b> Single carriageway  <b>Junction Control:</b> Give way or uncontrolled</p>  <p>For more information about the data please visit: <a href="http://www.crashmap.co.uk/home/Flag">www.crashmap.co.uk/home/Flag</a>  To subscribe to unlimited reports using CrashMap Pro visit: <a href="http://www.crashmap.co.uk/home/Premium_Services">www.crashmap.co.uk/home/Premium_Services</a></p> <p>Page 1 of 3    11/03/2021 01:22 PM    </p> </div> <div data-bbox="645 826 1361 1353">  <p><b>Vehicles Involved</b></p> <table border="1"> <thead> <tr> <th>Vehicle Ref</th> <th>Vehicle Type</th> <th>Vehicle Age</th> <th>Driver Gender</th> <th>Driver Age Band</th> <th>Vehicle Manoeuvre</th> <th>First Point of Impact</th> <th>Journey Purpose</th> <th>Hit Object - On Carriageway</th> <th>Hit Object - Off Carriageway</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Car (excluding private hire)</td> <td></td> <td>3 Male</td> <td>16 - 20</td> <td>Vehicle proceeding normally along the carriageway, not on a bend</td> <td>Front</td> <td>Other</td> <td>None</td> <td>None</td> </tr> <tr> <td>2</td> <td>Car (excluding private hire)</td> <td></td> <td>5 Male</td> <td>26 - 35</td> <td>Vehicle is in the act of turning left</td> <td>Back</td> <td>Other</td> <td>None</td> <td>None</td> </tr> <tr> <td>3</td> <td>Car (excluding private hire)</td> <td>14</td> <td>Unknown</td> <td>Unknown</td> <td>Vehicle proceeding normally along the carriageway, not on a bend</td> <td>Front</td> <td>Other</td> <td>None</td> <td>None</td> </tr> </tbody> </table> <p><b>Casualties</b></p> <table border="1"> <thead> <tr> <th>Vehicle Ref</th> <th>Casualty Ref</th> <th>Injury Severity</th> <th>Casualty Class</th> <th>Gender</th> <th>Age Band</th> <th>Pedestrian Location</th> <th>Pedestrian Movement</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>1</td> <td>Slight</td> <td>Driver or rider</td> <td>Male</td> <td>16 - 20</td> <td>Unknown or other</td> <td>Unknown or other</td> </tr> <tr> <td>1</td> <td>2</td> <td>Slight</td> <td>Vehicle or pillion passenger</td> <td>Male</td> <td>21 - 25</td> <td>Unknown or other</td> <td>Unknown or other</td> </tr> <tr> <td>1</td> <td>3</td> <td>Slight</td> <td>Vehicle or pillion passenger</td> <td>Female</td> <td>16 - 20</td> <td>Unknown or other</td> <td>Unknown or other</td> </tr> <tr> <td>2</td> <td>4</td> <td>Slight</td> <td>Driver or rider</td> <td>Male</td> <td>26 - 35</td> <td>Unknown or other</td> <td>Unknown or other</td> </tr> </tbody> </table> <p>For more information about the data please visit: <a href="http://www.crashmap.co.uk/home/Flag">www.crashmap.co.uk/home/Flag</a>  To subscribe to unlimited reports using CrashMap Pro visit: <a href="http://www.crashmap.co.uk/home/Premium_Services">www.crashmap.co.uk/home/Premium_Services</a></p> <p>Page 2 of 3    11/03/2021 01:22 PM    </p> </div>	Vehicle Ref	Vehicle Type	Vehicle Age	Driver Gender	Driver Age Band	Vehicle Manoeuvre	First Point of Impact	Journey Purpose	Hit Object - On Carriageway	Hit Object - Off Carriageway	1	Car (excluding private hire)		3 Male	16 - 20	Vehicle proceeding normally along the carriageway, not on a bend	Front	Other	None	None	2	Car (excluding private hire)		5 Male	26 - 35	Vehicle is in the act of turning left	Back	Other	None	None	3	Car (excluding private hire)	14	Unknown	Unknown	Vehicle proceeding normally along the carriageway, not on a bend	Front	Other	None	None	Vehicle Ref	Casualty Ref	Injury Severity	Casualty Class	Gender	Age Band	Pedestrian Location	Pedestrian Movement	1	1	Slight	Driver or rider	Male	16 - 20	Unknown or other	Unknown or other	1	2	Slight	Vehicle or pillion passenger	Male	21 - 25	Unknown or other	Unknown or other	1	3	Slight	Vehicle or pillion passenger	Female	16 - 20	Unknown or other	Unknown or other	2	4	Slight	Driver or rider	Male	26 - 35	Unknown or other	Unknown or other
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**Crash Date:** Sunday, November 12, 2017    **Time of Crash:** 1:00:00 PM    **Crash Reference:** 2017471801049

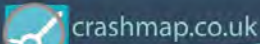
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**Highway Authority:** West Sussex    **Number of Vehicles:** 4  
**Local Authority:** Crawley Borough    **OS Grid Reference:** 529563 141191

**Weather Description:** Fine without high winds  
**Road Surface Description:** Dry  
**Speed Limit:** 40  
**Light Conditions:** Daylight: regardless of presence of streetlights  
**Carriageway Hazards:** None  
**Junction Detail:** T or staggered junction  
**Junction Pedestrian Crossing:** No physical crossing facility within 50 metres  
**Road Type:** Single carriageway  
**Junction Control:** Give way or uncontrolled



For more information about the data please visit: [www.crashmap.co.uk/Home/FAQ](http://www.crashmap.co.uk/Home/FAQ)  
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**Vehicles Involved**

Vehicle Ref	Vehicle Type	Vehicle Age	Driver Gender	Driver Age Band	Vehicle Manoeuvre	First Point of Impact	Journey Purpose	Hit Object - On Carriageway	Hit Object - Off Carriageway
1	Pedal cycle	-	Female	56 - 65	Vehicle proceeding normally along the carriageway, not on a bend	Did not impact	Other	None	None
2	Pedal cycle	-	Male	Unknown	Vehicle is slowing down or stopping	Did not impact	Other	None	None
3	Car (excluding private hire)	-	Male	56 - 65	Vehicle is slowing down or stopping	Front	Commuting to/from work	Parked vehicle	None
4	Car (excluding private hire)	-	Male	36 - 45	Vehicle is in the act of turning right	Did not impact	Other	None	None

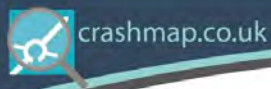


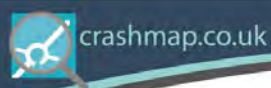

**Casualties**

Vehicle Ref	Casualty Ref	Injury Severity	Casualty Class	Gender	Age Band	Pedestrian Location	Pedestrian Movement
1	1	Slight	Driver or rider	Female	56 - 65	Unknown or other	Unknown or other

For more information about the data please visit: [www.crashmap.co.uk/Home/FAQ](http://www.crashmap.co.uk/Home/FAQ)  
 To subscribe to unlimited reports using CrashMap Pro visit [www.crashmap.co.uk/Home/Premium\\_Services](http://www.crashmap.co.uk/Home/Premium_Services)

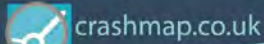


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## Chapter 9. Economic Growth

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			<div data-bbox="640 288 1370 821">  <p><b>Crash Date:</b> Friday, October 28, 2016    <b>Time of Crash:</b> 6:15:00 AM    <b>Crash Reference:</b> 2016471606462</p> <p><b>Highest Injury Severity:</b> Serious    <b>Road Number:</b> B2036    <b>Number of Casualties:</b> 1</p> <p><b>Highway Authority:</b> West Sussex    <b>Number of Vehicles:</b> 3</p> <p><b>Local Authority:</b> Crawley Borough    <b>OS Grid Reference:</b> S29534 141273</p> <p><b>Weather Description:</b> Fine without high winds</p> <p><b>Road Surface Description:</b> Dry</p> <p><b>Speed Limit:</b> 60</p> <p><b>Light Conditions:</b> Darkness: no street lighting</p> <p><b>Carriageway Hazards:</b> None</p> <p><b>Junction Detail:</b> Not at or within 20 metres of junction</p> <p><b>Junction Pedestrian Crossing:</b> No physical crossing facility within 50 metres</p> <p><b>Road Type:</b> Single carriageway</p> <p><b>Junction Control:</b> Not Applicable</p>  <p>For more information about the data please visit: <a href="http://www.crashmap.co.uk/home/Faq">www.crashmap.co.uk/home/Faq</a> To subscribe to unlimited reports using CrashMap Pro visit: <a href="http://www.crashmap.co.uk/home/Premium_Services">www.crashmap.co.uk/home/Premium_Services</a></p> <p>Page 1 of 2    11/03/2021 01:25 PM</p>  </div> <div data-bbox="640 839 1370 1374">  <p><b>Vehicles involved</b></p> <table border="1"> <thead> <tr> <th>Vehicle Ref</th> <th>Vehicle Type</th> <th>Vehicle Age</th> <th>Driver Gender</th> <th>Driver Age Band</th> <th>Vehicle Manoeuvre</th> <th>First Point of Impact</th> <th>Journey Purpose</th> <th>Hit Object - On Carriageway</th> <th>Hit Object - Off Carriageway</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Car (excluding private hire)</td> <td>11</td> <td>Male</td> <td>46 - 55</td> <td>Vehicle is passing another moving vehicle on its offside</td> <td>Front</td> <td>Commuting (to/from work)</td> <td>None</td> <td>None</td> </tr> <tr> <td>2</td> <td>Pedal cycle</td> <td>-1</td> <td>Male</td> <td>56 - 65</td> <td>Vehicle proceeding normally along the carriageway, not on a bend</td> <td>Did not impact</td> <td>Commuting (to/from work)</td> <td>Kerb</td> <td>None</td> </tr> <tr> <td>3</td> <td>Goods vehicle 7.5 tonnes (rigid and over)</td> <td>-1</td> <td>Male</td> <td>26 - 35</td> <td>Vehicle proceeding normally along the carriageway, not on a bend</td> <td>Offside</td> <td>Journey as part of work</td> <td>None</td> <td>None</td> </tr> </tbody> </table> <p><b>Casualties</b></p> <table border="1"> <thead> <tr> <th>Vehicle Ref</th> <th>Casualty Ref</th> <th>Injury Severity</th> <th>Casualty Class</th> <th>Gender</th> <th>Age Band</th> <th>Pedestrian Location</th> <th>Pedestrian Movement</th> </tr> </thead> <tbody> <tr> <td>2</td> <td>1</td> <td>Serious</td> <td>Driver or rider</td> <td>Male</td> <td>56 - 65</td> <td>Unknown or other</td> <td>Unknown or other</td> </tr> </tbody> </table> <p>For more information about the data please visit: <a href="http://www.crashmap.co.uk/home/Faq">www.crashmap.co.uk/home/Faq</a> To subscribe to unlimited reports using CrashMap Pro visit: <a href="http://www.crashmap.co.uk/home/Premium_Services">www.crashmap.co.uk/home/Premium_Services</a></p> <p>Page 2 of 2    11/03/2021 01:25 PM</p>  </div>	Vehicle Ref	Vehicle Type	Vehicle Age	Driver Gender	Driver Age Band	Vehicle Manoeuvre	First Point of Impact	Journey Purpose	Hit Object - On Carriageway	Hit Object - Off Carriageway	1	Car (excluding private hire)	11	Male	46 - 55	Vehicle is passing another moving vehicle on its offside	Front	Commuting (to/from work)	None	None	2	Pedal cycle	-1	Male	56 - 65	Vehicle proceeding normally along the carriageway, not on a bend	Did not impact	Commuting (to/from work)	Kerb	None	3	Goods vehicle 7.5 tonnes (rigid and over)	-1	Male	26 - 35	Vehicle proceeding normally along the carriageway, not on a bend	Offside	Journey as part of work	None	None	Vehicle Ref	Casualty Ref	Injury Severity	Casualty Class	Gender	Age Band	Pedestrian Location	Pedestrian Movement	2	1	Serious	Driver or rider	Male	56 - 65	Unknown or other	Unknown or other
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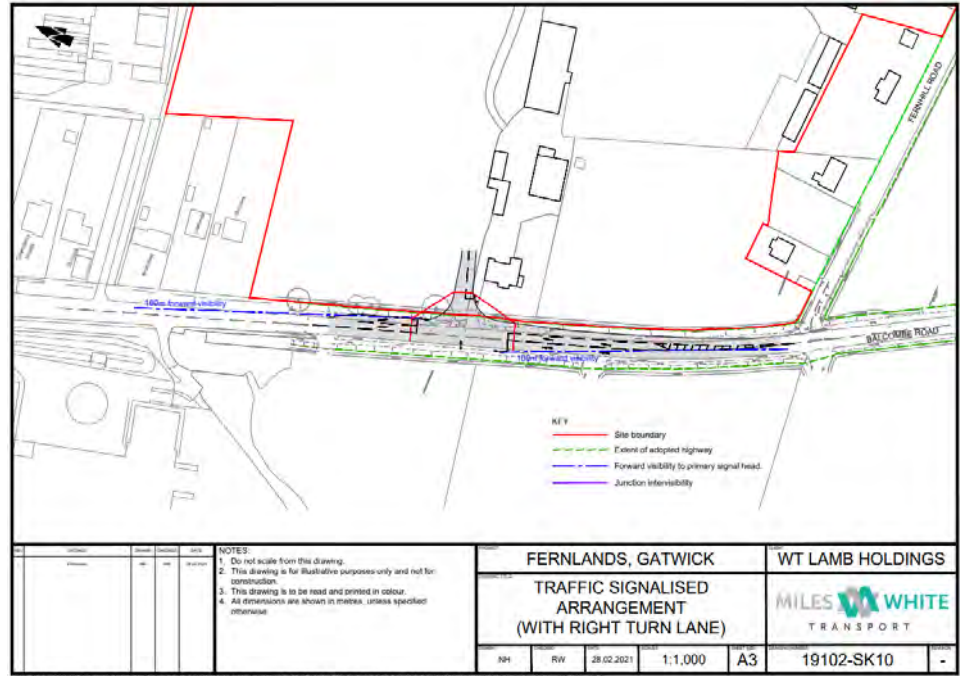
## Chapter 9. Economic Growth

Ref. No.	Respondent	Policy/ Para	Comments																																																																								
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APPENDIX B Proposed 'Gatwick Green Missing Section' Site Access



APPENDIX C TRICS Data: Please request original representation.

APPENDIX D LINSIG Data: Please request original representation.

**Appendix 5. Ecology Note Prepared by GE**

**1 INTRODUCTION**

GE Consulting has been commissioned by WT Lamb, Staminier and the Elliot Family to prepare this Ecology Technical Note to accompany representations to the draft local plan consultation in relation to land at Fernlands, Gatwick Green, Fernhill Road, West Sussex (central OS grid reference: TQ 296 413) hereafter referred to as the 'Site'.

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			<p>The purpose of the report is to determine the ecological constraints and to assess the suitability of the Site for allocation within the emerging Local Plan for future employment development. The area within the application boundary is hereafter referred to as the 'Site'.</p> <p><b>2 SCOPE AND AIMS</b></p> <p>The aims of this report are to:</p> <ul style="list-style-type: none"> <li>- Draw together previous ecological survey work and provide an overview of baseline conditions;</li> <li>- Evaluate the requirements of a proposal in terms of biodiversity planning policy and legislation;</li> <li>- Review initial constraints and opportunities for the Site and propose likely mitigation measures/ design considerations; and</li> <li>- Detail further ecological survey work required to inform detailed proposals and a future planning application.</li> </ul> <p><b>3 METHODS</b></p> <p><b>3.1 Desk Study and Previous Surveys</b></p> <p>A Preliminary Ecological Appraisal (PEA) and Ecological Impact Assessment (EclA) have been undertaken which form the basis of this technical note. This work comprises:</p> <ul style="list-style-type: none"> <li>- A PEA of land east of Balcombe Road (The Ecology Co-op, 2020) covering three western fields and two buildings. This work comprised an online desk-based study and walkover survey, including a high-level, external preliminary bat root assessment of buildings and trees.</li> <li>- An EclA of the Former Fernlands Nursery (CSA Environmental, 2017) covering a field, property and woodland north of Fernhill Road. This work included a desk-based study comprising internet searches and data from Sussex Biological Records Centre (SxBRC) and Surrey Biodiversity Information Centre (SBIC) in November 2015. A Phase 1 Habitat Survey was undertaken in 2015, a dormouse presence/ absence survey and an emergence/ re-entry survey of trees with bat roost potential in 2016.</li> </ul> <p>An updated desk-based internet study has been undertaken in March 2021 including:</p> <ul style="list-style-type: none"> <li>- A search of the government environmental mapping tool MAGIC1 for statutory sites within 2km, European sites within 10km, Priority Habitats and European Protected Species (EPS) licences issued by Natural England within 2km of the Site and the National Habitat Network within the Site;</li> <li>- A review of aerial imagery and OS maps to identify possible important habitat features;</li> <li>- A search of Natural England Open Data Geoportal for records of great crested newt eDNA2 in ponds within 1km of the Site;</li> <li>- The Sussex Local Nature Partnership website for information on Biodiversity Opportunity Areas (BOAs);</li> </ul>

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			<p>- Biodiversity policies within the Draft Crawley Local Plan 2021 – 2037 (January 2021), plus Policy EC4 Strategic Employment Location (Gatwick Green), were reviewed in relation to the proposed development. The existing Green Infrastructure SPD5 (2016) was also reviewed.</p> <p>3.2 Limitations The aforementioned survey work was largely undertaken in accordance with best practice guidance, however, it should be noted that some of the work is now 5 – 6 years old. Therefore, whilst care has been taken to ensure that balanced advice is provided based on the information available, the possibility of important ecological features being missed cannot be ruled out (e.g. due to survey timings, changes in conditions, absence during surveys or the year of survey). The lack of evidence or records of protected species documented within this report does not preclude their presence from Site.</p> <p>The survey work undertaken above does not cover all areas of the Site; it excludes a field north of Elliott Metals (central grid reference TQ 296 412) along with a property and field at the eastern edge of the Site (central grid reference TQ 298 413) (see Figure 1). Whilst assumptions can be made based on survey work of adjacent land, no ground-truthing or protected species surveys have been undertaken within these areas.</p> <p>4 BASELINE CONDITIONS</p> <p>4.1 Statutory Designated Sites There are no National Site Network sites, which includes SACs and SPAs, within 10km. However, a Draft Habitat Regulations Assessment<sup>6</sup> of the Draft Crawley Borough Council Local Plan (Lepus Consulting, January 2021) has screened in specific impacts relating to development at Gatwick Green on: - Mole Gap to Reigate Escarpment SAC, 11.3km north-west - Ashdown Forest SAC/ SPA, 12.5km south-east; - The Mens SAC, 30km south-west; and - Arun Valley SAC/ SPA/ Ramsar, 33km south-west.</p> <p>There are no statutory sites (such as SSSIs or LNRs) within 2km of the Site. Furthermore, the Site does not lie within any Natural England SSSI Impact Risk Zone (IRZs) for residential or commercial/ industrial development.</p> <p>4.2 Non-statutory Sites There are two non-statutory sites of County importance located within 1km: - Horleyland Wood Local Wildlife Site (LWS), 0.8km south-west, important for ancient coppice-with-standards bluebell woodland; and - The Roughs LWS, 0.9km north-east, important for ancient semi-natural woodland and locally rare fine-leaved water-dropwort.</p> <p>4.3 Local Priorities/ BAP/ Conservation Strategies</p>

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			<p>4.3.1 Biodiversity Opportunity Areas Biodiversity Opportunity Areas (BOAs) are landscape scale areas which have been identified as supporting high concentrations of Habitats and Species of Principal Importance (HPI/ SPI) and/or have the potential/ greatest opportunities for restoration and creation of habitats. They seek to expand, link and buffer important biodiversity sites to provide an ecological network.</p> <p>The Gatwick Wood BOA8 lies partially within the Site boundary, excluding the southern and western fields (see Figure 1 and Appendix 3). This area is described within the Crawley Green Infrastructure SPD (2016) as: <i>“dominated by the Gatwick Airport landscape but contains a small amount of ancient woodland amongst agricultural land where the opportunities for biodiversity gain and landowner liaison are tangible.</i></p> <ul style="list-style-type: none"> <li>• <i>Woodland management and restoration;</i></li> <li>• <i>Education and community engagement, including links to health;</i></li> <li>• <i>Increased site designation;</i></li> <li>• <i>Working with and attracting new businesses;</i></li> <li>• <i>Ecological networks;</i></li> <li>• <i>Visitor facilities.”</i></li> </ul> <p>4.3.2 Natural England National Habitat Network Natural England have developed an England-wide dataset of zones where action may be undertaken to build greater ecological resilience. These zones are based around existing HPIs, or ‘primary habitats’ and comprise: Network Zone 1: land within close proximity to the primary habitat what are more likely to be suitable for creation of the same habitat type. Network Zone 2: land within close proximity to the primary habitat that are unlikely to be suitable for creation of the primary habitat, but where other types of habitat may be created or green infrastructure delivered. Fragmentation Action Zone: land immediately adjoining primary habitat patches that are small or have excessive edge to area ratio where habitat creation is likely to help reduce the effects of habitat fragmentation. Network Expansion Zone: land within relatively close proximity to Zones 1 &amp; 2 identified as possible locations for connecting and linking up networks across a landscape.</p> <p>The Site does not lie within any National Habitat Network zones.</p> <p>4.4 Habitats &amp; Flora</p> <p>4.4.1 Priority Habitats A review of MAGIC shows HPI ‘Deciduous Woodland’ occupying the eastern field and surrounding the property off Fernhill Road (see Appendix 4). The field appears from aerial imagery to comprise grassland and would therefore require ground-truthing.</p>

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			<p>No other HPIs are indicated on MAGIC within or adjacent to the Site boundary, however the network of hedgerows within the Site are likely to meet HPI criteria.</p> <p><b>4.4.2 Onsite Habitats</b>  The Site comprises six distinct fields, properties with associated gardens, small areas of woodland and boundary trees and hedgerows.</p> <p>Fields within the north and west of the Site comprise poor semi-improved grassland, managed by cutting (The Ecology Co-op, 2020). A central field, not surveyed as part of previous work, appears to comprise rough grassland and scattered trees, possibly a former orchard. Seasonally wet ditches are present including along the northern, southern and western boundaries of the Site.</p> <p>Two residential properties are present; 'Hunters Lodge' along the eastern boundary accessible from Balcombe Road and 'Fernlands' along southern boundary accessible from Fernhill Road, along with associated outbuildings. Gardens comprised ornamental planting, scattered ornamental and coniferous trees and regularly mown, species-poor lawns. A further property, 'Flight House' is found to the east of Fernlands in an area of unsurveyed land. It is surrounded by car parking, amenity grassland and semi-mature trees.</p> <p>During previous survey work, the field north of Fernlands bungalow has been cleared and comprised bare, disturbed soil with limited areas of poor semi-improved grassland following clearance of waste and former glasshouses (CSA Environmental, 2017). Aerial imagery suggests this previously comprised a mosaic of grassland, trees and scattered scrub and is now likely to comprise grassland habitat. Similarly, the eastern field (mapped as woodland on MAGIC) appears to have been felled since 2015 as indicated on historical imagery, however mature boundaries have been retained.</p> <p>The field boundaries are marked by species-poor hedgerows, many with banks, dominated by blackthorn and hawthorn with occasional standard trees. Some of the inner boundaries of the Site are marked by mature tree lines, scrub, fences or walls. North of Fernlands is a line of mature oak and ash trees.</p> <p>Broadleaved woodland is present to the east of Fernlands, comprising mostly immature/semi-mature oak and silver birch, with occasional ash, hazel, holly and conifer species.</p> <p>In terms of value, hedgerows (and their associated trees) and broadleaved woodland are Habitats of Principal Importance listed on Section 41 of the NERC Act 2006.</p> <p><b>4.4.3 Flora</b>  Previous survey work has not identified any notable or invasive plants within the Site. <b>4.5 Protected and Notable Fauna</b> Based on the desk-based study and walkover surveys, the following protected and notable faunal species were considered to be present/ have potential to be present:</p>

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			<p>Badger – no setts found however footprints and dead badger recorded at Balcombe Road in 2020 indicates local presence. There may be setts in unsurveyed parts of the Site and the fields offer foraging potential.</p> <p>Bats – A residential bungalow (Hunters Lodge) and agricultural barn off Balcombe Road provide moderate and low potential for roosting bats respectively (The Ecology Co-op, 2020). Fernlands bungalow and outbuildings offer negligible/ low potential (CSA Environmental, 2017) and the property in the south-east corner has not been assessed. These categories are based on external assessments only, therefore internal assessments would be required to confirm. Numerous trees within the Site offer roosting potential, including mature oaks with high potential towards the eastern end of the Site. Previous emergence surveys did not record roosts within trees north of Fernlands. Local records (all over 1km from Site) indicate the presence of common pipistrelle, noctule, brown long-eared bat, whiskered bat, Natterer’s bat and the rare barbastelle and Bechstein’s bat. Both the latter species favour woodland habitats, but could utilise the mature hedge/ tree lines particularly around the peripheries of the Site. Additionally, foraging soprano pipistrelle, serotine, myotis and big bats (Nyctalus or Eptesicus sp.) have been recorded along a mature tree line within the east of the Site and it is considered that the network of hedgerows and woodland edge throughout the Site is likely to be of value for local bat species for both commuting and foraging.</p> <p>Birds – Hedgerows, scrub, trees, woodland and buildings within the Site provide suitable habitat for a variety of widespread birds to nest and forage, including priority species under the NERC Act 2006 and Birds of Conservation Concern (BoCC).</p> <p>Dormouse – There are records within 1km of the Site, including three Natural England dormouse mitigation licences c.200m north-west. 2016 surveys of the southern part of the site did not record dormice, however given the age of data and small area surveyed it is recommended that update surveys are undertaken. Woodland, hedgerows and dense scrub provide suitable habitat for dormice and are connected to more extensive habitat beyond the Site boundary.</p> <p>Great crested newt (GCN) – There are two Natural England GCN mitigation licences c.850m southwest and there are older records (before 1996) from within 300m. There are at least two ponds within 250m of the Site, and a further three within 500m (excluding any north of the M23 motorway), but none within the Site itself. Should great crested newts be present in surrounding ponds, it is considered relatively unlikely that they would utilise the Site due to the relatively large dispersal distances between ponds, the presence of major roads acting as barriers to dispersal and the presence of suitable terrestrial habitat in closer proximity to off-site ponds.</p> <p>Invertebrates - Habitats on Site present opportunities for a broad range of common invertebrates with some notable species possible, such as brown hairstreak due to the presence of suckering blackthorn. Mature trees may also support notable deadwood invertebrates.</p> <p>Riparian mammals – No records of water vole within 2km were returned as part of the data search in 2015. Possible evidence of burrows along the banks of the western watercourse suggest that water vole could be present, although</p>

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			<p>the lack of emergent vegetation makes the Site sub-optimal. Other surveyed ditches were considered unsuitable due to size, lack of flowing water and isolation. No suitable habitat for otter is present.</p> <p>Reptiles - Suitable terrestrial habitat for common reptiles is present, particularly for common lizard and slow-worm. The dense tussocky sward structure and deep thatch within the western fields, and likely within the unsurveyed central and eastern fields, combined with bordering scrub and woodland, provide suitable refuge and invertebrate food resource.</p> <p>Hedgehog – The fields, scrub, woodland and garden habitats on Site provide good habitat for hedgehog and records are present within the area.</p> <p><b>5 CONSTRAINTS AND DESIGN OPPORTUNITIES</b></p> <p>This section seeks to identify where the presence of designated areas, habitats or the potential for protected or notable species to be present will be a material consideration for the LPA when considering future development proposals. It is based on the assumption that detailed further survey work would be completed to inform detailed design and accompany any future planning application for development of the Site (see Section 6).</p> <p><b>5.1 Designated Sites</b>  A screening assessment of Likely Significant Effects (LSEs) within the Draft HRA of the Crawley Local Plan (Lepus Consulting, 2021) indicates alone and in-combination effects of the Gatwick Green development on air quality, potentially impacting:  Ashdown Forest SAC and SPA; and  Mole Gap to Reigate Escarpment SAC.</p> <p>In addition, in relation to hydrology, it may increase discharges to Wastewater Treatments Works or increase pressure on public water supply abstraction. The HRA predicts changes in water quality and water quantity at:  Mole Gap to Reigate Escarpment SAC;  Arun Valley SPA/ SAC/ Ramsar; and  The Mens SAC.</p> <p>The HRA indicates that detailed air quality modelling, water quality and water quantity assessments are currently underway to further define impacts associated with increased traffic movements. It is anticipated that policy wording may require expanding to include sustainability measures, measures for water efficiency and protection of water quality to reduce impacts to negligible. Given the distances of these designations from the Site, it is anticipated that this will be achievable.</p> <p><b>5.2 Local Priorities/ BAP/ Conservation Strategies</b>  Whilst the Biodiversity Opportunity Area which covers part of the Site receives no statutory protection, it indicates where there are opportunities to provide net gains for biodiversity and can be used to inform opportunities for habitat</p>



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			<p>creation and restoration. In addition, BOA's are recognised within the Crawley Green Infrastructure SPD and for 'impacts which reduce, block or harm green infrastructure, the applicant should clearly explain this, why it can't be avoided and how they have been mitigated and/or compensated for'.</p> <p>Development of this Site could therefore offer opportunities to contribute to the Gatwick Woods BOA, ensuring that ecological (habitat) networks are maintained and enhanced. For example, the existing network of outgrown hedges/ treelines around the north and east of the Site could be expanded and enhanced, linking to small blocks of woodland in the south-east corner, north and west of the Site. The ecological network can be multi-functional, providing ecological benefits as well as creating an attractive setting for the development, providing space for recreation and encouraging sustainable travel e.g. cycle paths.</p> <p><b>5.3 Habitats and Flora</b>  In order to be compliant with planning policy and protect features of ecological value, the 'Mitigation Hierarchy' needs to be applied during development of proposals. This is a set of principals which are followed in sequential order: avoidance, mitigation and, as a last resort, compensation.</p> <p>HPIs should form the basis of habitat retention where possible. At this Site, retention should therefore focus on: Hedgerows; Woodland; and Mature trees.</p> <p>These habitats, with suitable buffer zones could form wildlife networks as well as Green Infrastructure (GI) through the Site. As these habitats are mainly focused around the Site peripheries and eastern areas, this offers good opportunities to tie in with the BOA enhancements discussed above. A full survey of the Site will be required to identify the habitats outside the previously surveyed areas and identify their value.</p> <p>If ancient woodland is present, a minimum 15m buffer will required between the development and the ancient woodland, including through the construction phase. A comprehensive Arboricultural survey should be undertaken prior to the detailed design stage.</p> <p>Unavoidable losses of habitats will need to be adequately compensated for in accordance with national and local policy.</p> <p>New habitat creation should focus on areas with high biodiversity value. This could include new woodland and hedgerows, orchards, species-rich grassland and wildlife-friendly SuDS schemes/ wetlands (bearing in mind potential constraints relating to Gatwick Airport and bird strike).</p> <p>Ditches, including those adjacent to Site should be buffered and measures employed to prevent pollution.</p> <p><b>5.4 Protected and Notable Fauna</b>  Appropriate design opportunities and constraints relating to fauna will be based on up-to-date survey work for these species; however, a summary of possible design considerations is provided below.</p>

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			<p>As a preliminary assessment, hedgerows, trees and woodland edge may form important bat, bird and dormouse habitat. Mature trees may be important for notable deadwood invertebrates. These habitats should be retained where possible. Retained and created habitat should be designed to provide connectivity across the landscape (e.g. north to south and east to west);</p> <p>Wildlife corridors should be protected from light-spill. As a guide, a buffer of 10 – 15m between important habitat and built development is usually sufficient to mitigate light-spill;</p> <p>Buildings and suitable trees within the Site have the potential to support roosting bats and will require an assessment to determine presence/ likely absence. If roosts are found, retention of the roost or a like-for-like replacement roosts will be required (in accordance with the conditions of a suitable Natural England EPS derogation licence);</p> <p>If reptiles are found to be present, GI can be designed to act as a ‘receptor area’ for populations found within the build area. The habitat within GI can be enhanced through the creation of tussocky grassland, sunny banks and habitat piles for refuge;</p> <p>Planting schemes should incorporate plants that support invertebrates. There are opportunities to support the West Sussex Pollinator Action Plan 2019 – 2022 by protecting and enhancing important pollinator habitat (e.g. trees and hedgerows) and creating pollinator-friendly environments as part of GI. To include native plants or those listed on RHS Plants for Pollinators, habitat piles, structurally diverse habitats and reduced cutting regimes via long-term management principles;</p> <p>Include integrated or surface mounted boxes for bats, birds and invertebrates on new buildings;</p> <p>Given the proximity to Gatwick Airport consideration will need to be given to bird species that could be attracted to new buildings (such as gulls which nest on flat roofs) and appropriate mitigation/ management designed in;</p> <p>The presence of badger setts on the Site (to be confirmed within unsurveyed areas) will require minimum 20m buffers in which no construction/ excavation occurs. If present, adequate wildlife corridors and foraging habitat will need to be provided. These spaces can form part of landscaping/ open space/ green infrastructure. It may be possible to close setts if required, although new artificial setts may be required (e.g. for main breeding setts);</p> <p>A planning application is likely to require a Landscape and Ecology Management Plan (LEMP) and Construction Environmental Management Plan (CEMP) prior to works/ occupation.</p> <p><b>6 BIODIVERSITY NET GAIN</b></p> <p>There is already policy requirement to enhance nature conservation and the Government are planning to roll out a legislative requirement for achieving a 10% net gain in biodiversity for all developments. This 10% gain relates to both</p>

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linear habitats (e.g. hedgerows) and non-linear habitats (e.g. grassland/woodland) and requires the use of a 'metric' to calculate the required biodiversity units.

It is important that BNG is considered early in the design stage to ensure that proposals can meet this requirement, or identify whether biodiversity offsetting payments will be required, i.e. paying for BNG offsite.

High distinctiveness habitats (woodland, mature trees, hedgerows) should be favoured for retention as opposed to low distinctiveness habitats (hard standing and improved grassland), which are easier to replace. New habitat creation should focus on those with high biodiversity value, for example wetlands, ponds, meadows and orchards.

**7 FURTHER SURVEY WORK**

The following timeline details the surveys that should accompany a planning application, along with key timings. Results and appropriate mitigation would be reported within an Ecological Impact Assessment.

**Table 2: Further Survey Work Required**

TASK	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
Phase 1 Habitat Survey and Condition Assessment for BNG												
Badger survey												
Breeding bird survey												
Great crested newt survey												
Roosting bats – daytime building & tree inspections												
Bat emergence survey (dependent on results of above) (up to 3 visits)												
Communing/ foraging bats												
Reptile survey												
Dormouse survey												
Water vole survey												
	Optimal			Sub-optimal								

**8 CONCLUSIONS**

In summary it is concluded that there are no in principle ecological constraints preventing allocation of this Site for future development. Furthermore;

The Site is unlikely to be constrained by the presence of statutory designated sites for nature conservation in the local area, subject to further assessment and possible mitigation;

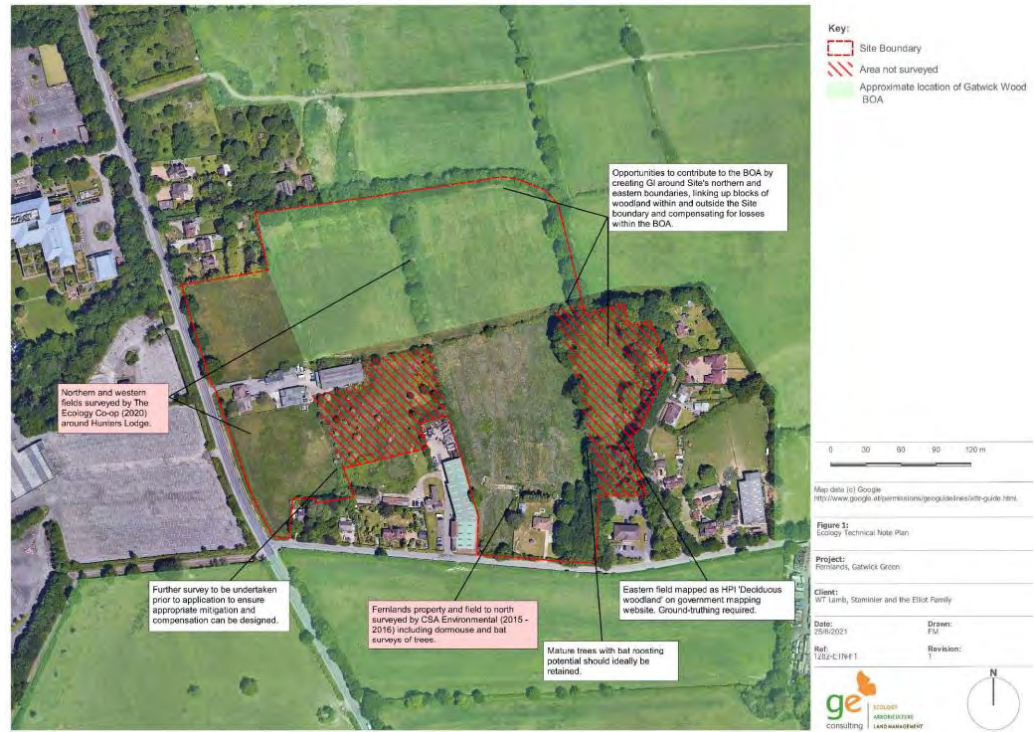
Habitat retention should focus on those features of highest ecological value, contributing to local conservation strategies/ priorities where possible;

Development should aim to retain and incorporate features for protected and notable species, including a network of wildlife corridors through and around the Site;

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Development proposals may require offsetting to ensure biodiversity net gain can be achieved. Detailed design and any future planning application should be informed by further ecological survey work.

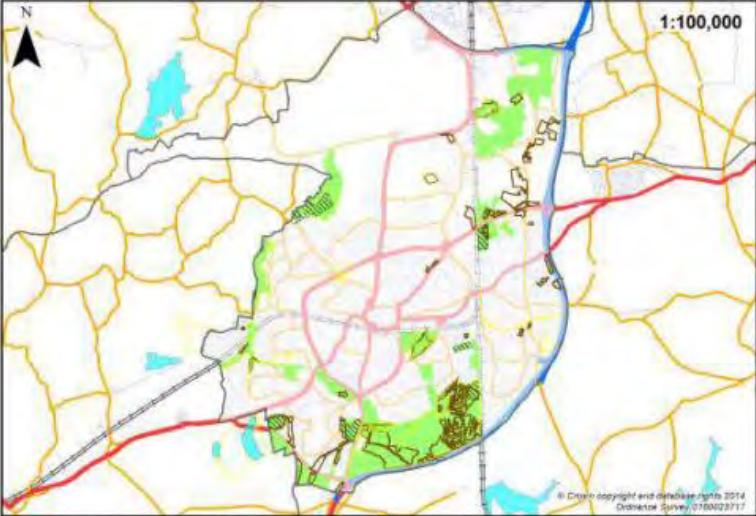



**Appendix 1 – General Glossary of Terms**

- Annex I Threatened bird listed on Annex I of the EC Birds Directive
- Annex II Habitats and species of community interest whose conservation requires the designation of SACs
- BAP Biodiversity Action Plan
- BNG Biodiversity Net Gain
- BoCC Bird of Conservation Concern (published by Eaton et al., 2015).
- CEMP Construction Environmental Management Plan
- EPS European Protected Species

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			<p>HPI Habitat of Principal Importance required under Section 41 of the NERC Act 2006  JNCC Joint Nature Conservation Committee  LBAP Local Biodiversity Action Plan  LEMP Landscape and Ecology Management Plan  NERC Act Natural Environment and Rural Communities Act 2006  NVC National Vegetation Classification Survey  SAC Special Area of Conservation  SPA Special Protection Area  SPI Species of Principal Importance required under Section 41 of the NERC Act 2006  SSSI Site of Special Scientific Interest  WCA Wildlife and Countryside Act 1981(as amended)</p> <p><b>Appendix 2 – Planning Policy and Legislation</b></p> <p><u>Habitat and Species Legislation</u>  Species and habitats receive legal protection in the UK under various legislation, including: The Wildlife and Countryside Act (WCA) 1981 (as amended); The Conservation of Habitat and Species Regulations 2017 (as amended); The Countryside Rights of Way (CRoW) Act 2000; The Hedgerows Regulations 1997; The Protection of Badgers Act 1992; and The Natural Environment and Rural Communities (NERC) Act 2006.</p> <p>Where relevant, this report takes into account the legislative protection afforded to specific habitats and species.</p> <p><u>National Planning Policy Framework 2019</u>  The National Planning Policy Framework (NPPF) sets out the Governments planning policies for England and how local planning authorities should incorporate them into their own policies and plans. Chapter 15 of the NPPF contains several policies targeted at enhancing the natural environment and requires local authorities to consider how impacts on biodiversity can be minimised and provide net gains in biodiversity. Paragraph 170 states that:</p> <p>“Planning policies and decisions should contribute to and enhance the natural and local environment by:</p> <ol style="list-style-type: none"> <li>a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);</li> <li>b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;</li> <li>c) maintaining the character of the undeveloped coast, while improving public access to it where appropriate;</li> </ol>

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			<p>d) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures;</p> <p>e) preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans; and</p> <p>f) remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate.”</p> <p>Additional Planning Practice Guidance (PPGs) supports the NPPF and includes guidance on: Landscape; Biodiversity, ecosystems and green infrastructure; and Brownfield land, soils and agricultural land.</p> <p><b>Appendix 3 – Designated Sites in Crawley (extract from current Local Plan)</b></p>  <p><b>Appendix 4 – Habitats of Principal Importance in Relation to Site (MAGIC map)</b></p> 

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			<p><b>Appendix 6. Landscape Note prepared by Pegasus</b></p> <p>GATWICK GREEN  INPUT INTO DEVELOPMENT FRAMEWORK DOCUMENT – LANDSCAPE AND VISUAL MATTERS  March 2021</p> <p><u>Landscape Designations and Planning</u></p> <p>1. The site is not covered by any designation at a national or regional level that recognises a specific landscape importance.</p> <p>2. The site lies within the corridor of a long distance view from Target Hill Park to the south-west of Crawley, as identified under Policy CH8 of Crawley District Council's Local Plan. The aim of the policy is to ensure the view remains unobstructed by development in the foreground, however, it is noted that the site is approximately 8km to the north-east of the corridor.</p> <p>3. The site is located within an area defined as the North East Crawley Rural Fringe, as identified under Policy CH9 of Crawley District Council's Local Plan. The policy states: 'To ensure that Crawley's compact nature and attractive setting is maintained, development should: i. Be grouped where possible with existing buildings to minimise impact on visual amenity; ii. Be located to avoid the loss of important on-site views and off-site views towards important landscape features; iii. Reflect local character and distinctiveness in terms of form, height, scale, plot shape and size, elevations, roofline and pitch, overall colour, texture and boundary treatment (walls, hedges, fences and gates); iv. Minimise the impact of lighting to avoid blurring the distinction between urban and rural areas and in areas which are intrinsically dark to avoid light pollution to the night sky; v. Ensure the building and any outdoor storage and parking areas are not visually prominent in the landscape; vi. Does not generate an unacceptable level and/or frequency of noise in areas relatively undisturbed by noise and valued for their recreational or amenity value; vii. Does not generate traffic of a type or amount inappropriate to the rural roads; and viii. Does not introduce a use which by virtue of its operation is not compatible with the countryside. Where harm to the landscape character cannot be avoided appropriate mitigation and, as a last resort, compensation, will be required as part of a planning application. Applicants are advised to consider the enhancement opportunities identified in the Crawley Borough Council Landscape Character Assessment.'</p> <p>4. Under Policy CH9, it specifically states in relation to North East Crawley Rural Fringe that 'Proposals which do not create or are able to adequately mitigate visual/noise intrusion are generally supported. This area has an important role in maintaining the separation of the distinct identities of Gatwick Airport, Crawley and Horley.'</p> <p>5. Northern most fields within the site are located within a Biodiversity Opportunity Area as defined by Policy ENV2 of Crawley District Council's Local Plan. The policy states that 'All development proposals will be expected to incorporate</p>

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			<p>features to encourage biodiversity where appropriate, and where possible enhance existing features of nature conservation value within and around the development.’.</p> <p><u>Landscape Character</u></p> <p>6. The site lies within National Character Area 121: Low Weald. At a regional level, the site is located to the north-east of the Northern Vales Landscape Character Area as set out in the West Sussex County Council Landscape Character Assessment. The land management guidelines overarching goal is to ‘Conserve the mostly rural character of the area’, with specific guidelines of relevance to the site as follows: • ‘Conserve, manage and restore woodlands, hedgerows, hedgerow trees, field ponds, species rich grassland and meadows, unimproved grassland and meadows. • Maintain historic character including small scale field patterns, earthworks and historic parkland. • Establish a framework of new woodland and hedgerow planting. • Promote the establishment of field margins in arable areas. • Conserve historic lanes with their ancient oaks and unimproved roadside verges. • Focus on the enhancement of the major transport corridors, seeking better integration into the existing field pattern of the • wider landscape. • Ensure any small scale development responds to the historic dispersed settlement pattern and local design and materials. • Ensure any new development around the urban edges, in particular ...Crawley...is well integrated with the wider landscape pattern. Encourage bold native woodland and hedgerow planting. Buildings should also blend in with the landscape in scale, form, colour and design. • Encourage screen planting of native trees and woodland around roadside buildings and service areas, and industrial and commercial development, including Gatwick Airport.’</p> <p>7. At a local level, the site is located within Area 6 – High Woodland Fringes Landscape Character Area. The area is identified as having high landscape value, but a moderate sensitivity to change, being sensitive to elements such as large scale commercial and residential development and the condition of the landscape is considered to be declining due to increasing visual/noise intrusion in some parts. The planning guidelines for the landscape character area are as follows: • Proposals must respect the important role of the area to maintaining the separate identities of Gatwick Airport, Crawley and Horley. • Incremental development should be resisted to prevent the actual and perceived reduction in the highly valued open character of this area. • Proposals should follow the wider planning and land management guidelines of the Low Weald Northern Vales character area.</p> <p><u>Context</u></p> <p>8. The site is located between Fernhill Road and Balcombe Road, to the east of Gatwick Airport and close to the M23 motorway, including a spur which provides a connection to the airport. The site is made up of a series of mostly irregular shaped agricultural fields, with the inclusion of a number of buildings including Hunters Lodge and an agricultural outbuilding to the west and Fernlands and an office building between Fernhill Road and Donkey Lane to the south-east.</p> <p>9. The site is surrounded by a number of residential, farm and employment buildings off the surrounding road network. Land to the north and south of Fernhill Road is predominantly agricultural, with the M23 forming a prominent visual</p>



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			<p>detractor in the surrounding landscape. The landscape to the west is dominated by car parking, employment buildings, hotels and retail uses.</p> <p>10. A public right of way (3675Sy) is located adjacent to the eastern site boundary, which provide a rural link between Fernhill Road and Balcombe Road to the northwest of the site. Close to the south-east corner of the site, another public right of way (359sy) follows a fenced off track adjacent to car parking associated with Gatwick Airport, before heading further southward and connecting to Radford Road. The Sussex Border Path long distance footpath is located to the east and north of the site, where it follows Peeks Brook Lane to the east before crossing the M23 and heading westward adjacent to the motorway. The Tandridge Border Path long distance footpath links with the Sussex Border Path east of the M23 and to the north-east of the site.</p> <p>11. A dense network of mature trees surrounds Fernlands and the office building to the south-east, which follow Donkey Lane and the public right of way. A tree lined hedgerow aligns most of Fernhill Road, coupled with residential properties and their associated garden vegetation, limits visibility into the site. Where the site abuts Balcombe Road (B2036) the site is defined by clipped field boundary hedgerows, with occasional matures trees within the hedgerows further to the south, which provides a more open aspect from the road. A mature tree belt defines the northeastern and northern boundaries, which provides visual enclosure. The internal field boundaries are of variable quality, with those most established appearing to the north.</p> <p>12. Views towards the site from surrounding areas are well contained by the surrounding network of mature vegetation. Therefore, views are limited to the network of roads and footpaths either adjacent to or in the vicinity of the site, and do not extend beyond the M23 or the areas of woodland to the south and south-west.</p> <p><u>Opportunities and Constraints</u></p> <p>13. The following landscape and visual opportunities and constraints are shown on the supporting plan and set out below.</p> <p><i>Opportunities</i></p> <p>14. The principal landscape and visual opportunities for the site comprise: • the potential to manage and enhance the existing field boundaries and mature trees, to provide visual enclosure and to enhance wildlife benefits; • the potential to manage and enhance the internal network of field boundary hedgerows; • the potential to enhance the local wildlife and biodiversity through new planting and the introduction of new landscape features; • the potential to provide improved connections to the surrounding roads and public footpaths; and • the potential to enhance the intimate landscape area to the south-east for recreation and/or local wildlife.</p> <p><i>Constraints</i></p> <p>15. The principal landscape and visual constraints for the site comprise: • Openness of Balcombe Road with clear and unobstructed views over wetern parts of the site; • The potential for the area of biodiversity enhancement to the north of the site to restrict development; • potential loss of existing site features including trees and hedgerows, in particular,</p>

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			<p>to the south-east; • potential to adversely affect the visual amenity of local residences, particularly those abutting the site along Fernhill Road and Balcombe Road; and • potential to adversely affect the visual amenity of vehicles and walkers using surrounding rural roads and the network of public footpaths.</p> <p><u>Design Considerations</u></p> <p>16. To assist the design development of future design proposals that mitigate the landscape and visual constraints identified, a number of design considerations are set out below.</p> <p><u>Vegetation Pattern</u></p> <p>17. Existing vegetation to the north and east and adjacent to Fernhill Road must be retained and respected, as well as augmented wherever possible.</p> <p>18. The internal network of field boundary vegetation must be respected by any development layout and enhanced.</p> <p>19. Any development needs to be set back from Balcombe Road (B2036), to allow for the addition of new structural planting along the western and south-western edges of the site.</p> <p>20. Development proposals must adhere to the guidance set out in the county and local landscape character assessments, as set out in paragraphs 6 and 7 above.</p> <p>21. The creation of a recreational or wildlife area to the south-east should be considered in order to respect the existing trees and vegetation and respect the intimate setting of the landscape.</p> <p>22. Any new planting or landscape features should aim to enhance the value of the site to local wildlife, in particular, where located within Biodiversity Opportunity Areas to the north as defined by Policy ENV2 of the local plan and shown on the landscape and visual opportunities and constraints plan.</p> <p>23. Any trees lost as a result of the development must adhere to tree replacement in accordance with Crawley District Councils Policy CH6, based upon tree replacement tree planting in relation to trunk diameter of the tree lost.</p> <p>24. Development should avoid any impacts upon trees and vegetation within adjacent properties.</p> <p>25. All landscape proposals must adhere to the guidance in relation to planting in proximity to airports, and in accordance with CAP 772: Wildlife Hazard Management at Aerodromes.</p> <p><u>Built Form</u></p> <p>26. The development should reflect the height, scale and massing of similar surrounding buildings in the vicinity of the site and be minimised wherever possible.</p> <p>27. The development should allow for sustainable movement around the site and look for opportunities to improve pedestrian and cycle links in the local area.</p>

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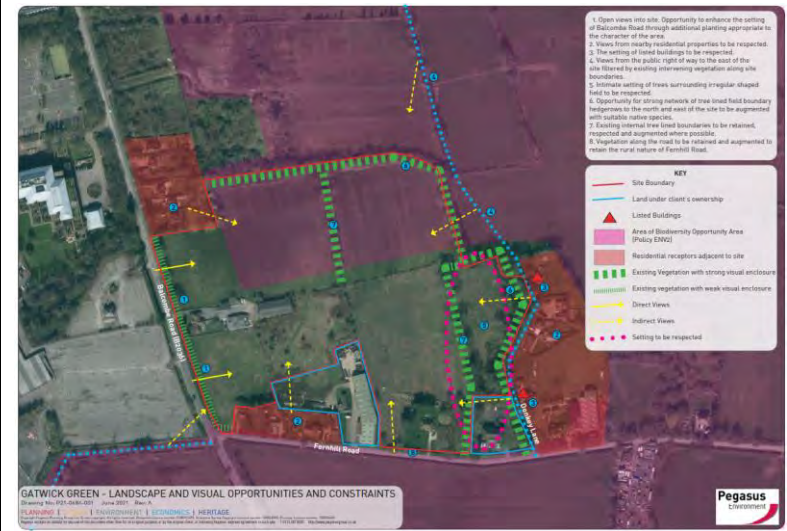
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Surrounding Land Uses

28. Any development must be appropriately offset from the adjacent residential properties to respect their visual amenity.

29. The development must respect the setting of the listed buildings to the east of the site, as well as other surrounding locally listed buildings further to the east and those listed buildings to the west.

30. Any development must ensure that the setting of the public right of way is respected, with mitigation within the site to limit views toward development proposals.




**Appendix 7. Drainage Strategy prepared by PHG**

**HYDROLOGICAL ASSESSMENT – LAND OFF FERNHILL ROAD, HORLEY**


PHG Consulting Engineers have reviewed the available information to assess the hydrology in the area of the proposed development site. It has been concluded that there is a very low risk of fluvial flooding and the low risk of surface water flooding can be reduced with the introduction of sitespecific positive drainage.

The site is located at grid reference TQ296413 (E529659, N141326) and bound to the south by Fernhill Road, to the west by Balcombe Road, to the north by greenfield land and to the east by Donkey Lane and further greenfield, the




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			<p>site location is shown in figure 1. The existing ground levels range from approximately 60.00m AOD to 58.00m AOD and fall typically south to north and in parts east to west.</p>  <p>Figure 1 - Site Location</p> <p>An existing drainage ditch is shown on online mapping flowing east to west along the northern boundary of the site. Due to the topography of the site any greenfield runoff from the development will flow to this existing ditch. Available Lidar data has been reviewed to determine the topography of the site and fall arrows indicate that further smaller ditches may be present onsite, a detailed topographical survey will be required to determine where any existing drainage ditches flow. The drainage ditch system also runs along the eastern kerbline of Balcombe Road and is culverted under the existing private accesses, any future crossing of this ditch would require a new culvert and Ordinary Watercourse Consent.</p> <p><b>Flood Risk</b> Flood maps available at Gov.UK have been reviewed to determine the risk of flooding from various source within the site. Figure 2 below shows the extent of fluvial flooding from rivers and shows the development site to be away from the extents of fluvial flooding.</p>

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			 <p data-bbox="651 708 1016 730">Figure 2 - Fluvial Flood Extents from Gov.UK</p> <p data-bbox="640 762 2033 975">Flood maps also show the risk of surface water flooding within an area, at the development site there is a large area at 'low' risk of surface water flooding as shown in figure 3. Areas of low flood risk have a likelihood of flooding between 0.1% and 1%. The depth of surface water flooding in this area ranges between 0-300mm and 300mm-900mm as shown in figure 4, The velocities of the are generally below 0.25m/s (figure 5) and therefore are not deemed to pose a major hazard. Flooding from surface water can be difficult to forecast due to small differences in rainfall intensity and volumes, local features can also affect the likelihood and severity of flooding. Surface water flooding within the site is mainly contained in the low-lying area at the north western corner.</p> <p data-bbox="640 995 2018 1145">Surface water runoff from the greenfield will add to any surface water flooding shown on the below maps. Therefore, the development of the site can reduce the extent of surface water flooding by reducing rate and volumes of runoff to this area. Given the likelihood of surface water flooding is minimal and anticipated depths are low, the overall risk of surface water flooding post development will be negatable. The proposed drainage strategy should reduce flow rates and volumes and make space for water</p>

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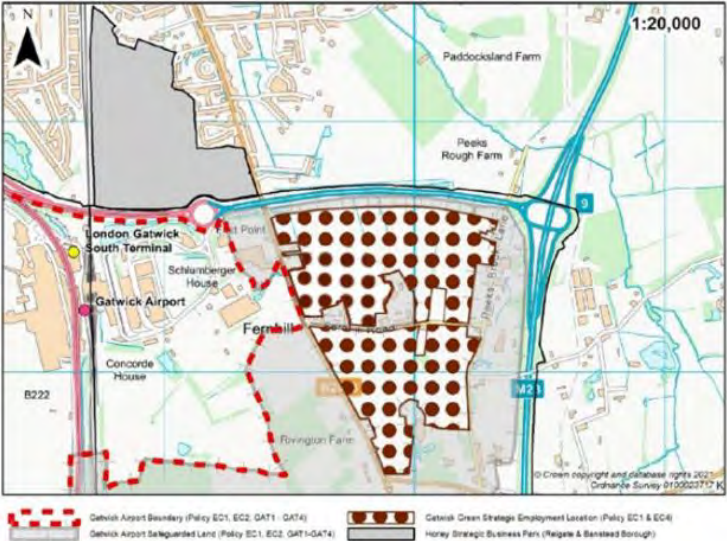
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			<div style="display: flex; justify-content: space-around;"> <div style="text-align: center;">  <p data-bbox="645 758 862 785">● High ● Medium ● Low</p> <p data-bbox="645 798 981 818">Figure 3 – Surface Water Flood Extents from Gov.UK</p> </div> <div style="text-align: center;">  <p data-bbox="1355 718 1736 742">● Over 900mm ● 300 to 900mm ● Below 300mm</p> <p data-bbox="1355 758 1691 778">Figure 4 – Surface Water Flood Depths from Gov.UK</p> </div> </div> <div style="text-align: center; margin-top: 20px;">  <p data-bbox="645 1300 1041 1324">● Over 0.25 m/s ● Less than 0.25 m/s ↖ Direction of water flow</p> <p data-bbox="645 1340 952 1361">Figure 5 – Surface Water Flood Velocities from Gov.UK</p> </div>

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			<p><b>Reservoir Flooding</b> Part of the northern section of the site is within the extent of reservoir flooding with maximum depths between 300mm-1m. Generally, reservoir flood risk maps are produced to inform reservoir owners and help produce evacuation and early warning plans. The likelihood of reservoir flooding is considered to be minimal and should not affect the use of land.</p> <p><b>Historic Flooding</b> The West Sussex SFRA provides an outline of historical flood events, however this information is limited and, in many cases, does not include the type of flooding. There are no known flood events within the site.</p> <p><b>Groundwater Flooding</b> The West Sussex SFRA (figure 1.2) shows the geology of West Sussex and shows the site to be in an area underlain by Clays. Therefore, groundwater flooding may occur from perched water flowing above more impermeable soils. A site-specific site investigation will be required and this should determine whether groundwater is encountered during works.</p> <p><b>Surface Water Drainage</b> The surface water drainage strategy for the site should restrict discharge to the calculated QBAR greenfield runoff rate, this would ensure that during rainfall events greater than the predicted 1 in 2 year event discharge from the site post-development would be reduced. Base on the site area of 9.18ha consisting of 60% impermeable surfacing the QBAR greenfield runoff rate has been calculated to be 28.6l/s. To maximise the benefits of a SuDS approach to surface water management, the use of swales to convey water should be considered and the final attenuation should be provided in a landscaped basin (or basins). This will ensure the surface water drainage network maximises amenity and biodiversity benefits whilst reducing the volume and rates of runoff. The masterplan should allow space within landscaped areas for attenuation basins to be provided. Any attenuation feature within the site should be designed to accommodate flows up to and including the 1 in 100 year with a 40% increased for climate change. To ensure exceedance can be managed, a minimum freeboard of 300mm should be included. Given the above parameters, a 1.5m deep basin with 1 in 3 banks covering a surface area of approximately 3,670m<sup>2</sup> and providing 4,500m<sup>3</sup> storage would be required. Further SuDS techniques such as porous surfaces can be utilised to reduce the overall size of surface water attenuation required.</p> <p><b>Foul Water Drainage</b> Sewer records have been obtained from Thames Water and show little existing foul sewers with the vicinity of the development. The development is surrounded by greenfield, Gatwick Airport and some smaller development/dwellings. The dwellings in the vicinity of the site are likely to have individual treatment plants and Gatwick Airport would be served by a private drainage system. The nearest Public Sewers are located approximately 600m south of the development in Balcombe Road. Sewer records show that the existing manhole (7801) at the start of this run has an invert level of 57.54m and the public sewer discharges to a pumping station. The pumping station is</p>

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			<p>assumed to have a direct discharge to Crawley Sewerage Treatment Works located 300m to the west. Due site levels and the invert level of the existing manhole, a pumping station will be required to discharge to the Thames Water network. The pumping station would also include an offsite rising main being laid in Balcombe Road, approximately 500m long. Once the development scale and uses are determined early discussion should take place with Thames Water to ensure sufficient capacity within the existing network.</p> <p><b>Suggested Modifications:</b>  <b>CHANGES REQUIRED IN ORDER TO ENSURE THAT THE PLAN IS COMPLIANT WITH NPPF</b></p> <ol style="list-style-type: none"> <li>1. As we have indicated we are supportive of the allocation of Gatwick Green as a strategic employment allocation under policy EC4. However, as set out in our representations in respect of Policy EC1 we consider that there is an under estimation of the amount of land requirement for employment purposes during the plan period. We have set out the change in respect of the strategic policy that we believe is required in order to make the plan sound in particular it requires that a minimum of 28.7ha of employment land is required over the course of the Plan period.</li> <li>2. As set out in our representation to Policy EC4, we do not believe that the current proposed allocation itself will be sufficient to achieve this higher level of employment land required due to significant infrastructure, amenity, landscape and attenuation requirements. However the addition of our clients land would provide sufficient land to achieve this minimum requirement.</li> <li>3. Aside from providing the required employment land, the addition of our clients land to the allocation would allow for a more comprehensive development scheme. The value of this method is in line with national design guidance and was recognised by TWG regulation 18 consultation submission. By approaching the area in a comprehensive manner would allow the overarching ambitions and high quality aspirations to be achieved, in simple terms approaching the area in a comprehensive rather than piecemeal way would allow for the proper planned approach.</li> <li>4. It is considered therefore that in order to make the plan sound, two changes are required. <ol style="list-style-type: none"> <li>1. The proposals map for Policy EC4 should be redrawn as below to include land within our clients control:</li> </ol> </li> </ol>



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			 <p>2. The policy wording of Strategic Policy EC4: Strategic Employment Location should be amended under the heading “Employment Uses” to read:</p> <ol style="list-style-type: none"> <li>a. <b>provide as a minimum 28.7ha of new industrial land, predominantly for B8 storage and distribution use, demonstrating through appropriate evidence the justification for any further industrial floorspace beyond this amount;</b></li> <li>b. <b>justify any limited complementary ancillary uses such as office floorspace, small-scale convenience retail and small-scale leisure facilities that would support the principal industrial-led storage and distribution function</b></li> </ol>
REP/035 (Mar 21)	Vail Williams on behalf of Ardmore Land Consortium	EC4	<p>As the Council are aware, our clients have historically been promoting Jersey Farm as a potential extension to Manor Royal, through a number of Core Strategies, Local Plans and other planning framework consultations with Crawley Borough Council over the last 20+ years. The site sits on the boundary with Manor Royal and even has direct existing access from County Oak Way, with large scale development to the East and North immediately abutting our site. The site also forms part of the Council ELAA.</p> <p>The principle of our site being available and deliverable was established in regard to the consented development in 2015 and 2019. We are now looking to implement this decision Spring 2021, and the building is being actively marketed.</p>

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			<p>The Council themselves have also historically acknowledged that there are significant land supply issues and this is still acknowledged in paragraphs 10.21 9.7 which confirm that Crawley requires 38.7 ha of new employment land over the Plan period to 2036.</p> <p>Para 9.7 also recognises that the scope to accommodate identified employment needs in Crawley is severely constrained by the requirement to safeguard land in the North of the Borough for the possible runway at Gatwick Airport. We support this paragraph that also identifies the risk that if Crawley’s own employment needs cannot be met within the borough, investment may indeed be lost for Crawley or the sub region entirely. Therefore, we wholeheartedly, agree that there is a need for <i>“a robust strategy which plans to positively meet Crawley’s employment needs, supporting the wider Gatwick Diamond and Coastal to Capital areas”</i>.</p> <p>However, paragraph 9.8 states that the Local Plan strategy focuses on <i>“the protection and intensification of the Borough’s existing main employment areas and the identification of new employment land. Manor Royal will remain the economic heart of the Gatwick Diamond and is protected and promoted for business led economic growth that builds upon its established function and role as the Gatwick Diamonds leading business destination”</i>. The Plan also acknowledges that appropriate extensions to Manor Royal located outside of the Gatwick safeguarding area will be supported, however it then goes on to say that <i>“to accommodate Crawley’s significant requirements for industrial and warehouse land, a Strategic Employment Location is allocated at Gatwick Green with the safeguarded land boundary amended accordingly”</i>.</p> <p>We believe that the SEL allocation away from Manor Royal, with the loss of countryside and its significant policy constraints and infrastructure issues, is at odds with the Council’s aims to ensure Crawley’s main employment areas will remain the focus for employment uses. Indeed, the ST4 allocation may not be able to ensure that the Main Employment Area’s economic function is not undermined, as this introduces a site that is disconnected and away from Manor Royal itself.</p> <p>Paragraph 9.13 confirms that there is a need for a B8 led SEL with an outstanding need of 24.1 ha of employment land, and we agree that this should be a plan led requirement to ensure that the site is suitable and appropriate to meet business needs. Para 9.14 continues by stating <i>“to supplement the employment land supply position and deliver new floor space at Manor Royal, small extensions to Manor Royal outside of the safeguarded land will be supported where this would contribute positively to business led economic growth.”</i></p> <p>However, we would argue that the Council is being forced to consider less sustainable locations without significant evidence that safeguarding cannot be amended accordingly, especially on the periphery of Manor Royal and in particular, in the area where they are already identifying a need for alternative development that would override safeguarding, such as the Crawley western link road. We therefore believe further consideration of alternative strategies are needed especially relating to criteria (v) that looks to provide 24.1 hectares of new industrial land over</p>

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			<p>the Plan period to 2036, by allocating the SEL at Gatwick Green, and how this may complement the established role of Manor Royal as required in paragraph 9.23.</p> <p>Whilst we recognise the extensive policy criteria requirements that would need to be met for the allocated site at Gatwick Green, as set out in policy EC4, we would argue that given that the safeguarded boundary has to be amended in order for this to come forward, the Council is not correct that in paragraph 9.15 this is <i>“the only location in Crawley that is capable of providing the required quantum of industrial land and floor space without prejudicing the possible future delivery of the southern runway on the safeguarded land”</i>.</p> <p>In addition, we would argue that the comments in paragraph 9.2 regarding an urban extension to Crawley, suggest that this is most likely to be provided on the western boundaries of the town, hence the need to provide the western link Relief Road.</p> <p>We would suggest therefore, that such an urban extension could increase the requirements for employment needs, especially to the west of the town, and that these could be more appropriately met in a more sustainable location on our site, as this would enable better connectivity and sustainable transport movements on the edge of the Manor Royal Business District (MRBD). Our site is better located in a closest to the western Borough boundary with Horsham and could be supported by the necessary infrastructure to the west of the Borough.</p> <p>We note and welcome that para 9.22 provides additional clarity that following any implementation of new extensions to Manor Royal should form part of the Manor Royal main employment area, and therefore this supports our justification for the Built Up Area Boundary and Manor Royal Main Employment Area boundaries to include our new development as consented.</p> <p>In regard to policy EC3, relating to Manor Royal, we agree that the business district is instrumental to the success of the wider Gatwick diamond and that development at Manor Royal should contribute positively to the overall setting and environment of the main employment area in accordance with the Manor Royal Design Guide SPD. Again, we believe that our masterplan has the merit of a successful transition between existing buildings on Manor Royal and the aspirations of a high quality environment especially in the area around the potential new western relief link road.</p> <p>In regard to policy EC4 on the SEL, this states that 24.1 hectares of new industrial land must be provided as a minimum, predominantly for B8 storage and distribution use. However, policy EC1 has required 24.1 hectares to be provided across the whole Local Plan, and therefore it is unclear how any additional potential industrial land or developments would be viewed across the rest of the town if Gatwick Green were not able to satisfy all of the requirements of Policy EC4 or be implemented.</p> <p>We agree that the provision should be predominately industrial/ B8 but there is concern how any additional mix may undermine rather than complement MRBD given its separate location. The policy also recognises the need for a comprehensive mobility strategy and improvements to public transport facilities links and infrastructure, which all</p>

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			<p>requires a robust transport assessment required. Again, we believe this allocation is for a disconnected site from the Main Employment Area of Manor Royal but also further away from those potential employees that reside in the neighbourhoods around it.</p> <p>Policy EC4 also recognises that particular regard should be had to the location of the site in regard to the North East Crawley Rural Fringe Landscape Character Area, recognising that design is critical to how this SEL will sit within the countryside location. Again, we would argue this may be more easily achieved in a site adjacent to existing development at Manor Royal.</p> <p>In summary, we believe our proposal could allow an area on the periphery of the safeguarding area to be removed from safeguarding without undermining the future delivery of safeguarding. The safeguarding boundary could be amended accordingly as the Council are suggesting they would do so with EC4. We believe our sites affords established continuity between the potential Crawley western relief road to relieve access and transport issues across the North and West of the Borough and would meet the 24.1 ha requirement whilst providing and enhancing the main employment area of Manor Royal in a more sustainable manner.</p> <p>This is because the location of our site on the northern boundary of the established main employment area, provides a sustainable extension to Manor Royal as the economic heart of the town. Indeed, previous Local Plan Inspectors have encouraged extensions to Manor Royal to provide essential employment needs and have rejected proposals for a SEL at Land East of Balcombe Road.</p> <p>In our view if the whole area is to be safeguarded for future needs then this should be consistent across the Borough, or the Council and GAL should openly review land take requirements in line with the principles within the NPPF regarding sustainable development in sustainable locations, releasing areas where development can support the economic activity of the town, Manor Royal and Gatwick Airport alike.</p> <p>We therefore would like to engage further with the Council in regard to further assessments on more sustainable alternative locations to be considered for the SEL under EC1.</p> <p>Whilst we appreciate that any aviation policy changes will trigger a new Local Plan review on both the principle of safeguarding and the extent of safeguarding, this would only occur after the release of the land under policy EC1 Land East of Balcombe Rd.</p> <p>As per our meetings with the Council as part of both of the Regulation 19 consultation, we wish to continue to engage as a viable alternative location to land East of Balcombe Road, and have included indicative Masterplans to enable the council to understand how such development could be provided on the Jersey Farm site.</p> <p><b>Suggested Modifications:</b> N/A</p>

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REP/035 (Jun 21)	Vail Williams on behalf of Ardmore/ Windsor Land Consortium	EC4	<p>As you are aware para 35 of the NPPF seeks to ensure LPAs' Local Plans are effective and do not defer on strategic matters and have looked at all "<i>reasonable alternatives</i>" and we believe our proposals are a more sustainable location and opportunity for the provision of a much need Strategic Employment Location. Para 35 also seeks to ensure that you have "<i>positively prepared the Plan</i>" and we believe that the allocation of Gatwick Green as the required SEL does not allocate employment development where it is appropriate to do so, and out alternative location, when considered in the round against employment policies and CBCs own aspiration of the Crawley Western Relief Road, that Jersey Farm affords a more sustainable and deliverable employment led development.</p> <p>Our proposals also more effectively align with section 9 of the NPPF in regard to promoting sustainable transport and this letter, as well as our supporting Promotion Statement demonstrates how we believe that our proximity to existing neighbourhoods and employment provision within Manor Royal align with the most sustainable approach to delivering economic growth in the town over the emerging period to 2037.</p> <p>This aligns with paras 102-105 of the NPPF by delivering enhanced connectivity with new and existing employment and residential developments, building on the local LCWIP. Jersey Farm Project Team are already interacting at an early stage with WSCC and key sustainable transport infrastructure providers &amp; stakeholders including Metrobus and MRBG. We are also demonstrating an appropriate mix of uses, hereby reducing the number and length of journeys. This more closely supports "Building a Strong Competitive Economy" and "Making Effective use of land" and "Promoting Sustainable Transport", as required by the NPPF.</p> <p>Section 6 of the NPPF "Building a Strong, Competitive Economy" also seeks to ensure that planning policies create conditions so business can invest, expand and adapt, and our illustrative Masterplan allows over 52,000sqm of new employment floorspace to be provided, extending the Borough's Main Employment Area. The Local Plan seeks to provide a clear economic vision but currently presents a disjointed geographical disconnect between the existing Manor Royal and the proposed Gatwick Green in a far less sustainable location.</p> <p>The criteria-based approach of Policy EC4 for Gatwick Green indicates the significant extent of policy constraints associated with the site including ensuring that there are no "<i>severe residual impact on the local and strategic road network</i>" and "<i>that there is an appropriate landscape buffer, and public open space, to reinforce the distinctive identity of Gatwick Green Strategic Employment Location, and its separation from Gatwick, and Horley</i>". In addition, the policy seeks to ensure that it is "<i>demonstrated how the Strategic Employment Location will address Crawley's identified need for industrial focused business floorspace, and how its offer will be complementary to the mixed-use business function of Manor Royal</i>". We believe that many of these issues and concerns are not constraints for Jersey Farm or if any such issues do exist, that they can easily be mitigated, as shown in the illustrative Masterplan and Promotion Statement that supports this representation.</p> <p>Para 82 of the NPPF seeks to ensure that locational requirements of different economic sectors, and provision of clusters/networks are achieved in highly sustainable locations – our site allows an extension to Manor Royal and</p>

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			<p>identifies an important synergy with the proposed highways link and how it aligns with ST4- CWRR which further supports our unique location to provide an opportunity to enhance and build on the success of Manor Royal.</p> <p>Whilst we support your evidence base and the revised Topic Paper 5, these confirm that the ELAA for years 1-5 and the ELT state that there is a supply of only 17.56 ha of land supply against a requirement of 38.7ha (5.9ha office and 32.8ha industrial) resulting in an outstanding requirement of 24.1ha. Our site in the first instance can provide 19.6ha of space and 23.5 Ha in total in this most sustainable location for economic growth.</p> <p>Using new updated Lichfields' scenarios, and the allocation on the 24.1 ha Gatwick Green for predominantly B8 uses (years 6-10), the plan indicates if Gatwick Green is allocated, it can meet Crawley's land supply requirements. We would however note that this assumes a baseline job growth scenario rather than using more appropriate past take-up rates. We believe that the future of supply may need to address a return to more normal market conditions that the September 2020 update report implies, requiring even more land in Crawley as the region hub for development, even when considering other SEL opportunities at HDC, RBBC and MSDC. We would also argue that Gatwick Green does not align with many of the other objectives of the plan, or the NPPF and alternative locations for the SEL should have been more appropriately considered.</p> <p><i>*see rep to Policy CL8*</i></p> <p>Whilst we recognise that the January 2021 Sustainability Appraisal looks at the alternative options for allocating or not allocating a SEL site, and the merits of an AAP, it also identifies the Planning Inspectorate feedback, on safeguarding being retained. As already stated, we believe that this approach needs to be reconsidered against the more sustainable opportunities afforded by alternative sites such as ours, and how this and demonstrated land scarcity may override a blanket approach to safeguarding.</p> <p>For our site, the impact and mitigation opportunities are significantly more appropriate, as an extension to the Built Up Area Boundary with less intrusive impact visually, and ecologically as well as enhanced connectivity and reduced movement patterns, than a new disconnected site to the north under EC4, at Gatwick Green.</p> <p>We believe that your inclusion of the search corridor for ST4 already indicates a clear change in use and character for this area of land, in regard to travel patterns and form, and whilst a precise boundary is not yet identified, and further work is ongoing by SYSTRA, we believe this should form part of any new BUAB to facilitate much needed development. We would wish to be further consulted and involved on the outcomes of the SYSTRA reports that we believe are due to be finalised later this summer.</p> <p>As our additional June representation, our additional information therefore seeks to demonstrate how we believe that our 19-24 ha site is more suited to the provision of the much needed employment land supply, in a more sustainable location than the proposed Gatwick Green SEL and we provide specific commentary on the proposed Reg 19 (2) local</p>

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			<p>plan policies and its evolved evidence base but specifically the transport modelling undertaken by Stantec. Our additional detailed comments are as follows:</p> <p><b>Response to Stantec Transport Modelling Report</b></p> <p>The Local Plan evidence base is supported by strategic traffic modelling undertaken by Stantec on behalf of CBC. The “Crawley Transport Study: Transport Study of Strategic Development Options and Sustainable Transport Measures: Draft Crawley Local Plan 2021 – 2037” by Stantec (dated December 2020) was published on 18 May 2021. The strategic modelling assesses the traffic impact of three different Local Plan scenarios (1-3).</p> <p>In terms of employment, Scenario 2 is the same as Scenario 1 but with the addition of the strategic employment site at Gatwick Green, which is modelled as comprising 77,500 square metres (sqm) gross floor area, comprising 10% B8 Parcels Distribution, 60% B8 Commercial Warehousing, and 30% B2 Industrial estate.</p> <p>In Scenario 2 the Gatwick Green site is predicted to generate approximately 330 vehicle movements in the weekday AM peak hour and approximately 300 in the PM peak hour. The modelling has assumed that there will be a modest number of car trips made by staff working on site which will respond to sustainable travel modal shift, and predicts that measures will reduce the traffic impact by approximately 20 vehicle trips in each peak hour.</p> <p>As the Jersey Farm proposal comprises similar land uses, but slightly less quantum than Gatwick Green, the development trip numbers are expected to be commensurate with the smaller GFA when compared with Gatwick Green. However, as set out below, Jersey Farm has considerably greater potential for sustainable travel mode shift given its location adjacent to the Manor Royal Main Employment Area and the associated non car travel opportunities and initiatives.</p> <p>The strategic modelling identifies predicted traffic impacts on the B2036 Balcombe Road for most of its length, both north and south of the B2037 Antlands Lane junction with Balcombe Road. A significant proportion of these trips are freight / heavy goods traffic, which is not expected to respond to sustainable travel modal shift.</p> <p>There are concerns about the sensitivity of the Gatwick Green freight traffic using the local residential roads, and an HGV ban is proposed through the built-up area in Horley. Also, a right turn ban is proposed for HGV traffic exiting the site, to prevent it using the northern sections of Balcombe Road to reduce the associated noise and air pollution in this area.</p> <p>Again, the proximity of Jersey Farm to the established Main Employment Area and its purpose-built industrial road network which connects to the principal road network, ensure that this is not an issue for Jersey Farm. In this respect, Jersey Farm is appropriate development in an appropriate location, with limited impact on residential areas.</p>

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			<p>There is a planned new link road between A2011 and Balcombe Road, designed to improve the access route to the North East Sector developments. This is shown in the modelling to have capacity problems in the Reference Case and the Local Plan scenarios, even after the proposed sustainable travel mitigation is applied.</p> <p>In the vicinity of Jersey Farm, the strategic modelling predicts impacts at a number of junctions, notably the Ifield Roundabout (Ifield Avenue/A23 Crawley Avenue) and the Tushmore Gyrotory, however, the report concludes that sustainable travel measures can successfully mitigate the impacts at almost all of the junctions.</p> <p>Only the Ifield Roundabout is identified as needing some physical improvements, which are all deliverable within WSCC Highway Land. Stantec has identified a scheme to resolve this, which is proposed within their report.</p> <p>Our further ongoing work also aims to provide further commentary as we analysis data and you are aware we are in ongoing dialogue with Stantec.</p> <p><i>*see rep to Chapter 17 and Policy ST4*</i></p> <p><b>Jersey Farm Masterplan and the Local Plan Review Policy Context:</b>  As part of our own evidence base we have developed alongside our current marketing for the Building A of the Jersey Farm employment location, our Promotion Statement that looks at high level, the main themes and aims of the wider and its role as a sustainable urban extension to Manor Royal.</p> <p>The Masterplan and our supporting documents look at our opportunities through its sustainable location and its surroundings and context in proximity to the existing Main Employment Area Manor Royal.</p> <p>Our Promotion Statement document also addresses the site constraints and opportunities, that we have considered, informing the Masterplan and its layout. This also enhances connectivity opportunities with Manor Royal and the surrounding countryside and its transition between the two.</p> <p>In addition, we have also provided further information on market demand, economic benefits and the potential delivery strategy for the site given the wider project team with Vail Williams and KBA as significant local land agents, to assist marketability and delivery. This builds on the fact that our clients at Windsor Development and Ardmore, already have significant experience in bringing forward major developments such as the proposal at Jersey Farm.</p> <p>Our Masterplan also picks up future potential phasing with any Crawley Western Relief Road and that there is an opportunity to provide essential small and medium enterprise space, and incubation opportunities on the western side of the site as it transitions to the countryside. These will provide grow-on space that is much needed in Crawley reflecting the findings of the Employment Growth Assessment and the wider ambitions of the Council and Manor Royal Business District.</p>



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			<p>These illustrative plans indicate approximately a 13% provision for support/amenity facilities and B1c/Class E facilities with the remainder of the site, available for B8 light high tech units.</p> <p>The Masterplan also provides a range of size of units based on market intelligence and demand as captured by KBA and Vail Williams, providing flexibility on sites to react to market demand.</p> <p><i>*see rep to Policy CL2*</i></p> <p><b>Suggested Modifications:</b></p>
REP/055	Savills on behalf of Wilky Group	EC4	<p><b>1.0 Introduction</b></p> <p>1.1 This representation is submitted on behalf of The Wilky Group (TWG), which has a longstanding interest in the promotion of strategic employment land within the Crawley Borough Council (CBC) area. This representation relates to Strategic Policy EC4 Strategic Employment Location in the draft Crawley Borough Local Plan, 2021 (DCBLP).</p> <p>1.2 TWG owns about 48 ha (119 acres) of land east of Gatwick Airport as shown the plan at Appendix 1. The land has been promoted by TWG as a strategic employment opportunity known as Gatwick Green (the Site). The Site is proposed for allocation as a Strategic Employment Location (SEL) of 47 ha (116 acres) in the DCBLP under Strategic Policy EC4 as a comprehensive industrial-led development of predominantly storage and distribution uses under use class B8. The extent of the SEL allocation is identified on the plan at Appendix 1.</p> <p><b>Background</b></p> <p>These are TWG's representations made in the light of the updated DCBLP 2020, which was published following the advice from the Planning Inspectorate to Crawley Borough at the Advisory Visit in April 2020: the advice was that the Local Plan had to include a strategy to address Crawley's employment needs and that the removal of safeguarding could not be regarded as certain. Accordingly, the representations revise TWG's position, given the changes in the draft Plan and the revised / updated evidence base since the original representations were made.</p> <p><b>Scope of representation</b></p> <p>1.3 Savills' representation on behalf of TWG on Strategic Policy EC1 contains evidence in support of the DCBLP in relation to economic strategy, the scale of employment land provision and the allocation of Gatwick Green as a Strategic Employment Location (SEL). In particular, the representation sets out the evidence in support of how policy expresses the employment land requirement as a <b>minimum</b>, with provision beyond this to be justified by evidence of market requirements / need. This representation cross-refers to evidence contained in the representation on Strategic Policy EC1 as necessary to support considerations raised in connection with Strategic Policy EC4.</p> <p>1.4 This representation therefore focuses on evidence in support of Strategic Policy EC4 with regard to the development control provisions within the policy. Where matters relating to employment land requirements are</p>

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			<p>raised, the representation cross-refers to evidence contained in the representation on Strategic Policy EC1. The representation makes reference to the following sources and technical reports/evidence:</p> <ol style="list-style-type: none"> <li>1. Evidence by Empiric Partners and i-Transport on the transport provisions of Strategic Policy EC4.</li> <li>2. An Environmental and Utilities Preliminary Assessment report and related Addendum.</li> <li>3. A Preliminary Ecological Appraisal (PEA) report and related Addendum.</li> <li>4. A Hedgerow Regulations Assessment report and related Addendum.</li> <li>5. A Landscape Character and Visual Appraisal report and related Addendum.</li> <li>6. A Heritage Constraints Appraisal report and related Addendum.</li> </ol> <p>1.5 The reports noted at 2-6 above formed Appendices to TWG's representation on Policy EC1 of the DCBLP (2020) (2020 Appendices) and form part of the Council's evidence base (Consultation appendix 4b: Wilky Group appendices combined). These reports have been supplemented by Addenda to reflect the revised policy framework in the DCBLP and other changes in circumstances since the original appendices were prepared.</p> <p><b>Executive Summary</b></p> <p>1.6 The DCBLP adopts the Experian Baseline Job Growth projection as the basis for the amount of employment land provided for in Strategic Policy EC4. The Council has expressed this requirement as a <b>minimum</b> in both policy and the supporting text – this includes Strategic Policy EC4, which provides for a <b>minimum</b> of 24.1 ha of new industrial land predominantly for B8 storage and distribution use, with provision for additional land if appropriate evidence on market demand/need can be demonstrated. TWG supports this approach insofar as it reflects national planning policy and guidance and local economic and policy priorities by planning positively to future-proof the local economy in the face of long-standing needs and the impacts of the COVID-19 pandemic.</p> <p>1.7 Gatwick Green can be designed and developed such that it can be fully compliant with the development control requirements in Strategic Policy EC4 – the key elements of this are:</p> <ul style="list-style-type: none"> <li>• Gatwick Green can deliver a highly sustainable pattern of movement and access consistent with guidance in the NPPF and the Council's sustainable transport strategy.</li> <li>• Gatwick Green can be developed in a way that achieves sustainable drainage design and construction / operation in accordance with specific policies on flood risk, drainage and sustainability.</li> <li>• As a new-generation storage and logistics development, Gatwick Green will incorporate future-proofed digital communications in accordance with Policy IN3 (Supporting High Quality Communications).</li> <li>• Evidence contained in appendices to this representation confirm that Gatwick Green can be developed with appropriate avoidance and mitigation measures so as to respect the various environmental values in and around the Site.</li> <li>• There is a high level of complementarity between Gatwick Green and other existing and planned strategic employment sites in the and near to Crawley.</li> </ul>

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			<ul style="list-style-type: none"> <li>• Gatwick Green is viable and deliverable in accordance with the provisions in Strategic Policy EC4.</li> </ul> <p>1.8 Strategic Policy EC4 is therefore considered to be sound with regard to the how it plans for the provision of further employment land such that it is in accordance with the four soundness tests contained in the NPPF (para 35). The representation also sets out the case for some minor adjustments to the policy, the supporting text and the Local Plan Map as follows:</p> <ol style="list-style-type: none"> <li>1. Provide consistency of wording within the policy with regard to the strategic nature of the 'Requirements' referred to in the policy.</li> <li>2. Ensure flexibility in the approach to the delivery of strategic infrastructure to support the Strategic Employment Location allocated under Strategic Policy EC4 so as to retain a broad base of delivery options and be consistent with the Annex on Planning Obligations.</li> <li>3. Allow for the dual use of the Safeguarded Land south of the M23 spur road to ensure a land / resource-efficient outcome with regard to the provision of highway infrastructure to serve both Gatwick Green and the future additional wide-spaced runway.</li> <li>4. Make it clear that all the employment land requirements are minimum requirements consistent with how these are expressed in Strategic Policies EC1 and EC4.</li> <li>5. Provide clarity that the allocation under Strategic Policy EC4 can accommodate additional employment land over and above the minimum of 24.1 ha, subject to the development controls in the policy and evidence of market demand/need.</li> <li>6. Amend the Local Plan Map to redress a mapping error by revising the extent of the Safeguarded Land south of the M23 spur road to reflect the areas advised by GAL to TWG.</li> <li>7. Amend the Local Plan Map to correct a mapping error by including two parcels of land owned by TWG within the allocation for Gatwick Green.</li> <li>8. Clarify that the s106 sustainable transport contribution relates to that identified in the formula contained in the Planning Obligations Annex.</li> </ol> <p><b>2.0 Meeting Crawley's employment land requirement</b></p> <p>2.1 The Council has adopted the employment land requirement based on the Experian Baseline Job Growth projection contained in the Economic Growth Assessment update for Crawley (EGU CU), but applied it so that it is expressed as a <b>minimum</b> of 38.7 ha of land to meet needs up to 2036 (DCBLP, para 9.12 and Strategic Policy EC1). The industrial component of this employment land requirement is 32.8 ha, leading to an <b>outstanding need for a minimum of 24.1 ha of industrial land</b> (after taking account of the industrial land supply of 8.7 ha). Savills' representation on behalf of TWG in relation to Strategic Policy EC1 sets out, <i>inter alia</i>, the case in support of this approach and in particular, the Council's decision to express the employment land needs as <b>minimum</b> requirements in Strategic Policies EC1 and EC4 and the supporting text.</p>

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			<p>2.2 This approach is in line with national planning policy and guidance, and local economic and policy priorities, to plan positively and future-proof the local economy in the face of long-standing needs and the impacts of the COVID-19 pandemic. This approach is largely reflected in wording in Strategic Policy EC1 and Strategic Policy EC4. There is, however, some inconsistency between the policies, and within the supporting text of the Plan relating to both policies – this relates to the need to consistently express the employment land requirements as ‘<b>minimum</b>’. These inconsistencies need to be resolved if the Plan’s economic strategy and policies are to be interpreted and applied in the way that is clearly intended – a number of minor changes to the supporting text to Strategic Policy EC4 are therefore advanced in this representation.</p> <p><b>3.0 Requirements for Gatwick Green under Strategic Policy EC4 Sustainability</b></p> <p>3.1 The Council has assessed the alternative options in its Sustainability Appraisal (SA/SEA). This evaluated three options: (1) allocate a SEL only through Strategic Policy EC1, (2) allocate a SEL through a dedicated local plan policy, and (3) explore the scope to allocate an industrial-led SEL through an Area Action Plan. Option 2 was selected as it allowed for detailed matters relating to the amount and type of business floorspace, transport and access, design and amenity and environmental considerations to be addressed in policy and provide a framework to achieve a sustainable development through a masterplan and planning application. The Council’s approach is supported in that it has allowed for the Gatwick Green SEL to be identified as part of the overall economic strategy for the Borough articulated in Strategic Policy EC1, with the detailed matters relating to site / development requirements to be addressed separately in a site-specific policy (EC4).</p> <p><b>The effect of policy</b></p> <p>3.2 Strategic Policy EC4 sets out a clear basis for the development of Gatwick Green in a sustainable and efficient manner. Before reviewing the various requirements of the policy, it is worth setting out what the policy means for the implementation of Gatwick Green.</p> <p>3.3 Strategic Policy EC4 provides for the following, with the key aspects underlined:</p> <ul style="list-style-type: none"> <li>I. The Gatwick Green site is allocated for comprehensive development as an industrial-led Strategic Employment Location.</li> <li>II. The development of a minimum amount of new industrial land of 24.1 ha (item a).</li> <li>III. The development of the site for predominantly B8 storage and distribution uses (item a).</li> <li>IV. Any further industrial development beyond the 24.1 ha must be justified by appropriate evidence (item a).</li> <li>V. The provision of limited complementary ancillary uses such as office floorspace, small-scale convenience retail and small-scale leisure facilities to support the industrial-led function to be justified (item b).</li> <li>VI. Limitations on development through the application of a number of development control policies that will limit the scale of development at the site and ensure the timely delivery of appropriate physical and blue/green infrastructure so as to make the development acceptable in planning and environmental terms (items c – t).</li> </ul>

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			<p>VII. The provision of an Impact Assessment to provide evidence to demonstrate that any proposals will address Crawley's identified need for industrial focused business floorspace and how such will be complementary to key employment areas within Crawley, the Horley Business Park (HBP) and other key planned strategic employment sites in the functional economic market area (Crawley Borough, Mid-Sussex District and Horsham District).</p> <p>VIII. Planning conditions and obligations to ensure on-site and off-site physical, social and green infrastructure to control the delivery of development – these obligations will include economic impact testing, the delivery of the objectives of the Crawley Employment and Skills programme and the development of a masterplan in consultation with the Council to be advanced at the outline planning application stage to guide future detailed applications.</p> <p>3.4 TWG supports the framework of parameters and controls within Strategic Policy EC4, which recognise that the Site could accommodate more development than the <b>minimum</b> 24.1 ha provided for within the overall site area of 47 ha, but within the limitations imposed by the various development controls noted at points IV to VIII above.</p> <p><b>Development control provisions</b></p> <p>3.5 Strategic Policy EC4 also identifies the development control requirements that must be addressed at the planning application stage. This representation refers to a range of technical and environmental reports that provide sufficient policy-level evidence to demonstrate that Gatwick Green can be developed in a manner consistent with Strategic Policy EC4 and other DCBLP policies – the evidence comprises:</p> <ul style="list-style-type: none"> <li>• 2020 Appendices: <ul style="list-style-type: none"> <li>○ Environmental and Utilities Preliminary Assessment</li> <li>○ Updated Preliminary Ecological Appraisal (PEA)</li> <li>○ Hedgerow Regulations Assessment</li> <li>○ Landscape Character and Visual Appraisal</li> <li>○ Heritage Constraints Appraisal</li> </ul> </li> <li>• 2021 Appendices: <ul style="list-style-type: none"> <li>○ Outline Transport and Access Appraisal <b>Appendix 2</b></li> <li>○ Addendum: Environmental &amp; Utilities Report <b>Appendix 3</b></li> <li>○ Addendum: Updated Preliminary Ecological Appraisal <b>Appendix 4</b></li> <li>○ Addendum: Hedgerow Regulations Assessment <b>Appendix 5</b></li> <li>○ Addendum: Landscape Character &amp; Visual Appraisal <b>Appendix 6</b></li> <li>○ Addendum: Heritage Constraints Appraisal <b>Appendix 7</b></li> </ul> </li> </ul> <p>3.6 Gatwick Green is proposed for a comprehensive industrial-led strategic development of predominantly storage and distribution uses. Whilst conceptual site planning is still at an early stage, it is anticipated that the development could comprise the following:</p> <ul style="list-style-type: none"> <li>• A minimum of 24.1 ha of predominantly Use Class B8 with some Use Class B2 – storage and distribution and general industrial uses.</li> </ul>

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			<ul style="list-style-type: none"> <li>• Ancillary / incidental uses under Use Class E – office, business and services uses.</li> <li>• Supporting education uses for apprenticeships &amp; staff training.</li> <li>• An amenity hub to provide support facilities for staff.</li> <li>• An integrated green infrastructure framework – landscape, biodiversity, amenity space to address the objectives of the Biodiversity Opportunity Area and the requirement for Biodiversity Net Gain.</li> <li>• Sustainable mobility at the heart of the concept:</li> <li>• Two bus super hubs to facilitate modal switch and a high level of service for users.</li> <li>• A sustainable transport route through the site offering a high level of service for buses (notably the Fastway bus service), pedestrians and cyclists.</li> <li>• Ancillary car parking with Electric Vehicle Charging facilities.</li> </ul> <p>3.7 A Development Framework Plan (DFP) is contained at Appendix 8 – this provides a high level framework for the future masterplanning of the Site and shows indicative sustainable transport, green infrastructure and various environmental considerations that will influence the nature and extent of development in accordance with the various development control provisions in Strategic Policy EC4. A review of these provisions in the context of related technical and environmental evidence, is set out below which includes some preliminary findings on the types of measures that may be deployed to address the impacts of development at the Site.</p> <p><b><i>Movement and Accessibility</i></b></p> <p>3.8 Provisions c to h of Strategic Policy EC4 set out the requirements / guidance with regard to movement and accessibility for Gatwick Green. These require:</p> <ul style="list-style-type: none"> <li>• A Transport Assessment (TA) to demonstrate access can be provided and the proposals can be accommodated on the strategic and local road network taking account of other developments in the area.</li> <li>• A Mobility Strategy (MS) to demonstrate how the proposals can maximise sustainable access to the Site.</li> <li>• Provision of improvements to public transport facilities so as to maximise the accessibility of routes/services to serve occupiers of the Site.</li> <li>• Upgrading / extension of pedestrian/cycle routes to the Site from residential areas and Gatwick Airport rail station.</li> <li>• Provision of appropriate on-site parking and ensure no airport-related car parking can occur.</li> <li>• Submission of air-quality modelling to address air quality considerations along the road network.</li> </ul> <p>3.9 Appendix 2 contains a review by Empiric Partners and i-Transport of the above requirements / guidance, so as to demonstrate that, at a policy-level, the Site can be developed in a manner that is highly sustainable and deliverable in transport terms. The transport work adopted a highly sustainable approach in the context of the nature and capacity of the strategic and local highway infrastructure and is in line with the Council's Borough-wide</p>

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			<p>transport strategy, published in January 2020, which sets out urgent action to achieve the Council’s overarching aims:  <i>“The major challenges posed by the climate crisis, air quality, affordable homes and poor health related to inactivity have to be addressed. We need to develop a forward-focused vision for a low carbon, healthy and attractive town where people want to continue to live and work.”</i></p> <p>3.10 The review covers the above considerations in turn and concludes that:</p> <ul style="list-style-type: none"> <li>• There are no fundamental issues to access, promoting sustainable travel or mitigating traffic impacts. Any applications will be supported by a full Transport Assessment to demonstrate that the proposals can be accessed sustainably and would not have a severe impact upon the local highway network.</li> <li>• Initial assessments for a mobility strategy demonstrate how the Site will be integrated into the existing network, with off-site improvements aimed at promoting sustainable modes of travel for both future users of the Site and existing residents / businesses.</li> <li>• Any planning application will be accompanied by a range of infrastructure improvements to active travel and public transport to cost effectively mitigate development impacts.</li> <li>• Proposals to improve accessibility to the Site by public transport have been discussed and agreed in principle with Metrobus and the proposed site layout will bring forward bespoke public transport infrastructure.</li> <li>• Local upgrades to cycle and pedestrian facilities in the vicinity of the local area as well as Public Rights of Way are achievable and can be linked to improvements identified in the Crawley Walking and Cycling Infrastructure Improvement Plan.</li> <li>• The Site can be designed to provide appropriate levels of on-site parking for both cars and Heavy Goods Vehicles to ensure that all demand can be accommodated on site.</li> </ul> <p>3.11 Based on the above findings and provisions, proposals for Gatwick Green will contribute towards a defined strategy to link existing and developing residential areas, employment opportunities and day-to-day facilities within Crawley town centre, Horley, Forge Wood, Manor Royal, Three Bridges and Gatwick Airport, in line with the principle of the ‘15 minute Neighbourhood’. This will enable the development of infrastructure and transport services that cater for carbon neutral modes of travel, potentially reducing reliance on the private car, in line with the concept of Mobility as a Service, (MAAS) and the Government’s ambition for a step-change in the number of walking and cycling trips undertaken on a daily basis. The Development Framework Plan (<b>Appendix 8</b>) illustrates indicative infrastructure as part of the package of measures needed to make the development sustainable in transport terms:</p> <ul style="list-style-type: none"> <li>• An indicative Sustainable Modes / Public Transport Route through the Site to provide a dedicated and quality public transport route for buses, pedestrians and cyclists. This will avoid any negative interface with cars and</li> </ul>

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			<p>HGVs using the main Transport Route through the Site and, in so doing, ensure that the number of users is maximised through the high level of service offered.</p> <ul style="list-style-type: none"> <li>• The indicative Sustainable Modes / Public Transport Route through the Site will form part of an extension of the Fastway on road / dedicated bus route service between Maidenbower/Brewbush, Crawley, Gatwick Airport, Three Bridges, Horley, and Redhill.</li> <li>• Two Public Transport Hubs to facilitate modal shift (bus/walking/cycling) with facilities for all users such as bike stores, shelters and real-time timetabling.</li> <li>• The diversion of the existing Public Right of Way on the Site to ensure continued connectivity via a high quality route between the centre of Gatwick Green and Balcombe Road to the north leading to Horley.</li> <li>• Two points of vehicular access to the Site on Balcombe Road to ensure an appropriate distribution of vehicle movements.</li> </ul> <p>3.12 In conclusion, the policy-level work undertaken shows that Gatwick Green can be delivered in line with Strategic Policy EC4 and other transport policies in the DCBLP so as to provide an industrial-led development that benefits from a highly sustainable pattern of movement and access consistent with guidance in the NPPF and the Council's sustainable transport strategy. Gatwick Green can therefore be developed in a way that achieves sustainable transport outcomes. These matters will be addressed at the planning application stage via a TA and MS with obligations that can be guaranteed via planning conditions / a s106 agreement.</p> <p><b>Sustainable Design and Construction</b></p> <p>3.13 Provisions i to k of Strategic Policy EC4 set out the requirements / guidance with regard to Sustainable Design and Construction for Gatwick Green. These require achieving BREEAM Excellent rating; Net Zero emissions and carbon neutrality by 2050; implementing an energy strategy under Policy SD2, and provision of surface water drainage so as to avoid increasing flood risk.</p> <p>3.14 The Environmental and Utilities Preliminary Assessment Report (EUPAR)<sup>5</sup> forms part of the 2020 Appendices and sets out the various design parameters for surface water drainage and flood prevention. The Site is located in Flood Zone 1 and the EUPAR sets out the approach, incorporating Sustainable Urban Drainage Systems (SuDS) and surface water attenuation arrangements that are Airport-compliant. An Addendum to the EUPAR has been prepared by Clarkebond (<b>Appendix 3</b>), which contains a surface water and flood risk strategy that sets out the core drainage design principles and demonstrates that the various site and local hydrology/hydrogeology considerations can be satisfactorily addressed at the planning application stage.</p> <p>3.15 Gatwick Green can be developed in a way that achieves sustainable drainage design and construction / operation and in accordance with specific policies in the DCBLP in respect of flood risk, drainage and sustainability<sup>6</sup>. These matters will be addressed at the planning application stage and set out in a sustainability assessment and FRA with obligations that can be guaranteed via planning conditions / a s106 agreement.</p>



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			<p><b>Digital Technology</b></p> <p>3.16 Provisions in Strategic Policy EC4 set out the requirements / guidance with regard to Digital Technology for Gatwick Green. This requires the provision of high quality communications infrastructure including gigabit capable full fibre broadband. As a new-generation storage and logistics development, Gatwick Green will incorporate futureproofed digital communications as indicated at Section 5.4.2.2 of the EUPAR and in accordance with Policy IN3 (Supporting High Quality Communications). This requirement will be addressed at the planning application stage and set out in a utilities report with obligations that can be guaranteed via planning conditions / a s106 agreement.</p> <p><b>Character and Design</b></p> <p>3.17 Provisions m to t of Strategic Policy EC4 set out the requirements / guidance with regard to Character and Design for Gatwick Green. These require that a range of environmental and design / amenity considerations are taken into account in the design and operation of the proposals for the Site. These include:</p> <ul style="list-style-type: none"> <li>• A layout and design that respects the interface between the surrounding residences and countryside areas within the North East Crawley Rural Fringe landscape character area.</li> <li>• A design that is in compliance with the Aerodrome Safeguarding requirements.</li> <li>• The inclusion of landscape buffers and public open space to address separation of Gatwick Green from Gatwick Airport, Horley and the wider countryside.</li> <li>• An exemplar standard of flexible design with a high quality public realm.</li> <li>• The integration of trees, hedgerows and biodiversity into the layout and design and enhance blue/green infrastructure in the context of the Gatwick Woods Biodiversity Opportunity Area.</li> <li>• Minimising the impacts of lighting on neighbouring residences.</li> <li>• Respecting the setting of Listed Buildings and Locally Listed Buildings, the integration of ‘important’ hedgerows and retaining a green buffer along Balcombe Road.</li> </ul> <p>3.18 The environmental considerations relating to hedgerows and ecology, heritage and landscape / visual matters are addressed in the 2020 Appendices and subject to Addenda contained at <b>Appendices 3 - 7</b>. These Addenda confirm that the original recommendations remain valid in the context of the proposed allocation of Gatwick Green under Strategic Policies EC1 and EC4 and any other changes in circumstances.</p> <p>3.19 The specialist reports in the 2020 Appendices and the Addenda at <b>Appendices 3 – 7</b> contain a series of conclusions that confirm that the Site can be developed whilst respecting the various environmental values in and around it, and include recommendations on appropriate avoidance and mitigation measures in the context of the specific policies in the DCBLP in respect of environmental protection and enhancement<sup>8</sup>. These matters will be addressed at the planning application stage and set out in a Design and Access Statement.</p> <p><b>Impact Assessment</b></p>

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			<p>3.20 Strategic Policy EC4 requires an assessment to demonstrate how the SEL will address Crawley’s identified need for industrial focused business floorspace and how such will be complementary to key employment areas within Crawley, the HBP and other key planned strategic employment sites in the function economic market area (Crawley Borough, Mid-Sussex District and Horsham District).</p> <p>3.21 Savills Economics has undertaken an assessment of Industrial and Logistics (I&amp;L) market and its implications for the economic needs of Crawley9. The assessment looked at the importance of the I&amp;L sector to the national economy; the diversity of I&amp;L employment opportunities; the supply-chain and locational characteristics of I&amp;L development; the implications of the COVID-19 pandemic; the I&amp;L market signals for Crawley, and how these factors support the economic strategy in the DCBLP focused on optimising opportunities at Manor Royal alongside the industrial-led allocation at Gatwick Green, primarily for distribution and storage uses. The assessment concludes that various trends and factors are fuelling growth in the I&amp;L sector; the sector is growing in all areas of England; there is a paucity of opportunities for larger I&amp;L units in Crawley, and the Crawley market is very undersupplied when compared to similar markets, including those near to major airports. The assessment’s overall conclusion is that Gatwick Green can deliver new supply in an ideal location adjacent to the M23 and the UK’s second largest airport - it will also offer a scale of development that can include a focus on larger and very large units (&gt;100,000 sqft).</p> <p>3.22 Savills representation on Strategic Policy EC1 includes a review of the employment land supply in Crawley. It concludes that the land supply in the Employment Land Trajectory (ELT) has limitations related to the scale of industrial units it can accommodate and the segments of the market it can serve. This underlines the need for Gatwick Green to meet the market needs that are not catered for by the supply of sites mainly at Manor Royal, which is focused on smaller/medium and some large units. Gatwick Green will therefore focus on the need for strategic-scale storage and distribution uses aligned with occupier demand for buildings in the 100,000+ sqft range, which are unlikely to be accommodated at Manor Royal. Gatwick Green offers a premier location with high levels of accessibility and connectivity that can be developed in a sustainable manner so as to meet a key part of the outstanding Crawley-derived future employment needs in quantitative and qualitative terms.</p> <p>3.23 A more detailed analysis of the degree of complementarity between Gatwick Green and the other key employment areas in, and in the vicinity of, Crawley is included in a separate assessment by Savills Economics10. This analyses the market position of Manor Royal, the proposed Horley Business Park (HBP), the town centre the proposals for Gatwick Green, and the opportunities at each location. The findings show clearly how the business profile of each of the employment areas is clearly distinct and that the development opportunities they offer are very different, and in turn serve different segments of the industrial market. The analysis demonstrates the complementarity of Gatwick Green with these key employment areas, so supporting the Council’s objective that these areas will serve different sectors of the market in a complementary way (DCBLP, para 9.49).</p>

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			<p>3.24 The current evidence therefore supports the conclusion that there is a high level of complementarity between Gatwick Green and the other key employment areas in and close to Crawley. A further impact assessment will be undertaken at the planning application stage to confirm the position with regard to these policy tests.</p> <p><b>Delivery</b> <b>Policy requirements</b></p> <p>3.25 Strategic Policy EC4 requires planning conditions and obligations to ensure on-site and off-site physical, social and green infrastructure to control the delivery of development. These obligations will include economic impact testing, the delivery of the objectives of the Crawley Employment and Skills programme and the development of a masterplan in consultation with the Council to be advanced at the outline planning application stage to guide future detailed applications.</p> <p>3.26 As noted at paragraphs 3.20 – 3.22, Gatwick Green would complement the existing employment sites in Crawley and the wider area – biannual impact testing will be undertaken throughout the implementation period to comply with this requirement. In terms of employment and skills, it is envisaged that Gatwick Green will include a provision for education uses to support apprenticeships &amp; staff training, whilst an Employment and Skills Plan will be developed to source local labour for the construction and operational phases.</p> <p>3.27 A masterplan will be prepared taking account of the policy-level baseline surveys and investigations already undertaken for the DCBLP Examination. These will be supplemented by further detailed technical, urban design and environmental investigations to inform a comprehensive masterplan for the Site. For the purposes of the DCBLP Examination, a conceptual Development Framework Plan (DFP) has been prepared (<b>Appendix 8</b>), which illustrates the green framework for the Site comprising the adjacent priority habitat; peripheral hedgerows (including some classified as ‘important’); the extent of the Biodiversity Opportunity Area; the key transport corridors / hubs; the extent of the Airport’s main runway Public Safety Zone (PSZ), within which land uses are restricted, and areas where built development is likely to be accommodated. The DFP acknowledges all these key considerations and that they will indicatively inform the preparation of a masterplan.</p> <p><b>Deliverability – tenure, funding and viability</b></p> <p>3.28 TWG sets out its case in relation to the deliverability of Gatwick Green in its separate representations on the Employment Land Trajectory (ELT). These representations conclude as follows:</p> <ul style="list-style-type: none"> <li>• TWG controls all the land within the area allocated for Gatwick Green (as proposed to be amended in representations by TWG – this relates to addressing a mapping error by the inclusion of some small parcels of land owned by TWG within the allocation).</li> <li>• There is a small part of the site subject to an encumbrance on title – this would not materially affect the development of the site or the delivery of 24.1 ha or more of employment land.</li> </ul>

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			<ul style="list-style-type: none"> <li>Given the significant interest TWG has received from occupiers, investors and funders, it is confident that the proposals can be developed in a sustainable and comprehensive manner, subject to the site being allocated in the DCBLP.</li> <li>The Council's plan-wide viability assessment has concluded that <i>"The Gatwick Green site appears to have the potential to support a more certain or stronger viability outcome, with a wide range of our sensitive tests producing RLVs either well in excess of greenfield land values on the established EUV+ basis again, and values representing serviced, ready to develop industrial land (equivalent to PDL values) also potentially supportable."</i></li> <li>Savills Economics has undertaken a review of the Council's viability assessment (<b>Appendix 9</b>) which supports the Council's findings and concludes that <i>"We agree with the overall conclusion of the viability evidence that the proposed Gatwick Green allocation is deliverable and generates a Residual Land Value in excess of Greenfield Land Values of circa £250k per gross hectare, which we consider reasonable for high level viability testing. We do note however the upper Greenfield Land Value of £500k per gross hectare is higher than typically applied in Local Plan and CIL viability testing."</i></li> </ul> <p>3.29 Overall therefore, Gatwick Green is available and TWG has unencumbered ownership of all the land within the allocation area (as proposed to be amended in representations by TWG). TWG also has sufficient funding and will draw in additional funding via a development agreement / JV so that the finance is in place to ensure the Site can be developed in a sustainable and comprehensive manner. The Council's viability assessment and Savills review demonstrate that development as envisaged in DCBLP policy is viable and deliverable. TWG is therefore able to deliver the development of Gatwick Green in line with the provisions in Strategic Policy EC4.</p> <p>3.30 Paragraph 2.22 of TWG's representation on the Employment Land Trajectory (ELT) sets out TWG's intentions to advance a planning application in 2022 based on seasonal survey work and technical investigations that have commenced. The work will inform the preparation of a masterplan as required under Strategic Policy EC4 and other documentation necessary for an outline planning application. This further demonstrates the deliverability of the Gatwick Green proposals. The DCBLP righty contains no policy to constrain delivery timing or phasing, and so the earlier development of the Site would be supported by the Plan.</p> <p><b>Conclusions</b></p> <p>3.31 Overall, the technical and environmental evidence produced by TWG and contained in the 2020 Appendices and more recent assessment updates (<b>Appendices 2 – 7</b>) demonstrate that at a policy-level, there are no issues or matters that would mitigate against the comprehensive development of the Site, in accordance with the various development controls contained in Strategic Policy EC4 and other policies of the DCBLP, as noted. Indeed, all feasibility investigations to date indicate that the 24.1ha minimum requirement can be delivered in accordance with these requirements. The evidence therefore indicates that the Site can be developed in a highly sustainable</p>

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			<p>manner such as to promote a range of environmental, design and sustainability policy objectives, whilst delivering a viable scheme that can offer the range of benefits noted in this representation.</p> <p><b>4.0 The policy response</b></p> <p><b>Overview</b></p> <p>4.1 Strategic Policy EC4 of the DCBLP allocates Gatwick Green for an industrial-led Strategic Employment Location and sets out the requirements to ensure the Site can be developed in a sustainable manner. It identifies the Site for a <b>minimum</b> of 24.1 ha of new industrial land, predominantly for B8 uses.</p> <p>4.2 The Council has therefore responded positively to the shortfall in employment land availability in Crawley and to critical challenges facing the Crawley economy as a result of the COVID-19 pandemic by allocating Gatwick Green for strategic employment development under Strategic Policies EC1 and EC4. This allocation has been made recognising that retaining the Site for possible long term airport-related surface car parking would represent <i>“an inefficient use of the land”</i> in the context of:</p> <ol style="list-style-type: none"> <li>1. The Airport’s plans for decked and other more land efficient operations including robotic parking to serve its expansion plans under the proposed Development Consent Order (DCO).</li> <li>2. The Airport’s increasing switch to more sustainable modes of transport under its Surface Access Strategy (para 3.4.1, Topic Paper 2: Gatwick Airport, January 2021).</li> </ol> <p>4.3 TWG therefore broadly supports Strategic Policy EC4 and the range of development controls and other requirements relating to the need for impact assessments, planning conditions and obligations and a masterplan to guide the comprehensive development of the Site.</p> <p><b>Changes to supporting text in relation to employment land requirements</b></p> <p>4.4 As referred to in paragraphs 2.1 and 2.2 above, TWG supports the Council’s decision to express the employment land requirements as a <b>minimum</b> in Strategic Policies EC1 and EC4. TWG’s evidence in support of this policy response is set out in full in its representations on Strategic Policy EC1 – the evidence also supports the approach adopted in Strategic Policy EC4, which expresses the outstanding industrial land need of 24.1 ha as a <b>minimum</b>. Based on this evidence, it is proposed that the supporting text to Strategic Policy EC4 should be subject to some minor amendments to express the employment land requirements as <b>minimum</b> requirements over the Plan period. Other proposed minor changes to the policy are addressed below.</p> <p><b>Minor changes to Strategic Policy EC4 and supporting text</b></p> <p>4.5 It is considered that there is a planning case for some minor adjustments to Strategic Policy EC4 to ensure consistency within the policy, ensure there is some flexibility in the implementation/delivery of off-site infrastructure and to ensure clarity in meaning. There are four proposed such adjustments, which are set out below alongside the justification in planning terms.</p> <p><b><i>1. Consistency within Strategic Policy EC4 – strategic infrastructure</i></b></p>

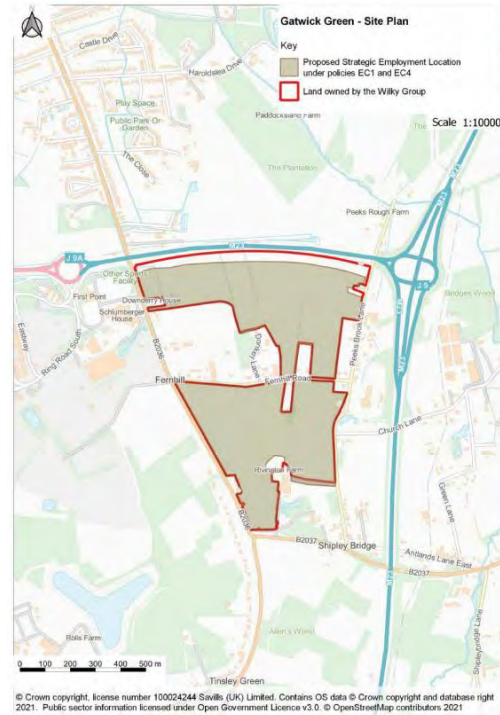
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			<p>4.6 Insofar as Strategic Policy EC4 is a 'strategic' policy within the meaning given in the NPPF (paras 17 &amp; 20-23), its provisions should also be 'strategic' in that they are of a strategic nature to guide and manage the development of the Strategic Employment Location. In the case of Strategic Policy EC4, there is an inconsistency in that the 'Requirements' in the policy are not explicitly stated as 'strategic'. It would, therefore, ensure consistency within the policy if these 'Requirements' were identified as 'strategic' – this will ensure they assume strategic importance, such that their delivery by the developer can be advanced in partnership with the Borough Council.</p> <p><b>2. Consistency with Strategic Policy EC4 – further industrial development</b></p> <p>4.7 There is a need to amend paragraph 9.54 to reflect the provisions in Strategic Policy EC4, which allow for further industrial development above the minimum 24.1 ha, provided that there is a justified need for such development. The paragraph currently states that such further industrial development, within the overall allocation of 47 ha, is restricted to complementary and ancillary uses where justified by evidence. In contrast, Strategic Policy EC4 contains no such proviso, clearly stating that any further industrial development would be above the 24.1 ha and thereby within the overall allocation area of 47 ha. The text of paragraph 9.54 should therefore be amended such that it is consistent with Strategic Policy EC4.</p> <p><b>3. Flexibility in the provision of off-site highway infrastructure</b></p> <p>4.8 The policy implies that off-site highway infrastructure associated with Gatwick Green can only be 'delivered' as part of the development, whereas in reality there may be other means of securing such infrastructure, for example through a scheme-specific or generic development contribution to fund such works or general improvements. Policy should not pre-judge the most appropriate approach. Instead, it should provide the flexibility to allow the most appropriate approach to be adopted, which will in turn more fully support the delivery of the allocation.</p> <p>4.9 Planning Practice Guidance (PPG) states that developers may be asked to provide contributions for infrastructure in several ways (Paragraph: 003 Reference ID: 23b-003-20190901). Therefore, on this basis and in order to maintain flexibility, Strategic Policy EC4 and paragraph 9.59 should therefore be amended to provide for a flexible approach to the provision of infrastructure associated with the development of Gatwick Green.</p> <p><b>4. Clarity in relation to the application of sustainable transport contributions under s106</b></p> <p>4.10 Strategic Policy EC4 states that as Gatwick Green will be required to address its own highway impacts, a s106 sustainable transport contribution will not be sought. This approach is supported by TWG, but it needs to be made clear that this contribution relates to that identified through the formula contained in the Planning Obligations Annex. As worded in the policy, it could exclude other one-off contributions towards sustainable transport related to addressing the specific impacts of Gatwick Green. This clarification can be provided through a minor amendment to paragraph 9.59 of the DCBLP.</p> <p><b>Interface between Gatwick Green and Safeguarded Land</b></p>

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			<p>4.10 Evidence is set out in TWG's representation on Policy GAT2 (Safeguarded Land) to justify complementary and compatible amendments to Policy GAT2 and Strategic Policy EC4 to bring about a more resource and land-efficient approach to the planning of highway infrastructure to serve Gatwick Green and the possible addition of a wide-spaced southern runway for Gatwick Airport. These changes would enable the Safeguarded Land south of the M23 spur road to accommodate the northern on-site access road to serve Gatwick Green, without prejudicing GAL's ability to bring forward the highway infrastructure associated with the development of an additional wide-spaced runway. The approach would not only reduce the number of roads in the same broad corridor from three to two, but would also enable one of those roads to serve a dual purpose (with some modest upgrading) for Gatwick Green, and for surface access arrangements associated with a possible future wide-spaced runway (diversion of Balcombe Road). The approach has been discussed with Gatwick Airport Limited and a statement setting out progress on those discussions is appended to TWG's representation on Policy GAT2.</p> <p><b>Amendments to the extent of the SEL allocation and Safeguarded Land</b></p> <p>4.11 The site plan submitted as part of TWG's representations on the DCBLP 2020 (March 2020) contained three mapping errors with regard to the land owned by TWG. Two small parcels of land north west of Rivington Farm and adjacent to Royal Oak House owned by TWG were erroneously omitted from the land shown on the plan as being owned by TWG. In addition, the Council has in error omitted a parcel of land owned by TWG from the allocation – this relates to a parcel of land fronting Peeks Brook Lane north of Royal Oak House. It was Crawley Borough Council's intention to allocate all of the land owned by TWG under Strategic Policy EC4 (except the Safeguarded Land south of the M23 spur road), but owing to the mapping errors, parts of the land near Rivington Farm and Royal Oak House were omitted from the allocation and inadvertently included as Safeguarded Land. The parcels of land are shown on the plan at <b>Appendix 10</b>.</p> <p>4.12 This error only affects 5,589 sqm (0.56 ha) of land - the inclusion of these areas would result in a very minor loss of Safeguarded Land. Based on evidence provided by Mott Macdonald on the need for Safeguarded Land for airport-related surface car parking (Appendix 3 to TWG's representation on Policy GAT2 (Safeguarded Land)), it is considered that the loss of these small areas of future surface car parking would not prejudice the future development of an additional wide-spaced runway and associated surface access requirements. It is therefore proposed that in order to effect an efficient use of land resources and the proper and effecting planning of the area, the draft Local Plan Map should be adjusted to correct these mapping errors.</p> <p>4.13 There is also a discrepancy between the land safeguarded between the Gatwick Green allocation and the M23 spur road – details of this discrepancy are set out in paragraph 3.3 of TWG's representation on Policy GAT3 (Safeguarded Land). This has resulted in a mapping error in respect of the amount of land required to be safeguarded south of the M23 spur road to accommodate all of GAL's future additional runway related access infrastructure. The result is that the Safeguarded Land in this area is not sufficient to accommodate all the surface access infrastructure associated with the possible additional wide-spaced runway, comprising new slip roads from</p>

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the M23. The revised extent of this Safeguarded Land is shown on the plan at **Appendix 11**. It is therefore proposed that the draft Local Plan Map should be adjusted accordingly to correct this additional mapping error.



**Appendix 2 – Outline Transport and Access Appraisal**

1.0 Introduction Background

1.1 This transport appraisal has been prepared by Empiric Partners and i-Transport (the transport consultants) on behalf of the Wilky Group (TWG). It provides a supporting Appendix to the representation by Savills relating to Strategic Policy EC4, Strategic Employment Location, in the Draft Crawley Borough Local Plan, 2021 (DCBLP). It specifically addresses the ‘Movement and Accessibility’ provisions within Strategic Policy EC4 (provisions c – h) and sets out, at a policy level, how the proposals for Gatwick Green will comply with these provisions.



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			<p>1.2 TWG owns about 48 ha (119 acres) of land east of Gatwick Airport. The land has been promoted by TWG as a strategic employment opportunity known as Gatwick Green (the Site). The Site is proposed for allocation as a Strategic Employment Location (SEL) of 47 ha (116 acres) in the DCBLP under Strategic Policy EC4 as a comprehensive industrial-led development of predominantly storage and distribution uses under use class B8.</p> <p>1.3 This appraisal should be read in conjunction with the Crawley Transport Study Report (CTSR - Transport Study of Strategic Development Options and Sustainable Transport Measures). The CTSR specifically considers a n industrial-led Strategic Employment development at Gatwick Green of predominantly B8 storage and distribution uses: this is reflected in the central scenario tested by the Council's consultants (Stantec) (Scenario 2), comprising of 77,500 square metres (SQM) (GFA) split into: B8 Parcels Distribution (10%), B8 Commercial Warehousing (60%) B2 Industrial estate (30%). Strategy</p> <p>1.4 The overall transport strategy for the Gatwick Green proposal is based on a philosophy which requires the application of an accessibility 'hierarchy': which assumes that, for employees, there will be a priority order of transport mode based on cycling/walking, bus, train and then private car. This ensures that the emphasis is placed first on sustainable transport modes before transport by private-car. This Appendix confirms that the proposed development meets the criteria defined in Strategic Policy EC4, specifically to ensure that:</p> <ul style="list-style-type: none"> <li>• A Transport Assessment will be provided to demonstrate that appropriate access can be provided to the Site;</li> <li>• A Mobility Strategy is prepared to show optimisation in the use of sustainable modes;</li> <li>• Infrastructure improvements can be identified to mitigate development impacts;</li> <li>• Improvements to public transport infrastructure are defined;</li> <li>• Upgrades to cycle and pedestrian facilities are achievable; and</li> <li>• Appropriate levels of on-site parking are provided in the context of the approach to sustainable transport.</li> </ul> <p>1.5 The freight movements associated with the proposed uses can only use HGV-borne transport, requiring this traffic to be accommodated on the existing highway network in the most sustainable manner. Over time, the continued switch to hydrogen-powered HGVs, (which is expected to become common place over the early years of operation at Gatwick Green), will significantly improve the sustainability profile of this traffic.</p> <p>1.6 The development scheme will be designed in accordance with the mitigation strategy identified within the CTSR and will bring forward a package of measures aimed at delivering non-car access as a priority, whilst ensuring the local highway network can accommodate predicted vehicular traffic. Whilst some car-borne traffic is inevitable, measures will be put in place to ensure trips are completed as sustainably as possible and that these measures assist with improving conditions for all users at a local level to encourage modal shift.</p> <p>1.7 This appraisal is not intended to fulfil the requirements of a Transport Assessment, (TA) but does provide a policy-level appraisal of the impacts of the scheme, and related mitigation, using parameters which typically form the basis of a TA and which have been discussed with West Sussex County Council as Highway Authority whilst also</p>

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			<p>taking account of the findings of the CTSR. It therefore defines an access and mobility strategy which demonstrates that the Site can be accessed in a sustainable manner and that there are no major transport constraints or impediments which would prevent development of the Site. Transport Assessment</p> <p>1.8 Following consultation with the relevant local authorities and stakeholders, a full Transport Assessment and Mobility Strategy will be provided in support of a Planning Application.</p> <p>1.9 The Transport Assessment will be undertaken in accordance with the requirements of the National Planning Policy Framework (NPPF) and the National Planning Practice Guidance (NPPG) and, more particularly, the three critical tests outlined in paragraph 108 of the NPPF which require that:</p> <ul style="list-style-type: none"> <li>• Safe and acceptable access can be provided to the Site for cars, HGVs, pedestrians, cyclists and public transport;</li> <li>• Through best practice design and a package of mitigation measures, the existing sustainable travel options will be enhanced and opportunities for sustainable travel will be taken up; and</li> <li>• Impacts will be suitably mitigated through a package of pedestrian, cycle, public transport and highway capacity improvements, ensuring that there will not be a 'severe' residual cumulative transport impact.</li> </ul> <p><b>Report structure</b></p> <p>1.10 The remainder of this report is structured as follows:</p> <p>Section 2 – sets out the details of the proposed access strategy;</p> <p>Section 3 – sets out the outline mobility strategy to show how the development will optimise the use of sustainable modes of transport;</p> <p>Section 4 – provides an indication of improvements to public transport facilities and infrastructure;</p> <p>Section 5 – identifies potential upgrades and extensions to pedestrian/cycle routes;</p> <p>Section 6 – demonstrates that consideration has been given to the impacts of the development on the highway network along with some initial assessment of the infrastructure improvements required to avoid or mitigate such impacts;</p> <p>Section 7 – confirms that appropriate levels of on-site parking will be provided; and</p> <p>Section 8 – Summarises the findings and conclusions.</p> <p><b>2.0 Access Strategy</b></p> <p>2.1 The Site has ample frontage onto Balcombe Road, both north and south of Fernhill Road, as well as frontage onto Antlands Lane. It is currently proposed that two separate access points will be provided into the Site from Balcombe Road. There is no direct access planned to the M23, M23 spur or Junction 9A of the M23 spur. The</p>

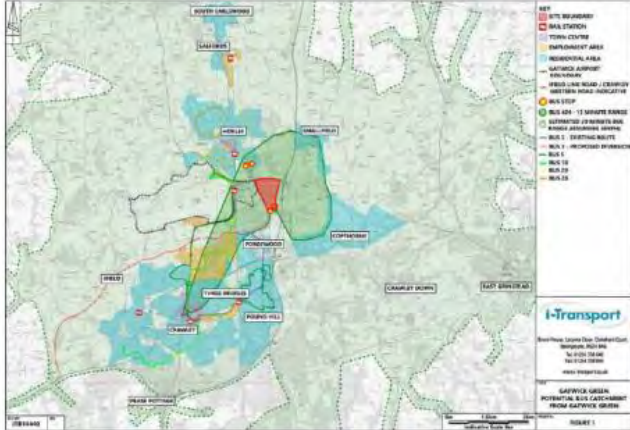
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			<p>location of the access points is shown in the Development Framework Plan (DFP) forming Appendix 8 to Savills representation on Strategic Policy EC4.</p> <p>2.2 The two junctions would be linked by an internal spine road providing an HGV and all vehicular corridor through the Site. A separate access will be provided for a Sustainable Transport Corridor (STC) for pedestrians, cyclists and possibly buses. This will provide a safe route through the Site for these modes of travel and thereby promote alternatives to the private car.</p> <p>2.3 This access strategy is in line with the modelling contained within the Crawley Transport Study Report (CTSR).</p> <p>2.4 The STC will also be served by two public transport / mobility hubs that will enable safe and efficient transfer from bus / cycle modes to pedestrian mode, including a potential range of transfer facilities (bicycle racks, shelters, real-time information etc) to ensure a high level of service.</p> <p>2.5 All junctions have been designed to accord with the latest guidance and best practice. The accesses have been sized, (and modelled) to accommodate likely traffic flows associated with the proposed development. This is based on trip generation rates, derived from TRICS, which will be reviewed as the mobility strategy progresses.</p> <p>2.6 The development is likely to be constructed on a phased basis, with the necessary infrastructure being delivered at the time it is required. Given the recent changes in travel behaviour, as well as anticipated changes in the way in which mobility is considered, the Council's infrastructure delivery plan should be as flexible as possible. This is in line with latest 'Decide and Provide' guidance promoted by TRICS.</p> <p><b>Northern Access</b></p> <p>2.7 Access to the northern section of the Site will be provided by a new all moves signal junction arrangement. The proposed junction is currently designed to maximise capacity by the provision of two lanes at the stop line on each approach. The CTRS has identified that, by restricting HGV movements at the northern junction, the impacts arising from increases in HGV traffic on Balcombe Road north of the Site and therefore within Horley can be reduced. The need for such restrictions will be considered within any Transport Assessment in support of the Site.</p> <p>2.8 Almost immediately opposite the proposed junction is a gated and unused access from Balcombe Road onto Buckingham Gate, which provides onwards access to the Gatwick Airport Road network. The Gatwick Green strategy does not prejudice the reinstatement of this access for pedestrians and cyclists accessing the South Terminal, or the significant benefits that could be derived if the access were reinstated for buses. It is acknowledged that the reinstatement of this access will require collaboration between West Sussex County Council, Gatwick Airport and Crawley Borough Council. This is not critical to achieving an acceptable transport strategy for the Site but does offer some wider benefits and so is supported by TWG.</p> <p><b>Southern Access</b></p>

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			<p>2.9 Access for general traffic into the southern section of the Site will be provided by a new three arm roundabout on Balcombe Road. This would be the primary access point to the Site, given the propensity for most traffic to arrive from/depart to the south.</p> <p>2.10 Where necessary, it is proposed that the junction would accommodate new and improved pedestrian and cycle facilities.</p> <p><b>Antlands Lane Access</b></p> <p>2.11 There is also an opportunity to provide access to Gatwick Green from Antlands Lane using the frontage of Balcombe Road and Antlands Lane. The development at Forge Wood has identified potential improvements at this junction in the form of signalisation. These improvements are included within the CTRS modelling. The delivery of Gatwick Green could bring forward additional land to further improve the junction, including the provision of priority to buses, pedestrians and cyclists.</p> <p><b>Operational Assessments</b></p> <p>2.12 Initial assessments of the northern and southern access points identified above have been undertaken. These are based on anticipated future traffic flows on Balcombe Road, including those associated with the allocation of the Horley Business Park (HBP) under Policy HOR9 of Reigate &amp; Banstead Borough Council's Development Management Plan (DMP): this involves a proposed primary access via junction 9a of the M23 and very limited traffic access via Balcombe Road.</p> <p>2.13 The northern and southern Site access junctions will be designed to work within their theoretical design capacities providing for future year traffic, with the additional trips generated by development at Gatwick Green (GG). The northern junction (signalised) is the most sensitive of the two, although there are no fundamental concerns in catering for the anticipated demand, whilst accommodating pedestrian, cycle and bus priority.</p> <p>2.14 The north and south junctions would provide a high-quality access to the new development and critically, would do so without generating any significant detriment to the operation of Balcombe Road.</p> <p><b>Construction phase</b></p> <p>2.15 Any planning application will be accompanied by a Construction and Environmental Management Plan (CEMP), which will ensure that all the junctions and the proposed construction phase of the 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.</p> <p><b>Summary</b></p> <p>2.16 In the context of the NPPF transport tests, it is demonstrated that the Site benefits from two main deliverable points of access, plus a dedicated entry/exit point for cyclists and pedestrians, ensuring safe and suitable access to the Site can be delivered for all modes.</p>

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			<p><b>3.0 Mobility Strategy</b></p> <p>3.1 TWG is committed to delivering a Mobility Strategy in line with the aspirations of both WSCC and CBC to establish a multi-modal, comprehensive and flexible Sustainable Transport Network.</p> <p>3.2 The Mobility Strategy will draw on the excellent location of the Site to deliver development which can be accessed via a range of travel modes, with public transport, walking and cycling at its heart.</p> <p>3.3 The location of new development in proximity to existing residential areas will reduce levels of “out-commuting” and, therefore, the length of trips, through the provision of a range of high-quality employment opportunities which will diversify and improve the skill-base of residents in Crawley and its immediate neighbours.</p> <p>3.4 Given it’s 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. Targeted improvements to pedestrian and cycle routes will also benefit both existing residents and future travellers to Gatwick Green.</p> <p>3.5 Transport and access for 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 and digital travel platforms and to deliver Virtual Mobility.</p> <p>3.6 The proposed approach to access, traffic impacts and sustainable transport are subject to ongoing discussions with Local Highway Authorities of West Sussex and Surrey County Councils, (WSCC and SCC); Highways England (HE); Crawley Borough Council (CBC), and the local Fastway and bus operator, Metrobus. In preparing this work the following transport policies and documents were considered:</p> <ul style="list-style-type: none"> <li>• Draft Crawley Borough Council Local Plan 2020 – 2035;</li> <li>• The Local Transport Plans of Crawley Borough Council (CBC) and West Sussex County Council;</li> <li>• The proposals within the Crawley Borough Council (CBC) Growth Programme;</li> <li>• New Directions for Crawley - Transport and access for the 21st century (Crawley Borough Council) (March 2020);</li> <li>• The recently published Gatwick Airport Master Plan (GAMP, 2019), which proposes the use of the existing emergency runway (take-off only) as an operational runway for regular use in dependent operating modes with the existing main runway;</li> <li>• The Development Consent Order (DCO) (Scoping Opinion) for the expansion of Gatwick Airport through use of the standby runway as submitted (28 August 2019). The currently identified improvements are noted and any additional information will be examined, and proposals considered as the DCO progresses. It is recognised that the impact on aviation of the global pandemic may influence work on the DCO. This will be considered in preparing the Transport Assessment for the planning application;</li> </ul>


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			<ul style="list-style-type: none"> <li>• The committed and proposed measures which form part of the Coast to Capital Growth Fund and those indicated in the Gatwick 360 Strategic Economic Plan;</li> <li>• The emerging Transport Strategy for the South-East;</li> <li>• The Network Rail improvements to Gatwick Railway station;</li> <li>• Priorities and future aspirations of the transport network providers and operators;</li> <li>• The committed and proposed development in the area, which includes promoted strategic schemes at pre-planning stage;</li> <li>• Guidance and best practice, including Manual for Streets (MfS) and Manual for Streets 2 (MfS2);</li> <li>• Gear Change – A bold vision for Walking and cycling (DT – July 2020);</li> <li>• Decide and Provide Guidance (TRICS March 2021); and</li> <li>• Various papers on changing travel behaviours and likely future travel patterns.</li> </ul> <p>3.7 The current Covid-19 crisis is having profound effects on traffic volumes, travel patterns and the economy. The precise impacts and the long-term changes which occur as the UK enters a ‘new normal,’ are not known at this early stage, (June 2021).</p> <p>3.8 The approach adopted by TWG is described in the following sections and confirms that in the context of the NPPF Transport tests, there will be enhanced opportunity for sustainable travel, attracting new users and simultaneously discouraging travel by private car. 3.9 The approach promoted by TWG accords with the modelling assessment undertaken by Crawley to support the Local Plan, as summarised in the Transport Study of Strategic Development Options and Sustainable Transport Measures Report (CTRS), which is supported by New Directions for Crawley – Transport and access for the 21st century, March 2020. In this context, the overarching objectives of the Mobility Strategy will be to: • Provide a masterplan with sustainable movement at its heart, including a Sustainable Transport Corridor (STC) with dedicated pedestrian, cycle and public transport provision alongside public transport / mobility hubs; • Promote the extension of the Fastway development programme; • Link the Site to existing public transport infrastructure and the three local railway stations; • Improve walking and cycling infrastructure in the local vicinity and link the Site to the network of routes to be delivered through Crawley’s Local Cycling, Walking, and Implementation Plan (LCWIP); • Contribute towards the delivery of the LCWIP; • Encourage users of the proposed development as well as encourage residents from developments such as Forge Wood and Steers Lane to use these facilities rather than the car; and • Promote sustainable travel options through a comprehensive Travel Plan.</p> <p><b>4.0 Public Transport Facilities</b></p> <p><b>Bus Travel</b></p>

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			<p>4.1 Bus stops are located 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.</p> <p>4.2 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 distance and are served by route 26, which provides four services a day on Mondays, Wednesdays and Fridays. These provide a route to Horley and the nearby suburbs. The bus stop on Antlands Lane 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.</p> <p>4.3 While there are bus services which operate within the local area, due to limited development in the immediate vicinity of the Site, the local bus infrastructure is limited. Figure 1 (also included in Appendix A) summarises a potential bus catchment assuming up to 15 and 30 minute journey times to the Site.</p> <p><b>Figure 1 - Potential Bus Catchment Area for Gatwick Green</b></p>  <p><b>The Bus and Fastway Strategy for Gatwick Green</b></p> <p>4.4 The operator of bus services and Fastway in Crawley has been consulted and is closely involved in the development of the basis for a Bus and Fastway Strategy for Gatwick Green. As such an endorsement has been received from Patrick Warner, Head of Innovation Strategy at Metrobus in an email which contains the following statement: "It is with great pleasure that we are able to confirm that we have been collaborating with Wilky Group and Empiric Partners in the creation of a draft transport strategy to support the proposed Gatwick Green development. Our shared vision as detailed in their strategy mentions zero emission buses, the future evolution of</p>

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			<p>the highly successful Fastway network and the upcoming delivery of the first 'Superhub' mobility hub concept in Manor Royal. These are all high quality complimentary public transport assets that are subscribed to fully by us and a wide coalition of local stakeholders. We look forward to the opportunity to continue to work with Wilky Group, Empiric Partners, the planning and highway authorities to ensure that they are taken forward during any forthcoming planning process for Gatwick Green". (Patrick Warner, Metrobus, 15th June 2021).</p> <p>4.5 The strategy has four components, each designed to improve services, increase demand amongst existing travellers and form lasting "habits" amongst those working and visiting the new development at Gatwick Green. The four components are:</p> <ol style="list-style-type: none"> <li>1. Strengthening existing services to offer an improved frequency and greater flexibility to those living and working along the Balcombe Road corridor or those travelling to origins and destinations within the Gatwick area. This could include: <ol style="list-style-type: none"> <li>a. The existing service number 3 (Crawley Town Centre - Forge Wood - Gatwick South Terminal) being extended and diverted into the Site;</li> <li>b. Fastway 10 being extended to serve the Site; and</li> <li>c. Further opportunities to extend bus services 4 and 5 to serve the development.</li> </ol> </li> <li>2. To provide a safe and prioritised route for buses travelling through the heart of the new development, offering faster journey times to encourage greater use of services as part of CBC's wider aspirations to deliver Fastway across the Borough. This could be delivered via: <ol style="list-style-type: none"> <li>a. Dedicated access e.g., bus gate, priority incorporated into the junctions and on the approaches to Site access junctions.</li> <li>b. An internal site layout designed to incorporate the extension of the Fastway network through the provision of priority to buses, with a Sustainable Transport Corridor through the Site.</li> </ol> </li> <li>3. To deliver mobility hubs which significantly improve waiting facilities and achieve better integration between active and carbon-neutral modes of travel and public transport services.</li> <li>4. To ensure that Gatwick Green is a key player in the creation of high quality connections between new residential and employment areas, including links with Reigate and other nearby centres in line with CBC aspirations.</li> </ol> <p>4.6 The investment in zero carbon vehicles by Metrobus, in conjunction with CBC and other partners, has offered a key to improvements in air quality and an illustration of the benefits of transferring journeys by private car to public transport. Gatwick Green will promote this evolutionary approach, by providing a new development which recognises the climate change agenda and supports the delivery of high quality public transport services and their integration with active and carbon-neutral modes of travel.</p>




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			<p>4.7 The approach to providing twin accesses onto Balcombe Road/Antlands Lane, offers an 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 residents and businesses and potentially new development along the route towards Horley.</p> <p>4.8 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 investment and the provision of new infrastructure. 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 District ) and the planned Horley Business Park.</p> <p>4.9 Within the Site, on the Sustainable Transport Corridor (STC), small public transport / mobility transport hubs and/or 'Super Hubs' will be developed. An illustration is provided below at Image 1.1. 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 potentially have expanded facilities such as shelters, Wi-Fi, phone charging, coffee outlet, charging and storage for electric bike and electric scooters (subject to legislation).</p> <p style="text-align: center;"><small>Image 1.1. – Public Transport / Mobility Hub</small></p>  <p>4.10 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.</p> <p><b>Rail Travel</b></p> <p>4.11 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 is located to the south.</p> <p>4.12 The Local Plan supporting evidence refers to station improvements at Crawley and Three Bridges which are included within the Crawley Growth Programme, while Gatwick Airport station is to be significantly improved and</p>

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			<p>upgraded, alongside improved access to local Fastway bus services. These improvements will enhance the transport interchanges and help achieve modal shift from the private car.</p> <p><b>Gatwick Airport Station</b></p> <p>4.13 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.</p> <p>4.14 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 and connections to the airport terminals and passenger wayfinding will be upgraded.</p> <p>4.15 It is possible to access the station from Gatwick Green via existing pedestrian facilities and via Ring Road South, as well as via the Public Right of Way network using Footpath 359Sy. The station is also within easy cycle distance from the Site, via relatively quiet roads.</p> <p><b>Horley Railway Station</b></p> <p>4.16 Horley Railway Station is located some 2.3km from the centre of the Site and provides the opportunity to travel on the rail network with direct links to a variety of stations including Peterborough, London Bridge and Horsham. 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. 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.</p> <p><b>Three Bridge Railway Station</b></p> <p>4.17 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 stations. Three Bridges has a station car park in addition to 276 cycle spaces. 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.</p> <p><b>Station Accessibility Improvements</b></p> <p>4.18 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.</p> <p><b>5.0 Walking and Cycling</b></p>

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			<p><b>Walking</b></p> <p>5.1 The National Travel Survey (NTS) 2019 identifies the mode share of journeys of different lengths: the majority (80%) of trips are undertaken on foot for journeys up to one mile. The data also shows that approximately 31% of journeys between one and two miles (3.2 km) will be on foot i.e., a significant proportion of people are prepared to walk for journeys up to two miles.</p> <p>5.2 The Chartered Institution of Highways and Transportation (CIHT) guidance 'Planning for Walking' (2015) further states that: "Across Britain, approximately 80% of journeys shorter than 1 mile are made wholly on foot – something that has changed little in 30 years. The main reason for the decline in walking is the fall in the total number of journeys shorter than 1 mile, which has halved in thirty years. It is not that people are less likely to make short journeys on foot but rather that fewer of the journeys they make can be accomplished on foot. If destinations are within walking distance, people are more likely to walk if walking is safe and comfortable and the environment is attractive."</p> <p>5.3 Locating employment within one mile (1.6km) of residential development and local facilities and services will provide the greatest opportunity for trips to be made by foot. One mile is not however, the maximum that people are prepared to walk, it is clear from the NTS data that around one-third of journeys between one and two miles are undertaken on foot.</p> <p>5.4 Figure 2 (also included as Appendix A ) shows a typical walk distance of 15 and 20 minutes from the Site. It is evident that the development is within one mile (1.6km) of existing (Horley and Tinsley Green) and emerging development areas (Forge Wood and Steers Lane), which will provide the greatest opportunity for a significant proportion of trips to be made on foot.</p>

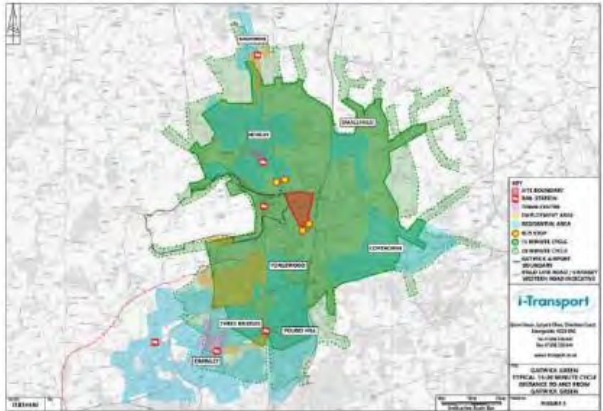
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			<p><b>Figure 2 - Typical 15-20 minute Walk distance to / from Gatwick Green</b></p>  <p><b>Cycling</b></p> <p>5.6 Data provided within the National Travel Survey (NTS) demonstrates that the average distance per journey by bike is approximately 4.4km, with the current average length of an employment and leisure cycle trip some 5.2km. On this basis, a cycle distance of 5km is considered reasonable.</p> <p>5.7 Furthermore, more people are acquiring e-bikes, which enable greater distances to be covered in shorter times travel. E-bikes are particularly useful for people who, for example, need to ride in business clothes, to ride up hills, to travel long distances, or who are older or less fit and discouraged by the physical effort of an ordinary bike. Journeys by e-bike of up to 8km are not uncommon. Figure 3 (also included as Appendix A) shows a typical cycle distance of 15 and 20 minutes to the Site.</p>

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Figure 3 - Typical 15-20 minute cycle distance to and from Gatwick Green



**Public Right of Way Network**

5.8 There are several public rights of way in the local area (Image 1.2). 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 continues 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, providing traffic free routes between residential areas and existing and future employment. This will both reduce the need for people to travel by private car and enhance the opportunity for sustainable travel modes to be taken up.

Image 1.2 - Existing Public Rights of Way



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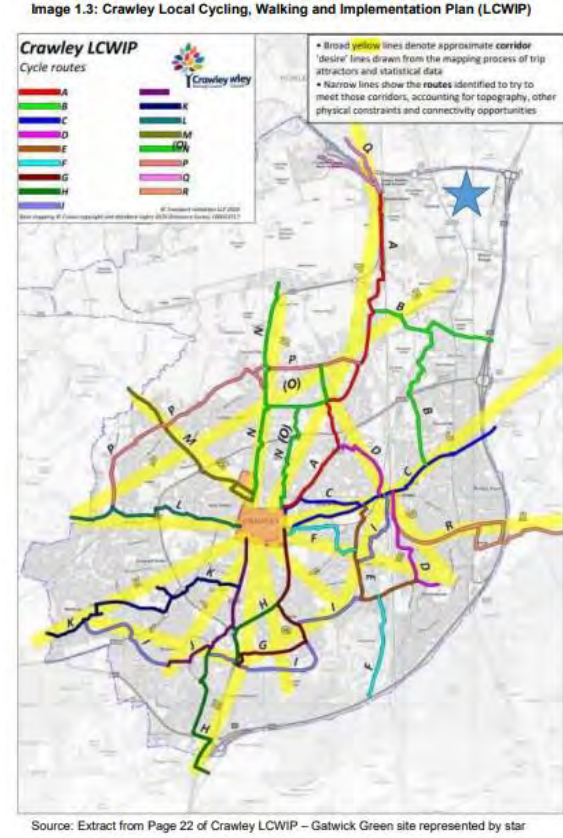
**Local Cycling, Walking, and Implementation Plan (LCWIP)**  
 5.9 The Government’s first Cycling and Walking Investment Strategy (CWIS) (published in 2017) set out initiatives to make walking and cycling the natural choice for shorter journeys or as part of a longer journey. LCWIPs are a new strategic approach to identifying cycling and walking improvements required at the local level and enable a long-term approach (ideally over a 10- year period) to developing local cycling and walking networks. They form a vital part of the Government’s strategy to increase the number of trips made on foot or by cycle. The Crawley LCWIP identifies functional, direct routes and zones and outlines measures to develop these into a connected network. It will inform the new Local Plan, guiding building development, and is an important contribution to New Directions for Crawley, the council’s transport and access plan.

5.10 As stated in the Crawley Transport Study, “Investment in walking and cycling infrastructure to access key destinations and public transport services, will lead to greater uptake in active travel, healthier lifestyles, reduced carbon emissions, improved air quality, and a reduction in traffic volumes.”

5.11 The Gatwick Green site is ideally placed to link into and assist in the delivery of pedestrian and cycling links, especially those identified within the Crawley Local Cycling, Walking, and Implementation Plan (LCWIP). An extract from the Crawley LCWIP, (image 1.3) is provided below.

5.12 There are opportunities to improve walking and cycling facilities on Balcombe Road to the north and south of the Site, with the potential to link the Site to the proposed routes A and B. 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 complementary employment areas of Manor Royal and Gatwick Airport.

5.12 These opportunities align with the modelling associated with the Crawley Transport Study Report. The detail of these routes will be included within the Transport Assessment following consultation with relevant stakeholders.



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			<p><b>Summary</b></p> <p>5.13 The promotion of walking for short trips and cycling for increasingly longer distances, (because of the emergence of powered cycles), alongside conventional and demand responsive public transport networks is important and forms a key part of the Authorities' ambitions. It is central to The Crawley Transport Strategy, 'New Directions' and Crawley Growth Programme. The transport strategy for Gatwick Green includes:</p> <ul style="list-style-type: none"> <li>• Providing high quality walking and cycling routes within the Site. The delivery of facilities in line with latest guidance will prioritise and encourage travel via the walking and cycling network, reducing dependency on travel by private motor vehicles;</li> <li>• Plugging the 'missing gaps' on Balcombe Road and local roads to improve walking and cycling facilities;</li> <li>• Local upgrades to cycle and pedestrian facilities in the vicinity of the area as well as improving Public Rights of Way;</li> <li>• Providing improved connections to existing and proposed walking and cycling improvement schemes; and</li> <li>• Contributing towards the delivery of the Crawley Local Cycling and Walking Infrastructure Plan.</li> </ul> <p>5.14 As such, the proposal will contribute towards a defined strategy to link existing and developing residential areas, employment opportunities and day-to-day facilities, within Crawley town centre, Horley, Forge Wood, Manor Royal, Three Bridges and Gatwick Airport in line with '15 minute Neighbourhood' principles.</p> <p>5.15 This will enable the development of infrastructure and transport services that cater for carbonneutral modes of travel, potentially reducing reliance on the private car and in line with the concept of Mobility as a Service (MAAS), and the Governments ambition for a step-change in the number of walking and cycling trips undertaken daily.</p> <p><b>6.0 Traffic Impact and Infrastructure Improvement</b></p> <p>6.1 In advance of a full Transport Assessment, initial junction capacity assessments have been undertaken for the local highway network.</p> <p>6.2 This is based on traffic surveys completed in January 2020 (following agreement with WSCC that they represent typical operating conditions). These counts are worse case, since they were undertaken at a time when the economy was functioning normally, prior to the Covid-19 crisis. It is likely that there was higher than usual demand on Balcombe Road and surrounding roads in response to the ongoing traffic management on the M23 associated with the implementation of the Smart Motorways scheme.</p> <p>6.3 Future year traffic forecasts were derived which included planned and committed development at, Forge Wood; Steers Lane, and Copthorne.</p> <p>6.4 Based on the traffic generation, assignment and distribution, local junctions in the vicinity of the Site were tested using industry standard modelling tools. The identified capacity issues generally occur in the peak hour and for short periods, where there is a "mini" peak within that period. On this basis, it is reasonable to conclude that</p>

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			<p>investing in a scheme to alleviate peak hour capacity is not an efficient use of capital funding. An alternative approach, (consistent with CTSR) would focus on investment in schemes which promote modal shift and provide benefit throughout the day and have more positive merit in delivering improvements to public transport and active travel modes.</p> <p>6.5 Rather than follow an exclusive 'Predict and Provide' approach to addressing capacity issues, the Gatwick Green mobility strategy is designed to follow the 'Decide and Provide' philosophy in a way which complements the aspirations of WSCC and CBC. In this context it is pertinent to understand how changes in travel patterns and future opportunities will impact upon demands and to develop a range of plausible scenarios which can be developed and tested, to understand their impacts on the surrounding transport network.</p> <p>6.6 The strategy for the Site is, therefore, to consult with the local highway authorities (WSCC and SCC) and Crawley Borough Council (CBC) to derive a holistic approach to mobility in the area, which may include proposals for some additional highway capacity schemes where appropriate. Crawley Transport Study Report (Transport Study of Strategic Development Options and Sustainable Transport Measures Draft Crawley Local Plan 2021 - 2037) (December 2020)</p> <p>6.7 Crawley published its study into the impact of the development proposed in the Local Plan in May 2021. The report specifically considers an industrial-led development of predominantly storage and distribution uses under use class B8 at Gatwick Green, comprising of 77,500 square metres (SQM) (GFA) split into: B8 Parcels Distribution (10%), B8 Commercial Warehousing (60%) B2 Industrial estate (30%). This is referenced as Scenario 2 within the modelling report.</p> <p>6.8 The Report (CTSR) identifies the impacts likely to arise for planned development when no interventions are included and then considered mitigation in the form of modal shift resulting from improvements to pedestrian, cycling and public transport facilities. Additional measures which could reduce the demand for the private car and further encourage modal shift are also considered; however, these are not considered within the future year modelling assessment. Where these interventions do not address congestion hotspots, additional 'capacity' improvements are identified, either in the form of modest junction amendments, or improvements to signal timing and equipment.</p> <p>6.9 The 'Decide and Provide' approach set out in the CTSR is in line with the latest thinking and Government Policy, aimed at delivering sustainable interventions before physical capacity improvements. The mitigation identified builds on the existing Fastway network within Crawley and the already identified and costed improvements to walking and cycling as set out in the LCWIP.</p> <p>6.10 Section 7.8 of the report identifies that the unmet demand at almost all junctions analysed can be addressed through sustainable mitigation measures. These measures would include:</p> <ul style="list-style-type: none"> <li>• Limited bus priority measures to increase uptake of bus ridership;</li> </ul>

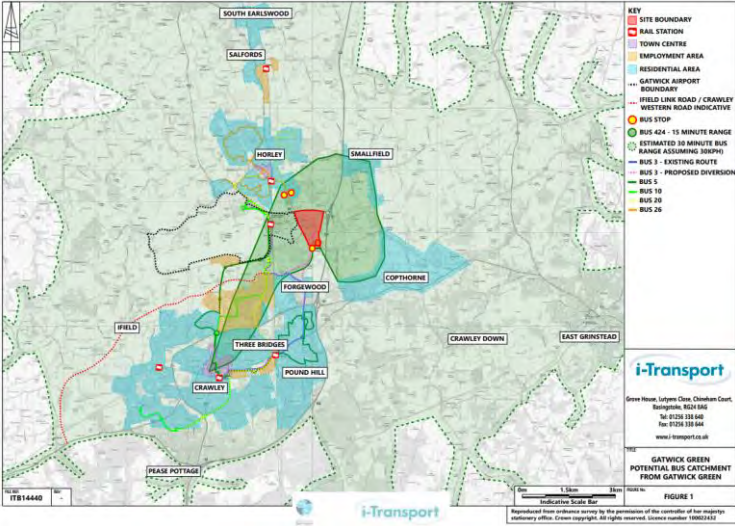


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			<ul style="list-style-type: none"> <li>• The delivery of the LCWIP to increase uptake in active modes walking and cycling; and</li> <li>• Increased Virtual Mobility, particularly working from home which would lead to reduced car travel at peak times.</li> </ul> <p>6.11 The report identifies that in respect to Scenario 2 and 3, the sustainable travel interventions could mitigate the impacts of the development in most locations. However, the Ifield Roundabout/Ifield Avenue/A23 Crawley Avenue junction would benefit from a modest improvement in terms of improving capacity on its link approaches.</p> <p>6.12 The report confirms that any impacts on the Strategic Route Network (SRN) i.e., the M23 and associated junctions, can be mitigated through planned improvements and signal optimisation.</p> <p>6.13 The strategy identified by Crawley, though the CTSR modelling report, is wholly in line with the mobility strategy identified for Gatwick Green. As such, development at Gatwick Green provides the opportunity to deliver improved walking, cycling and public transport infrastructure, with targeted junction improvements. This approach will not only mitigate the impacts of the development, but also assist in the delivery of the Local Plan as a whole, as these active mode improvements will benefit existing residents and businesses as well as those travelling to Gatwick Green.</p> <p><b>7.0 Provision of Parking</b></p> <p>7.1 Whilst the parking provision on Site is a matter for planning, normally determined at the Reserved Matters stage, the masterplan will be developed after considering:</p> <ul style="list-style-type: none"> <li>• Assumptions on changing travel behaviour and modal shift;</li> <li>• Local Parking Standards for commercial uses;</li> <li>• A parking accumulation analysis utilising TRICS arrival and departure patterns throughout a typical day;</li> <li>• Experience of other similar sites</li> <li>• Input from typical end users; and</li> </ul> <p>7.2 A full detailed analysis will be provided within the Transport Assessment that will accompany any planning application. This will identify that:</p> <ul style="list-style-type: none"> <li>• Adequate parking for cars and HGVs will be provided in line with local parking standards;</li> <li>• That there will be no overspill parking onto local roads;</li> <li>• Adequate lay-over parking with associated facilities will be provided for HGVs to ensure that there is no HGV parking off site and that any parking is appropriately provided for;</li> <li>• Facilities will be provided for Electric Vehicle charging;</li> <li>• Opportunities for alternative future fuelling, such as hydrogen will be considered, and</li> <li>• Space will be provided for Car Clubs and priority spaces for car/ride sharing etc.</li> </ul> <p><b>8.0 Summary and Conclusion</b></p>

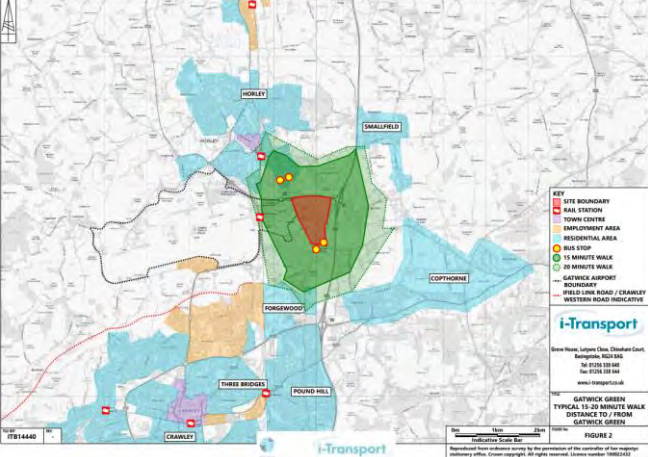
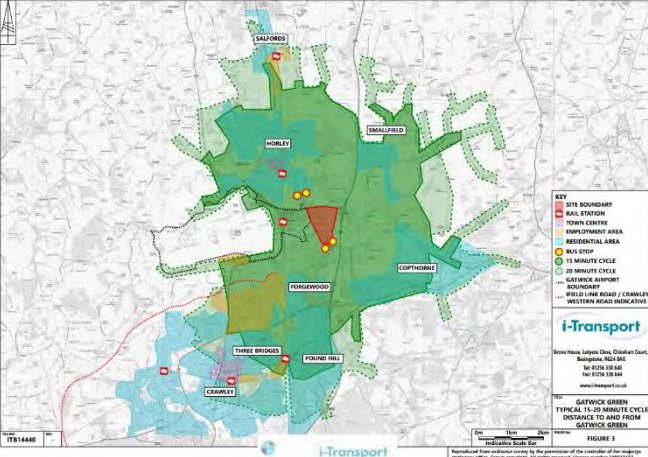
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			<p><b>Summary</b></p> <p>8.1 The Wilky Group (TWG) propose to bring forward an innovative industrial and logistics development and co-ordinated infrastructure solution to deliver the 47 ha (116 acre) Gatwick Green site allocation which lies within the heart of the Gatwick Diamond.</p> <p>8.2 This Appraisal has been undertaken in support of the Regulation 19 representation by Savills on behalf of TWG on the Draft Crawley Borough Local Plan (January 2021).</p> <p>8.3 The Gatwick Green allocation has been tested in terms of its impacts on the strategic and local transport networks, both by TWG and through Crawley's CTSR. Both studies conclude that the impacts of Gatwick Green can be addressed and mitigated through a combination of improved infrastructure for walking, cycling and public transport, alongside some targeted capacity improvements. The CTSR additionally concludes that the impacts arising from the Local Plan generally, including Gatwick Green, can be adequately dealt with.</p> <p>8.4 The allocation proposal will bring forward a package aimed at delivering non-car access as a priority, whilst ensuring that the local highway network can accommodate predicted vehicular and HGV 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 strategy includes:</p> <ul style="list-style-type: none"> <li>• Delivery of an access strategy and internal layout with a Sustainable Traffic Corridor (STC) which prioritises on-site public transport (Fastway) provision, with high quality walking and cycling routes in line with latest emerging guidance;</li> <li>• Contributions towards strengthening existing Fastway and bus routes and delivery of targeted Fastway/bus infrastructure, including bus priority and transit routes alongside enhancing existing pedestrian and cycle routes.</li> <li>• Plugging the 'missing gaps' and connecting to the Crawley Local Cycling and Walking Infrastructure Plan; and</li> <li>• A 'Decide and Provide' approach to highway capacity rather than the 'Predict and Provide' approach which has led to capacity improvement schemes designed to accommodate car based journeys at the expense of public transport, walking, and cycling.</li> </ul> <p>8.5 The proposal will contribute towards a defined strategy to link existing and developing residential areas, employment opportunities and day-to-day facilities within Crawley town centre, Horley, Forge Wood, Manor Royal, Three Bridges and Gatwick Airport in line with the principle of the '15 minute Neighbourhood'. This will enable the development of 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) and the Government's ambition for a step change in the number of walking and cycling trips undertaken daily.</p>

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			<p>8.6 The allocation proposals can therefore meet Strategic Policy ST1 which sets out the requirements for development in relation to sustainable transport. The objectives of the policy are set out below, followed by how the Gatwick Green proposals can fulfil these:</p> <ul style="list-style-type: none"> <li>• Locating and designing development to prioritise and encourage travel via the walking and cycling network and public transport routes, while reducing dependency on travel by the private motor vehicle. Gatwick Green is located in a highly sustainable location between Crawley and Horley, offering significant opportunities to provide infrastructure that prioritises public transport.</li> <li>• Development should contribute to improved sustainable transport infrastructure off-site, including, where appropriate, bus priority measures, enhanced passenger information, and routes identified in the Council's Local Cycling and Walking Infrastructure Plan. Gatwick Green can bring forward a range of off-site sustainable transport infrastructure to support and advance the use of public transport for access to the Site and more widely in Crawley.</li> <li>• Development should provide an appropriate amount and type of parking in accordance with Policy. Gatwick Green will include appropriate parking provision aligned with the sustainable transport strategy for the Site.</li> <li>• Developments should not cause an unacceptable impact in terms of increased traffic congestion or highway safety. The CTSR and TWG's transport investigators demonstrate that Gatwick Green can be developed without unacceptable harm in terms of highway capacity and safety.</li> <li>• Development will be considered acceptable in highways terms unless there would be an unacceptable impact on highway safety, or the cumulative impact on the transport network is severe and cannot be satisfactorily mitigated. The CTSR concludes that with mitigation, the cumulative impacts of the DCBLP proposals on Crawley's transport networks and in terms of highway safety are acceptable.</li> </ul> <p><b>Conclusion</b></p> <ul style="list-style-type: none"> <li>• This appraisal contains the findings of an initial assessment of access and transport considerations to support the allocation of the Gatwick Green site.</li> <li>• The Appraisal work has identified that there are no fundamental issues to access, promoting sustainable travel or mitigating traffic impacts. Any applications will be supported by a full Transport Assessment to demonstrate that the proposals can be accessed sustainably and would not have a severe impact upon the local highway network.</li> <li>• Initial assessments for a mobility strategy demonstrate how the Site will be integrated into the existing network, with off-site improvements aimed at promoting sustainable modes of travel for both future users of the Site and existing residents / businesses;</li> <li>• Any planning application will be accompanied by a range of infrastructure improvements to active travel and public transport to cost effectively mitigate development impacts;</li> </ul>

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			<ul style="list-style-type: none"> <li>Proposals to improve accessibility to the Site by public transport have been discussed and agreed in principle with Metrobus and the proposed site layout will bring forward bespoke public transport infrastructure;</li> <li>Local upgrades to cycle and pedestrian facilities in the vicinity of the local area as well as Public Rights of Way are achievable and can be linked to improvements identified in the Crawley Walking and Cycling Infrastructure Improvement Plan.</li> <li>The Site can be designed to provide appropriate levels of on-site parking for both cars and Heavy Goods Vehicles to ensure that all demand can be accommodated on site.</li> </ul> 

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			<div style="display: flex; justify-content: space-around;">   </div> <p><b>APPENDIX 3: Addendum: Environmental &amp; Utilities Preliminary Assessment Report</b></p> <p>1 Background</p> <p>This is an Addendum to the report by Clarkebond entitled ‘Environmental and Utilities Preliminary Assessment Report, Gatwick Green’ dated 26 February 2020 (2020 report) on behalf of the Wilky Group (TWG). TWG has a long-standing interest in the promotion of strategic employment land within the Crawley Borough Council (CBC) area – a site known as Gatwick Green.</p> <p>TWG owns about 47 ha (116 acres) of land east of Gatwick Airport as shown on the plan in Appendix 1 (Gatwick Green / the Site). The Site is a proposed allocation as a Strategic Employment Location (SEL) in the draft Crawley Borough Local Plan, January 2021 (DCBLP) under Policy EC1 and Policy EC4 for an industrial-led scheme, predominantly for B8 use (strategic storage and distribution). The extent of the allocation for Gatwick Green is identified on the plan in Appendix 1 – it provides for a minimum of 24.1 ha of industrial development. The 2020 report provided a preliminary assessment of various environmental and infrastructure considerations pertaining to the proposed allocation of the Site for employment purposes.</p> <p>The 2020 report did not cover transport, biodiversity/ecology, heritage and landscape/visual considerations – these topics were addressed in separate reports. This Addendum provides an update to the 2020 report in response to the Site’s proposed allocation for employment development and in respect of certain infrastructure requirements where some additional assessment is needed to confirm the deliverability of Gatwick Green in this regard.</p>

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			<p>The basis of this Addendum is the revised planning status of the Site under the DCBLP as compared to the policy framework in the January 2020 version of the Plan and what was being promoted by TWG at that time. Consequently, the following sections of 2020 report are no longer valid and are superseded by this report. The table below indicates the sections from the 2020 report that have been superseded and the replacement sections in this report.</p> <table border="1"> <thead> <tr> <th>2020 report sections - superseded</th> <th>2021 report sections – replacements</th> </tr> </thead> <tbody> <tr> <td>1.1 Overview</td> <td>2 Overview</td> </tr> <tr> <td>1.2 The Proposed Development/Concept</td> <td>2.1 The Development Concept and the Draft Crawley Borough Council Local Plan</td> </tr> <tr> <td>2.0 Site Description and Land Use</td> <td>2.2 Site Description and Land Use</td> </tr> <tr> <td>2.2 Profile of the Proposed Development Concept for Gatwick Green</td> <td>2.3 Proposed Development Concept for Gatwick Green</td> </tr> <tr> <td>3.2 Submission Crawley Local Plan 2020 - 2035 (2019)</td> <td>2.4 Draft Crawley Borough Local Plan 2021 - 2037 (January 2021)</td> </tr> </tbody> </table> <p>The other sections of the 2020 report remain valid – the data and assessments contained in these sections and related recommendations remain valid and part of TWG’s evidence base and that of the DCBLP.</p> <p>In addition to the above, this report provides supplementary assessments / information on the following matters:</p> <ul style="list-style-type: none"> <li>• Sustainable surface water drainage considerations and opportunities (Sections 3 to 5).</li> <li>• Consideration of the capacity within the existing foul drainage network and infrastructure (including the Crawley sewage treatment) works to accommodate the current proposal being promoted by TWG with a near-term 2022-26 delivery timeframe (Section 6).</li> <li>• An update on the Air Quality Assessment in the 2020 report based on the development being promoted by TWG now.</li> </ul> <p><b>2 Overview</b></p> <p>Gatwick Green is a proposal to develop a sustainable mixed-use development on land east of Gatwick Airport, as proposed by TWG.</p> <p><b>2.1 The Development Concept and the Draft Crawley Borough Council Local Plan</b></p> <p>The proposed Gatwick Green development is envisaged to be a comprehensive industrial-led development to deliver B8/B2 industrial / logistics / storage uses on land currently allocated for the comprehensive development of an industrial-led Strategic Employment Location in Strategic Policy EC4 – Strategic Employment Location of the latest Draft Crawley Borough Council Local Plan (DCBLP) 2021-2037. The targeted programme is based on a near-term 2022-26 delivery timeframe. Figure 2.1.1 shows the proposed Development Framework Plan.</p>	2020 report sections - superseded	2021 report sections – replacements	1.1 Overview	2 Overview	1.2 The Proposed Development/Concept	2.1 The Development Concept and the Draft Crawley Borough Council Local Plan	2.0 Site Description and Land Use	2.2 Site Description and Land Use	2.2 Profile of the Proposed Development Concept for Gatwick Green	2.3 Proposed Development Concept for Gatwick Green	3.2 Submission Crawley Local Plan 2020 - 2035 (2019)	2.4 Draft Crawley Borough Local Plan 2021 - 2037 (January 2021)
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Figure 2.1.1: Proposed Development Framework Plan

**2.2 Site Description and Land Use**

The Proposed Gatwick Green Site is on predominantly undeveloped Greenfield land, located approximately 800m east of Gatwick Airport and at National Grid Reference (NGR) TQ 29992 41345. The area defined by the red-line plan that represents TWG land is shown in Figure 2.2.1, which is different from the red-line site boundary of the development layout in the 2020 report.



Figure 2.2.1: Red-line Plan Representing TWG land

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			<p>Most of the Site is bounded to the west by Balcombe Road, beyond which is Gatwick Airport South Terminal Long Stay car park, Gatwick Airport train station and other Gatwick Airport support facilities. Gatwick Airport South Terminal is approximately 1000m west of the Site. The Gatwick Stream is located approximately 800m to the west and the Crawley Sewage Treatment Works is approximately 935m southwest of the southern boundary of the Site.</p> <p>The northern boundary is the M23 spur road between junctions 9 and 9a. North of the spur road lies the residential area of Horley, with the Burstow Stream and further Greenfield land located to the north-east. The east of the Site is bounded by Peaks Brook Lane, beyond which are a mix of residences on larger plots and some small businesses. The M23 is approximately 180m to the east, and the south is bounded by further greenfield land. There are listed buildings on the proposed Site as well as in the local surrounding areas.</p> <p>The town of Crawley is approximately 3.5km south-west of the Site, the town of Horley is approximately 1.7km to the north-west, and the village of Cophorne is approximately 1.7km to the south-east.</p> <p>The Site itself is mainly undeveloped agricultural land, which is roughly bisected by a minor road (Fernhill Road) near the centre.</p> <p><b>2.3 Proposed Development Concept for Gatwick Green</b> The development profile is envisaged to comprise:</p> <ul style="list-style-type: none"> <li>• A minimum of 24.1 ha of predominantly Use Class B8 with some Use Class B2 – storage and distribution and general industrial uses.</li> <li>• Ancillary / incidental uses under Use Class E – office, business and services uses.</li> <li>• Supporting education uses for apprenticeships &amp; staff training.</li> <li>• An integrated green infrastructure framework – landscape, biodiversity, amenity space to address the objectives of the Biodiversity Opportunity Area and the requirement for Biodiversity Net Gain.</li> <li>• Sustainable mobility at the heart of the concept: <ul style="list-style-type: none"> <li>▪ Two bus super hubs to facilitate modal switch and a high level of service for users.</li> <li>▪ A sustainable transport route through the site offering a high level of service for buses (notably the Fastway bus service), pedestrians and cyclists.</li> </ul> </li> <li>• Ancillary car parking with Electric Vehicle Charging facilities. Refer to Site Plan and Developing Framework Plan in Appendix 1.</li> </ul> <p><b>2.4 Draft Crawley Borough Local Plan 2021 - 2037 (January 2021)</b> 2.4.1 Description of the shift in policy between the 2020 and 2021 Regulation 19 DCBLP The 2020 Regulation 19 DCBLP removed blanket safeguarding for the additional wide-spaced runway at Gatwick Airport, replacing it with a</p>



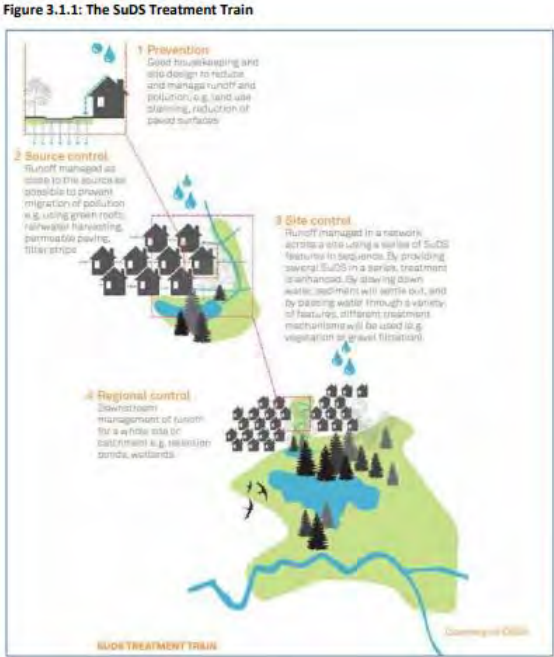
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			<p>commitment to prepare an Area Action Plan (AAP) under Policy SD3 over the former safeguarded land and within which a temporary safeguarding arrangement was proposed. The AAP would be advanced via a separate Development Plan Document to address Crawley's unmet needs for employment, housing and community uses alongside any legitimate long-term development needs of Gatwick Airport. Following advice from the Planning Inspectorate, the Council revised its strategy by reviewing the extent of safeguarding, that in turn allowed for the identification of a Strategic Employment Location at Gatwick Green. The 2021 Regulation 19 DCBLP therefore allocates Gatwick Green as an industrial-led development site under policies EC1 and EC4, with safeguarded land retained outside the allocation to accommodate an additional wide-spaced runway and associated airport infrastructure.</p> <p><b>2.4.2 Description of the new policy framework</b> Gatwick Green is allocated as an industrial-led Strategic Employment Location for a minimum of 24.1 ha under policies EC1 and EC4. Policy EC4 makes provision, where evidenced, for additional industrial land beyond this amount. Limited complementary ancillary uses are provided for, such as offices and small-scale convenience retail and leisure facilities that would support the industrial-led function. Policy EC4 also sets out a range of development management provisions relating to transport and access, sustainable design and construction, digital technology and character and design, with further requirements related to the assessment of economic impacts and arrangements for delivery.</p> <p>These provisions establish the scope and nature of the associated infrastructure requirements and environmental considerations, which combined with other policies in the DCBLP, are designed to ensure that the site is developed in a sustainable manner.</p> <p><b>3 Sustainable Surface Water Drainage Opportunities</b></p> <p><b>3.1.1 Objectives</b> This additional Section highlights the potential constraints and opportunities which need to be considered in assessing the suitability of the various sustainable drainage system (SuDS) techniques that could be implemented at the Site. It has been undertaken following the approach set out in the relevant standards and guidance (see Section 3.1.4) to inform the Development Framework Plan and the conceptual drainage strategy.</p> <p><b>3.1.2 Why it is important to Consider SuDS Early</b> SuDS are designed to reduce the potential impact of a development with respect to surface water drainage on both the development itself and the wider area. It also provides opportunities to remove pollutants from urban runoff at source, and combines water management with green space, with benefits for amenity, recreation and wildlife. To fully gain the benefits from a SuDS system it should be considered as early as possible in the design process so that it can be integrated into the master planning for a development to ensure drainage systems are effectively delivered. Consideration of the movement of water and its interaction with space is crucial to the success of SuDS and allows</p>

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			<p>the designer and developer to maximise wider benefits and pre-empt or reduce the issues that could later arise that conflict with the ability of development proposals to incorporate SuDS. Development proposals progressed without undertaking this early stage risk the possibility that the proposed layout would not be capable of being drained in a sustainable way to meet national and local policy. When designed well, SuDS can increase property value, mitigate local flood risk, moderate microclimate, benefit ecology, provide new sources of water and create valuable amenity spaces for communities to enjoy.</p> <p><b>3.1.3 SuDS Policies, Best Practice Standards &amp; Guidance</b></p> <p>The Flood and Water Management Act 2010 provides the legislative intention to require all new developments to incorporate SuDS. The National Planning Policy Framework (NPPF) is also a key driver, stating that development should give “priority to the use of sustainable drainage systems”. The NPPF also sets out key priorities for planning to address, including climate change, flood risk, water quality and biodiversity - all challenges that SuDS will help to address.</p> <p><u>Draft Crawley Borough Council Local Plan 2021 – 2037 (January 2021)</u> The key policies relating to SuDS within the Draft Crawley Borough Council Local Plan are:</p> <p>Strategic Policy GI1: Green Infrastructure “Large development proposals will be required to provide new and/or create links to green infrastructure as well as take into consideration the use of SuDS and methods that incorporate blue infrastructure into development designs to improve the visual amenity of the development, to account for Policy EP1 and to aid in reducing surface water run-off.”</p> <p>Policy EP1: Development and Flood Risk “Development must avoid areas which are exposed to an unacceptable risk from flooding and must not increase the risk of flooding elsewhere. To achieve this, development will demonstrate that peak surface water run-off rates and annual volumes of run-off will be reduced through the effective implementation, use and maintenance of SuDS, unless it can be demonstrated that these are not technically feasible or financially viable.”</p> <p><u>Lead Local Flood Authority (LLFA) Guidance</u> “Water. People. Places – A guide for master planning sustainable drainage into developments”, prepared by AECOM for the Lead Local Flood Authorities of South East of England, complements existing guidance on SuDS design, maintenance and operation which should be used to inform detailed design and delivery of SuDS.</p> <p>The South East Lead Local Flood Authorities expect this guidance to be used as part of the initial planning and design process for all types of residential, commercial and industrial development. It has been developed through a partnership of South East Authorities and it intends to provide a consistent approach to best practice design of SuDS at the master planning stage. Specific local requirements for SuDS design and adoption may also be set by the Lead Local Flood Authorities.</p>

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			<p><u>DEFRA Standards for Sustainable Drainage Systems</u>  This document recommends peak flow and volume control of off-site discharge and the requirements of the drainage system to limit on-site flood risk.</p> <p>For previously developed sites, the 1 in 100-year runoff volume should be as close as reasonably practicable to the Greenfield runoff volume for the same event and should never exceed the runoff volume of the site prior to redevelopment nor adversely affect flood risk downstream.</p> <p>The runoff rates for the 1 in 1 year and 1 in 100-year rainfall events should also be as close as reasonably practicable to the Greenfield runoff rates for the same events and should never exceed the runoff rates of the present land use.</p> <p><u>Construction Industry Research and Information Association (CIRIA): The SuDS Manual (C753)</u>  This publication covers the planning, design, construction and maintenance of Sustainable Drainage Systems (SuDS) to assist with their effective implementation within both new and existing developments. It looks at how to maximise amenity and biodiversity benefits, and deliver the key objectives of managing flood risk and water quality. There is also supporting information covering topics such as materials, landscape design, maintenance, community engagement and costs and benefits.</p> <p>The guidance provides the framework for designing SuDS with confidence and to maximise benefits.</p> <p><u>Building Regulations (2010) Hierarchy of Surface Water Discharge</u>  The hierarchy of how surface water disposal should be managed is also discussed in Part H of the Building Regulations (2010) document. It highlights infiltration of surface water to groundwater using soakaways as the most sustainable and preferred drainage strategy. If this isn't feasible then the next consideration should be discharge of water directly into a surface water body, followed by discharge into a surface water sewer/other drainage system and finally discharge into a combined sewer. Where infiltration is not possible it is expected that attenuation techniques are adopted.</p> <p><b>3.1.4 SuDS 'Treatment Train'</b>  SuDS are not individual items, but rather an interconnected system where water slowly flows from where it falls to a soakage area or discharge point through a series of features that help to treat, store, re-use, convey and celebrate water. An important concept for the SuDS designer to follow is known as the 'treatment train'. By passing water through several stages of treatment, sediment and other pollutants will be removed more effectively, and maintenance costs are reduced as this minimises the risk of downstream SuDS features becoming clogged or blocked. The designer can use the treatment train to create green corridors and links, add opportunities for engagement and education and to match delivery of SuDS to phasing of development.</p>

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**3.1.5 Application of SuDS Guidance to Conceptual Site Development and Drainage Strategy**

Both the Site conceptual masterplan and drainage strategy have sought to follow these concepts and standards, considering the site-specific conditions and constraints as outlined in Section 4 and Section 5 of this report.

**4 Assessment of Site Constraints**

Refer to the summary of results from the site constraints analysis in Appendix 2.

**4.1.1 Possible Constraint from the Floodplain of Fluvial & Surface Water Sources**

There are no “main rivers” within the Site boundary.

The Site is in Flood Zone 1, which means that the risk of fluvial flooding at the Site is less than a 1 in 1000 year or 0.1% probability each year. This is the lowest classification of flood risk and therefore flooding from fluvial source is

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not a constraint to development at the Site or to the implementation of SuDS methods. The Environment Agency indicative flood risk map is shown in Figure 4.1.1.

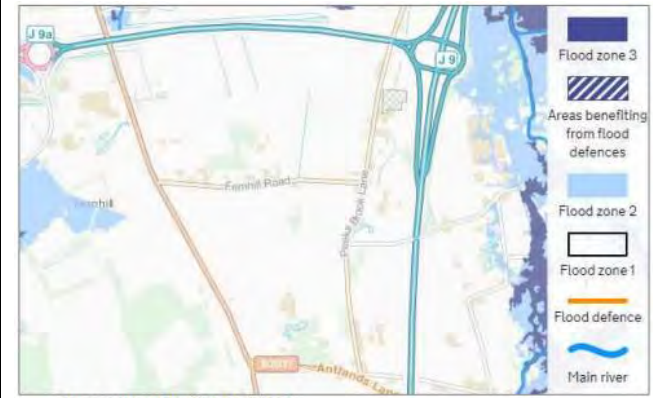


Figure 4.1.1: EA Flood Map for Planning



Figure 4.1.2: EA Surface Water Flood Map

As can be seen from the EA surface water flood map (Figure 4.1.2), most of the Site is at very low risk of surface water flooding (i.e., less than 0.1% annual probability of occurrence). There are some pockets of low risk (0.1 – 1% annual probability), medium risk (1 – 3.3% annual probability) and high risk (>3.3% annual probability) on the west and north parts of the site – typically in topographically low areas and along the routes of existing minor ditches and drains.

The proximity of the Site to Gatwick Airport means that there is a large impermeable surface area just to the west. There is a need for flood risk to be managed at Gatwick Airport particularly in times of heavy rainfall and balancing ponds are used to regulate the rate at which surface runoff is discharged into the River Mole and other watercourses, in accordance with the EA discharge requirements. This does not pose a risk of surface water flooding to Gatwick Green because the drainage catchment area for Gatwick Airport is toward the Gatwick Stream which flows in a north westerly direction away from the Gatwick Green site.

Based on the above, the floodplains of fluvial and surface water sources do not pose any material restrictions to the implementation of SuDS at the Site.

**4.1.2 Possible Constraint from Groundwater**

The Site is not within a Groundwater Source Protection Zone (SPZ), and the nearest SPZ is located approximately 8km north. A review of historic borehole data from the BGS website states that groundwater was encountered as seepage at 0.80m depth at the north-west of the Site. While this does not pose a risk of contamination to important

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			<p>water resources, care will need to be exercised in the consideration of infiltration-based SuDS methods due to the potential for a high water-table locally in some areas of the Site.</p> <p><b>4.1.3 Possible Constraint from Soils &amp; Geology</b>  Infiltration to ground is influenced by the following factors:</p> <ul style="list-style-type: none"> <li>• Soil being free-draining and underlying strata having a suitable permeability;</li> <li>• The presence of important groundwater bodies (receiving water) which are vulnerable to contamination;</li> <li>• Presence of contaminants on site;</li> <li>• Availability of adequate land space to satisfy BRE infiltration specification and design requirements.</li> </ul> <p>A review of the Site geology from British Geological Survey (BGS) viewer indicates superficial deposits comprising River Terrace Deposits (undifferentiated) – i.e., sand and gravel underlying the north, east and south-east of the site. The bedrock geology comprises Weald Clay Formation with Mudstone underlying most of the Site, and Weald Clay Formation – i.e., clay-ironstone approximately east-west across the centre of the site.</p> <p>LandIS 'Soilscapes' data indicates that most of the Site falls within 'Soilscape 22: i.e., loamy soils with naturally high groundwater". The south-west of the Site is of 'Soilscape 18: slowly permeable seasonally wet slightly acid but base-rich loamy and clayey soils.' This is known to have impeded drainage.</p> <p>An appraisal of the geology would indicate that the ground conditions at the Site would not be able to facilitate certain types of infiltration drainage methods. However, this will need to be confirmed by BRE Digest 365 Soakaway Tests. This does not rule out the use of infiltration-based SuDS methods with liner and underdrain.</p> <p><b>4.1.4 Possible Constraint from Contaminated Land</b>  A Preliminary Risk Assessment was undertaken by Clarkebond for the 2020 report (refer to Section 4.5 – Land Contamination), which identified the following potential sources of contamination at the Site:</p> <ul style="list-style-type: none"> <li>• A large above ground oil storage tank was observed to the north of Fernhill Lane. The integrity of the tank is unknown and therefore it may have leaked into the underlying soil. Several other, domestic size oil storage tanks were observed across the site.</li> <li>• Current land uses of contiguous and surrounding areas include metal merchants and light industrial works. Therefore, there is the potential of hydrocarbon impact from fuel oils/lubricant leakage from these existing land uses.</li> <li>• It's possible that the Made Ground beneath the site might be contaminated by asbestos and other materials. <ul style="list-style-type: none"> <li>• Areas of present and historical land use may have elevated levels of residual pesticides, herbicides and insecticides.</li> </ul> </li> </ul> <p>It was assessed that the general risk of significant contamination is low. The potential impact to the local environment should however be assessed in the future by appropriate analysis of the soils and groundwater together with a risk assessment based on the site-specific criteria.</p>

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			<p>The above assessment does not limit the use of most SuDS methods; however, care will need to be exercised in the consideration of infiltration-based SuDS methods due to the potential low risk of contamination.</p> <p><b>4.1.5 Possible Constraint from Surface Runoff Features and Requirements</b>  There are minor watercourses and drains within the Site boundary which eventually discharge into the Burstow Stream north of the M23 spur road. It is therefore feasible for surface runoff from the proposed development to be discharged at controlled rates into these receiving watercourses although some channel improvement works, and upgrades may be required.</p> <p><u>Discharge Requirements</u>  In accordance with the NPPF and DEFRA guidance, development on existing Greenfield sites should restrict runoff to Greenfield rates to ensure the increased impermeable area as a result of development mitigates any impact on the downstream drainage network.</p> <p>The Draft Local Plan also requires the demonstration that peak surface water run-off rates and annual volumes of run-off will be reduced through the effective implementation, use and maintenance of SuDS. The above conclusions do not limit the use of most SuDS methods at the Site, and it is recommended that the proposed drainage strategy restricts runoff post-development to current greenfield rates.</p> <p><b>4.1.6 Possible Constraint from Site Topography</b>  Topographic data was obtained from the LiDAR composite Digital Terrain Model (DTM), produced by the Environment Agency at a spatial resolution of 1m. The lowest ground levels are in the north-west adjacent to Balcombe Road, at approximately 57.1m AOD. The highest level is at the south-east at approximately 61.5m AOD. From the contours shown, natural gradients range from mild slopes to relatively flat areas. The topography also indicates that levels generally decrease towards the 'main rivers' north-west and north-east of the M23 spur road – both tributaries of the Burstow Stream. This also indicates the general direction of flow which surface runoff may take.</p> <p>The topographic review indicates that there is enough land gradient and depth of ground cover to suggest that drainage via gravity is achievable.</p> <p><b>4.1.7 Possible Constraint (Easement/Buffer Requirements etc.) from Existing Infrastructure</b></p> <p><u>Foul and Surface Water Sewers</u>  Asset records show that there are no existing surface water sewers on the Site. There are 2 separate public foul sewers on Peeks Brook Lane, which cross the Site and connect to the pump station located adjacent to the eastern boundary. The pump station discharges foul sewage, via a rising main, to the south western corner, near Rose Cottage. There will be easements for the sewers and rising main subject to confirmation with Thames Water.</p> <p><u>Power</u></p>

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			<p>The closest UK Power Networks grid substation (275kV to 132kV) is in Smallfield, 3km north-east of the Site. The HV cables from Smallfield run to the north of the Site boundary.</p> <p>Multiple 33kV primary distribution cable routes cross the Site boundary in the north. 11kV underground and over-ground cables also cross the Site and are assumed to supply 4 HV/LV substations, where a low voltage (LV) network serves local properties via underground and over-ground service lines. LV underground cables and overhead lines are also present within the Site boundary.</p> <p>Any required excavation work would need to be away from installation, plant and cable routes to avoid damage. Easement and buffer areas will need to be confirmed with the power network provider, but these are not determined to pose any material constraints to the choice of SuDS methods that can be applied at the Site.</p> <p><u>Gas Network</u> Southern Gas Networks (SGN) owns and operates the gas main network in the area of the site. An 18" medium pressure main runs to the west and south of the Site. This is a significant piece of infrastructure which SuDS should avoid. A 125mm low pressure main is located along the existing east-west road that crosses the Site. Because these utilities are beneath a public highway, they are unlikely to be directly affected by the proposed development. Therefore, the local gas network should not affect the choice of SuDS at the Site.</p> <p><u>Water Supply</u> Distribution mains border the Site to the west and the east, running parallel with the B2036 and Peaks Brook Lane respectively, as well as along Fernhill Road. Multiple distribution mains extend away from the Site in the south-west, as well as west towards Gatwick Airport and North towards Horley.</p> <p>In conclusion the location of these utilities will not pose a material constraint to the use of most types of SuDS due to the availability of space that can be utilised.</p> <p><b>4.1.8 Space Constraints</b> SuDS are often associated with large green spaces; however, there are a range of SuDS features which can be easily designed into tight urban settings. Design forethought is required to build SuDS into multi-functional spaces (such as incorporating them in as part of the public open space requirement) and build up a network of SuDS that manage runoff close to its source to avoid the need for large storage areas.</p> <p>The space available does not limit the types of SuDS that can be used. 'Land-hungry' SuDS methods are also feasible at the Site. Similarly, space efficient SuDS, such as green roofs, lined permeable paving, rills, rainwater harvesting, hardscape storage are equally viable.</p>



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			<p>However, the proximity of Gatwick Airport and the associated flight paths limit the use of large areas of open water such as ponds and wet drainage basins as they can attract birds and pose a risk to aircraft through bird strikes. These types of SuDS features should therefore be avoided at the Site.</p> <p><b>4.1.9 Possible Constraint from Protective Species or Habitat</b> According to Defra's 'Magic Maps', the Site does not fall within an area designated as a protective habitat, including any grassland, heathland, inland rock, wetland or woodland. Therefore, this does not pose a constraint to the use of SuDS.</p> <p>The area falls within an area outlined as 'Priority Species for CS Targeting – Brown hairstreak (butterfly) and lapwing (bird)'. Although it does not fall within a protected area for any bird, mammal or plant species. Therefore, it is assessed that protective species and habitats will not pose a constraint to any SuDS considered for the Site.</p> <p><b>4.1.10 Possible Ownership &amp; Maintenance Constraint</b> Adoption discussions should be held early in the design process to ensure that SuDS are designed to the standards required by the adoption authority. Depending on the local provisions and context, the adopter could be the SuDS Approval Body (SAB) under the Flood and Water Management Act, a local authority, a highways authority, a landowner or a water company. Where adoption is uncertain, it is beneficial to ensure that design accommodates flexibility and favours simple solutions with low maintenance needs.</p> <p>SuDS features can be designed for adoption, ownership and maintenance therefore, this does not act as a constraint to the use of SuDS at the site.</p> <p><b>4.1.11 Recommended Sustainable Drainage Principles &amp; Masterplan Considerations</b> Based on the constraints identified, it is recommended to discharge surface water runoff by gravity to the local watercourses on and near the Site at a controlled greenfield runoff rate as the preferred strategy.</p> <p>There are additional "source and site control" SuDS measures that are recommended as suitable given the constraints identified and the land space available. Warehousing typically present a low pollutant hazard and uncontaminated runoff can then be directed to the local watercourses or infiltrate in a greenfield area. Key impermeable surfaces that will generate runoff should be distributed around the site.</p> <p><b>4.1.12 Additional Sustainable Drainage Principles</b> The following additional techniques can also be considered if viable:</p> <p><u>Source control</u></p> <ul style="list-style-type: none"> <li>• Green roofs &amp; rainwater harvesting are both suitable for the large warehouse roofs</li> <li>• Landscaping (trees and planters) &amp; bioretention areas could be utilised around the perimeter of the Site, which along with the green roof will promote integration of the development with its greenfield surroundings.</li> </ul>

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• Underground storage, which can store filtered water from a bioretention area for redistribution around the Site.

Site control

- Lined permeable paving where HGVs access is not required.
- Filter strips and swales which can be utilised around the perimeter of the Site to filter runoff and intercept potential runoff from off-site.

Planters, wet woodlands, and trees can be an effective method of water storage and would provide amenity value and there is space available for landscaping within the Site layout.

The use of surface water attenuation ponds & open wetlands is unlikely to be acceptable due to the risk of birds-strike at Gatwick Airport. Therefore, these types of SuDS are not proposed.

**5 Drainage Design Principles and Parameters**

**5.1.1 Design Considerations and Requirements**

The drainage design principles and parameters proposed in this report for the proposed development follow the concepts, considerations and constraints from Section 4.

Greenfield Run-off rates

Gross site area measures 47ha. Using micro-drainage and based upon FSR rainfall data, the greenfield run-off rates are calculated as follows:

**Table 5.1.1- Summary of Greenfield Runoff Rates Calculated**

Return Period (years)	1-year	QBAR	30-year	100-year	100 year + 40%
Greenfield Runoff (l/s)	216.6	254.9	577.6	813.0	1138.2

Qbar discharge rate equates to 5.4 l/sec/Ha. Refer to green-field run-off calculation in Appendix 3. For the purposes of testing the ability of the site to be drained through a SuDS system, the site has been divided into notional plots as a basis for testing a high-level scenario; these are as follow

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			<p><b>Table 5.1.2- Site Area Broken Down by Plots</b></p> <table border="1"> <tr> <td>Plot Numbers (North of Fernhill Road)</td> <td>A</td> <td>B</td> <td>C</td> <td></td> <td></td> </tr> <tr> <td>Areas (Ha)</td> <td>2.93</td> <td>8.40</td> <td>4.48</td> <td>-</td> <td>-</td> </tr> </table> <table border="1"> <tr> <td>Plot Numbers (South of Fernhill Road)</td> <td>-</td> <td>-</td> <td>-</td> <td>D</td> <td>E</td> </tr> <tr> <td>Areas (Ha)</td> <td>-</td> <td>-</td> <td>-</td> <td>5.69</td> <td>6.73</td> </tr> </table> <p>Total Area 28.23 Ha</p> <p>Based upon the total area of 28.23 Ha and discharge rate being restricted to Qbar, the total discharge rate for the plot areas is 152.4 l/sec, and total volume of storage required is 27200m3 .</p> <p>For those plots North of Fernhill Road                      The Sub-Total Area 15.81 Ha                      Combined discharge rate 85.4 l/sec                      Approximate volume of attenuation required 15300m3</p> <p>For plots South of Fernhill Road                      Sub-Total Area 12.42 Ha                      Combined discharge rate 67.0 l/sec                      Approximate volume of attenuation required 11900m3</p> <p>If on plot attenuation is taken forward the discharge rates and volumes would be as follows:</p>	Plot Numbers (North of Fernhill Road)	A	B	C			Areas (Ha)	2.93	8.40	4.48	-	-	Plot Numbers (South of Fernhill Road)	-	-	-	D	E	Areas (Ha)	-	-	-	5.69	6.73
Plot Numbers (North of Fernhill Road)	A	B	C																								
Areas (Ha)	2.93	8.40	4.48	-	-																						
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			<p data-bbox="645 284 1144 304">Table 5.1.3- Summary of Key Drainage Design Parameters by Plot</p> <table border="1" data-bbox="645 325 1458 421"> <thead> <tr> <th data-bbox="645 325 848 421">Plots</th> <th data-bbox="848 325 1052 421">Areas (Ha)</th> <th data-bbox="1052 325 1256 421">Greenfield Discharge Rates (l/s)</th> <th data-bbox="1256 325 1458 421">Storage Volume Requirement (m<sup>3</sup>)</th> </tr> </thead> <tbody> <tr> <td data-bbox="645 459 848 523">Site A</td> <td data-bbox="848 459 1052 523">2.93</td> <td data-bbox="1052 459 1256 523">15.9</td> <td data-bbox="1256 459 1458 523">2840</td> </tr> <tr> <td data-bbox="645 523 848 587">Site B</td> <td data-bbox="848 523 1052 587">8.40</td> <td data-bbox="1052 523 1256 587">45.4</td> <td data-bbox="1256 523 1458 587">8110</td> </tr> <tr> <td data-bbox="645 587 848 651">Site C</td> <td data-bbox="848 587 1052 651">4.48</td> <td data-bbox="1052 587 1256 651">24.2</td> <td data-bbox="1256 587 1458 651">4320</td> </tr> <tr> <td data-bbox="645 651 848 715">Site D</td> <td data-bbox="848 651 1052 715">5.69</td> <td data-bbox="1052 651 1256 715">30.8</td> <td data-bbox="1256 651 1458 715">5500</td> </tr> <tr> <td data-bbox="645 715 848 778">Site E</td> <td data-bbox="848 715 1052 778">6.73</td> <td data-bbox="1052 715 1256 778">36.3</td> <td data-bbox="1256 715 1458 778">6430</td> </tr> </tbody> </table> <p data-bbox="645 823 1182 850"><b>5.1.2 Principles of Land Drainage Proposal</b></p> <p data-bbox="645 855 2018 1007">It is proposed to re-profile the existing ditch to the point of the existing culvert crossing. An ecological survey will be required to ascertain if any wildlife will be affected by the reprofiling. It is also proposed to extend the existing ditch located in the middle of the Site (north side of Fernhill road) so that it crosses Fernhill Road. The route of the proposed onsite access road will provide the optimal route for this extended ditch, which will assist with the proposed surface water drainage for plots D &amp; E.</p> <p data-bbox="645 1026 2018 1082">There will be a requirement to get approvals for any changes to the existing ditches, which will require Land Drainage Consents (LDC).</p> <p data-bbox="645 1102 1111 1129"><b>5.1.3 Proposed Drainage Attenuation</b></p> <p data-bbox="645 1134 1984 1190">Based upon micro-drainage quick storage estimates (QSE) and incorporating flood studies report rainfall data, the storage requirement for the whole Site will be 27,200m<sup>3</sup>.</p> <p data-bbox="645 1209 1122 1236">Refer to QSE calculations in Appendix 3.</p> <p data-bbox="645 1257 1693 1284">The proposed attenuation and water treatment can be provided by the following methods:</p> <p data-bbox="645 1305 992 1332"><u>Tanked permeable pavement</u></p> <p data-bbox="645 1337 1995 1393">Note because of the land uses being put forward, there will be a requirement to improve the water quality prior to discharging from the Site. The option of using tanked permeable paving will provide means of attenuating the hard-</p>	Plots	Areas (Ha)	Greenfield Discharge Rates (l/s)	Storage Volume Requirement (m <sup>3</sup> )	Site A	2.93	15.9	2840	Site B	8.40	45.4	8110	Site C	4.48	24.2	4320	Site D	5.69	30.8	5500	Site E	6.73	36.3	6430
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			<p>standing run-off as well as providing a means of improving the water quality. Tanked permeable pavement negates the requirement for full retention interceptors.</p> <p><u>Dry Swales</u> Due to proximity of Gatwick Airport and the risk bird strike the methods of open storage need to be considered carefully. Dry swales could be effective if they are located close to existing/proposed tree lines. The swales will provide a means of attenuation and improving water quality. The extent of the use of swales will need to be further assessed when more details of the Proposal are known.</p> <p><u>Dry Basin</u> Based upon the proximity of Gatwick airport and the issue of bird strike, this option is not considered viable. Cellular Tanks Use of cellular tanks provide another means of attenuation. Cellular storage can provide up to 95% by void ratio as a means of attenuation. Oversized pipework/culverts There may be a requirement to provide this, though this is to be reviewed at as part of the planning stage.</p> <p><b>6 Foul Drainage Considerations</b></p> <p><b>6.1.1 Position Statement on Foul Drainage in DCBLP</b> Thames Water are supportive of growth within the LPA boundary based on Policy IN1 and paragraph 8.10 of the Draft Local Plan, but consider that there should be specific mention in the Policy of wastewater/sewerage infrastructure to ensure that growth is aligned with delivery of additional capacity at Crawley wastewater treatment works. Please refer to Clarkebond's letter and pre-planning enquiry application, and the response from Thames Water (Appendix 4).  TWG Ltd fully recognise that water and wastewater infrastructure is essential to any development and that failure to ensure that any required upgrades to the infrastructure network are delivered alongside development, could result in adverse impacts in the form of internal and external sewer flooding and pollution of land and watercourses and/or low water pressure.  Under the Water Industry Act 1991 (amended by the Water Industry Act 1999), developers have an automatic right to connect to the sewer network, but it is generally acknowledged that Thames Water cannot reserve capacity for a particular development in advance; although based on our combined experience and knowledge we understand that it is very rare that sufficient capacity is not available, as regular adjustments are made to existing plant.</p> <p><b>6.1.2 Consultation with Thames Water</b> In order to ensure delivery of the planned growth in the Local Plan and the longer lead-in times that improvements to the sewerage and water network assets for the planning and delivery of any upgrade require, Thames Water encourage developers to contact the water/wastewater company as early as possible to discuss their development proposals and intended delivery programme to assist with identifying any potential water and wastewater network reinforcement requirements.</p>

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			<p>Clarkebond has therefore consulted with Thames Water on behalf of TWG in March and April 2021 about the availability of foul drainage capacity at the Gatwick Green site in Crawley, West Sussex.</p> <p>Please refer to Clarkebond's letter and pre-planning enquiry application, and the response from Thames Water (Appendix 4).</p> <p><b>6.1.3 Foul Drainage Implications for Gatwick Green</b> Thames Water indicated in their response that as proposed, the minimal discharge from industrial, logistics, storage units domestic load, would not be of concern, as the minimal flow would not be a problem to their sewer network or treatment capacity. Thames water further indicated that should the proposals progress in line with the details provided, they would confirm that there will be enough sewerage capacity in the adjacent foul water sewer network to serve the development.</p> <p><b>7 Air Quality Update</b></p> <p><b>7.1.1 Further Air Quality Considerations from Initial investigations</b> Initial air quality analysis and investigations for the latest conceptual development proposed by TWG at Gatwick Green indicate that the air quality impacts of HGVs on Balcombe Road will require further investigation to be undertaken at the planning application stage. It is however believed that these impacts can be satisfactorily addressed with a range of potential mitigation measures. This detailed air quality assessment would normally be submitted as part of the planning application.</p> <p><b>7.1.2 Possible Way Forward</b> The approach for Gatwick Green would likely be consistent with the emerging approach that is being trialled by existing businesses and operators in the local industrial environment. Hauliers, online and food retailers, delivery companies and even Royal Mail are trialling and actively implementing the use of delivery vehicles which run on hydrogen gas or electricity. Amazon has started a rollout of electric delivery vehicles this year and UPS, DHL and FedEx have all started to change the ways in which their vehicle fleet is powered. There is also the proposed hydrogen dump at Manor Royal which MetroBus will be making available to 3rd parties. These innovations in approach to sustainability also present an opportunity for Gatwick Green to manage air quality emissions going forward.</p> <p><b>8 Conclusions</b> The topics outlined and examined within this Addendum indicate that there are no significant and preventable constraints to the development.</p>

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			<div style="display: flex; justify-content: space-between;"> <div style="width: 48%;"> <p><b>Gatwick Green - Site Plan</b></p> <p>Key</p> <ul style="list-style-type: none"> <li>Proposed Strategic Employment Location under policies EC1 and EC4</li> <li>Land owned by the Wilky Group</li> </ul> <p>Scale 1:10000</p> <p>© Crown copyright. License number 100024244. Savills (UK) Limited. Contains OS data © Crown copyright and database right 2021. Public sector information licensed under Open Government Licence v3.0. © OpenStreetMap contributors 2021</p> </div> <div style="width: 48%;"> <p>A3 11/091 / SK-86 / D</p> <p>Legend:</p> <ul style="list-style-type: none"> <li>Wilky Owned Land</li> <li>Biodiversity Opportunity Area</li> <li>Wilky Land Outside Biodiversity Opportunity Area</li> <li>Priority Habitat Inventory - Deciduous Woodland (England)</li> <li>Primary Site Access</li> <li>Indicative Transport Route Through Site</li> <li>Indicative Sustainable Modes / Public Transport Route</li> <li>Potential Public Transport Hub</li> <li>Existing Public Right of Way Improvements to be Investigated</li> </ul> <p>LYONS+SLEEMAN+HOARE Architects</p> <p>11/091 / SK-86 WORK IN PROGRESS</p> <p>Site: Development Framework Plan (2021)</p> </div> </div>

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**Summary of Results from Site Constraints Analysis**

Suitable		Green Roof	Rainwater Harvesting	Soakaway	Permeable Paving	Filter Strip	Bioretention Area	Swale	Hardscape Storage	Underground Storage
Floodplain	Located in the Floodplain?	●	●	●	●	●	●	●	●	●
Groundwater	Groundwater less than 3 metres below ground surface?	●	●		With liner and underdrain (no treatment)	With liner and underdrain (no treatment)	With liner and underdrain (no treatment)	With liner	If aboveground	In some areas
Topography	Sited on a flat site (<5% gradient)	Source Control	Source Control	Source Control	Source Control	Source Control	With short Kerb or 10 Length	Careful to provide some gradient	If needed	
Soils and Geology	Impermeable soil type (e.g. clay-based type)	●	●		With underdrain (no treatment)	●	●	●	●	●
Contaminated Land	Are there contaminated soils on site?	●	●		With underdrain (no treatment)	With liner	With liner and underdrain	With liner	With Liner	With Liner
Existing Infrastructure	Are there underground utilities in the SuDS area?	●	●	●	●	●	Possible with structural grid in wetover utilities	●	●	●
Space Constraints	Limited space for SuDS components?	●	●	●	●	●	●	●	●	●
Runoff Characteristics	Suitable for inclusion in high risk contamination areas?	Source Control	Source Control		●	●	●	●	●	●
Protected Species or Habitat	Proximity to designated sites	●	●	●	●	●	●	●	●	●

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Suitable		Green Roof	Rainwater Harvesting	Soakaway	Permeable Paving	Filter Strip	Bioretention Area	Swale	Hardscape Storage	Underground Storage
	and priority habitats?					●				
Ownership and Maintenance	Can the feature be designed for adoption?									

Appendix 3 and 4: Please request original representation.

**APPENDIX 4: Addendum: Updated Preliminary Ecological Appraisal**

**1. INTRODUCTION**

1.1 This Note is an Addendum to the report by Middlemarch Environmental Ltd (MEL) entitled 'Gatwick Green, Crawley, West Sussex: Updated Preliminary Ecological Appraisal' dated 27 February 2020 (2020 PEA) on behalf of the Wilky Group (TWG). TWG has a long-standing interest in the promotion of strategic employment land within



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			<p>the Crawley Borough Council (CBC) area; a site known as Gatwick Green. Gatwick Green is proposed for a comprehensive industrial-led development of predominantly storage and distribution uses.</p> <p><b>2. SITE AND PROJECT BACKGROUND</b></p> <p>2.1 The allocated site extends to 47 ha (116 acres) of land east of Gatwick Airport as shown on the plan at Appendix 1 (Gatwick Green / the Site). Gatwick Green is allocated as an industrial-led Strategic Employment Location for a minimum of 24.1 ha under policies EC1 and EC4. Policy EC4 makes provision, where evidenced, for additional industrial land beyond this amount. Limited complementary ancillary uses are provided for such as offices and small scale convenience retail and leisure facilities that would support the industrial-led function. Policy EC4 goes on to set out a range of development management provisions relating to transport and access, sustainable design and construction, digital technology and character and design, with further requirements related to the assessment of economic impacts and arrangements for delivery. These provisions establish the scope and nature of the associated infrastructure requirements and environmental considerations, which combined with other policies in the DCBLP, are designed to ensure that the site is developed in a sustainable manner.</p> <p>2.2 The 2020 Regulation 19 DCBLP removed blanket safeguarding for the additional wide-spaced runway at Gatwick Airport, replacing it with a commitment to prepare an Area Action Plan (AAP) under Policy SD3 over the former safeguarded land and within which a temporary safeguarding arrangement was proposed. The AAP would be advanced via a separate Development Plan Document to address Crawley's unmet needs for employment, housing and community uses alongside any legitimate long term development needs of Gatwick Airport. Following advice from the Planning Inspectorate, the Council revised its strategy by reviewing the extent of safeguarding, that in turn allowed for the identification of a Strategic Employment Location at Gatwick Green. The 2021 Regulation 19 DCBLP therefore allocates Gatwick Green as an industrial-led development site under policies EC1 and EC4, with safeguarded land retained outside the allocation to accommodate an additional wide-spaced runway and associated airport infrastructure.</p> <p><b>3. REVIEW OF 2020 PRELIMINARY ECOLOGICAL APPRAISAL</b></p> <p>3.1 The 2020 PEA provided an assessment of the ecology on the Site to inform its promotion for employment purposes by TWG. This Addendum provides an update to the 2020 PEA in response to the changed planning policy status of the Site, being its proposed allocation for employment development in the DCBLP.</p> <p>3.2 Based on the changed planning policy status of the site, MEL has reviewed the scope and nature of the ecological investigations / surveys undertaken to inform the 2020 PEA. The 2020 PEA was informed by a desk study exercise and survey work (Phase 1 Habitat Survey) undertaken in November 2019: the survey covered broadly the same area of land now being proposed as an allocation.</p>

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			<p>3.3 At the time of the Phase 1 Habitat Survey in November 2020, 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.</p> <p>3.4 The key ecological features identified within or surrounding the site include the 'Gatwick Green' Biodiversity Opportunity Area, ancient woodland sites, Habitats of Principal Importance for Nature Conservation in England (woodland and hedgerows), and other valuable habitats (semi-mature and mature trees and ditches). The habitats on site have the potential to support a range of protected/notable species, including bats, terrestrial mammals, amphibians, reptiles and birds.</p> <p>4. CONCLUSION</p> <p>4.1 MEL confirms that the survey work remains in date and that consequently, the conclusions and recommendations in the 2020 PEA remain valid as a basis for the consideration of the proposed allocation of Gatwick Green in the DCBLP though the forthcoming Examination. Consequently, the 2020 PEA remains a valid part of TWG's evidence base and that of the DCBLP, supplemented by this Addendum.</p> <p><b>APPENDIX 5: Addendum: Hedgerow Regulations (1997) Assessment</b></p> <p>1. INTRODUCTION</p> <p>1.1 This Note is an Addendum to the report by Middlemarch Environmental Ltd (MEL) entitled 'Gatwick Green, Crawley, West Sussex: Hedgerow Regulations (1997) Assessment' dated 27 February 2020 (2020 HRE) on behalf of the Wilky Group (TWG). TWG has a long-standing interest in the promotion of strategic employment land within the Crawley Borough Council (CBC) area; a site known as Gatwick Green. Gatwick Green is proposed for a comprehensive industrial-led development of predominantly storage and distribution uses.</p> <p>2. SITE AND PROJECT BACKGROUND</p> <p>2.1 The allocated site extends to 47 ha (116 acres) of land east of Gatwick Airport as shown on the plan at Appendix 1 (Gatwick Green / the Site). Gatwick Green is allocated as an industrial-led Strategic Employment Location for a minimum of 24.1 ha under policies EC1 and EC4. Policy EC4 makes provision, where evidenced, for additional industrial land beyond this amount. Limited complementary ancillary uses are provided for such as offices and small scale convenience retail and leisure facilities that would support the industrial-led function. Policy EC4 goes on to set out a range of development management provisions relating to transport and access, sustainable design and construction, digital technology and character and design, with further requirements related to the assessment of economic impacts and arrangements for delivery. These provisions establish the scope and nature of the associated infrastructure requirements and environmental considerations, which combined with other policies in the DCBLP, are designed to ensure that the site is developed in a sustainable manner.</p> <p>2.2 The 2020 Regulation 19 DCBLP removed blanket safeguarding for the additional wide-spaced runway at Gatwick Airport, replacing it with a commitment to prepare an Area Action Plan (AAP) under Policy SD3 over the former</p>

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			<p>safeguarded land and within which a temporary safeguarding arrangement was proposed. The AAP would be advanced via a separate Development Plan Document to address Crawley's unmet needs for employment, housing and community uses alongside any legitimate long term development needs of Gatwick Airport. Following advice from the Planning Inspectorate, the Council revised its strategy by reviewing the extent of safeguarding, that in turn allowed for the identification of a Strategic Employment Location at Gatwick Green. The 2021 Regulation 19 DCBLP therefore allocates Gatwick Green as an industrial-led development site under policies EC1 and EC4, with safeguarded land retained outside the allocation to accommodate an additional wide-spaced runway and associated airport infrastructure.</p> <p>3. REVIEW OF 2020 HEDGEROW REGULATIONS (1997) ASSESSMENT</p> <p>3.1 The 2020 HRE provided an assessment of the hedgerows on the Site to inform its promotion for employment purposes by TWG. This Addendum provides an update to the 2020 HRE in response to the changed planning policy status of the Site, being its proposed allocation for employment development in the DCBLP.</p> <p>3.2 Based on the changed planning policy status of the site, MEL has reviewed the scope and nature of the hedgerow surveys undertaken to inform the 2020 HRE. The 2020 HRE was informed by survey work undertaken in November 2019: the survey covered broadly the same area of land now being proposed as an allocation.</p> <p>3.3 At the time of the survey in November 2020, a total of 14 hedgerows considered suitable for assessment under the Hedgerow Regulations (1997) were identified on site. The majority of these hedgerows were frequently managed and species-poor, typical of arable field boundaries or roadsides. The hedgerows tended to have an impoverished hedge ground flora, often as a result of nutrient enrichment from agricultural and highways runoff. Following an assessment against the wildlife and landscape criteria detailed in the Hedgerow Regulations (1997), two hedgerows (H1 and H2) were deemed to be 'important'. Both hedgerows satisfied the criteria relating to the number of woody species recorded and the criteria for associated features.</p> <p>4. CONCLUSION</p> <p>4.1 MEL confirms that the survey work remains in date and that consequently, the conclusions and recommendations in the 2020 HRE remain valid as a basis for the consideration of the proposed allocation of Gatwick Green in the DCBLP though the forthcoming Examination. Consequently, the 2020 HRE remains a valid part of TWG's evidence base and that of the DCBLP, supplemented by this Addendum.</p> <p><b>APPENDIX 6: Addendum: Landscape Character &amp; Visual Appraisal</b></p> <p>1. INTRODUCTION</p> <p>1.1 This document has been prepared by landscape consultants Allen Pyke Associates (APA) to update, and identify, any changes to the baseline information and result conclusions reached in their report entitled 'Landscape</p>

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			<p>Character and Visual Appraisal: Gatwick Green, Land off Balcombe Road &amp; Fernhill Road, Crawley' dated January 2020 (2020 LCVA) produced on behalf of the Wilky Group (TWG).</p> <p>1.2 TWG has a long-standing interest in the promotion of strategic employment land within the Crawley Borough Council (CBC) area. The site extends to about 47 ha (116 acres) of land east of Gatwick Airport - the site known as Gatwick Green (as shown on the plan at Appendix 1). The Site is proposed for allocation as a Strategic Employment Location (SEL) in the draft Crawley Borough Local Plan, January 2021 (DCBLP) and is identified under Policy EC1 and Policy EC4 as an industrial-led scheme, predominantly for B8 use (strategic storage and distribution). The extent of the allocation for Gatwick Green provides for a minimum of 24.1 ha of industrial development.</p> <p>1.3 The 2020 LCVA provided an assessment of the landscape and visual considerations relating to the Site to inform the promotion of Gatwick Green for employment purposes. The 2020 version of the DCBLP identified the Site as part of a wider area proposed for an Area Action Plan (AAP) to address the Borough's future urban growth and community needs alongside the future needs of Gatwick Airport.</p> <p>1.4 The basis for this Addendum is the revised planning status of the Site under the DCBLP as compared to the policy framework in the January 2020 version of the Plan and what was being promoted by TWG at that time. TWG is now promoting a development for predominately storage and distribution uses in line with policies EC1 and EC4 of the DCBLP.</p> <p>1.5 Based on the changed planning policy status of the site, APA has reviewed the scope and nature of the landscape and visual investigations/surveys undertaken for the 2020 LCVA, which was informed by survey work undertaken in November 2019. The original baseline landscape studies covered broadly the same area of land now being proposed as an allocation. APA confirms that the survey work remains up to date. Consequently, the conclusions and recommendations in the 2020 LCVA remain valid as a basis for the consideration of the proposed allocation of Gatwick Green in the DCBLP though the forthcoming Examination. The 2020 LCVA, supplemented by this Addendum, therefore remains a valid part of TWG's evidence base for their DCBLP submissions.</p> <p>2. CHANGE IN PLANNING POLICY</p> <p><u>Change in Policy between the 2020 and 2021 Regulation 19 DCBLP</u></p> <p>2.1 The 2020 Regulation 19 DCBLP removed blanket safeguarding for the additional wide-spaced runway at Gatwick Airport, replacing it with a commitment to prepare an Area Action Plan (AAP) under Policy SD3 over the former safeguarded land and within which a temporary safeguarding arrangement was proposed.</p> <p>2.2 The AAP would have been advanced via a separate Development Plan Document to address Crawley's unmet needs for employment, housing and community uses alongside any legitimate long term development needs of Gatwick Airport. Following advice from the Planning Inspectorate, the Council revised its strategy by reviewing the</p>

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			<p>extent of safeguarding, which in turn allowed the identification of a Strategic Employment Location at Gatwick Green.</p> <p>2.3 The 2021 Regulation 19 DCBLP therefore allocates Gatwick Green as an industrial-led development site under policies EC1 and EC4, with safeguarded land retained outside the allocation to accommodate an additional wide-spaced runway and associated airport infrastructure.</p> <p><u>New Crawley BC Policy Framework</u></p> <p>2.4 Gatwick Green is allocated as an industrial-led Strategic Employment Location for a minimum of 24.1 hectares under policies EC1 and EC4.</p> <p>2.5 Policy EC4 makes provision for additional industrial land beyond this amount. Limited complementary ancillary uses, such as offices and small scale convenience retail and leisure facilities, may be included where they would support the industrial-led function.</p> <p>2.6 Policy EC4 goes on to set out a range of development management provisions, such as access, sustainable design and construction, character and design, and arrangements for delivery. These provisions establish the scope and nature of the associated infrastructure requirements and environmental considerations, which combined with other policies in the DCBLP to ensure the site is developed in a sustainable manner.</p> <p>3. METHODOLOGY</p> <p>3.1 The methodology used for the review in this Addendum follows the same principles as those used in the 2020 LCVA. These are taken from the recognised Landscape Institute &amp; IEMA publication 'Guidelines for Landscape &amp; Visual Impact Assessment, 3rd Edition of 2013 (GLVIA3).</p> <p>4. REVISED PROPOSALS</p> <p>4.1 The amended proposals and development principles are broadly similar to those assessed in the 2020 LCVA. The principal difference being the substitution of a mixed B1,B2, B8 development for a scheme consisting predominantly of B8 units.</p> <p>5. LANDSCAPE &amp; OTHER CONSIDERATIONS</p> <p><u>Landscape Character &amp; Visual Amenity [LCVA 3.34 to 3.49]</u></p> <p>5.1 The overall massing of the storage and distribution units within the site will be similar for the surrounding visual receptors and other viewpoints identified in the 2020 LCVA. The only significant change will be more uniform building heights compared to the mixed business proposal TWG promoted via its Reg 19 representations to the DCBLP 2020. The 2020 LCVA therefore considered a greater potential range in unit heights that included landmark buildings of greater height.</p>

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			<p>5.2 The more uniform building heights will assist the landscape mitigation principles recommended in the 2020 LVCA [4.1 to 4.7] and bring forward the effectiveness of the screening proposals and assimilation of the development into the landscape. Therefore, the new proposals will have no greater visual impact on the neighbouring visual receptors or impact on the character of the various adjacent rural and urban landscapes. Landscape Designations [LVIA 3.26 to 3.28]</p> <p>5.3 The 2020 LCVA demonstrated that the site was not subject to any statutory or local landscape designations, that it was located outside the London Metropolitan Green Belt but was identified as a Biodiversity Opportunity Area. These circumstances remain unchanged in April 2021. Local Planning Policies [LCVA 3.16 to 3.25]</p> <p>5.4 The landscape related planning policies in the adopted and emerging Local Plans identified in the 2020 LCVA have not changed and the conclusions reached on these policies therefore remain valid.</p> <p>6. CONCLUSION</p> <p>6.1 The landscape and visual conclusions and recommendations included in the 2020 LCVA [5.1 to 5.17] remain valid as a basis for consideration of the proposed allocation of Gatwick Green in the DCBLP and, with the support of this Addendum, remain a valid part of the TWG evidence base for their DCBLP submissions.</p> <p><b>APPENDIX 7: Addendum: Heritage Constraints Appraisal</b></p> <p><u>1.0 Project background</u></p> <p>1.1.1 Savills Heritage and Townscape was 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.</p> <p>1.1.2 This Note is an Addendum to the report by Savills Heritage entitled 'Gatwick Green: Heritage Constraints Appraisal' dated January 2020 (2020 HCA) on behalf of The Wilky Group (TWG). TWG has a long-standing interest in the promotion of strategic employment land within the Crawley Borough Council (CBC) area; a site known as Gatwick Green. The original HCA constituted a preliminary scoping report for the client, outlining the likely considerations 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.</p> <p>1.1.3 TWG owns about 47 ha (116 acres) of land east of Gatwick Airport as shown on the plan attached to this Addendum (along with the original HCA). The Site is a proposed allocation as a Strategic Employment Location (SEL) in the draft Crawley Borough Local Plan, January 2021 (DCBLP) under Policy EC1 and Policy EC4 for an industrial-led scheme, predominantly for B8 use (strategic storage and distribution). The extent of the allocation for Gatwick Green is identified on the attached plan – it provides for a minimum of 24.1 ha of industrial development.</p> <p>1.1.4 The 2020 HCA provided an assessment of the hedgerows on the Site to inform its promotion for employment purposes by TWG. The 2020 version of the DCBLP identified the Site as part of a wider area proposed for an</p>

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			<p>Area Action Plan (AAP) to address future urban growth and community needs alongside the future needs of Gatwick Airport. This Addendum provides an update to the 2020 HCA in response to the changed planning policy status of the Site, being its proposed allocation for employment development in the DCBLP.</p> <p>1.1.5 The basis of this Addendum is the revised planning status of the Site under the DCBLP as compared to the policy framework in the January 2020 version of the Plan and what was being promoted by TWG at that time. TWG is now promoting a development for predominately storage and distribution uses in line with policies EC1 and EC4 of the DCBLP.</p> <p><u>2.0 Planning context</u></p> <p>2.1.1 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 of the original HCA). 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).</p> <p>2.1.2 The purpose of this Heritage Constraints Appraisal Addendum is to review the findings of the original Appraisal (Savills 2020) and report on whether the recommendation remain valid in the context of the Site's revised planning policy status as a proposed allocation for industrial uses, predominately B8 (storage and distribution).</p> <p>2.1.3 The Reg 19 Draft Crawley Local Plan Regulation 19 consultation has been extended to 30 June 2021 and includes the following Strategic Policy in relation to Heritage Assets, which is reproduced in full below:</p> <p>Strategic Policy HA1: Heritage Assets Crawley's designated and non-designated heritage assets include:</p> <ul style="list-style-type: none"> <li>• Listed Buildings (see also Policy HA4);</li> <li>• Scheduled Monuments (see also Policy HA7);</li> <li>• Non-designated archaeological assets of equivalent significance to scheduled monuments (see also Policy HA7);</li> <li>• Conservation Areas (see also Policy HA2);</li> <li>• Locally Listed Buildings (see also Policy HA5)</li> <li>• Areas of Special Local Character (see also Policy HA3);</li> <li>• Historic Parks and Gardens (see also Policy HA6);</li> <li>• Other non-designated assets with archaeological interest (see also Policy HA7).</li> </ul> <p>All development should respond to these as a finite resource, providing a distinctive combination of social, economic and environmental benefits. Proposals should seek to ensure that heritage assets' key features or significance are conserved and enhanced as a result of development.</p> <p>Where a designated heritage asset is affected by a proposal, great weight will be given to its conservation, while harm to, or loss of, its significance will require justification according to the importance of the asset and the degree of loss or</p>

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			<p>harm, in line with local and national policy. Proposals affecting the significance of a non-designated heritage asset will be considered according to the scale of any harm or loss, and the asset's significance, in line with local and national policy.</p> <p>Where a development affects a heritage asset or the setting of a heritage asset, a Heritage Impact Assessment will be required. This should:</p> <p>i. for development proposals meeting criteria set out in the council's Local List of Planning Requirements: include, and be informed by, the findings of a search of the Historic Environment Record (HER) and/or an Archaeological Desk-based Assessment;</p> <p>ii. in all cases: describe, with reference to relevant sources (such as the National Heritage List for England and Conservation Area Appraisals), 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.</p> <p>The loss or replacement of a heritage asset may be appropriate in exceptional circumstances, where justified in line with local and national policy on loss or harm, and where it has been demonstrated that:</p> <ul style="list-style-type: none"> <li>• the site is essential to the development's success;</li> <li>• the benefits of the entire scheme outweigh the loss of the asset; and</li> <li>• any replacement scheme makes an equal contribution to local character and distinctiveness.</li> </ul> <p>In cases where a heritage asset is considered to be suitable for loss or replacement in accordance with local and national policy, and it has been demonstrated that its site is essential to the development's success, proposals will be subject to a requirement to record the asset(s) concerned. The scheme of investigation, including the Historic England Recording Level, is to be agreed with the council in advance of its implementation and will reflect the importance and nature of the asset and the impact of the proposal.</p> <p>Applicants in such cases will also be required to notify any relevant parties including Historic England and submit their recording to the Historic Environment Record. Regeneration proposals that make sensitive use of heritage assets, particularly where these bring redundant or under used buildings or areas, especially any on Historic England's At Risk Register, into appropriate use will be encouraged.</p> <p>2.1.4 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 setting of the listed buildings in line with local and national policy and historic England guidance on setting.</p> <p>2.1.5 In regards to archaeological remains here may be below-ground non-designated heritage assets associated with the previous historic farmsteads (which are visible on the historic OS maps). The LPA archaeological advisor is</p>



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			<p>likely to require site based archaeological fieldwork, dependant on the expected scheme impacts, in order to identify the nature and extent of any below ground nondesignated heritage assets.</p> <p>2.1.6 Also of relevance is Crawley Borough Council's recent consultation on 'Conservation areas and locally listed buildings', which is reflected in the Council's Heritage Assets Review, which forms part of the evidence base to the DCBLP. Overall, the Council propose to update the Local Heritage List (locally listed buildings) by the inclusion of around 60 additional buildings and the removal of 2 buildings currently on the list. The changes to Conservation Areas were not relevant to Gatwick Green. There are two locally listed buildings in Appendix A of the Heritage Assets Review which were not included in the explicit 'scoping out' of locally listed buildings in the 2020 HCA - these assets are some distance from the site and not considered to be relevant. However, there is one additional locally listed building which was not addressed in the 'scoping out' of locally listed buildings in the 2020 HCA because it wasn't listed at that time, namely Hamon Lodge (associated with Burstow Hall and north of Antlands Lane). Insofar as Burstow Hall was 'scoped out' in the 2020 HCA, the same would apply to the Lodge. Furthermore, Toovies Cottage, which was 'scoped out' in the 2020 HCA (as being too far from the site), has now been removed from the list of locally listed buildings.</p> <p>2.1.7 There are no identified Areas of Special Local Character (Policy HA2) or conservation areas (Policy HA3) within the vicinity of the site, however, Policy HA4 concerns listed buildings and is reproduced in full below:</p> <p><b>Policy HA4: Listed Buildings and Structures</b> 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 interest of any statutory Listed Building/Structure, in line with national legislation, policy and guidance.</p> <p>Any changes must preserve or enhance the design and character of the Listed Building and have regard to its historic and architectural significance. A Heritage Impact Assessment is required to be submitted demonstrating how proposals will protect the significance of the listed building, including its setting and its key features. Harm to, or loss of, the significance of a Listed Building will require clear and convincing justification, taking account of the grading of the building, and the degree of harm or loss, in line with national policy.</p> <p>Substantial harm to, or total loss of, the significance of a Listed Building will require exceptional justification, including benefits that outweigh the harm or loss, and further demonstration of either:</p> <ol style="list-style-type: none"> <li>a. the public and substantial nature of the benefits concerned; or,</li> <li>b. the absence of an alternative use which averts the loss or harm and is consistent with: <ol style="list-style-type: none"> <li>i. the nature of the Listed Building; or</li> <li>ii. medium-term viability; or</li> <li>iii. the extent of potential opportunities for grant-funding, or not-for-profit ownership.</li> </ol> </li> </ol>

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			<p>In cases where substantial loss or harm is justified, the council will require the building to have been recorded according to an agreed scheme of investigation which is proportionate to the importance of the Listed Building and the impact of the proposal. The record shall be submitted to the Historic Environment Record. Any development on the site of a demolished Listed Building must have regard to the character, form and heritage significance of the original building.</p> <p>Development proposals involving ground works adjacent to or within the curtilage of a Listed Building will also need to respond to the site's archaeological potential in accordance with Policy HA7.</p> <p>2.1.8 The LPA is likely to require a Heritage Statement as part of a planning application (the DCBLP 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.</p> <p>2.1.9 It is anticipated that the forthcoming development proposals will not physically 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. Upon reviewing the significance of heritage assets in the vicinity of the site based on statutory designation 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 buildings.</p> <p>2.1.10 Following the policy regarding listed buildings, Policy HA5 concerns locally listed buildings and is reproduced below:</p> <p>Policy HA5: Locally Listed Buildings All development will seek to secure the retention of Locally Listed Buildings. Development should also maintain features of interest, and respect or preserve the character or setting of the building.</p> <p>Development proposals affecting a Locally Listed Building must demonstrate in the Heritage Impact Assessment that the proposals take account of its heritage significance, including its setting and any heritage interest falling within the following categories:</p> <ul style="list-style-type: none"> <li>i) Age;</li> <li>ii) Authenticity;</li> <li>iii) Aesthetic/Architectural Value;</li> <li>iv) Historic Value;</li> <li>v) Social/communal Value;</li> <li>vi) Group Value;</li> <li>vii) Landmark/Townscape Value;</li> <li>viii) Archaeological Interest.</li> </ul>

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			<p>Proposals seeking the demolition or partial demolition of a Locally Listed Building may be acceptable in exceptional circumstances if the development proposals:</p> <p>a) reflect or retain the key features of the original building; and</p> <p>b) significantly outweigh the merit of retaining of the original building with regard to social, economic and environmental benefit to the wider area.</p> <p>If demolition is seen to be acceptable, the building must first be recorded according to an agreed scheme of investigation which is proportionate to the importance of the Locally Listed Building and the impact of the proposal. The record must be submitted to the Historic Environment Record in consultation with the Local Authority.</p> <p>2.1.11 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.</p> <p>2.1.12 The DCBLP states, in relation to locally listed buildings that “take account of its heritage significance, including its setting and any heritage interest”. Any forthcoming Heritage Statement (or Heritage Impact Assessment) 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 DCBLP HA4).</p> <p>2.1.13 There are no historic parks or gardens within the vicinity of the site (Policy HA6: Historic Parks and Gardens). However the site does have potential for remains of archaeological interest to be present below ground. Policy HA7 of the DCBLP relates to archaeological remains.</p> <p><b>Policy HA7: Heritage Assets of Archaeological Interest</b>  Development proposals in the vicinity of a Scheduled Monument, or any heritage asset with archaeological interest which is demonstrably of equivalent significance (i.e. ‘designated’ archaeological assets), will be expected to preserve or enhance the asset and its setting, including through the protection of the asset from disturbance associated with development activity, and through the avoidance of patterns of movement or land use which may cause harm to, or loss of, the significance of an asset over time. Development should identify and pursue opportunities to better reveal the significance of such assets.</p> <p>Development proposals affecting designated archaeological assets should be supported by a Heritage Impact Assessment demonstrating an understanding of the asset’s significance, and how this has informed compliance with the requirements identified above.</p> <p>Any harm to, or loss of, the significance of any designated or non-designated archaeological heritage asset involved in a development proposal will be considered in line with national and local policy, according to the significance of the asset and the degree of loss or harm.</p>

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			<p>This consideration will extend to cover heritage assets which are identified, or whose significance is re-evaluated, during the planning and development processes. In order to facilitate this, applications meeting the following thresholds should be supported by an Archaeological Desk-Based Assessment:</p> <ul style="list-style-type: none"> <li>• ground works adjacent to or in the curtilage of a Listed Building;</li> <li>• any activity within a Scheduled Monument;</li> <li>• ground works within a Red Archaeological Notification Area;</li> <li>• five or more residential units OR non-residential/mixed use development of over 0.2ha within an Amber Archaeological Notification Area;</li> <li>• development outside an Archaeological Notification Area comprising 10 or more new units OR over 0.5ha of non-residential/mixed use development.</li> </ul> <p>Subject to the findings of a Desk-Based Assessment, the council may require field evaluation and the recording and publication of results. In some cases, the council may require assets to be preserved in situ or excavated.</p> <p>2.1.14 No past archaeological investigations have been carried out within the Site and a total of seven archaeological investigations have been conducted within the study area, comprising both desk-based assessments along with archaeological fieldwork investigations. 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.</p> <p>2.1.15 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 these investigations in the vicinity of the site highlight varying levels of archaeological potential and it is possible that finds of a later date may also be located within the proposed development area, possibly associated with the previous historic farmsteads (which are visible on the historic OS maps).</p> <p>2.1.16 The LPA archaeological advisor is likely to require an full Archaeological Desk-based Assessment (ADBA) as part of a planning application. Moreover, 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. 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.</p> <p>3.0 Conclusion</p> <p>3.1.1 This addendum confirms the overall conclusions and recommendations of the original HCA which has identified the key heritage considerations for the site in line with the DCBLP policies. The original HCA concluded that:</p>

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			<p>“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 undesigned 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.”</p> <p>3.1.2 Embedded design mitigation is expected to be incorporated around and throughout the development and it is considered that any perceived harm to heritage significance via a change in setting of these statutory and locally listed buildings could be avoided or minimised by the subsequent detailed design, or outweighed by the public benefits of the scheme (in line with the NPPF).</p> <p>3.1.3 Furthermore, in regards to archaeological considerations the original Appraisal concluded that : “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.”</p> <p>3.1.4 As the Site is located in a recognised historic agricultural landscape, the local authority may require a preliminary archaeological evaluation of the Site, which would further assess the below ground potential for archaeological remains.</p> <p>3.1.5 Overall, the LPA is likely to require a Heritage Statement (Heritage Impact Assessment) and a full Archaeological Desk-based Assessment as part of a planning application. An archaeological field evaluation may be required by the LPA pre-determination of a planning application, but this will be based on the results of the full Archaeological Desk-based Assessment and will be the decision of the local authority archaeological advisors.</p> <p>3.1.6 In regards to the DCBLP, the findings and recommendations of the original HCA remain valid in the context of the proposed consultation changes. The revisions to Conservation Areas are not within the vicinity of the Site and the locally listed buildings have already been captured in the 2020 HCA.</p> <p>3.1.7 Savills Heritage and Townscape has reviewed its 2020 HCA in the context of the changed planning policy status of the site and the recent revisions contained in the Council’s Heritage Assets Review. The 2020 HCA was</p>

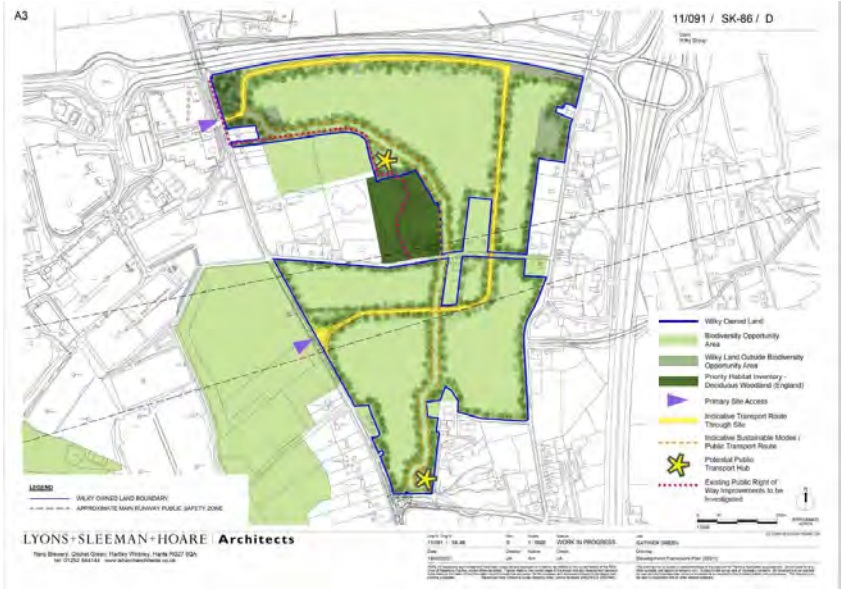
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informed by desk-based investigations undertaken in November 2019: the investigations covered broadly the same area of land now being proposed as an allocation. Savills Heritage confirms that the investigations in the 2020 HCA, updated in this Addendum with respect to the Heritage Assets Review, result in no changes to the findings and recommendations in the 2020 HCA.

3.1.8 The 2020 HCA therefore remains a valid basis for the consideration of the proposed allocation of Gatwick Green in the DCBLP though the forthcoming Examination. Consequently, the 2020 HCA remains a valid part of TWG's evidence base and that of the DCBLP, supplemented by this Addendum.

**APPENDIX 8: Development Framework Plan**



**APPENDIX 9: Gatwick Green Viability Note**

- 1.0 Introduction
- 1.1 This appendix provides Savills review of the Council's viability evidence specific to the proposed Gatwick Green allocation.
- 2.0 Reader Note

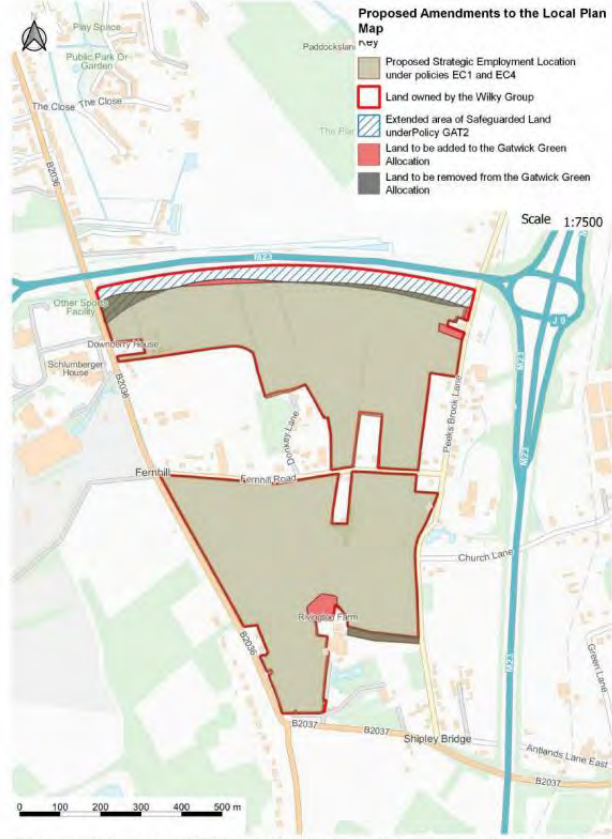
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			<p>2.1 When we refer to the industrial and logistics (I&amp;L) sector we mean Light Industrial (formally B1c use class now part of class E), General Industrial (B2 use class) and Storage and Distribution (B8 use class). Effectively the primary use classes that require shed-type units (including ancillary offices) and associated yard spaces. These use classes typically cover the diverse range of industrial, manufacturing and logistics companies that operate within England.</p> <p>3.0 Crawley Viability Evidence</p> <p>3.1 The viability evidence in support of the Submission Version of the Local Plan is detailed in the Local Plan Review: Whole Plan Policies &amp; Community Infrastructure Levy Viability Assessment (March 2021).</p> <p>3.2 We agree with the overall conclusion of the viability evidence that the proposed Gatwick Green allocation is deliverable and generates a Residual Land Value in excess of Greenfield Land Values of circa £250k per gross hectare which we consider reasonable for high level viability testing. We do note however the upper Greenfield Land Value of £500k per gross hectare is higher than typically applied in Local Plan and CIL viability testing.</p> <p>3.3 We agree with the conclusions of paragraphs 3.8.22, 3.11.35 and 4.1.23 that S106 rather than CIL is the more appropriate mechanism for securing enabling infrastructure for strategic development projects such as the proposed Gatwick Green allocation. S106 will ensure critical infrastructure is delivered alongside the development and therefore avoid delays which is common place with the collection and then subsequent spending of CIL receipts.</p> <p>3.4 We broadly agree with the viability assumptions used to test the deliverability of the proposed Gatwick Green allocation and the subsequent sensitivity testing detailed within Table 4i of Appendix IIIb.</p> <p>3.5 In our view I&amp;L yields relevant to the Gatwick Green allocation are likely to be in the range of 4.5% to 5.5% as indicated in paragraph 3.8.21 of the main report. We also consider the £500k per gross hectare for site works and infrastructure costs to be reasonable for high level viability testing. While this assumption is mentioned in paragraph 2.11.2, for clarity we feel it should be reiterated specific to Gatwick Green in either Appendix 1 or Table 4i of Appendix IIIb.</p> <p>3.6 Appendix 3 – Industrial &amp; Logistics Land Needs1 demonstrates Gatwick Green will experience strong market demand, including for larger units over 100,000 sqft which are currently under-represent in the Crawley market. In this regard the baseline rental assumption of £120 psqm is considered to be at the high end for larger units although we note sensitivity testing goes as low as £100 psqft, which is considered more appropriate as a blended rate should only larger units come forward at Gatwick Green. The counter balance to this is that larger units may have lower build costs to the £826 sqm assumption used which we note does not appear to have been sensitivity tested.</p>

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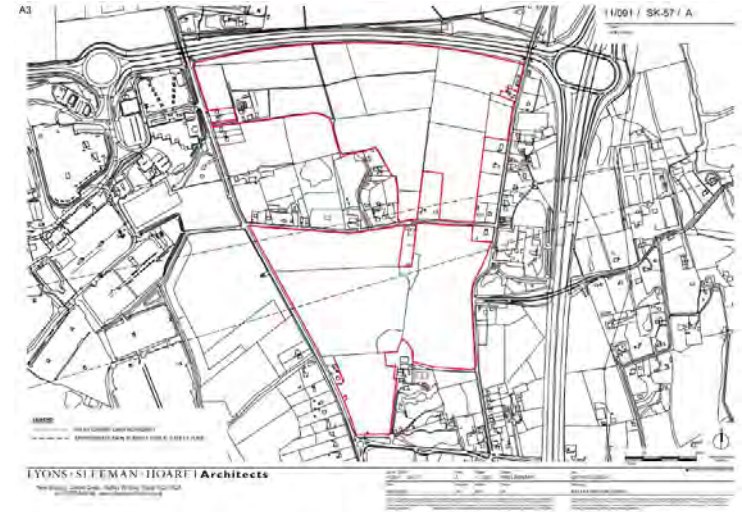
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**Comments**

**APPENDIX 10: Proposed Amendments to the Local Plan Map Red Line Plan (Wilky Control)**



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**APPENDIX 11: Revised Gatwick Airport Safeguarded Land**



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			<div data-bbox="645 284 1438 842" data-label="Figure"> </div> <p><b>APPENDIX 12: Proposed changes to Strategic Policy EC4 and supporting text</b></p> <p>Proposed changes to the Draft Crawley Borough Local Plan 2021-2037 (January 2021)      Savills on behalf of the Wilky Group</p> <p>Changes to policy / text      Proposed changes to the policies and text of the DCBLP are set out below and are indicated by the following means:      Additions: underlined      Deletions: crossed out</p> <p><b><u>Strategic Policy EC4</u></b>      “Land east of Balcombe Road and south of the M23 spur, referred to as Gatwick Green, is allocated for the comprehensive development of an industrial-led Strategic Employment Location.</p> <p><b><u>Requirements</u></b>      Proposals for development of the Strategic Employment Location will be required to <u>address the following strategic infrastructure requirements:</u></p> <p><b><u>Employment Uses</u></b></p>

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			<p>a. provide as a minimum 24.1ha new industrial land, predominantly for B8 storage and distribution use, demonstrating through appropriate evidence the justification for any further industrial floorspace beyond this amount;</p> <p>b. justify any limited complementary ancillary uses such as office floorspace, smallscale convenience retail and small-scale leisure facilities that would support the principal industrial-led storage and distribution function....</p> <p>d. Demonstrate through a comprehensive Mobility Strategy how the development will include measures and improvements to maximise sustainable access to the site, focusing on how the development will optimise the usage of sustainable modes of transport as opposed to the private vehicle, and detailing infrastructure improvements that will be required to adequately mitigate the development impacts on the highways network, detailing how these improvements will be delivered and operated. Highways infrastructure and improvements that are required as a result of impacts arising from the development must be <u>funded, secured or</u> delivered as part of the development. On the basis that the development will be required to address its own highways impact, a S106 sustainable transport contribution will not be sought.....</p> <p><b>Delivery</b>            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:</p> <ul style="list-style-type: none"> <li>• Requirement for ongoing economic impacts testing;</li> <li>• Contribute to delivering objectives of the Crawley Employment and Skills Programme, demonstrating through an Employment and Skills Plan (to be agreed by the council) how the development, through its construction and end user phases, will contribute to addressing the local skills gap. This may include, use of local labour, local supply chain procurement and similar skills/capacity support (in conjunction with local education and training providers);</li> <li>• <u>The provision of supporting access/highway infrastructure within the Safeguarded Land between the allocation and the M23 spur road in such a manner that is consistent with the requirements of Policy GAT2 Safeguarded Land.</u></li> </ul> <p><b>Supporting Text</b>            “9.48 As identified by Strategic Policy EC1, over the period to 2036 there is need for provision of <u>a minimum of up to</u> 38.7 hectares new business land in Crawley. Of the total business land requirement, office needs account for 5.9ha, which, taking account of the identified office land supply pipeline of 8.8ha, can be accommodated at sites identified in the Employment Land Trajectory. As such, the business land supply shortfall relates purely to industrial land, substantially within the storage &amp; distribution (Class B8) sectors, where there is a total need for <u>a minimum of 32.8ha of</u> land. With the Employment Land Trajectory identifying an existing supply pipeline of 8.7ha land within these sectors, this results in an outstanding need <del>of around</del> <u>for a minimum of</u> 24.1ha industrial land.            ....</p>

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			<p><b>Reasoned Justification</b></p> <p>9.50 Local Plan Policy EC1 identifies an overall need for <u>a minimum of 38.7ha</u> business land over the Plan period, of which the majority (32.8ha) is for industrial land, predominantly B8 storage &amp; distribution warehousing. With an existing industrial land supply pipeline of 8.8ha, there is outstanding need for at least 24.1ha new industrial land in the borough over the period to 2036. ...</p> <p>9.54 Land at east of Balcombe Road and south of the M23 spur, known as Gatwick Green, is allocated for an industrial-led Strategic Employment Location that will provide a minimum of 24.1ha industrial land, predominantly within the B8 use class. The site identified on the Local Plan Map is larger because <u>Policy EC4 acknowledges that the allocation could accommodate additional</u> <del>the significant quantum of</del> industrial floorspace where there is <u>evidence of need and</u> could be supported by complementary uses where justified by evidence, including ancillary uses such as a limited provision of offices and supporting amenity uses that will cater for the needs of employees. Also, there is a need for the strategic development to provide comprehensive supporting infrastructure, appropriate landscaping and to protect the amenity of neighbouring properties. Anticipated to be built out over a seven to ten year period, completed by 2035, the Gatwick Green allocation will meet Crawley's economic needs in the latter part of the Plan period.</p> <p>...</p> <p>9.59 The Strategic Employment Location is surrounded by strategic transport links, but it has no immediate access to the strategic road network or Gatwick Airport railway station. A Strategic Employment Location of the scale proposed at Gatwick Green will generate surface access demands that will impact upon the existing highways network. The focus will be to maximise opportunities to access the site by sustainable transport modes, particularly for employees. However, given the scale and industrial nature of the proposed development, development must cater for its operational requirements, particularly HGV movements, demonstrating through the Transport Assessment and Mobility Strategy how this will be achieved without an adverse impact upon the highways network and residential amenity. It is vital that surface access demands arising from the development are appropriately catered for through the delivery of new infrastructure and/or improvements to existing infrastructure as part of the development. The outcomes of the Crawley Local Plan Transport model are at the time of writing being finalised, and will form the basis for more detailed modelling to be undertaken by the site promoter at the planning application stage. Given the requirement to provide the physical infrastructure to support the Strategic Employment Location as part of the development itself, <u>impacts arising from the development must be funded, secured or delivered as part of the development. Therefore, a S106 sustainable transport contribution as provide for in the Planning Obligations Annex will not be sought.</u></p>
			<p><b>Suggested Modifications:</b></p> <p><b>5.0 Conclusions</b></p>

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			<p>5.1 It is concluded that against the tests of soundness at para 35 of the NPPF, <b>Strategic Policy EC4 is sound</b> as it allocates Gatwick Green as a major Strategic Employment Location to respond to the urgent and longer-term needs of the Crawley economy and to address the urgent needs arising from the COVID-19 induced economic downturn in the economy of the Crawley area. More specifically, Strategic Policy EC4 is sound for the following reasons:</p> <ul style="list-style-type: none"> <li>• <b>Positively prepared</b> – Gatwick Green can meet the Borough’s minimum objectively assessed need for industrial land, and specially for B8 uses, in a sustainable manner.</li> <li>• <b>Justified</b> – Gatwick Green advances the vision for Crawley and the strategy for the economy contained in a range of regional and sub-regional strategies and the DCBLP, having taken account of the absence of any reasonable alternatives, such that are constrained by safeguarding for critical airside and landside airport infrastructure related to an additional wide-spaced runway at Gatwick.</li> <li>• <b>Effective</b> – The Gatwick Green allocation is deliverable over the Plan period as evinced in this representation and in separate representations by TWG on the Employment Land Trajectory, and is also the most effective option in the context of the Council’s collaborative approach to assessing the needs of the economy across the north West Sussex area (Crawley Borough and Mid Sussex and Horsham Districts).</li> <li>• <b>Consistent with national policy</b> – The policy allocates Gatwick Green as a SEL: the Site represents a highly sustainable location and can be development in a sustainable manner in accordance with the development control provisions of Policy EC4 to deliver significant socio-economic and environmental benefits to Crawley Borough.</li> </ul> <p>5.2 Whilst Strategic Policy EC4 is sound, there are some minor changes to the DCBLP text and/or the policy to ensure it is clear that the employment land requirements of the Borough are a <b>minimum</b>; there is consistency within the policy; there is flexibility with regard to the delivery of Planning Obligations, and there is a more land and resource efficient dual use for highway infrastructure in the Safeguarded Land south of the M23 spur road owned by TWG. These minor changes are referred to in this representation, and include:</p> <ol style="list-style-type: none"> <li>1. <b>Amend Strategic Policy EC4 such that the ‘Requirements’ of the policy refer to ‘strategic infrastructure requirements’</b>. This will ensure consistency with the status of the policy as a ‘strategic policy’ as defined in the NPPF.</li> <li>2. <b>Amend Strategic Policy EC4 and paragraph 9.59</b> to provide for a flexible approach to the provision of off-site highway improvements via planning obligations, by the introduction of more flexibility in how these are delivered. The same change is proposed to the Annex on Planning Obligations in separate representations by TWG.</li> <li>3. <b>Amend Strategic Policy EC4</b> to enable the Safeguarded Land south of the M23 spur road to accommodate the northern on-site access road to serve Gatwick Green without prejudicing GAL’s ability to bring forward the highway infrastructure associated with the development of an additional wide-spaced runway for Gatwick Airport. A complementary change to the DCBLP safeguarding policy is addressed in Savills representation on behalf of TWG on Policy GAT2.</li> <li>4. <b>Amend paragraphs 9.48 and 9.59 of the supporting text to Strategic Policy EC4 to reflect that the overall and outstanding requirements of new employment land are a ‘minimum’</b>. The employment land</li> </ol>

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			<p>requirements are expressed as a 'minimum' in relation to the overall requirement of 38.7 ha (Strategic Policy EC1) and the outstanding requirement of 24.1 ha (Strategic Policy EC4), but this is not reflected in the supporting text where these requirements are not expressed as minima (paras 948 and 9.50). This also applies to the overall requirement for industrial land noted in paragraph 9.48. This represents an inconsistency between the text and the policies of the DCBLP and should be amended to ensure a coherent approach to the provision of employment land and achieve consistency across Plan.</p> <p><b>5. Amend paragraph 9.59</b> to make clear that the s106 sustainable transport contribution relates to that identified thorough the formula contained in the Planning Obligations Annex.</p> <p><b>6. Amend paragraph 9.54</b> to reflect the provisions in Strategic Policy EC4 that allow for further industrial development above the minimum 24.1 ha provided there is a justified need for such development.</p>
REP/056	Gatwick Airport Limited	Policy EC4	<p><b>See Detailed Representation under Policy EC1(v).</b></p> <p><b>Annex 1-3:</b></p> <p><b>Draft Crawley Borough Local Plan 2021 – 2037</b>  <b>Submission Publication Consultation: January – June 2021</b>  <b>Objections by Gatwick Airport Limited Detailed Objection to Policies EC1(v) and EC4 Strategic Employment Allocation at Gatwick Green</b>  <b>Annex 1: Review of Employment Land Justification</b></p> <p>The NPPF requires local authorities to “set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth, having regard to Local Industrial Strategies and other local policies for economic development and regeneration” (para 81.a).</p> <p><b>Safeguarding</b>  In the notes of the PINS Advisory Video Conference, the principle of safeguarding is dealt with directly in respect of the proposed removal of safeguarding for the Crawley North area. The Inspector advises that as the removal of safeguarding cannot be regarded as certain, there is no known timescale for the removal of the protection, and GAL objects to the removal of the safeguarding (the Gatwick Airport Masterplan stating that it is in the national interest to continue with the strategy of safeguarding), the proposal to remove the safeguarding was condemned as being ‘unlikely to be effective as things stand’. The strategy now adopted similarly conflicts with safeguarding policy. It has not been informed through discussions with GAL and an objection is maintained. The basis of the assumption is incorrect. GAL are making representations on this point.</p> <p><b>The Definition of the Functional Economic Market Area</b>  Crawley Borough Council commissioned Lichfields to undertake a study of the Northern West Sussex (NWS) area which encompasses three West Sussex local planning authorities - Crawley, Horsham and Mid Sussex.</p>

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			<p>Lichfields initially produced the 2020 Northern West Sussex Economic Growth Assessment (NWEGA) (dated January 2020) which was intended to provide a comprehensive evidence base for employment and economic development needs across the NWS area during the period up to 2036.</p> <p>The report concluded that, looking at commercial, retail and housing activities, the NWS operates as a broad Functional Economic Market Area (FEMA) which is largely consistent with the authority boundaries of Crawley, Horsham and Mid Sussex. This conclusion does not seem justified by the evidence referenced in the report which demonstrated Crawley's functional links with areas to the north, with the area covered by the adjoining district councils in Surrey and beyond. For example, the report examined commuting flows into and out of the area, identifying an inflow of 58,187 working people with the greatest quantities originating from Reigate and Banstead, the London Borough of Westminster, Tandridge and Mole Valley to the north and Brighton and Hove to the south.</p> <p>Whilst the commercial property market was found to be relatively self-contained, local agents reported that the majority of enquiries for business space tend to originate from within a 15-20 mile radius, with the M25 generally providing the 'cut off' in terms of occupier movement north of the sub-region. Crawley continues to attract the strongest levels of demand from business occupiers, across both office and industrial sectors and from major multinational firms as well as local SMEs. Again, this finding indicates a strong linkage with areas to the north of the borough.</p> <p>The latest retail study for Crawley showed that the Borough has a wide retail catchment area that extends north to the M25 and beyond (as far north as Warlingham, situated just south of Croydon), north west to Dorking, south west to Billingshurst, south to Burgess Hill, south east to Uckfield and north east to just west of Sevenoaks. This finding also demonstrates the borough's functional economic links with areas to the north.</p> <p>The housing market also points to an overlap with surrounding housing market areas, in particular in the southern parts of Horsham and Mid Sussex in and around Steyning, Hurstpierpoint and Hassocks (and potentially Burgess Hill) but also, in the northern part of the area, with parts of Surrey.</p> <p>The NWEGA states that its conclusions on the FEMA do not take account of policy positions or approaches that maybe adopted by local planning authorities across NWS and neighbouring areas through the Duty to Cooperate. It is up to local planning authorities to determine how the conclusions from the study are taken forward in planning policy terms.</p> <p>We consider the evidence clearly demonstrates the relationship of Crawley with the area to the north of the borough, in particular the three Surrey counties of Mole Valley, Reigate and Banstead, and Tandridge. Consequently, it is appropriate for these areas to be given equal weight in the application of the Duty to Cooperate with the other districts in NWS.</p> <p>Employment Forecasts</p>

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1. The Northern West Sussex Economic Growth Assessment (NWEGA) - Jan 2020  
 The NWEGA assess employment growth in the borough over the period 1999 – 2019, based on data provided by Oxford Economics (OE), as shown in the figure below which is extracted from the report (Figure 3.3). The report notes that over the period Crawley experienced the greatest job growth in NWS, with the greatest increase in jobs occurring in 2000 (9.8%) and in 2015 (9.6%) but with a stagnant job growth period in between 2003 – 2015. We note the report is silent on the pre-COVID decrease in employment post 2017 and the downward trend indicated by the data.



The study looks at employment change by sector in Crawley over the same 20-year period, again based on data from OE. This shows that some sectors have seen a large proportional increase in employment (such as administrative and support services; transportation and storage (in part reflecting the growth in activity at Gatwick Airport) but that the manufacturing sector has experienced a significant decline in employment (5,097 jobs).

The study then assesses three different future economic growth scenarios for Crawley (and Horsham) based on:

- (i) Projections of employment growth in the main B class sectors (labour demand) derived from economic forecasts produced by OE (dated Q4 2018);
- (ii) Consideration of past trends in completions of employment space based on monitoring data collected by Crawley Borough Council, and how these trends might change in the future.
- (iii) Estimates of future growth of local labour supply based on demographic assumptions applied as part of the 2019 Northern West Sussex Strategic Housing Market Assessment (SHMA).

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			<p>The OE employment projections indicate overall growth of 6,340 workforce jobs for Crawley over the period from 2019 to 2036, equivalent to around 373 jobs per year on average. Table 8.1 below, also extracted from the study, shows the changes on a sectorial basis. The key drivers of growth are admin and support, wholesale and retail trade whilst the manufacturing, transport and storage sectors will incur the largest employment losses.</p> <p>Table 8.1 Fastest Growing and Declining Sectors in Crawley, 2019-2036</p> <table border="1"> <thead> <tr> <th>Oxford Economics Sector</th> <th>Use Class</th> <th>Employment Change (2019-2036)</th> <th>% Change (2019-2036)</th> </tr> </thead> <tbody> <tr> <td>Admin and support services</td> <td></td> <td>+3,660</td> <td>+19.1%</td> </tr> <tr> <td>Wholesale and retail trade</td> <td></td> <td>+1,240</td> <td>+9.4%</td> </tr> <tr> <td>Professional, scientific and technical activities</td> <td></td> <td>+995</td> <td>+14.7%</td> </tr> <tr> <td>Human health and social work activities</td> <td></td> <td>+725</td> <td>+16.3%</td> </tr> <tr> <td>Construction</td> <td></td> <td>+625</td> <td>+16.8%</td> </tr> <tr> <td>Accommodation and food services</td> <td></td> <td>+530</td> <td>+7.3%</td> </tr> <tr> <td>Electricity, gas, steam and air conditioning supply</td> <td></td> <td>-150</td> <td>-11.4%</td> </tr> <tr> <td>Public admin and defence</td> <td></td> <td>-200</td> <td>-8.5%</td> </tr> <tr> <td>Transport and storage</td> <td></td> <td>-565</td> <td>-2.5%</td> </tr> <tr> <td>Manufacturing</td> <td></td> <td>-1,530</td> <td>-23.0%</td> </tr> </tbody> </table> <p>Source: Oxford Economics 2018 / Lichfields analysis                      Key: <b>GREEN</b> = B class sector      <b>ORANGE</b> = Part B class sector      <b>RED</b> = Non B class sector</p> <p>In comparison with past trends, the baseline employment projections for Crawley imply a significant slowdown in job growth over the study period between 2019 and 2036 compared with recent patterns of job change in the Borough going back to 2011 (paragraph 8.18).</p> <p>Converting the jobs change forecast into a floorspace requirement, the study identifies a need for employment floorspace of 6,790sqm in Crawley. However, as shown by Table 8.5 below extracted from the study, the need for both manufacturing and distribution is negative.</p>	Oxford Economics Sector	Use Class	Employment Change (2019-2036)	% Change (2019-2036)	Admin and support services		+3,660	+19.1%	Wholesale and retail trade		+1,240	+9.4%	Professional, scientific and technical activities		+995	+14.7%	Human health and social work activities		+725	+16.3%	Construction		+625	+16.8%	Accommodation and food services		+530	+7.3%	Electricity, gas, steam and air conditioning supply		-150	-11.4%	Public admin and defence		-200	-8.5%	Transport and storage		-565	-2.5%	Manufacturing		-1,530	-23.0%
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			<p>Table 8.5 Net Employment Space Requirements in Crawley and Horsham (Baseline Job Growth)</p> <table border="1"> <thead> <tr> <th rowspan="2"></th> <th colspan="2">Floorspace (GEA sqm) 2019 to 2036</th> </tr> <tr> <th>Crawley</th> <th>Horsham</th> </tr> </thead> <tbody> <tr> <td>Offices (B1a/B1b)</td> <td>33,890</td> <td>22,610</td> </tr> <tr> <td>Manufacturing (B1c/B2)</td> <td>-24,065</td> <td>-7,850</td> </tr> <tr> <td>Distribution (B8)</td> <td>-2,855</td> <td>25,970</td> </tr> <tr> <td><b>Total B Class</b></td> <td><b>6,970</b></td> <td><b>40,730</b></td> </tr> </tbody> </table> <p>Source: MSDC analysis      Note: Totals rounded</p> <p>The study then looks at past completion rates on the assumption that past development rates carry on in the future at the long-term average. On this basis, the floorspace requirement equates to 130,900 sqm for Crawley by 2036, comprising 27,200 sqm offices and 103,700 sqm industrial and warehousing.</p> <p>The labour supply assessment is based on an annual housing supply target of 752 dwellings per annum. As the draft plan proposes a lower annual housing target, we do not consider the results of this assessment further.</p> <p>The study then converts the jobs and floorspace requirements to a land requirement for Class B floorspace* which ranges from minus 1.1 ha for the employment projections to plus 33ha for the continuation of past trends.</p> <p>2. The Northern West Sussex Economic Growth Assessment Focussed Update for Crawley - Sept 2020  CBC subsequently commissioned Lichfields' to undertake a focused update to provide supplementary and updated economic evidence specifically to inform the approach to economic growth and employment land policies within the new Crawley Local Plan. The focussed report is dated September 2020.</p> <p>The scope of the update study is set out below with all other aspects of the NWEGA remaining unchanged.</p> <ol style="list-style-type: none"> <li>1 Re-visit future economic growth forecasts for Crawley set out in the 2020 EGA – prepared by Oxford Economics, which implied a fairly modest level of future growth – and undertake some further interrogation to identify the extent to which any specific macro sector or other assumptions had a determining effect on the outputs for Crawley, set in the context of the long-term historical growth rate for the Borough and the structure of its economy;</li> <li>2 Update the economic forecasts to reflect Covid-19 and revised macroeconomic assumptions for the UK economy more widely;</li> <li>3 Given the added uncertainties associated with forecasting at this time and also what appeared to be a pessimistic outlook associated with the 2020 OE economic forecasts, benchmark these against equivalent contemporary figures sourced from Experian(E) to inform the 'triangulation' judgement about the most appropriate and positive basis for long-term planning in Crawley;</li> <li>4 Prepare new estimates of future employment land requirements for the range of Class B uses in terms of floorspace and land areas for all updated growth scenarios;</li> </ol>		Floorspace (GEA sqm) 2019 to 2036		Crawley	Horsham	Offices (B1a/B1b)	33,890	22,610	Manufacturing (B1c/B2)	-24,065	-7,850	Distribution (B8)	-2,855	25,970	<b>Total B Class</b>	<b>6,970</b>	<b>40,730</b>
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			<p>5 Assess the updated demand/supply balance of employment land in Crawley over the new Local Plan period, to consider the potential need to provide additional capacity through the new Local Plan.</p> <p>The report acknowledges that it is inevitably a point-in-time assessment and that whilst it has incorporated the latest data and other evidence available at the time of preparation (i.e. July/August 2020), the accuracy and sources of data derived from third party sources has not been checked or verified.</p> <p>Projections of employment growth in the main Class B uses (labour demand) are derived from economic forecasts produced by OE and E in 2018 and 2020. In addition, a consideration of past trends in completions of employment space based on the latest monitoring data collected by Crawley Borough Council; and estimates of future growth of local labour supply based on the Council's latest housing delivery trajectory and demographic assumptions consistent with the 2019 Northern West Sussex Strategic Housing Market Assessment (SHMA).</p> <p>The 2018 forecasts produce different levels of employment land requirements ranging between 2.9ha and 38.7ha. These figures include a 10% buffer to cater for factors such as a delay in development sites coming forward.</p> <p>Table 2.4 Employment Land Requirements</p> <table border="1"> <thead> <tr> <th rowspan="2"></th> <th colspan="2">Employment Land (ha) 2019 to 2036</th> </tr> <tr> <th>Oxford Economics 2018</th> <th>Experian 2018</th> </tr> </thead> <tbody> <tr> <td>Offices (B1a/B1b)</td> <td>5.6</td> <td>5.9</td> </tr> <tr> <td>Manufacturing (B1c/B2)</td> <td>-6.0</td> <td>-0.6</td> </tr> <tr> <td>Distribution (B8)</td> <td>3.3</td> <td>33.4</td> </tr> <tr> <td><b>Total B Class</b></td> <td><b>2.9</b></td> <td><b>38.7</b></td> </tr> </tbody> </table> <p>Source: Lichfields analysis</p> <p>The 2020 forecasts examine the potential impact of the Covid-19 pandemic on the Borough's economy in both the short term and the longer-term Plan period. It is noted that these may need to be re-considered closer to the Local Plan examination stage depending on how the economic situation changes. The 2020 forecasts imply much lower levels of growth, and therefore employment land requirements, for Crawley overall. The OE forecasts are more pessimistic than the Experian.</p> <p>OE reduce Crawley's total job growth by over 50%, from 6,300 jobs to 2,900 jobs over the Plan period. This reduction is largely caused by the 'rebasings' of jobs in 2019, with workforce jobs expected to reach the same level by 2036 as implied by pre-Covid forecasts. B-class jobs reverse from growth of 1,600 jobs to a decline of 527 jobs;</p>		Employment Land (ha) 2019 to 2036		Oxford Economics 2018	Experian 2018	Offices (B1a/B1b)	5.6	5.9	Manufacturing (B1c/B2)	-6.0	-0.6	Distribution (B8)	3.3	33.4	<b>Total B Class</b>	<b>2.9</b>	<b>38.7</b>
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E also reduce Crawley’s total job growth by about 40%, from 14,800 jobs to 8,900 jobs over the 2019- 2036 Plan period and imply that the local economy supports a smaller employment base by the end of the Plan period. B-class job growth remains positive but reduces by nearly 60%.

Tables A.4.4 and A.4.6 are extracted from the study below and summarise the two forecasts which range from -9.8 ha to +13.4 for all B Class uses.

Table A.4.4 Employment Floorspace and Land Requirements: Oxford Economics 2020			Table A.4.6 Employment Floorspace and Land Requirements: Experian 2020		
	Change 2019-2036			Change 2019-2036	
	Net Employment Floorspace (GEA sqm)	Employment Land (ha)		Net Employment Floorspace (GEA sqm)	Employment Land (ha)
Offices (B1a/B1b)	27,385	4.5	Offices (B1a/B1b)	25,362	4.2
Manufacturing (B1c/B2)	-44,449	-11.1	Manufacturing (B1c/B2)	-16,362	-4.1
Distribution (B8)	-12,849	-3.2	Distribution (B8)	48,400	13.3
<b>Total B Class</b>	<b>-29,913</b>	<b>-9.8</b>	<b>Total B Class</b>	<b>57,400</b>	<b>13.4</b>

Source: Oxford Economics 2020 / Lichfields analysis

Source: Experian 2020 / Lichfields analysis

We comment that in comparison with past trends, the 2018 forecasts already imply a slower job growth trajectory for the Crawley economy over the new Plan period and the level of growth is even more subdued in the 2020 Covid-19 affected forecasts.

In comparison, the trend-based data reveals average net completions of 2,220sq m office floorspace and 7,150 sq m industrial and distribution floorspace per annum over the period 2011-2019. This trend is extrapolated across the plan period (2019-2036) and converted to a land requirement of 39ha. This conclusion is in part based on the fact that gross and net completions of B-class space were considerably higher in 2018/19 than in recent years (driven largely by two developments at Space Gatwick (B8) and the Former Thales site (B1 offices) which have had the effect of increasing the historic annual average take-up rate and therefore the resulting employment floorspace and land requirement under this scenario for the Local Plan period to 2036.

**Issues**

In the light of our analysis we have identified the following broad issues:


- (i) The failure to properly protect safeguarded land

The note of the PINS Advisory Video Conference sets out the Inspector’s advice that the NPPF requires local plan policies to positively and proactively encourage sustainable economic growth. It goes on to state explicitly that with the safeguarding of land at North Crawley still in place, the Council should be proactively seeking to accommodate unmet economic needs in nearby authority areas through the Duty to Cooperate. It treats the safeguarded land as a single entity and does not envisage that parts of it can or should be nibbled away.

- (ii) The reliability and interpretation of the economic land forecasts

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			<p>The employment land review undertaken for CBC across 2 studies produces a very broad range of employment land requirements. Even the Update report produces a range between 21.7ha and 56.9 ha. The 2018 OE and the 2020 OE and E assessments seem to be dismissed on the basis the conclusions did not provide employment land forecasts which were high enough, and in relation to the latter, that the conclusions on the impact of Covid 19 were too uncertain. Support for the 2018 E forecasts was advanced on the basis that the past take up rates indicate an employment land need of about the same magnitude. This justification overlooks the admission in the report (paragraph 2.37) that the additional 2018/19 data included the completions of two large developments which had the effect of increasing the historic annual average take-up and consequently the employment land requirement for the new local plan period.</p> <p>All of the evidence in the two employment land assessments points to a reduction of the level of employment growth in Crawley in the forthcoming local plan period. The employment forecast adopted was the highest of the various forecasts, with the exception of the future labour supply scenario which assumes that the whole of the West of Crawley housing allocation is completed within the plan period (which will clearly not be the case).</p> <p>The fact that the forecast level of need is of the same magnitude as that based upon past take up rates is cited as an indicator that the forecast is acceptable. The assessment itself nevertheless acknowledges that past take up rates have been inflated by two very recent completions and so, rather than providing support for the forecast, it indicates that the forecast overstates the level of need. This conclusion is further supported by the forecasts of the impact of Covid-19 on the employment position, which all forecast much lower levels of growth, and therefore employment land requirements but which are not taken into account by the Update Report.</p> <p>(iii) The oversize scale of the allocation Policy EC4 indicates that the Gatwick Green allocation of 47ha should provide “as a minimum”, 24.1ha new industrial land, predominantly for B8 storage and distribution use. Any additional floorspace would need to be justified through appropriate evidence. Gatwick Green is consequently very nearly twice the size of the employment land requirement (24.1ha) it is intended to meet. Furthermore, there is no evidence in the local plan, as is inherent from the wording of the policy itself, of any need for the larger allocation. It is unclear what happens to the remaining 22.9ha or why such a large release of surplus land is required and/or justified to meet the employment land requirement, even as identified by the council, especially in contravention of Gatwick Airport safeguarding.</p> <p>(iv) The lack of understanding of the impact of Gatwick Green on the GAL masterplan The allocation of Gatwick Green is based upon a simple but ultimately uniformed assessment as to whether land shown in the Gatwick Masterplan for surface parking produces an ‘efficient’ use of land. Justified on the basis that GAL are investigating the use of decked car parks, it is concluded that 47ha of land can be excluded from the safeguarding area. The opinion of GAL on the impact of removing this amount of land from the safeguarded area was not sought by CBC. It was a view reached unilaterally by CBC. The basis for the conclusion that it would not have an unacceptable impact on the Gatwick Masterplan is not set out nor is there any evidence as to what analysis was</p>

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			<p>undertaken by CBC on which to base this opinion. (v) The failure to examine alternative solutions The strategy adopted by CBC fails to look at the alternative scenarios for providing employment land either within the borough or in surrounding districts on the edge of the urban area, or elsewhere, through the Duty to Cooperate.</p> <p>A 'Built-Up Area Boundary Review' was undertaken in connection with the 2015 Local Plan. As a minimum, this exercise should have been repeated to allow an informed and balanced assessment of whether the objectively assessed employment needs could be met elsewhere in the borough. One possible location which has simply not been considered is Land West of County Oak which lies outside of the safeguarded area and adjacent to existing employment locations. By our assessment, this area extends to about 24ha (see below).</p> <div data-bbox="651 555 1704 1369" style="border: 1px solid black; padding: 10px;"> <p><b>Land West of County Oak</b></p>  <p style="text-align: center;"><b>Output : Current Area</b></p> <p style="text-align: center;">242889.62 m<sup>2</sup>   0.24 km<sup>2</sup>   60.02 acres   24.29 hectares   2614442.17 feet<sup>2</sup>   0.09 square miles   0.07 square nautical miles</p> <p style="text-align: center;"><b>Current Perimeter</b></p> <p style="text-align: center;">3129.416m OR 10267.111feet</p> </div>

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			<p>(vi) The failure in the duty to co-operate post April 2020</p> <p>Additionally, there needs to be further work with authorities within the Gatwick Diamond to determine the scope for additional land allocations beyond CBC boundaries – in particular along the M23 corridor – as part of the Duty to Cooperate. The discussions should not be restricted just to the authorities within Northern West Sussex Economic Growth Area as this is an artificial designation which does not reflect the location of Crawley on the northern boundary of the County; the primary road access to the town along the M23 which runs down from the north, or the town’s Travel to Work Area which recognises that the economic influence of the town also extends to the north to encompass areas in Surrey.</p> <p>There was an opportunity to work with Mid Sussex DC on its Site Allocations DPD which was submitted in December 2020 and which includes employment allocations along the M23:  SA4 Land North of Junction 10 2.7ha  SA7 Cedars 2.3ha  SA8 Pease Pottage Nurseries 1.0ha</p> <p>There was an opportunity to consider the extent to which these allocations could have been extended further, or indeed other sites brought forward, to help meet the employment needs of Crawley. Whilst the opportunity might have been missed in respect of this draft of the plan, there remain opportunities for Crawley to engage with the immediately neighbouring Surrey authorities, including Reigate and Banstead, Mole Valley and Tandridge.</p> <p>Conclusions  In the light of our analysis of the evidence base for the proposed Gatwick Green allocation, we have reached the following conclusions:</p> <ol style="list-style-type: none"> <li>1. Gatwick Green is proposed to be constructed on land that remains safeguarded for the expansion of Gatwick Airport;</li> <li>2. The Government’s draft Aviation Strategy concludes “It is prudent to continue with a safeguarding policy to maintain a supply of land for future national requirements and to ensure that inappropriate developments do not hinder sustainable aviation growth”. This stance is recognised in the National Planning Policy Framework (NPPF) which restates the government’s commitment to “identify and protect, where there is robust evidence, sites and routes which could be critical in developing infrastructure to widen transport choice” (paragraph 104).</li> <li>3. The development of Gatwick Green for employment purposes would conflict with that safeguarding and the Gatwick Masterplan;</li> <li>4. The matter of safeguarding was addressed in the Inspector’s Notes of the PINS advisory video conference (April 2020) in respect of land ‘North of Crawley’. The Inspector concluded that the removal of safeguarding cannot be regarded as certain, there is no known timescale for its removal and that GAL continues to object to its removal. Consequently, the proposal to remove safeguarded land was, in that case, as a consequence considered “...unlikely to be effective”. We consider that the circumstances which lead to that conclusion apply in this case;</li> </ol>

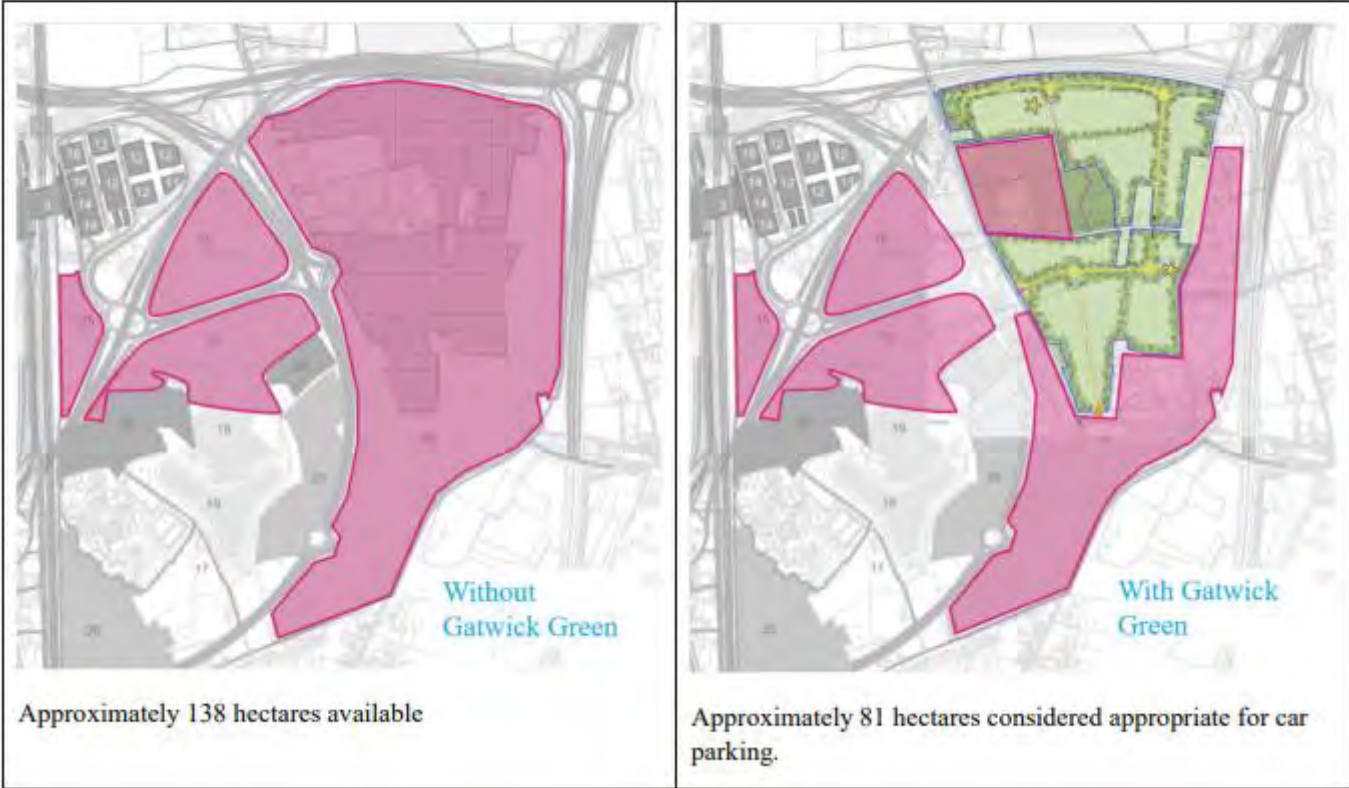
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			<p>5. The Inspector’s conclusion treats safeguarded land as a whole and does not give any support for parts of it to be nibbled away in a piecemeal fashion;</p> <p>6. The evidence base includes two studies which produce a wide range of employment land requirements ranging from a negative requirement based on employment projections to a requirement of 38ha based upon one of the sets of forecasts. The wide disparity in the conclusions undermines confidence in their reliability;</p> <p>7. The fact that the forecast level of need is of the same magnitude as that based upon past take up rates is cited as an indicator that the forecast is acceptable. The assessment itself nevertheless acknowledges that past take up rates have been inflated by two very recent completions.</p> <p>8. In addition, the Update report also examines the impact of Covid on rates of employment growth. Whilst both OE and E both conclude there will be lower levels of employment growth for Crawley due to a fairly significant ‘rebasin’ of local employment levels which effectively reduces the scale of expected job growth. These findings are not taken into account in the conclusions;</p> <p>9. Consequently, rather than providing support for the forecast, the fact that the allocation is of the same scale as past trends indicates that it overstates the level of need;</p> <p>10. The Update report acknowledges that the employment land requirements may need to be re considered closer to the Local Plan examination, depending on how the economic situation changes. Given the dismissal of the conclusions on the impact of Covid-19 on job growth, the need for a review of the employment growth findings becomes even more apparent;</p> <p>11. The note of the PINS Advisory Video Conference with CBC in respect of the draft plan (2 April 2020) makes direct reference to the approach to be adopted in respect of employment land stating they will not “...necessarily be predicted by extrapolating past trends”.</p> <p>12. The Gatwick Green allocation is 47ha – very nearly twice the identified employment land requirement. It is unclear what happens to the remaining 22.9ha or why such a large release of surplus land is required and/or justified to meet the employment land requirement when there is no evidence of need for any greater level of development and when the site is already protected for an alternative use.</p> <p>13. There has been no investigation as to whether a smaller release, so as to minimise the impact on safeguarded land, would be a preferable solution. The lack of this analysis is a significant omission.</p> <p>14. The PINS note also states that with the safeguarding of land at North Crawley still in place, the Council should be proactively seeking to accommodate unmet economic needs in nearby authority areas through the Duty to Cooperate. There is no evidence that this the council undertook such action post the April 2020 conference and prior to allocating Gatwick Green;</p> <p>15. That engagement should include neighbouring authorities in Surrey as these are clearly part of Crawley’s economic area;</p> <p>16. Similarly, CBC did not seek to meet the requirement by looking for other sites within the Borough and as a first step it should have done so through an updated Built-Up Area Boundary Review.</p>

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			<p>17. The allocation of Gatwick Green is based upon a simple but ultimately uninformed assessment as to whether land shown in the Gatwick Masterplan for surface parking produces an 'efficient' use of land. This assumption was not based upon any discussions with GAL. The decision to make the allocation was made on the basis of an uninformed and incorrect assumption;</p> <p>18. The allocation of Gatwick Green is a reaction to the PINS advice on the unacceptability of the proposal to remove safeguarding for the North Crawley Action Area Plan. There is no evidence that any analysis was undertaken to understand the impacts of that allocation or to investigate how the employment land requirement could have been met through alternative means.</p> <p>In the light of these findings, we conclude that the allocation of Gatwick Green is 'unsound' on the basis:</p> <p>(i) It has not been positively prepared as the strategy of meeting employment land needs at Gatwick Green has not been informed through either an appropriate understanding or evidence base of the impact of the allocation nor has there been any examination of whether the unmet employment space need could be accommodated elsewhere in the district or in other districts;</p> <p>(ii) It is not justified as the size of the allocation is too large and the need for scale of the employment land requirement is not proven;</p> <p>(iii) Would not be effective given the removal of safeguarding cannot be regarded as certain, there is no known timescale for its removal and that GAL continues to object to its total or partial removal;</p> <p>(iv) Would not respect national policy in respect of safeguarding land for airport expansion.</p> <p>GAL have sought to amplify these conclusions through two technical studies prepared by Arup Transportation which assess in detail the impact of the Gatwick Green allocation on the Gatwick Airport Runway 2 Masterplan and of the traffic modelling associated with the proposed employment development.</p> <p><b>ARUP</b>  <b>Subject Gatwick Green and Impact on R2 Scheme Date June 2021 Job No/Ref 279019-10</b>  <b>Gatwick Airport Limited (GAL) Review of Gatwick Green and Impact on Gatwick Airport Runway 2 (R2) Scheme</b></p> <p>Ove Arup &amp; Partners Limited ("Arup") has been appointed by Gatwick Airport Limited (GAL) to review the proposed Gatwick Green development as set out in the Draft Crawley Borough Local Plan.</p> <p>The Draft Crawley Borough Local Plan 2021-2037 (Submission Publication Consultation) seeks to revise the currently adopted Crawley 2030 Local Plan. This note outlines the key concerns with the proposed land allocation for Gatwick Green as a Strategic Employment Location (Policy EC4), and the resulting impact of the reduced Safeguarded Land for Second Runway (Policy GAT2).</p> <p>Paragraph 9.53 of the Draft Local Plan states: "...land at Gatwick Green does not form part of the land take that would be required to accommodate a southern runway and the diversion of the A23, and is shown in the Gatwick Airport</p>



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			<p><i>Master Plan as being utilised for a large area of surface car parking. The council does not consider parking to represent an efficient use of the site, particularly given the significant employment needs of Crawley borough, and is of the view that the airport could accommodate parking more efficiently through decked parking and other efficiency measures, should it be demonstrated that additional on-airport parking is required having regard to the airport's surface access obligations stated in the S106 legal agreement. Therefore, the Local Plan retains safeguarding but amends its boundary to exclude land to the east of Balcombe Road and south of the M23 spur, which represents the only site within Crawley that can be allocated for strategic employment growth without prejudicing the possible delivery of a southern runway at Gatwick Airport."</i></p> <p>The allocation of Gatwick Green is therefore based on the assumption that the car parking for Gatwick Airport Master Plan for Runway 2 (R2) could be provided more efficiently and the allocation of Gatwick Green would therefore not prejudice the ability of delivering the R2 scheme. Feasibility work has therefore been undertaken to understand the impact of Gatwick Green on R2 car parking.</p> <p>Gatwick Airport Master Plan R2 Car Parking Demand  GAL's Second Runway Operational Efficiency - Master Plan is Appendix A5 of the Updated Scheme Design Submission (May 2014). Section 3.7 of this report sets out the car parking that would be provided to the east of the railway lines. Short stay car parking will be located within the multi-story car parks (MSCPs) and long stay and staff car parking are expected to be located within Zone 15 in the Master Plan. This zone is proposed to provide 95,750 spaces and includes land proposed for the Gatwick Green allocation.</p> <p>Land Available for Car Parking  A review of the land available for 95,750 spaces has been undertaken with and without Gatwick Green. For the purposes of this note, "Without Gatwick Green" refers to the situation where the full R2 safeguarded land is available (i.e. no Gatwick Green development) and "With Gatwick Green" assumes the Gatwick Green allocation and development are successful. The land available is illustrated in Figure 1. Consideration is given on the likely remaining areas with the Gatwick Green development which would be appropriate to provide car parking.</p>

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			<p><b>Figure 1 – Land available for Master Plan car parking</b></p>  <p>Approximately 138 hectares available</p> <p>Approximately 81 hectares considered appropriate for car parking.</p> <p>Typical car parking densities, based on the experience at Gatwick Airport, are shown in Table 1. These have been considered against the land shown in Figure 1.</p>

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Ref. No.	Respondent	Policy/ Para	Comments								
			<p><b>Table 1 – Typical car parking densities</b></p> <table border="1" data-bbox="651 336 1720 533"> <thead> <tr> <th>Car park type</th> <th>Car park density</th> </tr> </thead> <tbody> <tr> <td>Surface level</td> <td>1 space per 20 sqm</td> </tr> <tr> <td>Single deck</td> <td>1 space per 31 sqm (15.6 sqm of ground floor area)</td> </tr> <tr> <td>MSCP</td> <td>1 space per 42 sqm (density by ground floor area subject to the number of floors)</td> </tr> </tbody> </table> <p>Without Gatwick Green</p> <ul style="list-style-type: none"> <li>• Around 138 hectares. The average car parking density required to provide 95,750 spaces equates to around 1 space per 14.5 sqm of ground floor area, which demonstrates that the R2 Master Plan, already required an efficient arrangement with a combination of single decked and block parking.</li> </ul> <p>With Gatwick Green</p> <ul style="list-style-type: none"> <li>• Around 81 hectares. The average car parking density required to provide 95,750 spaces is 1 space per 8.5 sqm of ground floor area.</li> <li>• This level of density means surface level and single decked parking across the whole area will be insufficient to meet requirements. To provide the required number of spaces, MSCPs with an average arrangement of ground plus 4 storeys would be required across the whole area. However, it should be noted that the area to the west of the A23 would be limited to providing up to one deck due to aerodrome safeguarding height constraints, and the general configuration of the residual land does not produce as efficient a layout for the airport car parking provided as MSCPs. These constraints and restrictions would mean that even higher density MSCPs, with a greater number of storeys would be required in other parts of the residual land. GAL notes that it is not viable for long stay products to be provided through constructing MSCPs, given the added construction costs and lower financial returns from passenger charges for long stay parking. This is a substantial change from the R2 scheme in terms of construction and operation.</li> </ul> <p>Highway Access to Land East of the A23</p> <p>As illustrated on Figure 1, the primary access junction presently serving the safeguarded land to the east of the realigned A23 is a significant grade separated junction commensurate with the level of use expected. The suggested land allocation for Gatwick Green (Policy EC4), and the resulting impact of the reduced Safeguarded Land for Second Runway (Policy GAT2) disconnects this primary high capacity access from the remaining safeguarded land east of the A23 and creates segregation between the remaining parcels of land for parking. This would result in a substantial change from the R2 scheme in terms of access strategy, highway design, construction, and car park operation.</p> <p>Summary and Conclusions</p>	Car park type	Car park density	Surface level	1 space per 20 sqm	Single deck	1 space per 31 sqm (15.6 sqm of ground floor area)	MSCP	1 space per 42 sqm (density by ground floor area subject to the number of floors)
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			<p>The Gatwick Green allocation in the Draft Crawley Borough Local Plan identifies the site to be a Strategic Employment Location and removes the land from being safeguarded for a second runway. The justification of this is that GAL could accommodate car parking more efficiently. We are not aware of any technical design exercise undertaken by or on behalf of CBC to test this assumption.</p> <p>On behalf of GAL, we have consequently undertaken a study which demonstrates that with R2, an efficient use of the land was already assumed with a combination of decked and block parking. With the loss of safeguarded land to allow for the Gatwick Green development, MSCPs (at least ground plus four storeys) across the whole of the remaining land would be required. This is not considered to be feasible and therefore Gatwick Green limits the ability for the R2 Master Plan to come forward.</p> <p><b>Subject Review of Gatwick Green Transport Modelling Date June 2021 Job No/Ref 279019-10 Gatwick Airport Limited (GAL) Review of Gatwick Green Transport Modelling</b> Ove Arup &amp; Partners Limited (“Arup”) has been appointed by Gatwick Airport Limited (GAL) to review the proposed Gatwick Green development as set out in the Draft Crawley Borough Local Plan.</p> <p>The Draft Crawley Borough Local Plan 2021-2037 (Submission Publication Consultation) seeks to revise the current adopted Crawley 2030 Local Plan. The Crawley Transport Study (dated December 2020 and published May 2021) reports on the transport modelling undertaken to inform the potential impacts of three Draft Crawley Local Plan scenarios for the period 2020 to 2035.</p> <p>The Local Plan period has since been extended to 2037 and the report considered that the modelling is sufficiently robust to be representative of impacts to 2037. It is stated that the quantum of development tested matches that proposed in the Local Plan period to 2037.</p> <p>This note outlines the key areas of concern with the modelling work in relation to Gatwick Green which are:</p> <ol style="list-style-type: none"> <li>1. The quantum of Gatwick Green development assessed within the traffic model.</li> <li>2. The assumptions made between the proportion of B8 warehouse and B8 parcel distribution for Gatwick Green and their effect on the traffic generated.</li> <li>3. The lack of highway mitigation identified, with reference to (1) and (2).</li> <li>4. No clear allowance for Gatwick Airport growth having been made.</li> </ol> <p>Summary In summary, our concern is that a series of assumptions or decisions feeding the Crawley Transport Study, have resulted in an assessment of Gatwick Green (Strategic Policy EC4) that is optimistic and does not adequately consider the effects of the Draft Local Plan development local to Gatwick Airport. The first assessment assumption is to consider an area of land, which is only 50% of the land removed from safeguarding (24.1 hectares of the 47.3 hectares of Gatwick Green). The Crawley Transport Study notes that the development area equates to 77,500sqm or around 32% of this reduced land area, rather than the 40% ratio used as a key assumption in both the Northern West</p>

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			<p>Sussex Economic Growth Assessment and the subsequent Focussed Update for Crawley. The Crawley Transport Study then equates the reduced floor area (on the reduced land area) to vehicle trips based upon an assumption that only a very small proportion of the land use (10%) would be B8 parcel distribution, which is the higher vehicle generating B8 use (around 10x that of the predominant B8 warehousing used in the assessment).</p> <p>Our concern is therefore that the vehicle trip generation of Gatwick Green allocation site could reasonably be multiples of that assessed within the Crawley Transport Study. An assessment of part of the land, part occupied by a very specific mix of development, could lead to an optimistic assessment of the impacts of the land allocation.</p> <p>This assessment with a reduced level of development and vehicle trip generation, with the benefit of additional sustainable travel mitigation measures, still resulted in six junctions modelled as being overcapacity, including two junctions on A2011 Crawley Avenue to the south of Gatwick Green. No specific highway mitigation measures are identified.</p> <p>1. Quantum of Gatwick Green Development  The quantum of development tested for Gatwick Green in the Crawley Transport Study is considered a low proportional use of the land identified in the Draft Crawley Borough Local Plan (32% of the minimum land area used as development area). It is noted that in the Local Plan's evidence base, the employment land assessment undertaken by Lichfields (both the Northern West Sussex Economic Growth Assessment and the subsequent Focussed Update for Crawley) apply a plot ratio of 40% (i.e. a one hectare site could accommodate a footprint of 4,000 sqm for industrial and storage or distribution uses) to reflect the pattern of development in Crawley. On this basis, we are concerned that the quantum tested in the Crawley Transport Study would lead to an optimistic assessment of the impacts of the land allocation.</p> <p>The development quantum assessed is also a substantially lower development area than the Gatwick Green Transport Strategy anticipates the development could comprise (circa 29% of 265,000 sqm of development). Again, our concern is that an assessment of part of the land, part occupied by development, could lead to an optimistic assessment of the impacts of the land allocation.</p> <p>The above is summarised in Table 1 below.</p>

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			<p><b>Table 1 – Quantum of Gatwick Green Development</b></p> <table border="1"> <thead> <tr> <th>Source</th> <th>Policy / Assumptions</th> <th>Quantum of development</th> </tr> </thead> <tbody> <tr> <td><b>Draft Crawley Borough Local Plan (2021)</b> Submission Publication Consultation</td> <td>Strategic Policy EC4 identifies “<i>Gatwick Green as a Strategic Employment Location. The policy states a minimum of 24.1 hectares of new industrial land, predominately for B8 storage and distribution use, demonstrating through appropriate evidence the justification for any further industrial floorspace beyond this amount.</i>”  Paragraph 9.53 recognises that the Gatwick Green site is 47 hectares.  The Gatwick Green land removed from Policy GAT2: Safeguarded Land for Second Runway exceeds 24.1 hectares and appears to be the full 47 hectares.</td> <td>A <b>minimum</b> of 24.1 hectares</td> </tr> <tr> <td><b>Gatwick Green Transport Strategy (2020)</b> Draft Crawley Borough Local Plan, Consultation Statement Appendix 4b Wilky Group appendices</td> <td>Paragraph 1.2.1: The Wilky Group proposes to bring forward an integrated mixed-use development and co-ordinated infrastructure solution to deliver the 47.3 ha (117 acre) site.  Paragraph 1.2.2: “<i>Whilst still at an early stage, it is anticipated that the development could comprise the following:</i>” <ul style="list-style-type: none"> <li>• <i>Circa 160,000sqm GEA of B8 (Warehousing, distribution and logistics)</i></li> <li>• <i>Circa 52,500sqm GEA of B1 (Office / employment use)</i></li> <li>• <i>Circa 52,500sqm GEA of C1 (Hotel use)”</i></li> </ul> </td> <td>47.3 hectares  <b>265,000 sqm of development</b> together with ancillary uses.  <b>Development area represents around 56% of the land.</b></td> </tr> <tr> <td><b>Crawley Transport Study (2020/21)</b></td> <td>Paragraph 4.2.1: “<i>Development quanta assumptions provided by CBC were used for the Gatwick Green site. The Gatwick Green assumptions comprise 77,500 square metres (SQM) (GFA) split into:</i>” <ul style="list-style-type: none"> <li>• <i>B8 Parcels Distribution (10%) or 7,750 SQM</i></li> <li>• <i>B8 Commercial Warehousing (60%) or 46,500 SQM</i></li> <li>• <i>B2 Industrial estate (30%) or 23,250 SQM”</i></li> </ul> </td> <td><b>77,500 sqm of development</b>  <b>Development area represents around 32% of the minimum allocated land (24.1 hectares), or 16% of the 47 hectares.</b></td> </tr> </tbody> </table> <p>The implications are considered follows:</p> <ul style="list-style-type: none"> <li>• On the above basis, it is suggested that the Transport Study assessment has considered a low proportional area of development on the identified land, which in turn would give an optimistic assessment of its impacts. The Local Plan employment land assessment uses a higher plot ratio of 40%.</li> <li>• As the land area is a minimum (24.1 hectares), within a much larger Gatwick Green site identified within EC4 (circa 47 hectares), only a small proportion of the likely development on the Gatwick Green is currently being assessed.</li> <li>• Strategic Policy EC4 identifies “Gatwick Green as a Strategic Employment Location. Proposals for development of the Strategic Employment Location will be required to provide as a minimum 24.1 hectares of new industrial land,</li> </ul>	Source	Policy / Assumptions	Quantum of development	<b>Draft Crawley Borough Local Plan (2021)</b> Submission Publication Consultation	Strategic Policy EC4 identifies “ <i>Gatwick Green as a Strategic Employment Location. 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predominately for B8 storage and distribution use, demonstrating through appropriate evidence the justification for any further industrial floorspace beyond this amount.” This appears to confuse land area and floorspace. It is not clear at what additional floorspace amount the appropriate justification would be required as the only area given is a land area. If the tested floorspace, 77,500 sqm, is the limit this should be stated. • We therefore have concerns as to whether the Transport Study is testing the full effects of the Draft Local Plan development local to Gatwick Airport, or whether the policy reflects the quantum of development considered.

**2. Land Use and Traffic Generation**

Strategic Policy EC4 identifies that proposals for development will be required to provide .... ‘predominately for B8 storage and distribution use’. Within the Crawley Transport Study, it is acknowledged within the study trip rates (see Table 2) that vehicle trip generation is sensitive to the proposed B8 uses, i.e. the B8 parcel distribution has much higher vehicle trip rates, around 10 times that of B8 warehousing. Therefore, the split assumed between these uses has great bearing on the overall vehicle generation and the assessment of the development impacts.

**Table 2 – Crawley Transport Study trip rates**

Development Type	Unit Rate	Origin Rate (AM)	Destination Rate (AM)	Total Rate (AM)	Origin Rate (PM)	Destination Rate (PM)	Total Rate (PM)
B8, Parcel Distribution Centre	per 100sqm GFA	0.466	1.042	1.508	1.082	0.623	1.705
B8, Warehousing Commercial	per 100sqm GFA	0.049	0.121	0.170	0.076	0.017	0.093
B2, Industrial estate (OZ/D)	per 100sqm GFA	0.153	0.436	0.589	0.407	0.119	0.526

*Extract from Table 3.1 of the Crawley Transport Study.*

The assumption in the Crawley Transport Study for Gatwick Green is that the highest generating use, B8 parcel distribution, is a very small proportion of the overall floor space, at 10%. B8 warehousing, with the lowest trip rates, is assumed to occupy the greatest amount of floor space (60%). In total, 333 vehicle trips in the AM peak, and 298 vehicle trips in the PM peak are estimated for Gatwick Green on this basis. If however, an equal split was used between the two B8 uses, the number of vehicle trips would have doubled in each peak hour to around 600 (noting that with a higher proportion of parcel and distribution this could increase further).

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			<p>At this stage, if the split of B8 parcel distribution and B8 warehousing is neither restricted or known, it is a concern that the sensitivity of the split between these uses has not been tested, given the substantial difference in vehicle traffic generated.</p> <p>We therefore have concerns as to whether the Crawley Transport Study is testing the full effects of the Draft Local Plan development local to Gatwick Airport, or whether the policy reflects the limitations in the development uses considered.</p> <p><b>3. Lack of Highway Mitigation</b> As noted above, we have concerns as to whether the Transport Study is testing the full effects of the Draft Local Plan development local to Gatwick Airport, or whether the policy reflects the quantum of development considered.</p> <p>Notwithstanding the assumptions above which could be significantly underestimating the Gatwick Green vehicle trips, the highway modelling work shows that a number of junctions will be overcapacity. This is both with and without sustainable travel mitigation measures. For modelling scenario 2 with Gatwick Green, even with sustainable travel mitigation measures, six junctions are modelled as being overcapacity. This includes two junctions on A2011 Crawley Avenue to the south of Gatwick Green.</p> <p>For modelling scenario 3 with Gatwick Green and additional housing, further junctions are recorded as being overcapacity, including along Balcombe Road / Radford Road and along M23 Spur / A23 corridor. No specific highway mitigation measures are identified and a Manage and Monitor approach is proposed.</p> <p><b>4. No Clear Allowance for Gatwick Airport Growth</b> The Crawley Transport Study includes an explanation of the committed and consented schemes included in the reference case and forecast models. The models also include an allowance for background growth using growth factors from NTEM / TEMPro. This growth is considered to take into account the committed and other planned growth of dwellings and jobs in the borough.</p> <p>As noted in Crawley Borough Local Plan Topic Paper 2: Gatwick Airport (2021), the growth of Gatwick Airport with a single runway, in terms of the number of flights and passengers, is not restricted by any extant planning permission. Gatwick Airport have set out their expectations for passenger and flight growth with the existing main runway in their 2019 Master Plan. It is not clear from the Crawley Transport Study whether any account of Gatwick Airport passenger growth with the existing runway has been accounted for in the assessment and therefore whether the Draft Local Plan highway impacts are fully understood.</p> <p><b>Suggested Modifications:</b> <b>Conclusions</b></p> <p>34. The allocation of Gatwick Green is a reaction to the PINS advice on the unacceptability of the proposal to remove safeguarding for the North Crawley Action Area Plan. It is not an allocation informed by a comprehensive strategy review of how to meet employment requirements as part of borough-wide development strategy. There is no evidence</p>




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			<p>that any analysis was undertaken to understand the impacts of that allocation or to investigate how the employment land requirement could have been met through alternative means.</p> <p>35. We consequently conclude that the Gatwick Green allocation is unsound on the basis it:</p> <ul style="list-style-type: none"> <li>i. It has not been positively prepared as the strategy of meeting employment land needs at Gatwick Green has not been informed through either an appropriate understanding or evidence base of the impact of the allocation nor has there has been any examination of whether the unmet employment space need could be accommodated elsewhere in the district or in other districts;</li> <li>ii. It is not justified as the size of the allocation is too large and the need for scale of the employment land requirement is not proven. Additionally, the impact of the removal of Gatwick Green from the safeguarded area on the ability to implement the Gatwick Masterplan has not been investigated or understood, and the transport modelling underestimates the potential highway impacts and fails to address the access impacts;</li> <li>iii. It would not be effective given the removal of safeguarding cannot be regarded as certain, there is no known timescale for its removal and that GAL continues to object to its total or partial removal;</li> <li>iv. Would not respect national policy in respect of safeguarding land for airport expansion.</li> </ul> <p>36. We request that this allocation is deleted from the draft plan and that further work is undertaken, including through the Duty to Cooperate, to examine whether the allocation can be met elsewhere.</p>
REP/058	Reigate and Banstead Council	Policy EC4	<p>Thank you for the opportunity to comment on the Regulation 19 Crawley Borough Local Plan 2021- 2037 (January 2021), draft Sustainability Appraisal (January 2021), Local Plan Map (May 2021), Viability Study (March 2021), Transport Study (December 2020), and draft Habit Regulation Assessment (January 2021). We previously submitted our response to the Regulation 19 Crawley Borough Local Plan 2020-2035 (January 2020) and associated key documents on the 2nd March 2020. We will therefore focus this response on the new changes since then, on the understanding that our response to the previous Regulation 19 consultation will be submitted in full, to the Secretary of State for the Local Plan's examination, along with responses received in this consultation.</p> <p>Reigate and Banstead Borough Council ("RBBC") note that the new Strategic Employment Location known as 'Gatwick Green' (Policy EC4) is proposed for the first time in this Publication Local Plan and was not included in the 2020 publication plan. It is included to aim to address Crawley's identified need for industrial business floorspace as the land is no longer proposed to be safeguarded to Gatwick airport expansion. We would like to share some of the following comments/concerns.</p> <p>Under the proposed allocation Policy EC4, no detail of vehicle access is provided. Rather we have been recommended by Crawley Borough Council ("CBC") to view the 1st Regulation 19 comments made by Savills obo the site promoter, Wilky Group (with site layout drawings by Lyons + Sleeman and Hoare Architect). The "preliminary" site layout plan 11/091/SK-62 shows two points of "Primary Site Access", both off Balcombe Road (B2036), with secondary site access from Peeks Brook Lane.</p>

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			<p>The drawing also shows existing public rights of way improvements in the site to be investigated. We object to the inclusion of the word “minimum” in front of the site area 24.1ha that is allocated for B8 (with some B2 if needed). This word allows for too much uncertainty within the site allocation, and should be removed, and potentially replace by “up to”.</p> <p>The Transport Study (May 2021) produced by Stantec highlights that the Gatwick Green employment site will be 70% B8 and 30% B2, and would predominantly generate freight/HGV traffic, “with the greatest impacts on Balcombe Road”. The impact of the proposed site allocation on the road networks is modelled in Scenario 2. The Study notes (para 7.7.2) that cross-boundary impacts into Surrey have been reviewed. We therefore strongly support the proposed ban for HGV’s left turn in and right turn out at the access/egress junctions on Balcombe Road to mitigate the adverse impacts on Balcombe Road in Surrey County. For reasons of soundness, we recommend that the suggested requirement from the Transport Study: “left turn in and right turn out bans for HGV’s at Gatwick Green’s access/egress junctions” are reflected strongly as a policy requirement in Policy EC4. We note that the Transport Study has also tested the Gatwick Green site (zones 320 and 321) for suburban offices, C1 use and hotel uses.</p> <p>Whilst we appreciate that CBC have considered the transport impact on RBBC’s site allocation at Horley Strategic Business Park (HOR9), we would recommend that the views of Surrey County Council, the Highway Authority, for the northern part of Balcombe Road are sought.</p> <p>We welcome the amendment to the proposed submission plan that it is also important now makes it clear that there is a distinction between the site allocation area and site uses that have been put forward for allocation at Gatwick Green by the site promoter, and the council’s specific requirements for the proposed allocation site set out in the council’s evidence and allocated through draft Policy EC4 of the draft Submission Local Plan.</p> <p><b>Suggested Modifications:</b></p>
REP/066	Mid Sussex District Council	EC4	<p>Mid Sussex <b>supports this policy in principle</b> as it seeks to allocate additional land for employment uses for which there is an unmet need in the Local Plan area. However, the Council consider that the Policy requires <b>further justification</b> and could be <b>more effective</b>.</p> <p>Mid Sussex notes the allocation of an additional site identified for employment uses (Gatwick Green). In the 2020 version of the Plan the site formed part of the larger North Crawley Area Action Plan Area (now removed policy EC1).</p> <p>The Gatwick Airport Masterplan (published by Gatwick Airport Limited in 2019) shows the site as being with the safeguarded land area, for use as surface car parking. Mid Sussex supports the view that there are other opportunities to provide on-airport car parking in a more efficient manner than currently proposed and that the allocation of this site will contribute to meeting the employment land requirements of the Borough.</p> <p>However, as noted in the supporting text of the Plan (paragraph 9.59) there is no immediate access to the strategic road network from this site and that the development will impact on the existing highways network. More specifically there is no direct access to the M23, with the nearest junction being Junction 10 (Crawley) or Junction 9 (Gatwick). It</p>

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			<p>is clear that one of the most direct routes from the site to the M23 will be via the local road network in Mid Sussex District via Balcombe Road B2036/Antlands Road/ Shipley Bridge Lane/ Copthorne Bank, or via Antlands Lane (B0237) and B2038 to join onto the A264 and M23 at Junction 10.</p> <p>The Transport Study paragraph 7.7.1 states “It is assumed that a proportion of employees working at the site would use the sustainable mitigation measure”, however this isn’t quantified or explained further in the report. The Transport Study goes on to state at paragraph 7.7.1 that “...a significant proportion of ... trips will be freight/ HGV traffic and therefore cannot be shifted to active modes or public transport”.</p> <p>Whilst at paragraph 7.7.2 there is mention of impact on the B2036 Balcombe Road and on the road network in Surrey there is no mention of impacts on the West Sussex/ Mid Sussex road network. The Transport Study looks at the number of trips north and south of the Balcombe Road, there is no information on potential routing beyond the Balcombe Road.</p> <p>Therefore, Mid Sussex is not satisfied that cross boundary impacts have been fully reviewed or mitigated. It appears mitigation is in place to prevent traffic travelling through the built up areas of Horley, with a right turn ban proposed but there is no mention of any mitigation of the adverse impact from HGV traffic such as, noise and air pollution, on Copthorne Village which could be used to access the M23 as a short route via the A264. It is already known that Copthorne village is used as a ‘rat run’ to reach the M23 from the north.</p> <p>It is well documented that M23 Junction 10 and the A264 corridor which links this junction to East Grinstead, suffers from congestion at key junctions (as identified in section 8.7 of the Crawley Transport Study and Mid Sussex Transport Study). The Mid Sussex Site Allocation DPD (currently at Examination) includes a policy SA35: Safeguarding land for and Delivery of Strategic Highway Improvements. This policy safeguards land at a number of junctions along the A264 corridor between M23 and East Grinstead including the junction at the Copthorne Hotel. These upgrades are necessary to increase capacity, improve highway safety within Mid Sussex and support planned growth in Tandridge. They are being developed in partnership with West Sussex and Surrey County Councils. Mid Sussex would want to ensure that the highway impact of this allocation on the road network, including at junctions that are already operating overcapacity are properly mitigated. The policy should be more explicit in relation to the need to work with adjacent local authorities to ensure the impacts of the development are fully understood and mitigated.</p> <p>As Mid Sussex is therefore concerned about the traffic impact that this site may have on the strategic and local road network in Mid Sussex, we would welcome further discussions with Crawley Borough Council and West Sussex County Council as the highway authority to better understand the implications of this proposed allocation on Mid Sussex.</p> <p><b>Suggested Modifications:</b>  <b>Changes required:</b> Further evidence is required to demonstrate that the policy is justified by highways evidence. The Council is not satisfied that the cross-boundary impacts of the policy within Mid Sussex have been fully justified by the</p>

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			transport evidence. Following an assessment of the impact of this proposed allocation the policy may need to be amended to make explicit any mitigation measures required to alleviate highways impacts in Mid Sussex District.
REP/071	Resident 17	Policy EC4	<p>I believe that this scheme will be a blight on the neighbourhood, the countryside and the habitats that reside within it. It will turn what is currently relatively undisturbed fields into a business park when there is a huge business park (Manor Royal) less than 2 miles away, much of which is idle and empty.</p> <p>The scheme will ensure that our houses are blighted and we will be made to ensure hugely increased traffic to our relatively quiet lanes.</p> <p>I would like my strong objections to this plan to be noted.</p> <p><b>Suggested Modifications:</b></p>
REP/072	Resident 18	Policy EC4	<p>Living in this area, we already have much more than our share of blight by aircraft noise, traffic noise and pollution. The area is also becoming more prone to flooding. With more ground covered in concrete and buildings will obviously make this worse. Presumably to service this new industrial area, Balcombe road will need widening, so more concrete.</p> <p>NO THANK YOU.</p> <p>Also, this project will have an adverse effect on the value of our property.</p> <p>Again, NO THANK YOU</p> <p><b>Suggested Modifications:</b></p> <p>There is no way that just cramming more &amp; more buildings in the South East can be considered sound and to concentrate more development in this small area is either a mistake by the planning department or just plain bullying.</p>
REP/073	Resident 19	Policy EC4/ para 9.47	<p><b>LOCATION</b></p> <p>The area designated for possible development is land that is safeguarded for the future expansion of Gatwick should approval ever be sought and given for a new southern runway. Ruling out encroaching on the far more suitable safeguarded land to the south, bordering Manor Royal, is now surely outdated. It should subsequently be given full consideration in the light of Gatwick's revised plan to upgrade runway 26R/08L to an operational second runway, albeit with initially limited movements. The plan will no doubt be approved and will push the southern runway option into the very, very long grass where it will remain buried for a generation if not forever. The area designated Gatwick Green is farming land with a light residential periphery. To build on a green field site bordered by houses would destroy an environment already subject to considerable noise and pollution. I might point out also that the 50 Hectares of pastureland that would disappear in the scheme absorbs an estimated 500 tons of CO2 per annum. For an area bounded by Gatwick Airport, the M23 and Balcombe Road with its 10,000+ per day vehicles, this natural CO2 absorption is a welcome asset to our environment and should not be destroyed. That the ultimate goal of developing this site to become carbon neutral is laudable, but in reality never likely to happen without offsetting. According to the Chartered Institute of Surveyors, more than half of the lifetime carbon emissions of a typical residential block will have</p>

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			<p>been emitted by completion. I would suggest that this figure is easily matched or exceeded by an industrial development on a green field site.</p> <p>This site, while being geographically close to the east side of Gatwick Airport, has no direct access to the airport. All the extra traffic generated will have to route through Horley town centre to the north, already badly congested, or Radford Road to the south, itself badly congested during peak times and with a dangerous series of bends where it crosses the London-Brighton rail line. Balcombe Road itself is having to accommodate an unprecedented increase in traffic already due to the ever expanding Forge Wood and developments further south and east. To further add to this by the development of two green field sites north and south of the Gatwick Spur, both exiting on to Balcombe Road, will make journeys slower and more polluting for the whole community. Unfortunately not everyone can turn to bicycles or battery powered scooters for mobility.</p> <p><b>NOISE AND POLLUTION</b></p> <p>Landing aircraft at Gatwick pass over Balcombe Road at around 100m and take-offs are as low as 300m for larger aircraft. A study of the noise footprints generated indicates that the western side of the proposed site could be a potential noise hazardous area for anticipated future personnel, with an aircraft movement nearly every minute during normal times. Accordingly, it's doubtful that detailed planning consent would be with consistent with employee wellbeing. As a resident I except the noise as a part of living in a precious green environment, which is now virtually all that's left between Crawley and Horley. Light pollution is a further issue. At present Gatwick Airport lighting destroys observation of the night sky to the west of my property, severely restricting an enjoyment of astronomy in this hemisphere. However, the eastern hemisphere is still relatively dark at night. An industrial state to the east of Balcombe Road, with concomitant floodlighting, would render my astronomical aspirations untenable. To destroy this 'isolated' oasis and replace it with yet another concrete and aluminium eyesore would be a bio-negative, environmental travesty.</p> <p><b>FLOODING</b></p> <p>The southern part of the proposed development area is flooded or waterlogged during all but a few summer months. Records will show that Thames Water have pumping vehicles working 24/7 for many weeks during a typical winter. Five episodes of flooding have been recorded during the last thirteen months alone. I might also point out that under the southern part of the proposed development area there is a huge waste water storage facility. Commissioned in by Thames Water in 2008, it has a capacity approaching 1,000,000 litres. As the storage tank, measuring an estimated 130m x 3m and traversing the entire width of the field, was not buried very deeply it's doubtful that building over it will be advisable, or even possible in its present form or location. As an adjacent resident to the proposed site I can state that the annual flooding events have become more common and severe over the past few years and have been led to believe that climate change will only exacerbate this further. I attach two images of the area taken on 21/01/2021 after a mere 12mm of rain the previous day.</p>

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			<p>I would like to surmise that the whole Gatwick Green development proposal is a box-ticking exercise to fulfil a government directive, because there can be absolutely no justification in delivering such a destructive development into reality. If future needs for commercial growth do actually transpire then there are far more logical and practical places to build on than Thunderfield Common. The site's historic name.</p>  <p><b>Suggested Modifications:</b> The loss of a green field sight can never be recovered. However, making Balcombe Road dual carriageway from Horley to Crawley, along with a new dedicated East access road to Gatwick Airport, would alleviate future expanded traffic congestion.</p>
REP/074	Resident 20	Policy EC4	<p>Our property is on the perimeter of the proposed Gatwick Green Industrial Warehouse scheme. We have lived here for fourteen years, and have seen flight traffic increasing gradually, until recently, and the value of our property relies greatly on its position. If the proposed plan goes ahead, this will impact our quality of life dramatically, with increased commercial traffic, an unattractive vista to look at from our property (currently a field with horses and wildlife). We also use the public footpaths and bridleways in the Fernhill area regularly to walk our dogs, and have done since moving to the area, and this was a major factor in choosing this property for our future.</p> <p>If we decided to sell our property and live elsewhere, our choices would be greatly diminished, as our resale value of our property will be hit by the close proximity of the industrial warehousing.</p> <p>What we are hoping to have as a resolution would be either:-</p> <ol style="list-style-type: none"> <li>The project is abandoned, and life continues as normal, or</li> <li>Our property is purchased by the developers at current market value (pre-Gatwick Green value), with additional compensation for the inconvenience of needing to relocate, and all costs incurred, or</li> </ol>

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			<p>c) We sell our property on the open market, and are compensated for the difference between current market value (pre-Gatwick Green value) and sale price, with additional compensation for the inconvenience of needing to relocate, and all costs incurred</p> <p>If there are any meetings at any point in the near future to discuss this, we would be happy to attend, as I'm sure will most of our neighbours.</p> <p><b>Suggested Modifications:</b> As above (resolutions a, b &amp; c)</p>
REP/075	Resident 21	Policy EC4	<p>Not keen on the local plan EC4 -concerned about the deterioration to the local environment caused by the 'industrialisation go the green field sites.</p> <p>No clear detailed indication of how extensive the use of the ear-marked area will be despite the good intentions conveyed in the strategic planning letter distributed dated 6 January 2021. My wish is to retain the present environment as it is: and not clear that all the available space elsewhere in the Crawley area has yet been utilised. I must also express concern over the potential loss of value in my property.</p> <p><b>Suggested Modifications:</b> Modifications not pertinent at this time as no details regarding use of the area are available. It is possible that the developer has not yet submitted plans for CBC to consider that there comply to the sentiments expressed in the announcement letter of 6 January 2021.</p>
Rep/076	Resident 22	Policy EC4	<p>I have concerns for the people that live in the area as there is no mention of compensation for further blight and there doesn't appear to be any road improvements for heavy goods vehicles to emerge safely. Also, the B roads are inadequate to carry further traffic which will presumably appear in our road too, adding to the already perpetual noise.</p> <p>We also have precious little green space left in Crawley and yet there are plenty of empty buildings on the industrial estate which could be redeveloped. Wildlife is being squeezed out of the area and we now have deer in our garden as they have nowhere to go together with rodent issues because of all the development as they are all being displaced.</p> <p>Also, it is really wise to put a whole load of buildings at the threshold of a major runway? If an aircraft was to have a total engine failure on take off (such as a bird strike), it would be preferable to land in fields than hard buildings, to say nothing of the people working in them and Fernhill already has one fatal airliner crash on record.</p> <p><b>Suggested Modifications:</b> If any development for warehouses or factory building is to proceed, then adequate compensation needs to be paid and particularly to those whose house are blighted immediately in the area. Unfortunately, councils adopt a policy of "it's not my back yard" when deciding to ruin people's lives. Dare I ask how many CBC members live in the proposed area?</p> <p>Perhaps a smaller development which is out of sight of dwellings and away from the runway centre line would be more appropriate or better still leave the land alone and allow free access to walkers and make it a space to be</p>

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			<p>enjoyed. There will be plenty of warehouse space in all the empty shops such as Debenhams, Sainsbury's, Morrisons (town centre) etc.! Making the town centre a warehouse facility is far more appropriate with online sales booming as they are. The high street is dead or at the very least, dying and no matter what initiatives are taken, it will just end up as coffee shops and restaurants. Office requirements are dwindling too and you only need to walk around the industrial estate to see how many buildings are empty.</p>
REP/079	Fernhill Riding School	Policy EC4	<p>This proposed plan to turn 24.1 hectares of agricultural green belt land into warehousing is outrageous. The poor residents of Fernhill Road have been waiting patiently to receive correct compensation in the form of compulsory purchase in view of airport runway facilitation, for well over 20 years now. And now it seems this has been kicked away from us in order for big companies to get rich. It means the resident's houses will be stuck as an island slap bang in the middle of an industrial estate. Life would become wretched with the noise and lorries at all times of the day and night. As well as the medical conditions that arise from living under the 2nd largest single runway airport in the world, it will increase the air pollution further.</p> <p>For myself, I run a riding school. The fields you propose to remove are the fields my horses graze on. Added to this, my covered school for taking lessons would be only a few yards away from the edge of this proposed industrial estate. It would be too dangerous for me to continue to take equestrian lessons as it would no longer be safe for clients to ride due to the nature of horses amongst noisy vehicles etc. Taking all this into consideration I would be forced to close my business due to lack of welfare for my horses and safety for my clients. This business has been running for over 40 years and is the only licenced riding school in Crawley. It would be a huge loss to the public due to the great health benefits it has for humans.</p> <p><b>Suggested Modifications:</b> Fully compensate us all for our land and houses with a fair deal of compulsory purchase so we can all move on with our lives and re-site our businesses and residential houses asap.</p>
REP/080	CMA Planning Ltd	EC4	<p>Please see below our client's comments on the proposed policy. In addition to these representations we note that the proposed allocation is a recent addition to the draft Local Plan which we understand has not been subject to previous consultation. Accordingly, we reserve the right to make further representations in due course with particular respect to Sections 19(3) and 19(5) of the Planning and Compulsory Act (2004), and paragraph 35 of the National Planning Policy Framework (NPPF).</p> <p>Comments from Mrs P J Chamberlain in OBJECTION to draft policy / site allocation:</p> <p>Dear Sir / Madam This area has been identified as being in the 'Strategic Gap' from 1979 to 2019 maintaining the identity of the settlements.</p> <p>Whilst Strategic Gaps were not themselves countryside protection policies they have become havens for wildlife supporting deer, foxes rabbits, bank voles, harvest and wood mice, pheasants, bats as well as providing wildlife</p>



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			<p>corridors through the existing field and hedge network. I note that the current Local Plan submission documents justifying the proposed site allocation / policy do not include a Habitats Regulations Assessment (HRA).</p> <p>In 2016 the Government produced a Parliamentary briefing which recognised that "urban vegetation" is known to improve the quality of local environments, for instance, reducing pollution and noise, and reviewed research into the direct public health benefits of green spaces focussing on mental and physical activity. All this should be protected as a valuable natural resource and should warrant considered attention and as well as on-going protection.</p> <p>Although the area may no longer have the protection of the 'Strategic Hap', the Government's 2016 briefing should be taken seriously to the quality of life of residence and the small remaining Greenfield's of natural un-developed land in this semi-agricultural landscape and wildlife should be valued for its own sake. Furthermore, the role of this un-developed land and in preserving the separate identities of the settlements remains valid in the context of sustainable development objectives.</p> <p>Accordingly, in the absence of a robust evidence base, or reasoned justification, for the proposed policy / site allocation it is clear that this element of the Local Plan is unsound in the context of paragraph 35 of the NPPF; fails to comply with Sections 19(3) and 19(5) of the Planning and Compulsory Purchase Act 2004; and the Council's adopted Statement of Consultation.</p> <p><b>Suggested Modifications:</b> As set out above the proposed policy / site allocation is unsound in the context of paragraph 35 of the NPPF and, as such, would need to be removed from the Plan.</p>
REP/081	Resident 24	EC4	<p>The Plan shows consideration to the residents surrounding the proposed industrial site. This does not copy the plan set out by Gatwick Airport expansion where all houses were included.</p> <p>There are a number of sites closer to Crawley that are empty and the industrial area has space to expand. There is also the Reigate Plan for industrial site just the other side of the Gatwick HNG.</p> <p>Where is all this need to come from.</p> <p>The area is prone to flooding and the existing owner has not maintained the land as promised. They just want to make a profit.</p> <p><b>Suggested Modifications:</b> If the council feel this is good for the town then why not include all the properties that are adjacent to the land shown on the plan.</p> <p>Since we moved from Surrey to Sussex we have been treated as second class, no drain, poor roads, little maintenance, even the police in Crawley do not include us.</p>
REP/082	Resident 25	EC4	I fundamentally disagree with the plan to build warehousing on agricultural green belt land.

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			<p>The proposal is one that proposes to build significant warehousing on c24 hectares of agricultural green belt land. I have a number objections to this proposal:</p> <ul style="list-style-type: none"> <li>- there is significant housing building currently destroying the green belt in this area at an alarming rate</li> <li>- this site is subject to significant flood risk which will be further exacerbated by concreting over a further 24 hectares - we currently have a Thames water pumping station operating at all times on the Balcombe Road</li> <li>- there is already industrial site in Manor Royal which I understand is under-occupied, the economic environment is hugely uncertain particularly in respect of air travel and retail there is no guarantee that this destruction of the green belt is necessary or will result in the desired employment</li> <li>- a warehousing development will substantially increase the noise, light and road pollution for residents already dealing with the airport and motorway and the already fast and busy Balcombe Road</li> <li>- I moved to this house 16 years ago understanding the risk of airport development which was mitigated by the proposal that such development would result in compulsory purchase at least market value and suggested MV +25%. This warehouse development destroys the environment and desirability of my property without compensation</li> <li>- my own planning application for a loft extension was denied because the expansion of the roof " could be seen from the road" despite a large garden with mature trees - this is appalling hypocrisy now that those same planners want to build substantial warehousing which will entirely destroy the ambience of the whole area.</li> </ul> <p><b>Suggested Modifications:</b></p>
REP/083	Resident 26	EC4	<p>Possibility of warehousing in Fern Hill in [draft consultation] Donkey Lane is a unique area with listed buildings, footpath used by many walkers shielded by hedges but wide, mature trees, and is like a private driveway.</p> <p><b>Suggested Modifications:</b> I hope it is clear.</p>
REP/085	Resident 28	EC4	<p>My first concern is for the people living in the proposed area for development. They will end up living in an industrial area with all of the noise and business that will be the result. There is no mention of any form of compensation for these residents. The value of their houses will plummet and they will find it impossible to sell.</p> <p>Our local roads are already incredibly busy with lorries and vans coming from the present industrial site, this will have the effect of more impact on local roads. These are B roads and are not built to cope with even the present traffic let alone the increase that will occur.</p> <p>There are few green spaces left locally, the Forge Wood estate has taken up great tracts of fields and footpaths that we once used. The wildlife is being squeezed into smaller and smaller areas, I frequently have eight or ten deer on my property. It has also been noted that during this epidemic that more people are looking for green space to walk and enjoy nature. In fact it is recognised that this is vital for our mental health. The footfall on the footpaths near me are evidence of this.</p>

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			<p>There is also the safety factor, should a plane unfortunately come down, surely it would be better to land on fields rather than on buildings full of people? (This has happened at Fernhill in the past).</p> <p><b>Suggested Modifications:</b>  Should this plan go ahead, the residents should be fully compensated as their properties will be blighted and their homes impossible to sell. They will stand to incur large losses on their investments in their homes.</p> <p>This land should be used for recreation and the grazing of animals.</p> <p>The way things are going in the retail area, surely buildings in the town centre could be allocated for storage. There are also empty premises on the present industrial estate along with empty spaces surrounding it. These should be used rather than eating into yet more of our countryside. This would have the added benefits of keeping the industrial sites with purpose built roads away from residential areas.</p>
REP/086	Resident 29	EC4	<p>The plans have not considered the impact on the people living around the proposed land.</p> <p>Horley already has issues with flooding and since the new estates have been built close by in Crawley the water levels have raised greatly.</p> <p>This further use of land closer to the town will increase the likely hood homes and businesses in Horley will flood.</p> <p>What actions will Crawley council take to ensure the rainwater usually absorbed by the land the proposal wants to build on is diverted away from Horley??</p> <p>In addition to the flood issues why build off a B road when there is plenty of space to build off A roads like the A217 or A23, building off these would have less impact of residents, flood risks and the road layout.</p> <p>Balcombe Road is already a highly dangerous road with cars driving at way above legal speeds, look at the accident records just at Fernhill Road junction.</p> <p>These roads were not designed for heavy goods lorries. There are a great deal of children living on the Balcombe Road who are already in danger of getting hit by speeding cars/ lorries/ buses/ vans, more so now with walking being essential and the Balcombe Road being a popular place to walk.</p> <p>What will happen to the woodlands and wildlife that live in the area? There is a large number of native animals and birds that have already had their environments taken away with all the housing estates being built.</p> <p>Crawley already has a large number of business parks which have many empty units, take Manor Royal as an example. Why not improve these already built for purpose areas and leave the green natural areas alone.</p> <p><b>Suggested Modifications:</b></p>

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			<p>If the council goes ahead with their plans then the water from the fields needs to be diverted away from Horley and away from Burstow Stream. Maybe build a reservoir or water storage unit off towards Smallfield or the other side of the M23 away from homes.</p> <p>Could there be a link road from the M23 Gatwick into the business development instead of vehicles using the Balcombe Road to access it. This would prevent an increase in traffic and environmental air issues for the residents. As the proposal will border that road it seems easier achievable to work with that road instead of a small B road. Alternatively look at the land around the Tesco supermarket on the A23/A217 area. There is plenty of land there and can easily run access roads from the A23. The residential impact will also be minimum.</p> <p>If the Balcombe Road has to be used for access can there be speed restrictions and road narrowing/speed bumps added to reduce the risk to residents. Crossing the road and cars pulling out of homes/roads onto it need to be considered.</p>
REP/088	Resident 30	EC4	<p>Roads only just able to take extra traffic especially through village/town when motorway closed or road works in area – causing diversion. Too many accidents already as roads are used as speedways. Speed limits not kept.</p> <p><b>Suggested Modifications:</b> N/A</p>
REP/089	Resident 31	EC4	<p>We already have enough fumes and ecological damage from airport and the M23 motorway. The area has a nice greenbelt, is a relatively quiet, safe and nice place to live. The plan is just another capitalism attempt and will destroy the area. The plan will devalue properties and bring much more traffic and will certainly open up the area to thieves. The view's will be destroyed and replaced with 20+ Hectors of industrial buildings on our doorsteps. The local roads will be unable cope, so congested and will become more of a nightmare place to live. The damage to the wildlife would also be so devastating as we are not the only ones on this planet.</p> <p><b>Suggested Modifications:</b> Find another location</p>
REP/090	Radford Road Community Ltd	EC4	<p>Radford Road Community Ltd consists of over 20 residents in the Radford Road area. This was formed to comply with the CBC Assets of Community Value Scheme. Whilst we would rather not have to make an official submission under this scheme, obviously, it is something we will do in order to protect community space and protect wildlife etc.</p> <p>We have concerns for the people that live in the area as there is no mention of compensation for further blight and there doesn't appear to be any road improvements for heavy goods vehicles to emerge safely. Also, the B roads are inadequate to carry further traffic which will presumably appear in our road too, adding to the already perpetual noise.</p> <p>We also have previous little green space left in Crawley and yet there are plenty of empty buildings on the industrial estate which could be redeveloped. Wildlife is being squeezed out of the area and we now have deer in all our gardens as they have nowhere to go.</p>

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			<p>Also, is it really wise to put a whole load of buildings at the threshold of a major runway? If an aircraft was to have a total engine failure on take-off (such as a bird strike), it would be preferable to land in fields than hard buildings, to say nothing of the people working in them and Fernhill already has one fatal airliner crash on record.</p> <p>We also note that the airport boundary for future provision has now been moved to the middle of Radford Road so presumably, developers can now build to our boundaries on the south side of the road and also, we assume that we can redevelop on this side of the road now too subject to planning?</p> <p><b>Suggested Modifications:</b>            If any development for warehouses or factory buildings is to proceed, then adequate compensation needs to be paid and particularly to those whose houses are blighted immediately in the area. Unfortunately, councils adopt a policy of "it's not my back yard" when deciding to ruin people's lives. Dare we ask how many CBC members live in the proposed area?</p> <p>Perhaps a smaller development which is out of sight of dwellings and away from the runway centre line would be more appropriate or better still leave the land alone and allow free access to walkers and make it a space to be enjoyed. There will be plenty of warehouse space in all the empty shops such as Debenhams, Sainsbury's, Morrisons (town centre) etc! Making the town centre a warehouse facility is far more appropriate with online sales booming as they are. The high street is dead or at the very least, dying and no matter what initiatives are taken, it will just end up as coffee shops and restaurants. Office requirements are dwindling too and you only need to walk around the industrial estate to see how many buildings are empty. We feel your plan was pre-pandemic and the world has changed considerably since then. It needs revising to reflect the downward spiral of retail shops and your revenues from business rates and rents so a town centre makeover would be far better use of scarce land resources.</p>
REP/094	Resident 32	EC4	<p>I would like to say that I live in Meadowcroft Close. I find this form difficult to understand as I know nothing about planning. As a resident I am very concerned about building on land that does &amp; will be flooded. This area is flat &amp; there has to be places for water to go where we have a large amount of rain. I have be[en] troubled by flooding recently &amp; this will only get worse. It is too often that developments are concerned about money &amp; do not think far ahead. This troubles me greatly &amp; more buildings will make <u>me want to leave the area!</u> I know we have to think about future employment but building on green areas is not the way forward. We have to take into account climate change &amp; all the hard decisions we will have to make.</p> <p>There is a lot about this form &amp; letter is not written in language that people like me understand. I see the map &amp; that I understand. I don't want to search around on the website for hours to find specific paragraphs. It just takes too long &amp; is very frustrating. I think this is done to put people off.</p> <p><u>I am not happy about this building</u> shown in the map. I am amazed that it's not compulsory to have solar panels &amp; grey-water tanks. I also have the concern of the Horley Business Park being built behind Meadowcroft Close &amp; I feel everything is closing in on us.</p> <p><b>Suggested Modifications:</b></p>

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REP/096	Landowner 1	EC4	<p>Before I comment of the plan itself, I must first comment on the consultation process and question whether it has been legally/correctly conducted. I own more than one property severely affected by this plan, and yet it is only by chance that I am even aware of the plan and the consultation currently in progress. One of my tenants has had the sense to forward me the letter sent by the council to the property address. The council has clearly not done its due diligence in checking the Land Registry to identify the correspondence addresses of the various affected property owners and has instead made the assumption that the property owners reside at the affected properties themselves. All of the properties that I own and that are adversely affected by the plan are registered at the Land Registry together with details of my correspondence address, and clearly showing that it differs from the property address. In contrast to the feeble incomplete notification of this plan and consultation by the Council, the plans and enquiries from Gatwick Airport a year or two ago arrived at my correspondence address in triplicate as I have 2 leasehold and one freehold interest registered at the Land Registry.</p> <p>In addition, the 6 January 2021 letter sent to the affected properties is misleading when compared with the local plan text in certain important respects. Specifically that letter s worded to give the strong impression that only a small proportion of the identified Strategic Development Land will be developed "It is important to be clear that the anticipated built area of any scheme is much smaller than the allocated site boundary shown in the Local Plan, with the expectation that development is comprehensively masterplanned with appropriate supporting transport infrastructure and landscaping provided to ensure protection of the amenity of nearby properties." This implies that affected local residents should not be concerned by the size of the Strategic Development Land area as only a fraction of it will be developed and that the remainder is specifically to protect the existing residential properties (with the exception of some transport infrastructure needs). By contrast, the Local Plan states in paragraph 9.54 "The site identified on the Local Plan is larger because the significant quantum of industrial floorspace could be supported by complementary uses where justified by evidence, including ancillary uses such as a limited provision of offices and supporting amenity uses that will cater for the needs of the of employees." This implies much more of the land would be developed and that much less of it would be available to create buffers and landscaping to protect existing properties and settlements.</p> <p>I am astounded that the Council thinks it appropriate or reasonable to surround hamlet and individual isolated rural properties with a business park development and, for the majority of those properties that border the Strategic Development Site to be sandwiched into a narrow strip between the M23 motorway and industrial/business development. No amount of landscaping will address that fact that the properties are being isolated by this proposed development from ANY other area of rural or urban space. The council is minimising the cost to itself by not including compulsory purchase of these properties within the land to be developed, rendering the affected residential properties completely worthless and completely unsaleable. It will literally cause financial ruin to those property owners. Furthermore paragraph 9.57 comments only on existing properties that border the site and fails to acknowledge that there are properties on Fernhill that are in the middle of the identified Strategic Development Site.</p>

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			<p>Whilst you might try to argue that the properties were already blighted by the Gatwick second runway proposals, the situation in that case is completely different. In those proposals, the residential properties are included within the perimeter of the expanded Gatwick and therefore would be compulsorily purchased at the indexed fair market value as assessed prior to the existence of the proposals should the development go ahead. The property owners are therefore not adversely affected by the Gatwick Plans from a financial perspective.</p> <p>You also might try to argue that in the text of the proposals you indicate that there will be "landscaping provided to ensure protection of the amenity of nearby properties" and also that the "built up area of any scheme will be much smaller than the allocated sit boundary shown in the Local Plan". This does not help at all - and as commented above, the letter from which this quote comes is inconsistent with the Local Plan itself. Any person thinking of buying one of the affected properties would be frightened off by the map included in the plan and would not even bother to read the text for further information. In addition, the text gives no comfort as to what exactly would be done, how close the development would be to each affected property and any safeguards that mean that any buffer between the development and residential properties could not modified or eroded over time in either future plans or if the plans were implemented. The comment that the development would be a "minimum of 24.1 hectares" also gives further scope to the council to develop a much bigger part of the identified area than is currently suggested so furthering the concern and alarm to any potential buyer of one of the residential properties. In addition you are leaving a number of properties either in the middle of, or bordering a huge building site should the plans be implemented - a further issue that will scare off any potential buyer of a property.</p> <p>In paragraph 9.58, Flood risk is addressed, and in Paragraph 9.59 consideration of HGV access is discussed. The Sussex County Council track record for both recognising the risks posed and protecting existing properties, services and environment over recent years following the approval of the old Jupps site on Peeks Brook Lane for the much bigger United operator which failed to take into account the impact on the roads (Peeks Brook Lane and Fernhill) and the junction between Peeks Brook Lane and Fernhill which were not designed to cater for such traffic and the junction was not used by the previous operator. As a result the ditches protecting to properties at Fernhill against flood are being destroyed by the oversailing HGVs so gradually eroding our flood protection. The BT chamber on the corner of Fernhill and Peeks Brook Lane has been destroyed several times by the HGVs since the change of operator and all the council does is order BT to repair the chamber rather than take action to put in place measures that would prevent the HGV's from oversailing onto the verge and the chamber in the first place. In addition the road surface is being destroyed and the weight of the HGVs using it caused the water main outside 2 Two Ways on Peeks Brook Lane to collapse in 2019. Whilst all this has previously been notified to the council no measures whatsoever have been taken to alleviate or reduce the issue. Indeed the Highways department of Sussex County Council instead in a phone call at the time threatened to remove the curb stones that the HGVs were oversailing so that there was no longer a highways boundary for the HGVs to stay within or any Council property (as opposed to BT property or protective ditches) for them to damage so the council would no longer have a problem that they needed to consider or respond to.</p> <p><b>Suggested Modifications:</b></p>

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			The only way in which this proposal could be considered as reasonable or acceptable is if it safeguards the value of the residential properties adversely affected by the plan. Specifically those in Fernhill and in Peeks Brook Lane that either border the development or are surrounded completely by the development. To do this, these properties would need to be included within the proposed perimeter of the identified land and be compulsorily purchased should this proposal be implemented. As the properties' value had already previously been tagged to the value prior to the Gatwick proposals being put forward the relevant value for compulsory purchase, should the Council's Local Plan be implemented, would need to carry through from that earlier value again.
REP/097	Resident 33	EC4	<p>I don't believe that the Airport City Business Park Proposal (HOR9) should go ahead due to the illegal felling of trees that took place at Meadowcroft Manor. Without seeking consultation from residents, and supposedly without the consent of Reigate and Banstead's councillors or MP (please see the attached emails) or even an ecology report, contractors from Bill Kear felled hundreds of trees on the 28th/29th of November.</p> <p>This has had the following immediate effects for the residents of Meadowcroft Close (RH6 9EJ):-</p> <ul style="list-style-type: none"> <li>• Increased Light Pollution from Gatwick Airport, the M23, the B2036, and the train station at Gatwick Airport</li> <li>• Increased Noise Pollution from the above sources.</li> <li>• Increased Exposure to inclement weather, including wind, snow, rain and bright sunshine. The remaining trees are also at increased risk of collapsing in high winds and causing property damage. (please see attached photo)</li> <li>• Decreased quality of life. Instead of a beautiful backdrop of trees there is now a field of rotting trees and mangled stumps.</li> <li>• Increased risk of flooding. (please see <a href="https://www.woodlandtrust.org.uk/media/1794/stemming-the-flow-trees-in-flood-protection.pdf">https://www.woodlandtrust.org.uk/media/1794/stemming-the-flow-trees-in-flood-protection.pdf</a>)</li> </ul> <p>During construction of the Business Park the loss of the trees at Meadowcroft manor will also expose the residents of Meadowcroft Close to the following:</p> <p>Increased Noise Pollution from Construction vehicles, both on the site and on the Balcombe Road (B2036)</p> <ul style="list-style-type: none"> <li>• Increased vehicular emissions from Construction vehicles</li> <li>• A sharp decrease in property values.</li> </ul> <p>I also strongly disagree with the idea of Covid 19 being a justification for the business park. I would argue that the shuttering of Gatwick airport during Covid and the sudden uptick in remote working actually make a case against building it.</p> <p><b>Suggested Modifications:</b></p> <p>If the proposal is to go ahead I believe Horley and Crawley Councils should reiterate what they intend to do to rectify the damage and restore the now severely reduced quality of life of the residents of Meadowcroft Close. I also believe the following steps should be implemented:</p> <ul style="list-style-type: none"> <li>• Conduct a thorough review into why the trees were felled, who authorised the felling and what the plan is to rectify this horrible act of environmental damage.</li> </ul>




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			<ul style="list-style-type: none"> <li>• Conduct a long term review into how residents of Meadowcroft Close will be affected by increased light and noise pollution, and take actions to reduce these effects.</li> <li>• Conduct a long term review into whether property values in Meadowcroft Close will or have been affected by both the felling of the trees and the plans for the business park.</li> <li>• Conduct a review into whether the Balcombe road is adequate to handle additional traffic caused by the business park.</li> <li>• Conduct a review into whether there will be an increased risk of flooding both on the Balcombe Road, at Gatwick Airport and Meadowcroft Close due to the loss of the trees at Meadowcroft Manor, in conjunction with the additional risk of flooding that may be caused by the increased surface runoff from the Business park.</li> </ul>
REP/098	Resident 34	EC4	<p>The complex procedure to enable an objection to be submitted will inevitably reduce the submission rate. In effect this form is discriminatory against us of reduced cognitive ability.</p> <p>Due to the Covid-19 restrictions, the residents of Fernhill have been unable to meet to discuss the way forward. Our right of free speech is not available at this moment.</p> <p>The proposal states that 24.1 hectares are required. Whereas the areas to the North and South of Fernhill Road total 42 hectares.</p> <p><b>Suggested Modifications:</b></p> <ul style="list-style-type: none"> <li>• This form is complete gobbledygook to most people, please stick to plain English and respond to the objections alone.</li> <li>• The consultation period should be extended for at least a month after the restrictions have been lifted.</li> <li>• This proposed B8 area is almost double of what is required.</li> </ul>
REP/100	Resident 36	EC4	<p><u>Reference: New Industrial Units in North Eastern end of Balcombe Rd, - Gatwick Green</u></p> <p>Thank you for your recent letter regarding this development.</p> <p>We live in one of the properties immediately opposite this site and would like to voice our concerns regarding the development.</p> <p>These concerns relate to increased traffic, existing local flooding issues, new jobs for the area, property values, wildlife present in the fields and destruction of the “green” habitat, all in an area already blighted by the airport and its possible expansion.</p> <p>This section of the Balcombe Road is already one of the busiest in West Sussex. It caters for a large volume of traffic using it as an alternative to the M23 and the A23. This has not been helped by the construction of the Forge Wood housing developments. In recent years the road has become noisier than the airport and even during the pandemic we are experiencing a constant flow of vehicles past our residence.</p> <p>During prolonged and heavy bouts of rainfall, the surrounding area is prone to flooding, including the area where the planned development will be (please see attached photos). This is not helped by the “Gatwick Clay” and the high</p>

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			<p>water table. This was relatively infrequent when we moved here but has happened on a more regular basis for some years now. As a result our garden regularly becomes water logged and our cast iron manhole cover in our front garden lifts allowing untreated sewage to pour into the garden and then into the ditch between our property and the road. During this time we are unable to use our downstairs toilet as it would overflow if flushed. For some months Thames Water have been using tankers at the local pumping station in the Balcombe Road to try and remove some of this excess water, but sadly to little avail. We are sure that Thames Water can give you further details regarding this ongoing issue. In a meeting that we had with Thames Water they cited that a contributory factor to this flooding was due to local homeowners creating paved areas in their gardens. What effect would a large industrial estate with its foundations, network of roads and parking areas on this already untenable situation?</p> <p>During a meeting with the planning office in Crawley some years back when we wished to extend our property, we were advised by the planning officer that the area we lived in was considered to be semi-rural and the council liked to keep a swathe of "green" land known as the "Strategic Gap" between the adjoining borough of Horley so as to provide a visual break, and potentially an "Impact Zone" for any aircraft experiencing trouble during landing or take-off. As a result we were advised that there were strict guidelines in place to restrict development in this area. We ourselves were told by our solicitor when we first moved here that there were building restrictions that still applied back to the time when Gatwick was part of Dorking Parish Council.</p> <p>You make reference to the extending of Gatwick with a second Southerly runway, but as you know Gatwick Airport have shelved the idea of a second runway as they intend to upgrade the Northerly "emergency runway" as an alternative. Surely this would free up some of areas being safeguarded in the borough for the airport</p> <p>Manor Royal along with the Airport must be one of the largest industrial developments in the South East and you state in your letter that some 40,000 plus people commute into the area for employment and only 30,000 of the work force are local residents. Driving through the existing industrial areas in the borough there has always been evidence of a number of vacant properties and large areas of under development. Surely it would be better to exploit and improve these existing areas than create new ones?</p> <p>Your planned development for this area adjacent to the Balcombe Road states that it would be used for distribution centres and warehousing. Experience is that, by design these distribution centres only employ a relatively few members of staff in huge incongruous buildings. We doubt they would provide that many jobs for the available local workforce but are more likely to increase the amount of commuters coming into the area.</p> <p>Finally on an ecological note, now even more than ever it is important to retain these green spaces for the betterment of the environment. Apart from being used for grazing by local farmers these areas that you wish to develop attract a variety of wildlife including deer, foxes, owls, buzzards etc. Surely it is better for this area to stay undeveloped than destroy as a habitat for local flora and fauna.</p> <p><b>Suggested Modifications:</b></p>

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REP/102	Resident 37	EC4	<p>Thank you so ***** much for dropping another heap of **** on the poor residents of Balcombe Road. As if it's not bad enough that your mates in Reigate and Banstead have saddled us with this massive so called Business Park across the road, you now want to build another one just to the south of us. Do you not think we have suffered enough? Just because we live near an airport and already suffer all the noise and air pollution that entails, that does not mean we have given up all rights to the consideration of our quality of life and wellbeing.</p> <p>I sat through the sham of a Local Plan inquiry and heard you people saying that you supported the Business Park because you needed more "employment land" and there was not enough in Crawley because you couldn't build on the "safeguarded" land for the airport. But here you are plonking a factory estate in the middle of it. If the "safeguarded" land is no longer safeguarded why choose that bit?</p> <p>What I learnt from going through the Reigate and Banstead local plan process is that it is an utter waste of time for a local resident to make any objections to the plan because they will not be taken any notice of by the council or the Government Inspector. The so called public consultation is merely a box ticking exercise to give the process a false veneer of respectability. All the process is really for is to give landowners and other vested interests a chance to influence the results. The Town and Country Planning Act was no doubt well intentioned when it was passed just after the Second World war, but it has become prostituted into a method of controlling land values. The Local Plan process is no more than a squabble between landowners as to whose land becomes more or less valuable.</p> <p>And another thing. No one but a fool would embark on an exercise like this in the middle of a global pandemic when the economy is in tatters and no one, absolutely no one, can make any serious predictions as to what the economy is likely to do in the short, medium or long term. One of justifications for the factory estate is that a large number of jobs have been lost in the aviation industry. Well there's a surprise when there's a travel ban on. There is no evidence that those jobs will not re-appear when the pandemic is finally behind us and people can travel freely again. Furthermore, if it were true that the jobs were lost for good, what about all the space vacated as a result. That could be reused for new purposes.</p> <p>It would be much more honest if you said that you were going to allocate this land unless some other landowner makes you a better offer and there's absolutely nothing we can do about it, instead of pretending that we do. As I live across the border, I don't even have the satisfaction, small though it is, of voting against you.</p> <p><b>Suggested Modifications:</b> Postpone the review until the Economic and social situation has at least some measure of clarity. Delete the policy relating to a factory estate south of the M23 Gatwick extension.</p>
Rep/101	Horley Town Council	EC4 4.58	<p><b>Horley Town Council response to the changes which have been made to the Crawley Borough Council Local Plan</b></p> <p>Thank you for giving us the opportunity to comment on the changes which have been made to the Crawley Borough Council Local Plan. Horley Town Council notes that in order to meet Crawley's employment land needs for the Plan period, the Local Plan proposes that land in the north east of Crawley, at Gatwick Green, will be allocated for delivery</p>

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			<p>of a strategic employment location that will provide as a minimum 24.1 hectares of new industrial land, predominantly for B8 storage and distribution uses.</p> <p>At the meeting of the Town Council's Planning &amp; Development Committee meeting held on Tuesday 16th February, Members discussed this proposal.</p> <p>It was noted that this area will be directly opposite the proposed Horley Business Park and separated by the Gatwick M23 spur road.</p> <p>Where the Horley Park is planned to have direct access to the M23 spur it is understood that the transport access for Crawley's Gatwick Green proposal would be via the Balcombe Road. We further understand that the site will comprise mainly warehousing which tends to produce more vehicle movements than offices or industrial use for example.</p> <p>It is for these reasons that Horley Town Council wishes to put on record its very real concerns on the potential impacts to the road network in Horley.</p> <p>Traffic from Gatwick Green could use the Balcombe Road which joins the A23 at the Chequers roundabout before heading north towards Redhill. This section of the A23 is already under great pressure with the increase in traffic from two major residential developments and the new North Gatwick Gateway warehouse site. In addition, there is the possibility that some site traffic will be allowed access to/from the Horley Business Park via the Balcombe Road.</p> <p>Of equal concern is the route that vehicles travelling to/from Gatwick Green will use to access the motorway network. One option could be via Horley Town Centre, the A23 and M23 at Gatwick or the reverse. We do not welcome the thought of a stream of commercial vehicles using Gatwick Green mixing with the regular town centre traffic of cars, buses, and delivery vehicles where queuing at peak times has been a feature for some while on current levels of traffic.</p> <p>We trust our concerns will be taken into consideration.</p> <p><b>Suggested Modifications:</b> N/A</p>

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REP/112	Resident 45	EC4	<p>I feel the area is already well served with commercial properties, both industrial, warehousing &amp; office. There are many empty units in Crawley, not least in Manor Royal, but also in several of the smaller business parks nearby. I don't see the benefit of adding yet more when there are many standing empty.</p> <p>The access road, Balcombe Road, is already extremely busy, particularly now that there have been thousands of new homes built in Forge Wood &amp; also Horley. Any new business park in the Fernhill area will create exponentially more traffic movements. It is already really difficult pulling out onto the road or indeed frequently dangerous trying to cross it.</p> <p>The area proposed for development is prone to flooding in the late autumn through to early spring. Many of the fields have huge areas under water, thus further development with just push the water through to existing developed areas of housing.</p>  <p><b>Suggested Modifications:</b> I cannot see that there are any modifications that will resolve the above issues, other than not build the Business Park.</p>
REP/120	Squires Planning on behalf of Residents	EC4	<p>EC4 Allocation Site Constraints</p> <p>3.46. There are a number of site constraints and policy requirements applicable to the 'Gatwick Green' site such as flood risk, landscape character, biodiversity, heritage, public safety zones and amenity. These impact the quantum of development that can be accommodated, the acceptability of the proposal and development viability.</p> <p>3.47. It is evident from the information supporting the proposed allocation that this exercise has not been undertaken. The following sections set out the main constraints and demonstrate that the developable land is likely to be severely restricted to be policy compliant.</p>

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			<p>3.48. In addition, proposed Policy EC4 requires a high-quality public realm, landscape buffers, public open space, and protection of hedgerows/trees. There does not appear to be any masterplanning to determine the quantum of development within the site taking into account these constraints and policy requirements.</p> <p>3.49. It is our view that this issue affects the soundness of the plan as there is significant uncertainty whether the site, consisting of a minimum 24.1ha of industrial land, is 'deliverable' (notwithstanding the conflict with national aviation policy that makes the allocation undeliverable).</p> <p><u>Impact on the Highway</u></p> <p>3.50. Strategic Policy EC4: Strategic Employment Allocation, requires that the 'Gatwick Green' Strategic Employment Location will be required to 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 allocated Horley Strategic Business Park, and the impact of committed developments in the borough and surrounding areas.</p> <p>3.51. Whilst the proposed 'Gatwick Green' site is close to the strategic road network it does not have immediate access to it. Routes to and from the site to the M23 would have to run through residential areas and local roads. This, as it stands, would clearly be inappropriate for B8/industrial uses which will include a high number of HGV movements.</p> <p>3.52. The provision of a major employment site will lead to an increase in car travel particularly in the morning and evening peak hours. A full transport study to examine potential locations, site density and employment mix and how travel demand should be managed is required.</p> <p>3.53. It is essential that transport modelling is undertaken to understand the impact on the local road network at the plan making stage. This approach was supported by WSCC at the Regulation 18 stage. Paragraph 102 of the NPPF states 'Transport issues should be considered from the earliest stages of plan-making'. However, transport modelling has not been part of the plan making stage. Since publication of the Draft Submission Local Plan in January 2021 a Transport Modelling Report has been prepared and published on 18th May 2021. It is unfortunate that the implications of the Transport Modelling will have to be addressed during the Local Plan Examination rather than the correct approach of undertaking as part of the plan preparation and shaping the policies and proposals within the draft Local Plan.</p> <p>3.54. Our specific comments on the Crawley Transport Study (CTS) are as follows:</p> <p>3.55. The CTS sets out three scenarios. Scenarios 2 and 3 are relevant in terms of the Gatwick Green allocation as the allocation has been included in the modelling for these two scenarios. Figure 5-1 shows the junctions where there are likely to be traffic issues. The relevant junctions regarding routes to/from the Gatwick green site are:</p> <ul style="list-style-type: none"> <li>• A2011 Crawley Avenue/B2036 Balcombe Road (ID13) 24</li> </ul>

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			<ul style="list-style-type: none"> <li>• B2036/Radford Road (ID14)</li> <li>• B2036/Steers Lane (ID15)</li> <li>• M23 Junction 10 (ID34)</li> </ul> <p>3.56. Table 5-1 and 5-2 analyses these junctions based on the increased traffic from each scenario in the AM and PM peak hours. The results show that each of the above junctions would be significantly above capacity in both the AM and PM Peak Hours and significantly worse than the reference case. Mitigation is therefore required to address these issues.</p> <p>3.57. Appropriately, sustainable mitigation has been considered first as a potential approach to mitigate the impacts of the Draft Crawley Local Plan scenarios, with physical mitigation considered as a last resort. A number of options are outlined to increase sustainable transport and reduce car trips, many of which are aspirational or in the early stages of development and are unlikely to be delivered as part of this Local Plan (para 6.3.2). Feasible measures include school streets, car park exclusion zones outside schools, low traffic neighbourhoods, improved public transport services/frequency, and personalised travel planning delivered by developers. It is unclear exactly how far these mitigation measures go to resolving the junction capacity issues stated above, that are partly caused by the 'Gatwick Green' allocation and its associated HGV/lorry trips which are not incorporated within the Transport Study modelling. There are a number of assumptions on the application of sustainable mitigation which are relied upon to deliver a substantial improvement in active travel and public transport services and infrastructure (para 7.8.2) to justify a lack of physical improvements. Paragraph 1.3.3 confirms the uncertain outcome of these measures and recommends monitoring and review of them. It is our view that reliance on the above measures create a significant risk that there will be insufficient provision of infrastructure to address transport issues (NPPF para 20). Under the approach outlined in the Crawley Transport Study, it may not be known whether the proposed sustainable travel mitigation is effective until after development has been approved and implemented leaving issues unresolved and with no mechanism to address them.</p> <p>3.58. Section 8.4 of the study assesses Junction 10 of the M23 and possible mitigation that will need to be discussed with Highways England. There does not appear to be any input or discussion with Highways England regarding the impacts of the scenarios on the M23. It is considered essential that Highways England are fully engaged in the Local Plan to ensure that the development proposed does not cause severe impacts on the strategic road network.</p> <p>3.59. Specifically with regard to the 'Gatwick Green' allocation, the Transport Study suggests no left turn into Gatwick Green from the north and no right turn going north when existing the site to avoid HGV traffic through Horley. This means HGVs coming southbound on the M23 will either take a circuitous route through Shipley Bridge/Copthorne which would have an unacceptable impact on those rural country roads that are not part of the WSCC Transport Plan local or strategic advised lorry/HGV routes. Alternatively, the route would be along the A2011 from J10 to Hazelwick Roundabout and then exiting the slip road to the Balcombe road running through Forge Wood. This route is a well know hotspot for traffic congestion and it does not appear that the Transport Study has identified this issue. It is our</p>

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			<p>view that further work needs to be undertaken to understand the impacts of the 'no turn' approach on the transport modelling and identified areas of overcapacity along this route (ID12, ID13, ID14 and ID15).</p> <p>3.60. In summary, it is considered that the preparation of the Crawley Transport Study, at the end of plan preparation and following publication of the Draft Submission Local Plan, undermines the proper plan preparation process of allowing the evidence to inform the most sustainable policy options/allocations. This further reinforces our view that the Crawley Local Plan has lacked the necessary evidence that is needed to properly inform an appropriate strategy for meeting Crawley's needs. We consider that a return to the Regulation 18 Stage to engage constructively with stakeholders and allow the recent evidence to shape the Local Plan proposals is required.</p> <p><u>Impacts on Landscape and Biodiversity</u></p> <p>3.61. The proposed allocation covers much of the landscape character area known as the North East Crawley Rural Fringe. Policy CL8: Development Outside the Built-Up Area, states: "...all proposals must recognise the individual character and distinctiveness, and the role of the landscape character area or edge in which it is proposed as shown on the Local Plan Map, established by the Crawley Borough Council Landscape Character Assessment."</p> <p>3.62. For the North East Crawley Rural Fringe Policy CL8 states: "This area has an important role in maintaining the separation of the distinct identities of Gatwick Airport, Crawley and Horley".</p> <p>3.63. The Crawley Green Infrastructure SPD (2016) states: "This area is of high landscape value which should be retained for public access benefits and maintaining the separate identities of Gatwick Airport, Crawley and Horley." (page 67)</p> <p>3.64. The proposed 'Gatwick Green' allocation would conflict with the character distinctiveness and perhaps most importantly the role of this area in maintaining the distinct identities of Crawley and Horley. The allocation would fill the countryside gap that currently exists between Crawley and Horley compromising its role in maintaining the separate and distinct identities of Crawley and Horley.</p> <p>3.65. The area proposed to be allocated also undermines its designation as a Biodiversity Opportunity Area. Clearly a proposed industrial/warehousing use of the area does not create an opportunity to enhance biodiversity on this site above the pre-development baseline as proposed Policy GI3 requires. It is our view that the requirement for a net gain in biodiversity on-site is likely to be undeliverable as the area needed for protection and enhancement would affect the viability of the scheme and the ability to deliver the required extent of employment land required. 26 3.66. The impact of the proposed allocation on the designated landscape character and biodiversity opportunity areas are not adequately recognised in Policy EC4 and the Sustainability Assessment of the site resulting in requirements that cannot be delivered. The proposed allocation is therefore not justified or effective as it could be undeliverable against the Local Plan as a whole.</p>



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			<p><u>Impacts on Flood Risk</u></p> <p>3.67. The proposed allocation is situated within the Burstow Stream catchment, which is identified as being at a high risk of cumulative flood impacts, whereby multiple development sites, unless carefully planned, could result in increased flood risk to third parties. There is insufficient evidence provided at this stage to ensure that the allocation will not cause unacceptable flood risk and therefore be undeliverable failing the 'effective' test of soundness.</p> <p>3.68. The photo below taken on January 2021 shows surface water flooding issues that occur throughout the site.</p> <p>3.69. Draft Policy EP1 Development and Flood Risk states that 'Development must avoid areas which are exposed to an unacceptable risk from flooding and must not increase the risk of flooding elsewhere.' As the 'Gatwick Green' site is in the Burstow Stream catchment area it is likely that significant mitigation will be required to make it acceptable. That would likely include extensive attenuation basins that would limit the developable area.</p> <p>3.70. It is our view that further work must be undertaken to demonstrate that the proposed allocation would not increase flood risk elsewhere or impact the residential properties within this area. Without this information there no certainty that the proposed allocation EC4 is deliverable and therefore meets the test of soundness</p> <p><u>Public Safety Zones</u></p> <p>3.71. The DfT Circular 01/2010 Control of Development in Airport safety Zones sets out the extent of Public Safety Zones (PSZ). These are areas of land at the ends of the runways at the busiest airports, within which development is restricted to control the number of people on the ground at risk of death or injury in the event of an aircraft accident on takeoff or landing. The basic policy objective governing the restriction on development near civil airports is that there should be no increase in the number of people living, working, or congregating in Public Safety Zones and that, over time, the number should be reduced as circumstances allow.</p> <p>3.72. There is a general presumption against new or replacement development which includes non-residential development. Exceptions are limited to extension or alteration to a dwellinghouse or a change of use of a building or</p>



Figure 2 – Flooding on the Gatwick Green site (January 2021)

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land which would not increase the number of people working living or congregating at the building on the land in question. There is also an exception for long stay parking (para 11(iv)). The Circular also states 'The extent of Public Safety Zones and any 1 in 10,000 individual risk contours should be indicated on proposals maps accompanying regional spatial strategies and local development frameworks'. It is noted that the PSZ for Gatwick is not currently shown on the Local Plan Map.

3.73. The Civil Aviation Authority has recently consulted on a revised Circular (CAP1096) and standardised risk profile for PSZs (shown below) with consultation ending on 23rd December 2020. It is likely that this will be applied to the existing runway at Gatwick.

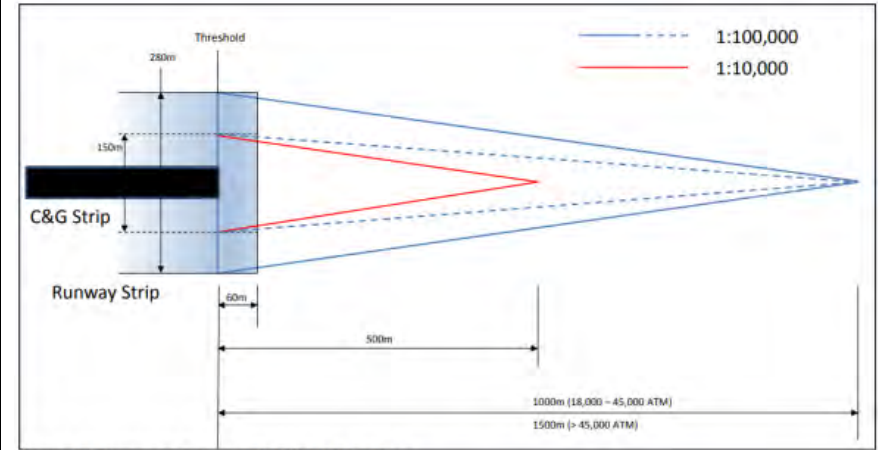


Figure 3 - Proposed runway Public Safety Zone

3.74. As Gatwick airport carries greater than 45,000 air traffic movements per year the safety zone extends 1500m from the end of the runway.

3.75. The proposed Circular maintains the previous approach to development within public safety zones which excludes new and replacement development within the 1:100,000 area.

3.76. As shown on the Wilky Group submitted plan 11/091/SK-62/E within Appendix 4b of their submission, the implication is that a large swathe of the 'Gatwick Green' site south of Fernhill Road is undevelopable. The area between the dotted lines represents the Public Safety Zone 1:100,000 area, where no new and replacement development should occur. Figure 4 – EC4 Illustrative layout 29

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Figure 4 – EC4 Illustrative layout

3.77. This has not been considered as part of the EC4 site allocation and calls into question the sustainability appraisal of the site and its suitability for development. As the proposal stands it is not justified or consistent with national policy.

3.78. Notwithstanding the objections to the principle of this allocation, the Public Safety Zone must be fully considered in the assessment of the 'Gatwick Green' allocation during preparation of the Local Plan and inform the extent of the site boundary.

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			<p>3.79. It is noted that the Gatwick Masterplan 2019 designates this area as long stay parking should a second runway be required. This type of development is acceptable in Public Safety Zones (Circular 01/2010 para 11(iv)). “long stay and employee car parking (where the minimum stay is expected to be in excess of six hours);”</p> <p><u>Heritage</u></p> <p>3.80. There are two Grade II Listed Buildings situated along Donkey Lane which is close to the boundary of the ‘Gatwick Green’ site. These are Lilac Cottage (early C18) and Old Cottage (C17 timber framed cottage) which are listed for their architectural interest. A Locally Listed building ‘Poplars’ to the north of Fernhill Road, is outside the boundary of the allocation but surrounded on all sides by it. There are a number of other Locally Listed buildings situated along Peeks Brook Lane which forms the eastern boundary of the site. The closest to the site is Royal Oak House, a Queen Anne style villa of the 1880s which has historic and architectural value. Locally listed buildings are a material planning consideration when deciding planning applications.</p> <p>3.81. Proposed policy HA4: Listed Buildings and Structures, requires that proposals demonstrate how they will protect the significance of the listed building, including its setting and its key features.</p> <p>3.82. Proposed Policy HA5: Locally Listed Buildings, requires that all development maintain features of interest, and respect or preserve the character or setting of the building.</p> <p>3.83. Paragraph “t” of proposed Policy EC4 requires that ‘development proposals have regard to conserving the setting of the Listed Buildings at Donkey Lane and Fernhill Road and the locally listed building at Rivington Farm’. This wording is too weak and should be strengthened to reflect the requirements of the wider local plan and national policy relating to heritage. It is also noted that it not clear where the Rivington Farm building is located on the Local Plan map or within the heritage assessment. A map showing the location and reference of the locally listed buildings would be useful.</p> <p>3.84. The proposed ‘Gatwick Green’ allocation would consist of large industrial and warehouse buildings with its associated infrastructure and activity. Whilst it may be possible to create a buffer between the above listed buildings and the proposed development, the entire character of the area would be transformed, with the setting of the listed buildings changing from rural to industrial. This would amount to substantial harm to the listed buildings of Lilac Cottage and Old Cottage.</p> <p>3.85. The impact on the locally listed buildings, Poplars and Royal Oak House is also substantial with the proposed allocation surrounding both buildings. The Royal Oak House is the only surviving building of a small farm known as Royal Oak Farm. The conclusion in paragraph 3.6.9 of the Wilky Group Appendix 4B – Heritage Constraints appraisal, that the agricultural setting only makes a minor contribution to its significance, is therefore clearly wrong as the building and surrounding fields are intimately linked. In this regard it is advised that the Sussex Historic Landscape Characterisation (HLC) is consulted to properly determine the impact on this historic landscape.</p>

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			<p>3.86. It is concluded that the impact of the EC4 allocation has not had proper regard to its impact on heritage in determining the site area. We believe that the boundaries of the allocation should be reviewed to allow buffers between the allocation boundary and the heritage assets rather than include unnecessary land within the site.</p> <p><u>Impact on Residential Amenity</u></p> <p>3.87. Through all the documents available on the Council's website we have not seen any proper analysis of the harm which would result from the allocation on residential amenity. This alone is a considerable shortcoming which threatens the soundness of the plan.</p> <p>3.88. As can be seen in Figure 5, there are a number of dwellings adjacent to the proposed 'Gatwick Green' allocation. Impacts on the residential property known as 'Poplars' (on Fernhill Road), other properties on Fernhill Road and residential properties along Donkey Lane would be acutely effected by the proposed allocation.</p> <p>3.89. These properties are generally tightly encompassed by the proposed allocation. There is no detailed masterplan for 'Gatwick Green' (which is in itself an issue) and it is self-evident that these properties such as 'Poplars', being entirely surrounded by a B8 warehouse and storage would be inappropriate and cause substantial harm to the occupier's amenity with regard to issues such as overlooking, dominance, overshadowing, traffic generation and general activity, such as noise, smells and/or vibration.</p> <p>3.90. Turning to the illustrative masterplan briefly, it cannot be called a masterplan. It illustrates a large development of warehousing as green fields and shows a tree lined distribution road through the area. We believe this plan is intended to mislead the viewer of the actual impacts on the proposal. What can be seen is that a major road is proposed adjacent to residential properties – without any mitigation or consideration of them.</p> <p>3.91. Whilst some may point to the fact that the area is safeguarded for airport expansion in any event, this current proposal is substantially different regarding residential amenity for one key reason. Should airport expansion take place in line with national aviation policy, the residential properties present would be bought and likely demolished as part of the proposal – removing any negative impacts on the residential properties. This current 2 Page 38, Non-designated Heritage Asset Review, Appendix A, Place Services and Crawley Borough Council (Dec 2020) 31 proposal would result in the residential properties remaining leading to significant and substantially harmful impacts on the amenity of them.</p> <p>3.92. Residential amenity has not been considered in enough depth. A full review of the proposal and its impacts must be undertaken.</p>

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*Figure 5 - Map showing residential property adjacent to the proposed EC4 allocation.*

**Suggested Modifications:**

- 4. Conclusions
  - 4.1. Our assessment of the proposed 'Gatwick Green' allocation has exposed fundamental issues with the legal compliance of the Submission Draft Local Plan and its soundness. As a result, we do not consider that the plan can proceed in its current state.
  - 4.2. Should the Inspector consider that the proposed plan is not legally compliant we consider that a return to the Regulation 18 Stage to engage constructively and on an ongoing basis to meet employment needs outside the Borough.

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			<p>4.3. Should the Inspector consider that the legal compliance test has been met it would be appropriate to adopt the Submission Draft Local Plan with safeguarding retained and the allocation proposed in EC4 deleted, with its extent reflecting that of Plan 21 within the Gatwick Airport Master Plan 2019, which is based on robust evidence of need.</p> <p>4.4. As Local Plans should be reviewed every 5 years it would then be entirely possible to commence constructive and ongoing dialogue with the Gatwick Diamond and LEP local authorities through the Duty to Cooperate to explore delivery of employment land within the wider economic area.</p> <p>4.5. Alongside this, it is possible that national aviation policy is published which changes the government's current position on requiring land to be safeguarded for a second runway. That would then open wide-ranging opportunities within the entire safeguarded area (613 hectares) to deliver a comprehensively planned and well thought strategic employment site, which includes the option of extending the existing employment area of the Manor Royal Business District northwards which would logically be the preferred location as it limits harmful impacts.</p> <p>4.6. Nevertheless, continuation of the existing Local Plan Policy EC1 is the correct approach: "The preferred location for strategic employment is within the borough, to the north of Manor Royal and south or east of Gatwick Airport, identified as the Area of Search on the Key Diagram. However, given current safeguarding of this land for a possible second runway at Gatwick, work required to identify an appropriate site, or sites, for further business development will take place after the government has issued a final decision on additional runway capacity in the UK, and has determined whether the area should still remain safeguarded".</p> <p>4.7. With 24.1ha of employment land needed before 2037 there is ample time to achieve that target without resorting to an approach that conflicts with national policy</p>
REP/125	JLL on behalf of Vectos	EC4	<p><b>1 Introduction</b></p> <p>1.1 These representations to the Crawley Local Plan Review (Regulation 19) Submission Publication document and supporting evidence are made by Vectos on behalf of Horley Business Park (Development) LLP in respect of the draft allocation under Strategic Policy EC4 for an industrial led strategic employment site referred to as Gatwick Green.</p> <p>1.2 The site comprises of a parcel of land to the east of Balcombe Road and south of the M23 spur for the comprehensive development of a minimum 24.1ha predominantly for B8 storage and distribution use located as shown in <b>Figure 1.1</b> as the parcel of land with dots.</p>

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Ref. No.	Respondent	Policy/ Para	Comments
			<div data-bbox="645 288 1317 746" data-label="Figure"> <p>The map shows the Gatwick Airport area with various landmarks and planning boundaries. A red dashed line indicates the Gatwick Airport Boundary. A grey shaded area represents Gatwick Airport Safeguard Land. A black outline with a grey fill indicates the Horley Strategic Business Park. Brown dots represent Gatwick Green Strategic Employment Locations. Key locations labeled include London Gatwick South Terminal, Gatwick Airport, Concorde House, Rivington Farm, Paddocksland Farm, Peeks Rough Farm, Downderry House, and Schlumberger House. The map scale is 1:20,000.</p> </div> <div data-bbox="1373 336 2004 528" data-label="Figure"> <p><b>Key</b></p> <ul style="list-style-type: none"> <li><span style="color: red;">- - -</span> Gatwick Airport Boundary (Policy EC1, EC2, GAT1-GAT4)</li> <li><span style="background-color: lightgrey; border: 1px solid black; display: inline-block; width: 10px; height: 10px;"></span> Gatwick Airport Safeguard Land (Policy EC1, EC2, GAT1-GAT4)</li> <li><span style="background-color: grey; border: 1px solid black; display: inline-block; width: 10px; height: 10px;"></span> Horley Strategic Business Park (Reigate and Banstead Borough)</li> <li><span style="color: brown;">●</span> Gatwick Green Strategic Employment Location (Policy EC1 and EC4)</li> </ul> </div> <p><b>Figure 1.1: Gatwick Green Location Plan</b></p> <p>1.3 The Wilky Group propose to bring forward a mixed use development at Gatwick Green. The i-Transport Transport Strategy document submitted by the Wilky Group anticipates that the development could comprise of the following:</p> <ul style="list-style-type: none"> <li>- circa 160,000m<sup>2</sup> GEA of B8 (Warehousing, distribution and logistics);</li> <li>- circa 52,500m<sup>2</sup> GEA of B1 (Office / employment use); and</li> <li>- circa 52,500m<sup>2</sup> GEA of C1 (Hotel use).</li> </ul> <p>1.4 The above floorspaces are considerably higher than those assumed by Crawley Borough Council for Gatwick Green within the modelling for the Crawley Local Plan Review, which accounts for 77,500m<sup>2</sup> of B8/B2 floorspace (54,250m<sup>2</sup> B8 and 23,250m<sup>2</sup> B2). This suggests that the modelling undertaken for the Local Plan Review considerably underestimates the level of trips that will be generated by the Gatwick Green site.</p> <p>1.5 The focus of these representations is to review the allocation in respect of the accessibility of the site by non-car modes and the cumulative impact on the local highway network when considered alongside the 31ha Horley Business Park allocated in the adopted Reigate and Banstead Local Plan Development Management Plan (Policy HOR9) for predominantly office development (up to 210,000m<sup>2</sup> of B1 and ancillary floorspace) located as shown in Figure 1.1 as the parcel of land outlined in black and shaded grey.</p>



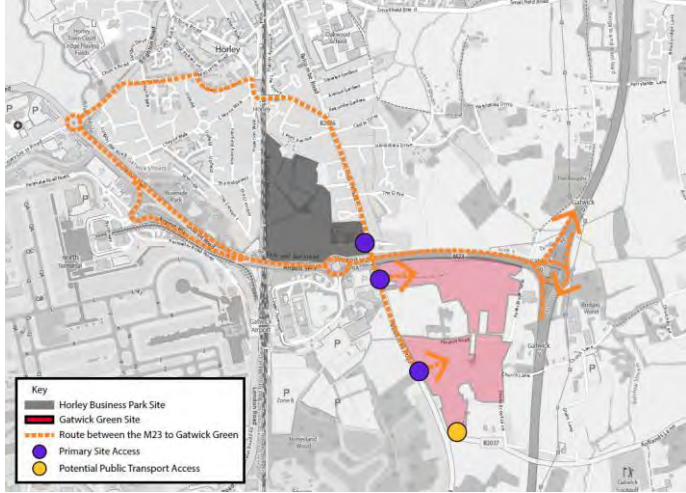
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			<p>1.6 The modelling work undertaken by Crawley Borough Council as part of the Crawley Local Plan Review assumes a provision of 210,000m<sup>2</sup> of B1/A1/A3/D1 and D2 floorspace for Horley Business Park. This is in line with what is proposed on the site, and is likely to have produced an overestimation of trips for the purpose of modelling when compared to the proposals.</p> <p>1.7 For reference, the following scenarios are assessed within the Crawley Local Plan Review modelling. It is possible to assess the individual impact of Gatwick Green by comparing the results of Scenario 1 with Scenario 2.</p> <ul style="list-style-type: none"> <li>- Reference Case – Baseline traffic to 2015, completions between 2015-2020, unbuilt consented development on allocated and other sites, strategic consented development in neighbouring areas, and allocation sites in neighbouring planning authorities, such as Horley Business Park.</li> <li>- Scenario 1 – Reference case plus 6,720 dwellings within Crawley Borough, at 420 dwellings per annum and Employment Land Trajectory sites.</li> <li>- Scenario 2 – Scenario 1 plus Gatwick Green Employment Allocation.</li> <li>- Scenario 3 – Scenario 2 plus West of Ifield (3,750 dwellings) and West of Kilnwood Vale (1,546 dwellings) and 50,000m<sup>2</sup> of employment leading to 12,016 dwellings at 751 dwellings per annum.</li> </ul> <p><b>2 Gatwick Green</b></p> <p>2.1 Paragraph 9.59 of the Draft Crawley Brough Local Plan Submission Publication document states:</p> <p><i>“The Strategic Employment Location is surrounded by strategic transport links, but it has <b>no immediate access to the strategic road network or Gatwick Airport railway station</b>. A Strategic Employment Location of the scale proposed at <b>Gatwick Green will generate surface access demands that will impact upon the existing highways network</b>. The focus will be to <b>maximise opportunities to access the site by sustainable transport modes</b>, particularly for employees. However, given the scale and industrial nature of the proposed development, <b>development must cater for its operational requirements, particularly HGV movements</b>, demonstrating through the Transport Assessment and Mobility Strategy how this will be achieved without an adverse impact upon the highways network and residential amenity.....”</i></p> <p><b>Non-Car Accessibility</b></p> <p>2.2 It is recognised that the development does not provide direct access to Gatwick Airport railway station. The only available route is via Buckingham Gate and Ring Road South which are predominantly designed for vehicle access to the airport and its car parks; the route does not have continuous pedestrian infrastructure and provides only intermittent footways with poor road crossing facilities. Without direct access to Gatwick rail station and the related bus services the sustainability and accessibility of the site by non-car modes is compromised.</p> <p>2.3 There are limited public transport services along Balcombe Road. The existing cycle network in the area around the Gatwick Green site is shown in Figure 2.1.</p>

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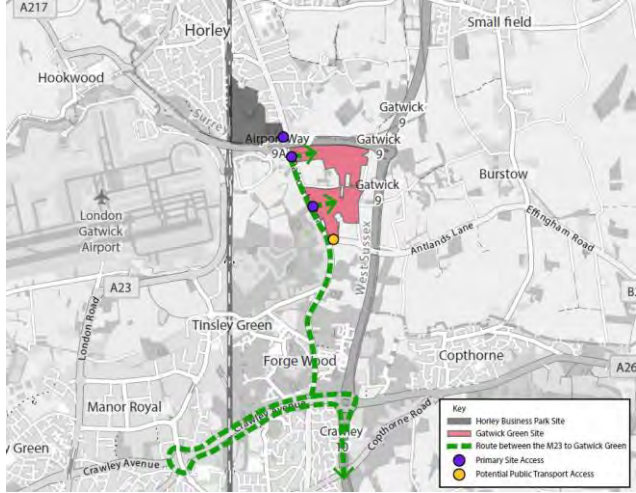
Ref. No.	Respondent	Policy/ Para	Comments
			<div data-bbox="638 284 1299 869" data-label="Figure"> </div> <p data-bbox="1310 845 1758 869"><b>Figure 2.1 – Existing Cycle Network</b></p> <p data-bbox="638 893 2027 949">2.4 The limited attractiveness to access the site on foot, by bicycle or public transport could lead to a reliance on non-sustainable modes, particularly the private car, for travel to and from the site.</p> <p data-bbox="683 965 1176 997"><b>Access to the Strategic Road Network</b></p> <p data-bbox="638 1005 2027 1125">2.5 The Gatwick Green draft allocation does not have direct access to the Strategic Road Network, and therefore all trips accessing the site from the M23, including HGVs associated with the proposed B8 uses, will need to travel on long, indirect routes on the local highway network, adding unnecessary additional trips to the local highway network which will impact on all users.</p> <p data-bbox="638 1141 2027 1236">2.6 The potential routes to and from the Gatwick Green draft allocation from the M23 are shown in Figure 2.2 and Figure 2.3. The distances associated with these routes are 7.2km (amber), and 6.8km (green) – shown in Figure 2.3.</p>

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**Figure 2.2: Potential Routes from/to M23 J9 to/from Gatwick Green**



**Figure 2.3: Potential Routes from M23 J10 to Gatwick Green**

2.7 The potential impact on residential amenity of all vehicles routing through Crawley or Horley is a serious concern. The effect of this impact is compounded by the proposed B8 Use which will generate a significant number of heavy goods vehicles (HGVs).

**3 Trip Generation**

3.1 As part of the Crawley Local Plan Review modelling a trip generation was provided based on the scheme comprising of a floorspace of 77,500m<sup>2</sup> of B8/B2. The resultant trip generation of the site was determined as 312 two-way vehicle trips in the AM peak and 281 two-way vehicle trips in the PM peak, after sustainable transport mitigation measures. This is the level of trips that informed the Scenario 2 network modelling, which included the Gatwick Green development.

3.2 Due to the considerable variations between the Gatwick Green floorspace assessed within the Local Plan Review modelling and the floorspaces provided within the i-Transport Gatwick Green Transport Strategy document (submitted by the Wilky Group) it is necessary to reconsider the impact of the development.

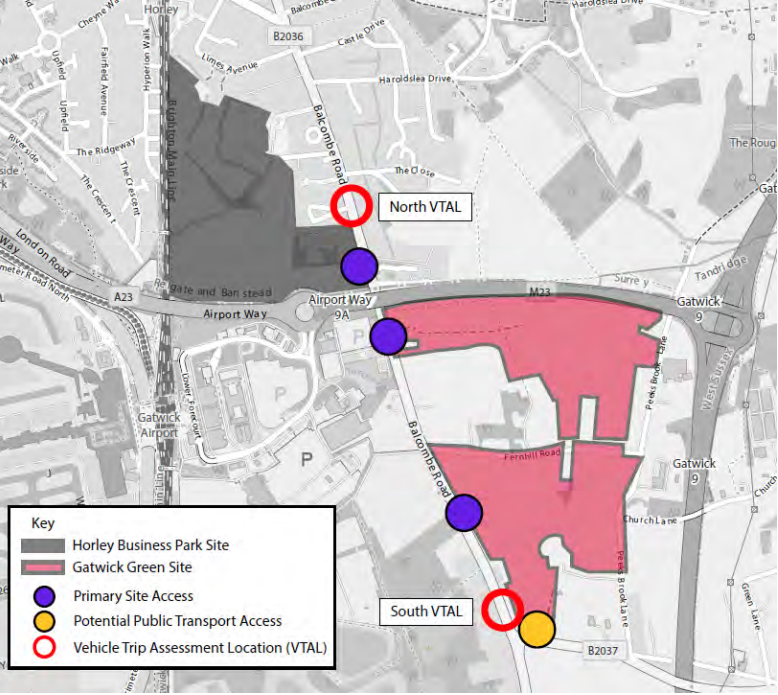
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			<p>3.3 An estimate of the trip generation of the draft allocation has been undertaken using the industry standard TRICS database to understand the substantial number of additional trips that the local highway network would be required to accommodate in the peak hours and daily.</p> <p>3.4 For the purpose of this exercise as a B8 use can significantly differ in its trip generation dependent on the type of proposed development trips are provided for 160,000m<sup>2</sup> of general warehousing and for 160,000m<sup>2</sup> of parcel distribution warehousing. Additionally, trips for 52,500m<sup>2</sup> of business park and 52,500m<sup>2</sup> of hotel have been estimated.</p> <p>3.5 This assessment shows that the number of two-way vehicle trips that the Gatwick Green draft allocation can be expected to generate is:</p> <ul style="list-style-type: none"> <li>- AM peak hour – between 1,598 and 2,584 vehicle trips;</li> <li>- PM peak hour – between 1,258 and 2,595 vehicle trips; and</li> <li>- Daily – between 13,535 and 26,329 vehicle trips.</li> </ul> <p>3.6 A further investigation of trips indicates that for general warehousing approximately 30% of the trips that are generated will be HGVs and for parcel distribution the percentage of HGV vehicle trips would be approximately 23%. Therefore, the number of two-way HGV trips that the Gatwick Green draft allocation can be expected to generate is:</p> <ul style="list-style-type: none"> <li>- AM peak hour – between 368 and 775 HGV trips;</li> <li>- PM peak hour – between 289 and 779 HGV trips; and</li> <li>- Daily – between 3,113 and 7,899 HGV trips.</li> </ul>

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Ref. No.	Respondent	Policy/ Para	Comments																																																																																																																																																																																									
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			<p><b>Table 3.1 Gatwick Green Estimated Trip Generation</b></p> <p>3.7 The trip generation associated with the Gatwick Green land uses proposed within the Transport Strategy are considerably higher than those utilised within the Local Plan Review modelling and as such an assessment that considers the full impacts of the development has not been undertaken.</p> <p>3.8 The trip generation assessed in the Local Plan Review modelling associated with the Gatwick Green site is 312 in the AM peak and 281 in the PM peak. The trip generation presented at Table 3.1 indicates an increase of between 1,286 (412%) and 2,272 (728%) in the AM peak and 977 (348%) and 2,314 (823%) in the PM peak period.</p>																																																																																																																																																																																									

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			<p>3.9 The expected level of trip generation is significant, and beyond the capacity of an urban road of this type, and will materially change the character of Balcombe Road and the routes that lead from Balcombe Road. No assessment of the impact that this significant level of trip generation will have on the highway network has been undertaken and therefore, no judgement can be made on whether there are suitable and deliverable interventions that can address this impact.</p> <p><b>4 Cumulative Impact of Gatwick Green and Horley Business Park on the Local Highway Network</b></p> <p><b>Horley Strategic Business Park</b></p> <p>4.1 Horley Strategic Business Park (HBP) is an allocated site (HOR9) in the Reigate &amp; Banstead Local Plan Development Management Plan adopted in September 2019.</p> <p>4.2 Horley Strategic Business Park will provide a dedicated, direct access onto the M23. This is considered the most appropriate way to accommodate the vehicle demand for a large employment site in this location, with direct access to the Strategic Road Network and only a small, secondary access to the local highway network to accommodate local trips. The secondary access will be provided onto Balcombe Road and its use will be limited to emergency service vehicles, public transport and other sustainable transport modes and a limited number of registered vehicles of local employees using the site.</p> <p>4.3 This access arrangement addresses the concerns of both Highways England to keep local traffic off of the Strategic Road Network, and the local highway authority, to prevent strategic traffic from rat-running on local routes. The restricted vehicular use will also encourage local trips to be undertaken by sustainable modes.</p> <p>4.4 Providing direct access to both the Strategic Road Network and the local road network is crucial for a large scale employment site in this area. The Gatwick Green draft allocation is cut off from the Strategic Road Network and only accessible via a significant diversion through Crawley or Horley.</p> <p>4.5 HBP is able to provide direct pedestrian / cycle access to Horley and Gatwick rail stations via existing routes (including Public Rights of Way and National Cycle Route 21) that are accessed via the western side of the development. HBP is to make a contribution to improve these routes.</p> <p><b>Balcombe Road</b></p> <p>4.6 Due to the presence of schools and a significant number of direct accesses to residential properties and businesses on Balcombe Road it is recognised that a significant increase in vehicular traffic would increase highway safety issues along this vehicle movement corridor. The environmental impact to local residents and active travel users is also considered to have an undesirable detrimental impact if large numbers of vehicles from the Horley Strategic Business Park were enabled unfettered access along Balcombe Road. This is why access to and from Balcombe Road from Horley Strategic Business Park will be carefully controlled as set out in policy.</p>

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Ref. No.	Respondent	Policy/ Para	Comments
			<p>4.7 An assessment of the existing level of traffic, the estimated vehicle trips that Horley Strategic Business Park and the estimated number of vehicle trips that Gatwick Green will generate along Balcombe Road has been undertaken. Two points have been assessed; the first is north of the proposed Horley Business Park access providing an estimate of the number of vehicles through Horley and the second is between the proposed southern Gatwick Green draft allocation access and the Balcombe Road / Antlands Lane junction, providing an estimate of the additional number of vehicles that will pass through this junction. The locations of the assessment points is shown in Figure 4.1.</p> <p>4.8 The distribution of the vehicle trips has been based on the assumed Horley Strategic Business Park distribution at its Balcombe Road access (11.5% northbound and 88.5% southbound). The results of the assessment are shown in Table 4.1.</p>  <p><b>Figure 4.1: Balcombe Road - Vehicle Trip Assessment Locations</b></p>


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			<p><b>Table 4.1 Balcombe Road Existing and Future Traffic Flows</b></p> <table border="1"> <thead> <tr> <th rowspan="2">Time Period</th> <th rowspan="2">Direction</th> <th rowspan="2">Existing (2016 Survey)</th> <th rowspan="2">Horley Strategic Business Park</th> <th colspan="2">Gatwick Green</th> </tr> <tr> <th>B8 General Warehousing (160,000m<sup>2</sup>) + Business Park (52,500m<sup>2</sup>) + Hotel (52,500m<sup>2</sup>)</th> <th>B8 Parcel Distribution (160,000m<sup>2</sup>) + Business Park (52,500m<sup>2</sup>) + Hotel (52,500m<sup>2</sup>)</th> </tr> </thead> <tbody> <tr> <td colspan="6" style="text-align: center;"><b>Northern Section</b></td> </tr> <tr> <td rowspan="3">AM Peak (08:00 – 09:00)</td> <td>Northbound</td> <td>654</td> <td>1</td> <td>53</td> <td>142</td> </tr> <tr> <td>Southbound</td> <td>568</td> <td>47</td> <td>131</td> <td>155</td> </tr> <tr> <td>Two-way</td> <td>1,222</td> <td>48</td> <td>184</td> <td>297</td> </tr> <tr> <td rowspan="3">PM Peak (17:00 – 18:00)</td> <td>Northbound</td> <td>624</td> <td>47</td> <td>101</td> <td>183</td> </tr> <tr> <td>Southbound</td> <td>788</td> <td>1</td> <td>43</td> <td>116</td> </tr> <tr> <td>Two-way</td> <td>1,412</td> <td>48</td> <td>144</td> <td>299</td> </tr> <tr> <td colspan="6" style="text-align: center;"><b>Southern Section</b></td> </tr> <tr> <td rowspan="3">AM Peak (08:00 – 09:00)</td> <td>Northbound</td> <td>611</td> <td>363</td> <td>1009</td> <td>1,196</td> </tr> <tr> <td>Southbound</td> <td>540</td> <td>8</td> <td>405</td> <td>1,091</td> </tr> <tr> <td>Two-way</td> <td>1,151</td> <td>371</td> <td>1,414</td> <td>2,287</td> </tr> <tr> <td rowspan="3">PM Peak (17:00 – 18:00)</td> <td>Northbound</td> <td>606</td> <td>6</td> <td>333</td> <td>890</td> </tr> <tr> <td>Southbound</td> <td>781</td> <td>363</td> <td>780</td> <td>1,405</td> </tr> <tr> <td>Two-way</td> <td>1,387</td> <td>369</td> <td>1,113</td> <td>2,295</td> </tr> </tbody> </table> <p>4.9 Table 4.1 indicates that the number of two-way vehicles on Balcombe Road north of the Horley Strategic Business Park proposed access in 2016 were 1,222 and 1,412 in the AM and PM peaks, respectively. Horley Strategic Business Park will increase these flows by 48 in the AM and PM peaks to 1,270 and 1,460 two-way vehicles, respectively. This impact is 3.9% and 3.4% respectively.</p> <p>4.10 The IEMA Guidelines for the Environmental Assessment of Road Traffic (IEA Guidelines) states that increases in traffic flows below 10% are generally considered to be insignificant in environmental impact terms given that daily</p>	Time Period	Direction	Existing (2016 Survey)	Horley Strategic Business Park	Gatwick Green		B8 General Warehousing (160,000m <sup>2</sup> ) + Business Park (52,500m <sup>2</sup> ) + Hotel (52,500m <sup>2</sup> )	B8 Parcel Distribution (160,000m <sup>2</sup> ) + Business Park (52,500m <sup>2</sup> ) + Hotel (52,500m <sup>2</sup> )	<b>Northern Section</b>						AM Peak (08:00 – 09:00)	Northbound	654	1	53	142	Southbound	568	47	131	155	Two-way	1,222	48	184	297	PM Peak (17:00 – 18:00)	Northbound	624	47	101	183	Southbound	788	1	43	116	Two-way	1,412	48	144	299	<b>Southern Section</b>						AM Peak (08:00 – 09:00)	Northbound	611	363	1009	1,196	Southbound	540	8	405	1,091	Two-way	1,151	371	1,414	2,287	PM Peak (17:00 – 18:00)	Northbound	606	6	333	890	Southbound	781	363	780	1,405	Two-way	1,387	369	1,113	2,295
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			<p>variations in background traffic flow may vary by this amount. Therefore, it is considered that the impact of HBP on Balcombe Road as it extends towards Horley is negligible.</p> <p>4.11 Using the expected level of traffic with Horley Strategic Business Park developed, Gatwick Green draft allocation as B8 General Warehousing is estimated to increase the two-way vehicle movements, north of the HBP access, by 14.4% in the AM peak and 9.8% in the PM peak.</p> <p>4.12 Using the expected level of traffic with the Horley Strategic Business Park developed, Gatwick Green draft allocation as B8 Parcel Distribution is estimated to increase the two-way vehicle movements by 23.4% in the AM peak and 20.5% in the PM peak.</p> <p>4.13 Within the IEA Guidelines, two broad rules are suggested to be used as a screening process to gauge the required environmental assessment:</p> <ul style="list-style-type: none"> <li>- Rule 1: include highway links where traffic flows will increase by more than 30% (or the number of heavy goods vehicles will increase by more than 30%);</li> <li>- Rule 2: include any other specifically sensitive areas where traffic flows have increased by 10% or more.</li> </ul> <p>4.14 Given this section of Balcombe Road contains a number of schools in close proximity, a church and direct accesses from dwellings and businesses it is likely that it would be considered as a sensitive area. Therefore, Gatwick Green is expected to have a detrimental environmental impact on Balcombe Road and within Horley.</p> <p>4.15 Table 4.1 indicates that the number of two-way vehicles on Balcombe Road south of the Gatwick Green draft allocation proposed southern access in 2016 were 1,151 and 1,387 in the AM and PM peaks respectively. Horley Strategic Business park will increase these flows by 371 and 369 in the AM and PM peaks to 1,522 and 1,756 two-way vehicles, respectively. This impact is 32.2% and 26.6% respectively. This level of impact is on the threshold of requiring further assessment from an environmental impact perspective.</p> <p>4.16 Using the expected level of traffic with Horley Strategic Business Park developed, Gatwick Green draft allocation as B8 General Warehousing is estimated to increase the two-way vehicle movements, north of the HBP access, by 92.9% in the AM peak and 63.4% in the PM peak.</p> <p>4.17 Using the expected level of traffic with the Horley Strategic Business Park developed, Gatwick Green draft allocation as B8 Parcel Distribution is estimated to increase the two-way vehicle movements by 150.3% in the AM peak and 130.7% in the PM peak.</p> <p>4.18 The level of change which will result from the Gatwick Green draft allocation could be 5 times higher than the threshold for an assessment of environmental impacts. The likely result is a material adverse impact in a range of areas including severance, pedestrian delay, pedestrian amenity, fear and intimidation, and driver delay.</p> <p>4.19 The Gatwick Green draft allocation has the potential to result in major environmental impacts on Balcombe Road.</p>

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			<p><b>Balcombe Road / Antlands Lane Junction</b></p> <p>4.20 The West Sussex County Council SATURN model identified the Balcombe Road / Antlands Lane priority roundabout junction as a hot spot on the network and a comprehensive improvement scheme introducing a signal controlled junction was developed to accommodate the Horley Strategic Business Park development traffic, as shown in Figure 4.2.</p>  <p><b>Figure 4.2: Proposed Layout of Balcombe Lane / Antlands Lane Junction</b></p> <p>4.21 Despite the identification of the Balcombe Lane / Antlands Lane junction as a hot spot on the network and in need of a comprehensive improvement scheme, the junction was not assessed within the Crawley Local Plan Review modelling.</p> <p>4.22 The Horley Strategic Business Park identified capacity issues at this existing priority roundabout and proposes to introduce a signalised junction as shown in Figure 4.1.</p> <p>4.23 A summary of the LINSIG capacity modelling results, undertaken to provide a junction suitable for 2031 with the Horley Strategic Business Park fully developed is shown in Table 4.2.</p>

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Ref. No.	Respondent	Policy/ Para	Comments
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**Table 4.2 Balcombe Road / Antlands Avenue Junction – LINSIG Results Summary – Base 2031 + Horley Strategic Business Park**

Link No.	Lane	AM Peak Hour		PM Peak Hour	
		Degree of Saturation	Queue Length (pcu)	Degree of Saturation	Queue Length (pcu)
1/1+1/2	Balcombe Road (North)	63.1	5.1	89.3	17.8
2/1+2/2	Antlands Lane	89.6	11.2	79.6	6.2
3/1+3/2	Balcombe Road (South)	82.0	10.0	89.9	19.1

- 4.24 The junction modelling demonstrates that the proposed signalised junction can accommodate the development traffic associated with the Horley Strategic Business Park in 2031. The assessment undertook an analysis of 2,361 and 2,774 vehicle movements in the AM and PM peaks, respectively.
- 4.25 The introduction of Gatwick Green draft allocation would increase vehicle flows at this junction by 1,406 - 2,274 in the AM peak and 1,107 – 2,284 in the PM peak. This is an increase of 60-96% in the AM peak and 40-82% in the PM peak
- 4.26 An assessment of the proposed signalised junction has been undertaken for Gatwick Green. The trip generation for B8 General Warehousing and B8 Parcel Distribution has been distributed on the assumed Horley Strategic Business Park distribution at the Antlands junction. A summary of the LINSIG results is shown in Table 4.3.

**Table 4.3 Balcombe Road / Antlands Avenue Junction – LINSIG Results Summary – Base 2031 + Horley Strategic Business Park + Gatwick Green**

Link No.	Lane	AM Peak Hour		PM Peak Hour	
		Degree of Saturation	Queue Length (pcu)	Degree of Saturation	Queue Length (pcu)
<b>B8 General Warehousing</b>					
1/1+1/2	Balcombe Road (North)	48.8	6.3	126.5	259.0
2/1+2/2	Antlands Lane	119.8	44.4	80.4	6.5
3/1+3/2	Balcombe Road (South)	122.3	239.6	122.1	116.1
<b>B8 Parcel Distribution</b>					
1/1+1/2	Balcombe Road (North)	88.1	16.8	147.3	491.4
2/1+2/2	Antlands Lane	132.6	63.0	106.8	32.0
3/1+3/2	Balcombe Road (South)	132.9	329.9	148.0	176.4

- 4.27 The assessment indicates that the proposed signalised junction would have significant capacity issues if Gatwick Green were to be allocated. Important to note is the queuing on the northern arm of Balcombe Road would

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			<p>increase from circa 18 passenger car units (PCUs<sup>1</sup>) to between 259 – 482 PCUs. There is limited scope for further amendments in this location due to the landownership constraints. The queue on the southern arm of Balcombe Road would also increase from circa 20 PCUs to circa 177 – 330 PCUs.</p> <p><b>Crawley Local Plan Review Modelling</b></p> <p>4.28 As aforementioned, modelling of a number of local junctions within Crawley has been undertaken as part of the Local Plan Review. Four scenarios have been assessed, and are summarised as follows:</p> <ul style="list-style-type: none"> <li>- Reference Case – 2015 Baseline, plus completions between 2015-2020, plus a number of unbuilt and consented developments within Crawley and other neighbouring areas. Horley Business Park is included within this scenario.</li> <li>- Scenario 1 – Reference case plus a number of employment and residential sites within Crawley Borough.</li> <li>- Scenario 2 – Scenario 1 plus Gatwick Green Employment allocation.</li> <li>- Scenario 3 – Scenario 2 plus additional residential and employment land.</li> </ul> <p>4.29 The difference in results from scenario 1 and scenario 2 essentially shows the impact of Gatwick Green allocation.</p> <p>4.30 In scenario 2, of the 39 modelled junctions, six junctions are operating over capacity. Of these, four are overcapacity in scenario 1 already. The two additional junctions that are operating overcapacity as a result of the addition of Gatwick Green traffic are the Crawley Avenue/Balcombe Road and Crawley Avenue/Ifield Avenue junctions.</p> <p>4.31 It should be noted that the trip generation utilised within the modelling work is considerably lower than is expected to be generated by the site (as per quantum of development proposed in the Transport Study), and using the trip generation provided at Table 4.1 may have resulted in considerably more over capacity junctions.</p> <p>4.32 Mitigation for the Crawley Avenue/Balcombe Road junction involves signal timing adjustments to be made to make Crawley Avenue the more dominant link, it was determined that no further mitigation is required.</p> <p>4.33 Mitigation for the Crawley Avenue/Ifield Avenue junction involves a local widening scheme to improve the junction to mitigate the impact of scenario 2 and scenario 3.</p> <p>4.34 It is unclear what level of contribution the Gatwick Green development will make towards these identified mitigation measures, and whether these mitigation measures will be required to be in place prior to occupation of the Gatwick Green development.</p> <p><b>5 Summary and Conclusions</b> <b>Summary</b></p>

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			<p>5.1 Gatwick Green has a poor level of active travel accessibility, with no direct access to Gatwick Rail Station and no bus services along its frontage. The site is considered to be in contradiction with National Planning Policy (NPPF) which places sustainability at the heart of the decision-making process.</p> <p>5.2 Gatwick Green does not have direct access to the Strategic Road Network, and therefore all trips accessing the site from the M23, including HGVs associated with the proposed B8 uses, will need to travel on long, indirect routes on the local highway network, adding unnecessary additional trips to the local highway network which will impact on all users.</p> <p>5.3 The vehicle trips expected to be generated by Gatwick Green is:</p> <ul style="list-style-type: none"> <li>- AM peak hour – between 1,598 and 2,584 vehicle trips;</li> <li>- PM peak hour – between 1,258 and 2,595 vehicle trips; and</li> <li>- Daily – between 13,535 and 26,329 vehicle trips.</li> </ul> <p>5.4 This number of vehicle trips equates to an additional vehicle trip on the highway network every 1.4 – 3.2 seconds. This level of trip generation is significant and will materially change the character of Balcombe Road and the routes that lead from Balcombe Road. No assessment of the impact that this significant level of trip generation will have on the highway network has been undertaken by the proposer and therefore, no judgement can be made on whether the impact can be addressed.</p> <p>5.5 The level of traffic that will be generated by the Gatwick Green development is considerably higher than the trip generation utilised within the Local Plan Review modelling work, which indicates that Gatwick Green will generate up to 312 two-way trips in either peak hour.</p> <p>5.6 As such, the local junction modelling work undertaken does not fully assess the potential impacts of the Gatwick Green development and is likely to have underestimated the level of mitigation required within the local highway network.</p> <p>5.7 Balcombe Road, north of the M23, contains a number of schools in close proximity, a church and direct accesses from dwellings and businesses and therefore is considered to be a sensitive area. The increase in traffic, due to Gatwick Green, on this section of Balcombe Road is expected to be between 9.8% and 23.4%. Using the IEMA Guidelines Rule 2 as a yardstick it is expected that Gatwick Green will have a detrimental environmental impact on this built-up section of Balcombe Road and within Horley.</p> <p>5.8 The increase in traffic, due to Gatwick Green, on Balcombe Road is expected to be between 63.4% and 150.3%. Using the IEMA Guidelines Rule 1 as a yardstick this level of change could be five times higher than the threshold for an assessment of environmental impacts.</p>

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			<p>5.9 The likely result of the increase in traffic is a material adverse impact in a range of areas including severance, pedestrian delay, pedestrian amenity, fear and intimidation, and driver delay. The Gatwick Green draft allocation has the potential to result in major environmental impacts on Balcombe Road.</p> <p>5.10 An assessment of the proposed signalisation of the Balcombe Road / Antlands Drive has been undertaken to understand the affect that the Gatwick Green draft allocation would have on its operation.</p> <p>5.11 The assessment indicates that the proposed signalised junction would have significant capacity issues if Gatwick Green were to be allocated with queues of between 259 – 482 PCUs on the northern arm of Balcombe Road where there is limited scope for further amendments due to the landownership constraints. The residual impact is expected to be severe. The draft allocation of Gatwick Green is considered to be in contradiction with NPPF which requires development to mitigate its impact and for development which would have a severe residual cumulative impact to be prevented.</p> <p><b>Conclusion</b></p> <p>The Gatwick Green draft allocation is considered to have limited ability to facilitate journeys by active travel or public transport, is expected to have a severe impact on the operation of the highway network and the potential to result in major environmental impacts on Balcombe Road.</p> <p>The impact of the Gatwick Green allocation is significantly underestimated within the Crawley Local Plan Review modelling work.</p> <p>Paragraph 35 of the NPPF sets out the tests of soundness for which all Local Plans are assessed against. The assessment undertaken within this note has demonstrated that on the basis of highways and traffic analysis that the proposed Gatwick Green allocation is unsound and should not be taken forward.</p> <p>In particular, it is of the view that the proposed allocation fails the test of effectiveness in that the effects of proposed allocation have not been fully considered and would have a wider effect than set out in the evidence base.</p> <p>In addition, we consider that the proposed allocation is not consistent with national policy as it would not enable the delivery of sustainable development.</p> <p>It is on this basis that it is requested that the proposed allocation of Gatwick Green should be removed from the Crawley Local Plan Review (Regulation 19) Submission Publication document.</p> <p><b>Suggested Modifications:</b></p> <p>The proposed allocation of Gatwick Green should be removed from the Crawley Local Plan Review (Regulation 19) Submission Publication document.</p>
REP/128	Resident 50	Policy EC4	<p>I disagree with the plan to build the Gatwick Green proposal for a number of Reasons</p> <ol style="list-style-type: none"> <li>1. This development is NOT needed at all; there are considerable numbers of empty industrial units in Crawley and Horley that can be utilised for this development</li> </ol>

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			<p>2. There has been NO evidence submitted or produced that suggests that ANY form of research has been carried out anywhere within the GATWICK DIAMOND area to otherwise suggest that the Fernhill/Peeks Brook Lane areas are the ONLY place suitable for this development (GD stems from Gatwick to Brighton and Horsham to East Grinstead)</p> <p>3. In line the National Aviation Plan, the land surrounding Gatwick has been ear marked and safe guarded for the expansion and development at some point of Gatwick Airport; and subsequently NO planning permission is available for any sort of development or expansion, even of private homes - One of the local residence was told a number of years ago that he was told his extension plans would be the LAST accepted in the area - YET CBC appear to be happy to allow Planning Permission to develop a major science park on the land</p> <p>4. This development will very likely PLACE a blight on the homes and lives of the local residents and significantly DEVALUE all of our homes (This is against HUMAN RIGHTS as much as anything else)</p> <p>5. There are a number of birds that are often seen in the fields behind me, from migrating Herons to Canadian Geese, as well as other wildlife such as wild deer and hares that are often seen in the fields</p> <p>6. There is NO mention anywhere of any CPO option or at the least any sort of compensation pay out for local residents</p> <p>7. This option was NEVER in the public domain pre January 2021 (that either I or any of my neighbours are aware of), and I've been here since 2012</p> <p>It is my belief that when Gatwick declared their MasterPlan in 2012 to expand the airport, the developer WILKES chose to buy up all the local farm land, with a view to making a big profit if and when Gatwick got the green light to expand.. This was subsequently denied to them when the Government and the courts finally gave Heathrow permission to expand with a third runway; now subsequently Wilkes investors would like to see a return. Hence the Gatwick Green Development Plan was suddenly announced earlier this year</p> <p>This is all highly controversial, unethical and moreover UNFAIR to the local residents and probably somewhere along the line legally questionable. Though I'm not a solicitor.</p> <p><b>Suggested Modifications:</b> That's CBC job, not mine. I'm dead against the Gatwick Green Development program. I'm not likely to tell you what you need to do to make it legal.</p>
REP/135	Resident 51	EC4	<p>As a resident how could we possibly know?</p> <p>That's the reason we objected in our original letter.</p> <p>It's the council's legal responsibility to ensure any proposed development is compliant. Take into consideration the airport, sewage works, motorway and already outstretched infrastructure.</p> <p>Don't you think that with all the new houses being built along this part of the Balcombe Road Area (forge wood) we have had our fair share of blight and disruption.</p>

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			<p><b><u>Local Plan Representation – Gatwick Green</u></b></p> <p>Following recent communication from your office, we would like to record our <b>objection</b> to the identification of 24.1. hectares of land south of the M23 and east of Balcombe Road, proposed for development for new industrial and warehousing, for the following reasons:</p> <ol style="list-style-type: none"> <li>1. We are <b>already</b> affected by a lot of <b>noise</b> and <b>air pollution</b> from the airport but the <b>addition</b> of more heavy vehicles using these already busy roads and the constant sound of reversing beepers from the lorries throughout the day and night whilst using the warehouse and industrial areas will be <b>intolerable</b> and a <b>detriment to our health and wellbeing</b>.</li> <li>2. This is an area of <b>problematic flooding</b> and adding more concreted areas will add to the problem and possibly increase the likelihood of our properties being flooded. There are <b>already serious issues</b> with the <b>foul water</b> and <b>sewage water</b> to this area as the Pumping Stations cannot cope now let alone with the added burden of further buildings.</li> <li>3. There are plenty of <b>brown field sites</b> within the Manor Royal Industrial Park so we don't understand why these cannot be seriously considered instead.</li> <li>4. The <b>property values</b> will obviously <b>decrease</b>, if we can sell at all, in the future due to the blight of the area already.</li> <li>5. Whilst Gatwick Greenspace have been looking after some of the natural woodland close to this area, this is yet another area that would be lost to much of our precious wildlife. It is our understanding that the involvement of the Gatwick Diamond Business Group has already led to <b>destruction</b> of the local environment in their recent works along the Balcombe Road so we have <b>little faith</b> that <b>compliance</b> to any <b>Gatwick Wood Biodiversity</b> would be honoured and further important habitats will be lost.</li> </ol> <p>Whilst writing, we would like to add that the form both online and submitted to us for our representation is not straight forwards it involves a lot of impossible questions for us as residents. We cannot possibly answer questions about Legal Compliance, Soundness and Compliance with duty-to-co-operate or indeed have an Agent.</p> <p><b>Therefore please accept <i>this letter</i> as our objection of the Plans.</b></p> <p><b>Suggested Modifications:</b></p>
REP/055	Savills on behalf of Wilky Group	EC5	<p><b>1.0 Introduction</b></p> <p><b>Background</b></p> <p>1.1 This representation is submitted on behalf of The Wilky Group (TWG or Wilky), which has a long-standing interest in the promotion of strategic employment land within the Crawley Borough Council (CBC) area. This representation relates to Policy EC5 Employment and Skills Development in the draft Crawley Borough Local Plan, 2021 (DCBLP).</p>

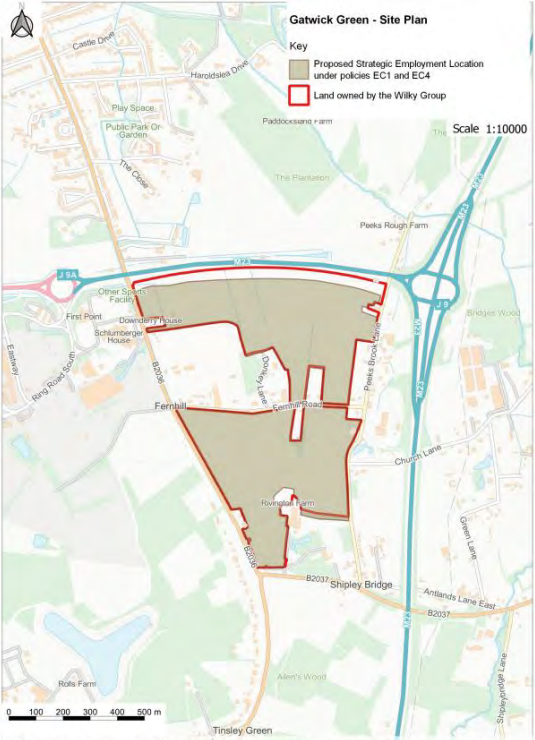


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			<p>1.2 TWG owns about 48 ha (119 acres) of land east of Gatwick Airport as shown the plan at Appendix 1. The land has been promoted by TWG as a strategic employment opportunity known as Gatwick Green (the Site). The Site is proposed for allocation as a Strategic Employment Location (SEL) of 47 ha (116 acres) in the DCBLP under Strategic Policy EC4 as a comprehensive industrial-led development of predominantly storage and distribution uses under use class B8. The extent of the SEL allocation is identified on the plan at Appendix 1.</p> <p><b>Scope of representation</b></p> <p>1.3 This representation sets out the evidence in support of Policy EC5 reference to:</p> <ul style="list-style-type: none"> <li>• The National Planning Policy Framework (NPPF, 2019).</li> <li>• The planning Practice Guidance (PPG)</li> </ul> <p><b>2.0 Policy EC5</b></p> <p><b>Intention of the policy</b></p> <p>2.1 The purpose of Policy EC5 is to bring forward initiatives to improve the skills of the local workforce and training opportunities to raise educational attainment levels within the Borough. These are considered to be important to reduce the disparity between the educational levels and earning potential of the local workforce and those who commute into Crawley. These characteristics are reflected in Crawley's position near the bottom of the social mobility rankings as 304th out of 324 local authorities (DCBLP, para 9.61). The Council estimates that £49 million GVA per annum is lost from Crawley due to skills shortages in the local workforce. The Council has committed to reduce the skills gap to help Crawley to continue to attract inward investment (DCBLP, para 9.62).</p> <p>2.2 Policy EC5 has two parts. Part i requires all major developments at the application stage to prepare an Employment and Skills Plan to demonstrate how the construction and occupier (where known) phases of the development will support the initiatives identified in the Crawley Employment and Skills Programme. Part ii requires major developments to make a proportionate financial contribution towards employment and skills initiatives in Crawley.</p> <p>2.3 The Policy cross-refers to the Planning Obligations Annex, which contains the basis for development contributions to ensure development within Crawley is served by, and helps provide, infrastructure of a suitable scale, quality and location so as to avoid harmful impacts. The Annex sets out the basis for planning obligations under various policies in the form of works or derived from contribution amounts based on formulas or generic approaches. This includes a formula for an employment and skills development financial contribution, which applies to all major residential and commercial developments so as to help improve social mobility, inclusion and address the existing skills gap.</p> <p>2.4 TWG supports Policy EC5 in principle, but considers that in line with national planning policy and guidance, the Plan should acknowledge the scope for greater flexibility in its application with regard to major developments such as Gatwick Green.</p>

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			<p><b>National planning policy and guidance</b></p> <p>2.5 Policy EC5 is considered to be in accordance with the policy and guidance contained in the National Planning Policy Framework (NPPF) and Planning Practice Guidance (PPG). The need to plan for and protect infrastructure features throughout the NPPF. In relation to strategic infrastructure related to strategic land use policies such as Strategic Polies EC1 and EC4, it requires strategic polices to make sufficient provision for, inter alia, infrastructure to serve strategic development: such infrastructure incudes transport, telecommunications, security, waste management, water supply, wastewater, flood risk and coastal change management, the provision of minerals and energy (including heat), and community facilities (such as health, education and cultural infrastructure) (para 20). The NPPF requires joint working between strategic policy-making authorities and other bodies to determine where additional infrastructure is necessary (para 26).</p> <p>2.6 Local Plans should set out the contributions expected from development, including for infrastructure such as that needed for education, health, transport, flood and water management, green and digital infrastructure. Such policies should not undermine the deliverability of the Plan (para 34). Paragraphs 54 – 57 deal with planning obligations to bring about the delivery of infrastructure related to new development. The policy guidance states that planning authorities should use conditions on a planning permission where possible, or otherwise where a condition is not appropriate, use planning obligations. Where planning obligations must be secured, they must only be sought where they meet the tests set out in Regulation 122(2) of the Community Infrastructure Levy Regulations 2010, i.e. they are necessary to make the development acceptable in planning terms, directly related to the development and fairly and reasonably related in scale and kind to the development.</p> <p>2.7 NPPF paragraph 57 goes on to confirm the importance of up-to-date policies that identify contributions expected from development – planning applications in accordance with such policies will be treated as being viable in line with the viability assessment of the Local Plan. The weight to be given to scheme-specific viability assessments at the application stage will depend on how up-to-date the Plan and related viability assessment are, and any changes in the circumstances of the site since the Plan was adopted.</p> <p>2.8 The importance of providing infrastructure features throughout the NPPF in relation to achieving sustainable development (para 8a); building a strong and competitive economy (para 81); promoting healthy and safe communities (para 91c); promoting sustainable transport (Section 9); supporting high quality communications (Section 10), and meeting the challenges of climate change (Section 14).</p> <p>2.9 The NPPF policy is supplemented by more detailed guidance in Planning Practice Guidance (PPG) on planning obligations. PPG sets out guidance on the scope, nature and use of planning obligations under CIL or developer contributions. On planning policy, PPG states that policies should be set out in plans and examined in public, and informed by evidence of infrastructure and viability assessments.</p>

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			<p><b>The need to retain flexibility in application</b></p> <p>2.10 PPG states that the evidence of need for infrastructure can be standardised or formulaic, and plan-makers should consider how needs and viability may differ between site typologies and may choose to set differential requirements. Policy requirements should be clear so that they can be accurately accounted for in the price paid for land. It states that developers may be asked to provide contributions for infrastructure in several ways (Paragraph: 003 Reference ID: 23b-003-20190901), implying that there should be flexibility in how that is achieved.</p> <p>2.11 PPG goes on to state that “...if a formulaic approach to developer contributions is adopted, the levy can be used to address the cumulative impact of infrastructure in an area, while planning obligations will be appropriate for funding a project that is directly related to that specific development” Whist this guidance implies a binary approach to the funding and delivery of infrastructure, in reality the picture will be somewhat less clear. In the case of major developments such as Gatwick Green, some infrastructure ‘projects’ may be best provided by the Council utilising funding secured via development contributions, or could be better provided on-site via works, which in the case of Gatwick Green could include an on-site education/training facility for apprenticeships or ongoing skills development. This therefore implies that the DCBLP should include some text that reflects the need for a flexible approach to the application of Policy EC5 in relation to major developments such as Gatwick Green.</p> <p>2.12 This flexibility could be included in the supporting text to Policy EC5 so as to inform its application in relation to major developments such as Gatwick Green. Aligned with the need for some flexibility, TWG has made representations to the Planning Obligations Annex seeking flexibility in how planning obligations are secured and delivered, and a change to reflect the approach to the application of Policy EC5 outlined in this representation in relation to major developments such as Gatwick Green.</p> <p>2.13 This flexibility could be included in the supporting text to Policy EC5 so as to inform its application in relation to major developments such as Gatwick Green. Aligned with the need for some flexibility, TWG has made representations to the Planning</p>



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			<p>Obligations Annex seeking flexibility in how planning obligations are secured and delivered, and a change to reflect the approach to the application of Policy EC5 outlined in this representation in relation to major developments such as Gatwick Green.</p> <p><b>Suggested Modifications:</b>  <b>3.0 Proposed changes to Policy EC5</b>  3.1 It is considered that Policy EC5 provides an appropriate basis for securing reasonable and proportionate planning obligations in relation to employment and skill development from new development. It is therefore consistent with national policy and guidance on infrastructure and planning obligations, and so represents <u>sound guidance in the context of the tests at paragraph 35 of the NPPF.</u>  3.2 However, in order to acknowledge that the contribution towards employment and skills training in Crawley could be in the form of on-site skills training and education facilities, the following text should be added to paragraph 9.75 of the Plan:  <i>“It is recognised however, that for some major developments it may be more appropriate for provision to meet part ii.) of the policy to be in the form of on-site education and skills training facilities to be funded by the development and its occupiers.”</i></p>
REP/044	Tim North & Associates Ltd on behalf of Hx Properties Ltd	EC7	<p>Please see attached correspondence dated 18 February 2021.</p> <p><b>Draft Crawley Borough Local Plan 2021-2037 January 2021 Regulation 19 Consultation</b>  Your records will reveal that my clients, HX Properties Ltd raised an objection to Policy EC6 of the Regulation 19 version of the Draft Crawley Borough Local Plan 2020-2035, along with the reasoned justification, including paragraphs 9.72 to 9.74 inclusive. It has been noted that Policy EC6 previously concerned with “<i>Visitor Accommodation</i>” has been amended and now forms part of Policy EC7 falling under the title “<i>Hotel and Visitor Accommodation</i>” in the latest Draft Crawley Borough Local Plan 2021-2037 (hereinafter referred to as the DCBLP 2021-2037).</p> <p>My clients, HX Properties Ltd, continue to object to Policy EC7 along with paragraphs 9.84 to 9.89 which set out the intention, and provide the reasoned justification behind the same policy. It is contended that this amended policy and supporting text are unsound, in that they have not been positively prepared, neither are they justified, nor are they consistent with national policy. The remainder of these representations set out the reasons for arriving at this view.</p> <p>There has been a fundamental change in the wording of Policy EC7 of the DCBLP 2021-2037 when compared with the earlier version of the same policy. The basis of Policy EC7 continues to rely on the sequential test in providing for hotel and visitor accommodation in accordance with paragraphs 86, 89 and 90 of the NPPF 2019, along with paragraph 009 Reference ID: 2b-009-20190722 of the NPPG on “<i>Town Centres and Retail</i>”. In this way, retail and leisure development are to be guided towards town centre locations first, and then if no town centre locations are available, to edge of centre locations, and only if suitable sites are not available or expected to become available</p>

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			<p>within a reasonable period, should out of centre sites be considered. This fundamental aspect of national policy, was fully supported in Policy EC6 forming part of the Draft Crawley Borough Local Plan 2020-2035.</p> <p>It is noted that “<i>Gatwick Airport</i>” is now inserted into Policy EC7 on the premise that it comprises a “<i>sustainable location for hotels</i>”. Gatwick Airport in terms of hotel and visitor accommodation is clearly not a town centre location, or an edge of centre location, and in considering these uses there is no justification in national or local policy terms for Gatwick Airport to be treated with equal weight in terms of hotel and visitor accommodation to locations in Crawley Town Centre as part of the sequential test.</p> <p>The consultation response from Gatwick Airport Limited (hereinafter referred to as GAL) to Policy EC6 of the earlier Regulation 19 version of the emerging Local Plan, had as its principal intention, absolving the Airport Owner from having to undertake a sequential test.</p> <p>GAL state that hotels on-airport serve a particular airport passenger need which they say is supported by an Airport Related Employment Land Study carried out by Lichfields on their behalf. That is not a sufficient reason to justify Gatwick Airport being afforded the same status as Crawley Town Centre, or even an edge of centre location, in the context of the sequential test. The general demise of retailing, including the hospitality industry within Crawley Town Centre cannot be disputed, and to this end the impetus in terms of planning policy should be on encouraging the vitality and viability of Crawley Town Centre, as the primary objective (A recent Centre For Cities Report reveals that Crawley along with London, Slough and Luton reliant on airports have been the hardest hit when looking at the cumulative increase in the number of people claiming unemployment benefits over the last 6 months due to the Covid-19 pandemic. Crawley represents one of the locations more affected than any other town, and as of September 2020 their rise in unemployment related claims was twice as large as that of the best performing cities in towns like York and Exeter). Hotels and visitor accommodation are an important integral part of the functions of a town centre, which are not only available for airport passengers, but are used currently by airline staff, airline companies and those wishing to organise conferences and seminars.</p> <p>It follows that many of the considerations as taken from the NPPF 2019, which it is said by GAL favour the removal of the sequential test in the provision of hotel accommodation on-airport, are equally if not more valid in justifying why Crawley Town Centre should be afforded greater importance than Gatwick Airport in the provision of hotel and visitor accommodation. The following factors taken from the NPPF 2019 advanced by GAL to justify its position concerning the need to plan positively to meet development needs or helping build a strong, responsive and competitive economy, are equally if not more relevant when considering hotel and visitor accommodation in Crawley Town Centre, through ensuring that sufficient land of</p> <ul style="list-style-type: none"> <li>• The right type is available in the right places to support growth, innovation and productivity and coordinating the provision of infrastructure;</li> <li>• Taking account of local business needs and wider opportunities for development (para 80)</li> <li>• Recognising and addressing the specific requirements of different sectors (para 82)</li> </ul>

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			<ul style="list-style-type: none"> <li>• Addressing transport issues, including: <ul style="list-style-type: none"> <li>○ Ensuring patterns of movement are integral (para 102);</li> <li>○ Actively managing patterns of growth, by focusing significant development on locations which are or can be made sustainable by limiting the need to travel (para 103)</li> <li>○ Supporting an appropriate mix of uses across an area and within larger scale sites to minimise the number and length of journeys needed (para 104) and</li> <li>○ Provide any large-scale transport facilities that need to be located in the area (including airports) and the infrastructure and wider development required to support their operation, expansion and contribution to the wider economy (para 104 e).</li> </ul> </li> </ul> <p>It is otiose for GAL to state in their consultation response to Policy EC6 that they acknowledge the provisions of the NPPF which defines hotels as a town centre use, only to then argue that <i>“it is clear that hotels serving the Airport are more sustainable by being at the Airport.”</i></p> <p>It appears that the formulation of Policy EC7 has conflated on the one hand, issues of sustainability coupled with the preference that all airport related car parking should be provided within the boundaries of Gatwick Airport; and on the other, considerations the proper remit of the sequential test. If the sequential test is expected to be interpreted in the same way as the issue of sustainability, there would be no need for the former as a policy instrument. Adopting this flawed reasoning results in added prominence being placed on hotel and visitor accommodation situated at Gatwick Airport, at the expense of sequentially preferential locations for the same form of development in Crawley Town Centre. In effect, Gatwick Airport is shown to take on enhanced significance in spite of the disadvantages associated with its out of centre location.</p> <p>The logic behind this policy approach is counterintuitive. It is Crawley Town Centre which is expected to be the preferred location for hotel and visitor accommodation, based on the sequential test. It is the same location where a positive proactive approach on hotel and visitor accommodation should be the focus by the LPA in accordance with paragraph 85 of the NPPF 2019, as part of a wider aim of increasing its vitality and viability over the period of the emerging Local Plan. To highlight the illogical approach adopted in Policy EC7, the reader needs to look no further than the commentary to Option 3 in the SA/SEA of the earlier Regulation 19 version of Policy EC6 in which it was stated <i>“Off airport hotels in sustainable locations such as the town centre can accommodate guests using the airport, without the need for them to drive at all, thereby reducing the need to provide extensive areas of car parking.”</i> It is difficult to comprehend how, in a period of 12 months, this volte face on the part of your Authority can be justified.</p> <p>An examination of the policies contained in the DCBLP 2021-2037 are all predicated on your Authority’s aim of placing reliance on Gatwick Airport to provide for all future airport related car parking. The provisions of Policy EC7 have sought to place considerable weight on airport related car parking to the extent that it appears commensurate in terms of its significance with the sequential test, leading to perverse incentives. This becomes evident in that despite the fact that Crawley Town Centre is the preferred location for hotels and visitor accommodation when applying the sequential</p>

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			<p>test, the provisions of Policy EC7 nevertheless seek to control parking at hotels in the town centre so that it is restricted to staff and guests in residence, preventing block parking or use of land within the confines of a hotel for off-airport car parking purposes.</p> <p>This approach is unnecessarily restrictive and unwarranted for a number of reasons. Firstly, the introduction of an airport related car parking use at a town centre hotel constitutes a material change of use of land for which planning permission is required. Secondly, to place what in effect is an embargo on all forms of airport related car parking outside the boundaries of Gatwick Airport simply leads to the proliferation of unauthorised airport related car parking, often in unsustainable locations, operated by rogue traders, with all the ensuing bad publicity generated for the airport related car parking industry. Thirdly, the Council are on record as stating that unauthorised long term airport related car parking will continue to be a source of capacity (supply) into the future. The pursuit of a strategy which perpetuates, at the same time places reliance on unauthorised airport related car parking, in preference to properly managing airport related car parking associated with hotel and visitor accommodation in Town Centre locations, is the very antithesis of “<i>managing</i>” the provision of hotel and visitor accommodation into the future.</p> <p>The amended approach now reflected in Policy EC7 is a prime example of how the subject of airport car parking has permeated through different policies in the emerging Local Plan, promulgated by what appears to be the need to avoid at all costs any potential conflict with Gatwick Airport. The contents of Policy EC7 reveals an unhealthy dependency on GAL by the Council in the provision of both hotels and visitor accommodation, in addition to airport related car parking. This is a matter which becomes clear from the chosen Option 2 in the latest iteration of the SA/SEA concerning Policy EC7, viz:</p> <p><i>“Further, for consistency with GAT3, it is important that airport-related parking is not allowed at off-airport hotels or locations, and is only allowed at on-airport hotels where justified by a demonstrable need in the context of proposals for achieving a sustainable approach to surface transport access to the airport. This matter is addressed through GAT3 but it is considered that a dedicated hotel and visitor accommodation policy adds further clarity.”</i></p> <p>The fact that it is necessary for hotel and visitor accommodation proposed within Gatwick Airport boundary to demonstrate that the development will not have a detrimental impact on the long term ability of the airport to meet its operational land and floorspace requirements as it grows, is no substitute for having to satisfy the sequential test.</p> <p>In this regard, hotel development, irrespective of the location, should not only meet the sequential test, but in accordance with paragraph 90 of the NPPF 2019, the adverse impact test (Court of Appeal decision <u><i>Warners Retail (Moreton) Ltd v Cotswold DC (2016) EWCA Civ 606 and Aldergate Properties Ltd v Mansfield DC (2016) EWHC 1670 (Admin)</i></u>) as well. Neither of these tests can be realistically divorced from considerations relating to demonstrable need.</p>

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			<p>There is an absence of any defining criteria comprising part of the reasoned justification to Policy EC7 which sets out in any detail how the demonstrable need test is expected to be assessed, when faced with applications for hotel and visitor accommodation within the boundaries of Gatwick Airport. It is the writer's view that given the relationship between demonstrable need and the sequential and impact tests, the former should be assessed in accordance with the provisions of paragraph 015 Ref ID: 2B-015-20190722 of the NPPG where it concerns "<i>Town Centres and Retail</i>".</p> <p>In this way, demonstrable need seen in terms of on-airport hotel and visitor accommodation, is required to be assessed in the context of i) the scale of existing provisions and future proposals in Crawley Town Centre; ii) the existing viability and vitality of Crawley Town Centre; iii) the cumulative effects of recent on-airport hotel and visitor accommodation on Crawley Town Centre, and whether it is vulnerable seen in the light of future on-airport hotel and visitor accommodation; iv) the likely effects of any on-airport hotel development and visitor accommodation on any town centre strategy, and resultant impact on any other planned investment in Crawley Town Centre. This impact should be on a like-for-like basis relating to the particular form of hotel accommodation provided, i.e. whether it is budget class hotel, or designed to meet a particular segment of the market.</p> <p>This is important in that in the absence of any reasoned justification relating to Policy EC7, there is a likelihood that on-airport hotel and visitor accommodation will be based on the views expressed by GAL, who will then be seen to act as both judge and jury in the determination of any planning application relating to the same form of development. The way that Policy EC7 is currently worded has the propensity to elevate private sector interests, i.e. those of GAL, as being more relevant than land use planning considerations surrounding the development of hotel and visitor accommodation. Furthermore, it has the prospects of distorting the delivery of competing hotel and visitor accommodation from occupying more sequentially compliant locations in place of sub-optimal locations on-airport, a matter of some significance given the disastrous consequences affecting Crawley Town Centres' hospitality sector resulting from the Covid-19 pandemic.</p> <p>A distinction should be drawn between airport related car parking and hotel accommodation where they concern land within the boundaries of Gatwick Airport. It is recognised that the airport owner and operator enjoy "<i>permitted development rights</i>" in accordance with Schedule 2 Part 8 Class F of the Town &amp; Country Planning (General Permitted Development) (England) Order 2015 (As Amended). However, this does not extend to hotel accommodation. The phrase "<i>operational building</i>" is defined in Schedule 2 Part 8 Class O as meaning "<i>a building, other than a hotel required in connection with the movement or maintenance of aircraft, or with the embarking, disembarking, loading, discharge, or transport of passengers, livestock or goods at a relevant airport</i>".</p> <p>In short, hotels and visitor accommodation do not benefit from "<i>permitted development rights</i>" where they relate to the same development on-airport, reinforcing a central issue raised in these representations, namely the need for consistency between the sequential and adverse impact tests on the one hand, and the demonstrable needs test on the other, a factor which it is contended should form the central thrust of Policy EC7. It is only by complying with all of</p>



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			<p>these tests individually, that adverse consequences can be avoided surrounding the priority which should be given to meeting such accommodation in Crawley Town Centre.</p> <p><b>Suggested Modifications:</b>            Gatwick Airport should not be afforded the same status in terms of the sequential and impacts test as Crawley Town Centre. There is no logic in preventing airport-related car parking at hotels within Crawley Town Centre at a time when there has been a demise in retailing including the hospitality industry within Crawley Town Centre. The aim should be to encourage the vitality and viability of Crawley Town Centre as the primary objective when considering hotel and visitor accommodation. On-airport hotel and visitor accommodation should be required to justify a demonstrable need which is required to be assessed in the context of i) the scale of existing provision and future proposals in Crawley Town Centre; ii) existing viability and vitality of Crawley Town Centre; iii) the cumulative effects of recent on-airport hotel and visitor accommodation on Crawley Town Centre, and whether the town centre it is vulnerable seen in the light of future on-airport hotel and visitor accommodation; iv) the likely effects of any future on-airport hotel and visitor accommodation on any Town Centre strategy, and resultant impact on any other planned investment in Crawley Town Centre. This impact should be provided on a like-for-like basis relating to the particular form of hotel accommodation provided, i.e. whether it is a budget class hotel or designed to meet a particular segment of the market.</p>
REP/056	Gatwick Airport Limited	EC7	<p>41. We objected to Policy EC6 in 2020 Reg19 DCLP. We note that the policy has now been changed and specifically excludes the need for application for hotel development at Gatwick from the sequential test. We support the policy.</p> <p><b>Suggested Modification:</b></p>
REP/106	Crawley Town Centre Bid Board	EC8	<p>The CTCBID supports Policy EC8. An enhanced night time economy will encourage the sustainable growth of the town, increasing its attractiveness as a place to live and visit for residents and business alike, whilst helping to meet other aims of the Plan in relation to sustainability and inclusion.</p> <p><b>Suggested Modifications:</b></p>
REP/106	Crawley Town Centre Bid Board	EC9	<p>The CTCBID supports Policy EC9 and encourages flexibility in policy and development control decisions within the Town Centre, where change in the retail environment is likely to bring about the need for new uses.</p> <p><b>Suggested Modifications:</b></p>
REP/106	Crawley Town Centre Bid Board	EC10	<p>The CTCBID TCP supports Policy EC10 and encourages flexibility in policy and development control decisions within the Town Centre, where change in the retail environment is likely to bring about the need for temporary or new uses. The encouragement to cultural and creative uses is fully supported.</p> <p><b>Suggested Modifications:</b></p>
REP/106	Crawley Town Centre Bid Board	EC11	<p>The CTCBID TCP fully supports the aims of Policy EC11 in preserving the economic function of the Town Centre whilst seeking to ensure residential amenity is protected.</p> <p><b>Suggested Modifications:</b></p>

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REP/031	Gatwick Area Conservation Campaign	GAT1	<p><b>CRAWLEY BOROUGH COUNCIL SUPPLEMENTARY RESPONSE BY THE GATWICK AREA CONSERVATION CAMPAIGN ON THE CRAWLEY PLAN 2022-37</b></p> <p>In addition to the points made in our previous response, GACC does not agree with proposed policy GAT 1 because:</p> <ol style="list-style-type: none"> <li>1. It is inconsistent with the vote by the Full Council on 12 December 2018. At that meeting the Full Council resolved by a substantial majority to oppose the principle of growing Gatwick by making best use of its existing runways. The Full Council's vote was clearly and specifically to reject the principle of growth on both the airport's runways. The Council cannot simultaneously both oppose growth at Gatwick and "support the development of facilities which contribute to the sustainable growth of Gatwick Airport as a single runway, two terminal airport" as GAT 1 proposes. Unless the Council defines "sustainable growth" in a way that effectively precludes any growth at Gatwick, the two positions are fundamentally inconsistent.</li> <li>2. It is inconsistent with the Council's commitment to ensuring that growth at Gatwick Airport is properly scrutinised, as set out in its letter to Gatwick's Big Enough dated 31 January 2020. That letter states "Let us first emphasise that the Authorities are fully committed to ensuring that growth at Gatwick Airport is properly scrutinised and comes forward in a way that is sustainable and which minimises so far as possible adverse impacts on the environment and local communities". As the Council is aware from our separate correspondence with it there is currently no effective mechanism through which Gatwick's proposed main runway growth, which amounts to some 16 millions passengers per annum, will be scrutinised and approved or rejected. This is inconsistent with government policy. There is therefore also no effective mechanism for ensuring that main runway growth at Gatwick comes forward in a way that is sustainable and minimises adverse impacts. In addition to point 1 above, the Council's policy should make clear that it opposes any growth that has not been fully scrutinised and consented or rejected, in line with government policy.</li> <li>3. It is inconsistent with the Council's declaration of a climate emergency in July 2019.</li> </ol> <p><b>Suggested Modifications:</b></p>
REP/056	Gatwick Airport Limited	GAT1	<ol style="list-style-type: none"> <li>1. In our response to the 2020 Reg19 DCLP we broadly supported policy GAT1 but objected to a number of aspects of the detailed wording of the policy. We suggested some minor amendments to the wording of the policy and the supporting text to address these objections.</li> <li>2. We note that no changes have been to the policy or supporting text, so we wish to maintain our earlier objections and invite the Council to make the changes we proposed at paras 2.1 and 2.2 of those representations for the reasons set out in paras 3.1 – 3.8.</li> <li>3. In view of the fact that the 2021 Reg19 DCLP reinstates a policy for the safeguarding of land for a second runway (GAT2) the changes we suggested to the final paragraph of the policy are no longer required.</li> </ol> <p><b>Suggested Modifications:</b></p>

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REP/068	Sussex Wildlife Trust	GAT1	<p><b>GAT1 Development of the Airport with a Single Runway</b></p> <p>SWT does not believe that the sustainable expansion of Gatwick Airport is possible against the backdrop of the legal requirement to reduce carbon emissions and meet net zero targets. We recognise that the policy does now reference biodiversity value in bullet point (ii), however we feel that the policy does not reflect the need to demonstrate the requirement to avoid impacts as the first step, instead it references the need to minimise. This does not comply with section 175 of the National Planning Policy Framework.</p> <p>SWT therefore propose the following amendment to the policy in bullet point (ii)  <i>The impacts of the operation of the airport on the environment, including noise, air quality, flooding, surface access, visual impact, biodiversity and climate change, are <del>minimised</del> avoided, where <b>this is not possible suitable necessary</b> <del>satisfactory</del> safeguards are in place to ensure they are appropriately mitigated and, as a last resort, <b>like for like fair</b> compensation is secured; and</i></p> <p><b>Suggested Modifications:</b></p>
REP/077	CAGNE	GAT1	<p>It is worded to facilitate a commercial organisation instead of seeking a green better future for Crawley. Aviation is one of the biggest polluters as such Crawley should be seeking to limit it via policy due to carbon emissions, small particles from the airfield, NOx and vapours produced by aircraft. As well as the new drop off charge pushing the pollution to other parts of Crawley away from the airport.</p> <p><b>Suggested Modifications:</b></p> <p>Policy should be more stringent in opposing Gatwick's growth and greener industries should be facilitated for employment. This policy is seeking more of the same which is not in keeping with consumer and government policy of net zero. Aviation will be burning fossil fuel for the next 30 years as such a major polluter therefore Crawley must accept these emissions as part of their policy and criteria to reduce emissions to meet net zero.</p>
REP/113	Natural England	GAT1	<p>GAT1: ii. We advise strengthening this environmental impact section, to include avoidance of impacts. We suggest wording along the lines of; '...climate change, are avoided where possible, minimised...'. Without such amendment, for example, the areas of priority habitat (deciduous woodland, some of which is ancient woodland) which are located within the Airport site (as shown on the Crawley Local Plan Map), would not be sufficiently protected, as required by the NPPF (para 174).</p> <p><b>Suggested Modifications:</b></p> <p>(Our suggested modifications are incorporated in the above advice).</p>
REP/032	West Sussex County Council	GAT2	<p>Policy GAT2: Safeguarded Land for the potential future additional wide spaced runway as per the Gatwick Airport Master Plan is in conflict with Policy ST4: Safeguarding of a Search Corridor for a Crawley Western Link Road as substantial sections of the ST4 area lies within the GAT2 safeguarded area. Failing to address this issue may compromise the ability for Gatwick Airport to expand in the future and/or delivery of a western link road to support future growth.</p>

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			<p>The Draft Local Plan therefore does not fully comply with the following sections of The National Planning Policy Framework due to the conflict:</p> <ul style="list-style-type: none"> <li>• 104 (c) – identify and protect, where there is robust evidence, sites and routes which could be critical in developing infrastructure to widen transport choice and realise opportunities for large scale development;</li> <li>• 104 (f) – recognise the importance of maintaining a national network of general aviation airfields, and their need to adapt and change over time – taking into account their economic value in serving business, leisure, training and emergency • 104 (f) – recognise the importance of maintaining a national network of general aviation airfields, and their need to adapt and change over time – taking into account their economic value in serving business, leisure, training and emergency service needs, and the Government's General Aviation Strategy.</li> </ul> <p>West Sussex County Council is aware that further technical analysis is currently underway to resolve the conflict. The objective of the analysis is to refine the alignment of the Link Road so that it does not conflict with the GAT2 boundary, or to come to an agreeable solution with all parties with regards to amended boundaries.</p> <p>Justification 17.25 – It should be noted that developments could be refused on highway grounds based on the potential severe cumulative impacts on the transport network, if the scheme is not implemented.</p> <p>Policy ST4 &amp; Justification 17.28 - As indicated in paragraph 17.28, there is potential that land may need to be compulsorily purchased in order to deliver the Western Relief Road.</p> <p>However, Policy ST4 does not include reference to the potential need for land to be compulsorily purchased in its reference to its impact on residential and commercial properties. This is not sound because the scheme is likely to be dependent upon a successful future application for a Compulsory Purchase Order which may need to be considered at a Public Inquiry. Therefore, Policy ST4 should be amended to specifically state that there is a potential need for land to be compulsorily purchased in order to deliver the scheme. Failing to amend Policy ST4 to reflect the potential need for land to be compulsorily purchased may compromise the future delivery of this section of the Western Relief Road or mean that the scheme is unable to achieve its strategic objectives.</p> <p><b>Suggested Modifications:</b> Refinement of the alignment of the Link Road so it does not conflict with the GAT2 boundary or to come to an agreeable solution with all parties with regards to the amended boundaries.</p>
REP/035 (Mar 21)	Vail Williams on behalf of Ardmore Land Consortium	GAT2	<p><b>Safeguarding</b> As you are aware our clients previously supported the further clarification in Policy SD3 in regard to the Gatwick Airport, and the proposed Area Action Plan. Whilst we appreciate that the 2021 Regulation 19 version removes this designation as a result of legal advice given to the Borough Council, we are understandably disappointed that safeguarding which has historically blighted on our client's land for so long, will appear to be continuing to do so. without any clarity from central government on any further evidence or timeline in regards to the need for this land to facilitate an additional runway at Gatwick.</p>

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			<p>This is despite confirmation from Gatwick Airport Limited (GAL) that they wish to pursue the emergency runway as a second runway within the current airport boundary. We therefore are very disappointed that this Local Plan has been required to reflect safeguarding, and especially to the extent that is shown on the Local Plan Proposals Map. We would query whether there is indeed sufficient evidence to demonstrate that the whole of this land, even larger and altered from the Adopted Local Plan, should be safeguarded for the whole plan period up to 2037 without further evidence, and to this extent in regard to the new boundary. It is not clear how a larger area can be justified further blighting the Borough's ability to provide much needed economic land supply within its own boundaries.</p> <p>However, we agree that if this is required due to national policy, then we agree with paragraph 10.17 of the emerging Local Plan, that confirms that para 10.8 of the Government's Aviation Strategy 'Aviation 2050' published in December 2018, does not provide any certainty in government policy that land at Gatwick is no longer required to be safeguarded. We therefore appreciate the position that Crawley is in, with regards to being consistent with national policy but welcome the caveat that should any national aviation policy on safeguarding provide certainty that the safeguarding is no longer required, this will trigger a new Local Plan Review.</p> <p>We understand that under policy GAT2, the airport operator GAL will continue to be consulted on for all planning applications within the safeguarded area. However, we again query how the Indicative Search Corridor for the CWRR under ST4, is itself consistent with GAT2 when no further information is available to justify the position of this corridor, and that this appears to promote an infrastructure led development which may not be consistent with policies GAT2 or CL8.</p> <p>In regard to safeguarding, we also query paragraph 10.21 of the January 2021 Local Plan which begins to remove land within the safeguarded boundary for other development, including Land East of Balcombe Rd where the Local Plan allocates a new Strategic Employment Location (SEL), on the grounds that Gatwick has identified it as being used for a large area of surface car parking, and this is therefore inefficient use of land.</p> <p>There appears to be inconsistencies in the Jan 2020 Local Plan as currently drafted in regard to safeguarding in the plan and paragraph 9.8 states that the SEL "Gatwick Green" will require the safeguarded boundary to be amended accordingly. We will respond to policies EC1 and EC4 separately, with the search corridor under ST4 and the SEL under EC4.</p> <p><b>Suggested Modifications:</b></p>
REP/035 (Jun 21)	Vail Williams on behalf of Ardmore/ Windsor Land Consortium	GAT2	<p>We do not agree that there is a robust evidence base that supports the continued retention of the safeguarding area within the plan period to 2037 to endorse this approach. We believe that the Aviation Strategy 2050 and the NPPF (para 104) intends for LPAs to inform their own approach. It cites that the NPPF requires LPAs to "<i>c) identify and protect, where there is robust evidence, sites and routes which could be critical in developing infrastructure to widen transport choice and realise opportunities for large scale development</i>". The Aviation Strategy states that this is "<i>sufficient</i></p>

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			<p><i>guidance for local authorities to consider future needs of airports and their associated surface access requirements, when developing local plans”.</i></p> <p>We do not believe there is a justifiable case to demonstrate that safeguarding at Gatwick is supported by robust evidence, especially given that Heathrow is the government’s choice for additional runway capacity. In addition, locally we believe the allocation of an SEL in EC4 and CWRR in the safeguarded area is not applying consistency in its approach to safeguarding for future growth.</p> <p>When coupled with the GAL intentions to deliver additional capacity and a second runway through the redevelopment of the emergency runway, under a DCO at Gatwick providing capacity until 2032, beyond the plan period, we believe the safeguarding policy is outdated and is not robust.</p> <p><b>Suggested Modifications:</b></p>
REP/041	IVCAAC	GAT2	<p>The plan outlines the reasons why the land still has to be safeguarded even though the expansion of Gatwick by a second runway seems unlikely. The unlikelihood of a second runway is welcome to the Conservation Area as the runway would have been uncomfortably close. The impact of COVID on the airport is acknowledged. We query whether the recovery to pre-covid levels of use will take only a ‘few years’ as indicated in the plan.</p> <p><b>Suggested Modifications:</b></p>
REP/044	Tim North & Associates Ltd on behalf of HX Properties Ltd	GAT2	<p>Your Council’s records will reveal that previous representations were raised by this company on behalf of my clients HX Properties Ltd, in which support was given to Policy SD3 contained in the previous Regulation 19 version of the Draft Crawley Borough Local Plan 2020-2035 (hereinafter referred to as the DCBLP 2020-35). In this way, my client supported the proposal for a North Crawley AAP comprising 613 ha of land lying to the north of the built-up area of Crawley, between the town and London Gatwick Airport in which they have a landholding interest. It was stated in those earlier representations that insofar as Policy SD3 was concerned, it was positively prepared, justified, effective and consistent with national policy.</p> <p>It has been noted that in the latest Regulation 19 version of the Draft Crawley Borough Local Plan 2021-2037 (hereinafter referred to as the DCBLP 2021-2037), Policy GAT2 “Safeguarded Land” has been reintroduced and substituted for Policy SD3 contained in the earlier DCBLP 2020-2035. My clients object to the reintroduction of Policy GAT2 into the DCBLP 2021-2037 and the remainder of these representations focus on the reasons behind their objection.</p> <p>My clients recognise the contribution made by London Gatwick Airport to the local, regional and national economy, although this factor cannot be considered in isolation, particularly when seen in the context of the new Economic Development Strategy for the Borough being prepared by your Council in conjunction with Lichfields. This new Economic Development Strategy is intended to set out a longer term direction to support Crawley’s economy as it seeks to recover from the disruption caused by the Covid-19 pandemic. It is understood that this emerging strategy is to focus attention on greater economic diversity so as to increase the economy’s resilience and reduce its exposure to financial</p>

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			<p>crisis, whilst identifying new employment land which could maximise growth opportunities and support the shift to a more diverse and multi-sectoral economy which has emerged over the past 15 years.</p> <p>The importance in pursuing a new Economic Development Strategy becomes immediately apparent when considering the latest unemployment figures for neighbouring towns reliant on airports. The Centre for Cities document published on 13th October 2020 revealed that Crawley, along with London, Slough and Luton, has been more affected than any other city or town, and at that time, it was placed in the top 15 locations when assessed against the total number of people claiming unemployment benefit, occupying a higher position than other traditionally weaker economies such as Liverpool and Blackpool.</p> <p>London Gatwick Airport experienced a 78% fall in passenger throughput in 2020 according to figures released by CAA, resulting in a loss of £465m, with a throughput over the entire year of 10.17mppa, compared with a throughput in 2019 of 46.6mppa. Passenger throughput in November 2020 was down 92.6% with a 3m passenger throughput for the same period in 2019. Capital expenditure has been slashed on previously identified infrastructure projects by £280m, with severely reduced airport activity and considerable numbers of staff being either made redundant or furloughed.</p> <p>These events are happening at a time when the DCBLP 2021-2037 is providing for a housing requirement figure of 5,320 dwellings or 332.5 dpa over the 16 year period between 2021-2037, resulting in a 5.2 year housing land supply. This housing requirement figure has to be seen in the context of Crawley BC's objectively assessed need (hereinafter referred to as OAN) amounting to 12,000 dwellings over the same time period, or 750 dpa over the 16 year period.</p> <p>This significantly reduced housing requirement figure, when compared to the OAN is a consequence of the constrained land supply position in Crawley BC's administrative area, despite the fact that the OAN for the Strategic Housing Market Area comprising Crawley BC, Horsham DC and Mid Sussex DC, is very close to the total requirement figure being 2019dpa against a figure of 2200 dpa. It is clear that at present as well as into the future, increasing emphasis will have to be placed on immediately adjoining Districts within the North West Sussex Strategic Housing Market Area, as well as reliance placed on the Borough of Reigate and Banstead in Surrey, to help meet Crawley's unmet housing needs. This factor means that where land may be available within your Council's administrative area to meet its longer term housing needs, these should be robustly assessed, if only to reduce dependency on adjoining Authorities.</p> <p>This situation does not just affect housing, it also has implications for future employment land requirements. The Crawley Focused Employment Growth Area Update (hereinafter referred to as the CBC EGA) published in September 2020 was prepared to (i) carry out a sensitivity check Oxford Economics Q4 2018 Forecast against comparative forecasts from Experian; (ii) consider Q2 2020 forecasts from Oxford Economics and Experian that take account of economic implications arising from the Covid-19 pandemic; (iii) update the Past Development Rates forecast to take account of 2018-2019 monitoring data; and (iv) update the Baseline Data Supply forecast to take account of the supply-led housing figure of 347 dpa, and a higher figure of 597 dpa to take account of a possible urban extension to Crawley.</p>

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			<p>It is worth recording at this stage that the figure of 347 dpa is higher than the 332.5dpa figure over the 16 year period between 2021 and 2037 now being promoted as part of the latest Regulation 19 version of the emerging Local Plan review.</p> <p>The 2020 North West Sussex EGA provides a baseline labour supply scenario based on population growth associated with the standard method of calculating housing need. This is based on Crawley's full "uncapped" housing need of 12,000 new dwellings, generating a theoretical need of up to 113 ha of new employment land over the period 2019-2036. As with future housing needs, this employment needs figure has to be examined in the context of Crawley's constrained land position.</p> <p>It is understood that the authors of the 2019 Northern West Sussex Strategic Housing Market Assessment provided job growth numbers which were subsequently converted into a business land requirement. This approach meant that a housing delivery of 347dpa would generate growth of 2,183 business sector jobs and a corresponding business land figure of 21.7ha. The higher 597 dpa would generate 5,725 business sector jobs and a corresponding business land requirement figure of 56.9ha.</p> <p>The Crawley Focused EGA Update September 2020 calculated that based on the 2018 Experian forecast, there was a minimum need for 38.7ha of new business land in the Borough, which would lead to an anticipated growth of 4,199 jobs across all business sectors for the period up to 2036. The Class B1(a)/B1(b) office needs accounted for 5.9ha of this 38.7ha of new business land, meaning that 32.8ha was attributable to the industrial sector falling within previous Use Classes B1(c), B2 and B8. Crawley's Employment Land Trajectory published in September 2020 identified available employment land supply in the pipeline of 8.7ha of industrial land, corresponding to an industrial land supply requirement figure of 24.1ha. The figure of 24.1 ha equates to the minimum amount of new industrial land to be provided at Gatwick Green in accordance with Policy EC4 in the DCBLP 2021-2037.</p> <p>The release of Gatwick Green can therefore be seen as the minimum future employment land requirement figure within a range extending between 22ha and 57ha of land, as outlined in the penultimate paragraph above. If the intended employment land strategy is to maximise growth opportunities and support a shift to a more diverse and multi-sectoral economy, this will not be achieved by simply relying on Policy EC4 where 60% of the land is expected to be devoted to Class B8 warehousing for which there is a need, with 30% used for industrial land purposes, and 10% for parcel distribution requirements.</p> <p>It means that there is a need to robustly assess all opportunities where it relates to "safeguarded land" to see whether it can be best used for future employment purposes, especially as the 57ha employment land figure representing the upper range of employment needs, is no different from the earlier employment land figure of 57.63ha required between 2020 and 2035 taken from the Regulation 18 version of the Draft Crawley Borough Local Plan. The Regulation 18 version of the emerging Local Plan was published in a period prior to the emergence of the Covid-19 pandemic, at a time before the decision was taken to pursue a new Economic Development Strategy for the Borough.</p>



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			<p>It is evident from a meeting of the Full Council of your Authority held on Wednesday 16th December 2020 that in April of last year, an approach was made by your Authority to an “Advisory Inspector” following the decision to promote Policy SD3 and a North Crawley AAP in the DCBLP 2020-2035. It is understood that the “Advisory Inspector” did not support the AAP approach, and that he advised your Authority as part of its emerging Local Plan review, to address Crawley’s employment needs, stating that the removal of “safeguarded land” could not at that time be regarded as certain. The “Advisory Inspector” also indicated that the 613ha of land to be released from the “safeguarded land” designation would probably result in a significant change to the Plan’s overall development strategy, and an AAP would not be consistent with the strategy of the submitted plan.</p> <p>It has to be understood that the “Advisory Inspector’s” conclusions were taken at a time of maximum uncertainty, some 2 months after the Court of Appeal’s decision delivered on 27th February 2020 involving Plan B Earth and Friends of the Earth Ltd’s successful challenge to the third North West Runway at London Heathrow Airport. The decision of the Court of Appeal found that the Secretary of State for Transport had breached Section 10 of the Planning Act 2008, and had acted irrationally by disregarding the Paris Agreement. Moreover, he had not taken into account non-CO2 warming impacts of aviation, or the effects of climate change beyond 2050, when publishing the Airports National Policy Statement (ANPS). It was therefore found by the Court of Appeal that the ANPS was unlawful in deciding to proceed with the North West Runway at London Heathrow Airport.</p> <p>Since the “Advisory Inspector’s” comments were received, Heathrow Airport Ltd successfully challenged the Court of Appeal judgement in the Supreme Court on 16th December 2020, whilst your Council published its Strategic Housing Market Assessment in September 2020, with additional consideration being given to a number of issues, including the economic implications arising from the Covid-19 pandemic through the Crawley Focused EGA Update also published in September 2020. In December 2020, the Sixth Carbon Budget the UK’s Path to Net Zero was published by the Climate Change Committee in which it was stated that “Aviation is one of the sectors in which we expect there to be significant remaining positive emissions by 2050 given the limited set of options for decarbonisation. Remaining residual emissions will need to be offset by greenhouse gas removals for the sector to reach Net Zero.”</p> <p>It is contended that there is more justification today than there was more than a year ago, for your Council to reduce its dependency on London Gatwick Airport in meeting its future employment needs over the Plan period, and in particular to adopt a pro-active response so that it meets more than the minimum employment growth figure of 24.1 ha of land at Gatwick Green. Indeed, it is noted that as part of the Crawley Transport Study published in May 2021, three separate draft Crawley Borough Local Plan scenarios were tested. Scenario 3 comprises the figure of 6,720 dwellings within Crawley BC’s administrative area, or 420 dpa, along with employment land trajectory sites; the Gatwick Green employment allocation, as well as land west of Ifield (3,750 dwellings) and west of Kilnwood Vale (1,546 dwellings), along with 50,000 sq.m of employment, resulting in 12,016 dwellings at 751 dpa.</p>

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			<p>The 6,720 housing figure is greater than the housing requirement figure of 5,320 set out in the DCBLP 2021-2037, and larger than the 347dpa figure set out in the Baseline Data Supply Forecast arising from the Crawley Forecast EGA Update.</p> <p>Scenario 3 represents the maximum housing figure in terms of meeting Crawley BC's OAN, but only takes into account the minimum employment growth figure. It is appropriate that a maximum employment growth figure should also be assessed, if only to ensure a balance with anticipated future housing growth, and for this situation to arise, consideration should similarly be given to releasing the 613ha of land lying to the north of the built-up area of Crawley between the town and London Gatwick Airport where HX Properties Ltd have a landholding interest, for future employment generating purposes.</p> <p>It is noted that the Crawley Transport Study is based on sustainable mitigation, with the need to play an important role in mitigating the impacts of the Local Plan up to 2037, in order to reduce the impact on the environment as well as improve health and well-being.</p> <p>It is ironic that this underlying strategy behind the Crawley Transport Study is being promoted at the same time as land is expected to remain sterilised as part of the reintroduction of Policy GAT2 into the DCBLP 2021-2037, with reliance placed on the 2003 Air Transport White Paper and 2013 Aviation Policy Framework; 18 and 8 years old respectively. There is no approved national UK Aviation policy, and no expected date for when a policy is likely to be forthcoming, although it was originally intended to be released at the end of 2019.</p> <p>Meanwhile GAL in its Gatwick Airport Masterplan 2019, indicate that as far as an additional runway is concerned, "... we are not currently pursuing this scheme, we believe it remains a credible means of providing longer term growth for the country and it should therefore continue to be safeguarded." That will, according to the Airport Owner, increase London Gatwick Airport's capacity to approximately 95mppa, requiring more significant changes on-airport as well as to surrounding infrastructure, having pronounced environmental impacts, at a time when increasing attention is being focused on meeting the requirements of the Paris Agreement.</p> <p>For the Airport Authority to contemplate growth to 95mppa at a time when overall growth as part of each of the alternative scenarios for aviation set out in the Sixth Carbon Budget is expected to see emissions fall from 2018 to 2050 by more than 35% is difficult to envisage, especially when there is little published information on the important topics of efficiency improvements, sustainable fuels and the nature of constraints and demand.</p> <p>Your Council has decided in the case of the Gatwick Green allocation forming part of Policy EC4 in the DCBLP 2021-2037, to remove "safeguarded land" allowing for an additional 24.1ha of employment land to be released in the future. In taking this decision, it could be said that this is not in strict compliance with the "Advisory Inspector's" comments. In my client's view, this position adopted by your Council is understandable, but the same stance should be extended to land north of the Manor Royal Employment Area and south of London Gatwick Airport.</p>

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			<p>There has been no detailed cost-benefit analysis undertaken which compares the decision to safeguard land for a future second runway, at a date which is completely unknown, with the release of the same land for industrial purposes along with other forms of development falling within Class E, including the delivery of the Crawley Western Link Road. This is despite the fact that the Development Consent Order application has yet to be submitted to The Planning Inspectorate, concerning the use of the existing standby runway to be used routinely with the main runway, catering for an increase in passenger numbers of more than 10mppa.</p> <p>In conclusion, my clients consider the time has arrived whereby the full employment needs of Crawley and the wider regional area should be afforded the necessary priority, consistent with a new, more wide ranging Economic Development Strategy, focusing attention on greater economic diversity to increase the economy's resilience, including the need to identify new employment land which can maximise employment opportunities to support a shift to a more diverse and multi-sectoral economy. The alternative is that ever-increasing reliance will be placed on adjoining Authorities to accommodate the Council's unmet housing and employment needs.</p> <p>It is contended that correspondingly less weight should now be placed on meeting the expected airport-related growth requirements of the owners of London Gatwick Airport. In this respect it is worth recalling that the French Government have decided to abandon an extension to Roissy-Charles de Gaulle Airport in Paris on the basis that it would not meet the objectives of climate change. A similar stance should now be taken by your Council where it concerns the need for a second runway at London Gatwick Airport, given the increasing attention placed on climate change and the Paris Agreement.</p> <p><b>Suggested Modifications:</b></p>
REP/055	Savills on behalf of Wilky Group	GAT2	<p><b>1.0 Introduction</b></p> <p>1.1 This representation is submitted on behalf of The Wilky Group (TWG), which has a longstanding interest in the promotion of strategic employment land within the Crawley Borough Council (CBC) area. It relates to Policy GAT2 Safeguarded Land in the draft Crawley Borough Local Plan, 2021 (DCBLP).</p> <p>1.2 TWG owns about 48 ha (119 acres) of land east of Gatwick Airport as shown the plan at Appendix 1. The land has been promoted by TWG as a strategic employment opportunity known as Gatwick Green (the Site). The Site is proposed for allocation as a Strategic Employment Location (SEL) of 47 ha (116 acres) in the DCBLP under Strategic Policy EC4 as a comprehensive industrial-led development of predominantly storage and distribution uses under use class B8. The extent of the SEL allocation is identified on the plan at Appendix 1.</p> <p><b>Background</b></p> <p>1.3 These are TWG's representations made in the light of the updated DCBLP 2020, which was published following the advice from the Planning Inspectorate to Crawley Borough at the Advisory Visit in April 2020: the advice was that the Local Plan had to include a strategy to address Crawley's employment needs and that the removal of</p>

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			<p>safeguarding could not be regarded as certain. Accordingly, the representations revise TWG's position, given the changes in the draft Plan and the revised / updated evidence base since the original representations were made.</p> <p><b>Scope of representation</b></p> <p>1.4 This representation does not address the principle of Safeguarded Land for a possible additional wide-spaced runway at Gatwick Airport. Instead, it focuses on its extent under Policy GAT2 as identified on the draft Local Plan Map and its interface with Gatwick Green.</p> <p>1.5 Land use planning and aviation evidence is provided to demonstrate that Gatwick Green can be developed in a manner that is fully compatible with, and not prejudicial to, the future development of an additional wide-spaced runway at Gatwick Airport.</p> <p>1.6 The representation also contains detailed evidence to support minor adjustments to the DCBLP to ensure that a land and resource-efficient approach is taken in the planning of shared highway access infrastructure, whilst also correcting some mapping errors in relation to the extent of the Safeguarded Land as shown on the draft Local Plan Map.</p> <p><b>Executive Summary</b></p> <p>1.7 TWG supports Gatwick Green being removed from the extent of the Safeguarded Land, as identified under draft Policy GAT2, and provides evidence to demonstrate that Gatwick Green can be developed in a manner that is fully compatible with, and not prejudicial to, the future development of an additional wide-spaced runway at Gatwick Airport. The representation includes airport planning evidence by Mott MacDonald to support the case being made.</p> <p>1.8 The Aviation Policy Framework (APF1) and the National Planning Policy Framework (NPPF, 2019) provide national aviation and planning policy to guide the future expansion of airport infrastructure. The APF states that airport master plans should be subject to wide consultation with local authorities, the community and stakeholders, allowing the future development airports to be considered in the local plan process. Airport Master Plans should contain sufficient information and drawings to identify any additional land requirements, which under the NPPF must be based on 'robust' evidence to identify any infrastructure that is 'critical' to the scheme so as to minimise long-term uncertainty and blight.</p> <p>1.9 Gatwick Airport Ltd (GAL) prepared the Gatwick Area Master Plan in 20192 (GAMP). The GAMP is a key document where the evidence and justification for safeguarding is expected to be found. The Council should therefore expect to see the robust evidence that supports the extent of the Safeguarded Land in the GAMP. However, whilst the GAMP includes a conceptual layout for an additional runway, this is not underpinned by any evidence to support the extent of land safeguarded for surface parking east of Balcombe Road (c 92 ha or 227 acres).</p> <p>1.10 The evidence therefore supports the Council's decision to remove some of the historically Safeguarded Land indicated as surface airport-related car parking related to a future additional wide-spaced runway to allow the</p>

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			<p>allocation of Gatwick Green. The Council's decision is based on the conclusion that surface parking does not represent an efficient use of this land, and given anticipated proposals by GAL for more land-efficient car parking and sustainable surface access.</p> <p>1.11 Indeed, GAL is already planning more land-efficient parking solutions through its Development Consent Order (DCO) for the continuous use of the emergency runway. The continued sterilisation of Gatwick Green for future car parking would represent an unnecessary, inefficient and inappropriate use of a key strategic site needed to meet the clear and urgent economic needs of the Borough.</p> <p>1.12 The evidence also demonstrates that the highway requirements related to Gatwick Green and the additional wide-spaced runway can be accommodated in the Safeguarded Land between the Gatwick Green allocation and the M23 spur road – this represents a resource-efficient solution with significant benefits for TWG and GAL. These matters have been the subject of discussions between TWG's transport consultant and Gatwick Airport Limited (GAL). Some minor adjustments to the DCBLP are proposed to allow for the joint use of this strip of Safeguarded Land.</p> <p>1.13 The evidence shows that in all other respects, Gatwick Green can be developed to be mutually compatible with the future development of an additional wide-spaced runway. The evidence also supports three minor adjustments to the extent of Safeguarded Land on the Local Plan Map, which are proposed to address some mapping errors that have arisen in the definition of the Safeguarded Land and the Gatwick Green allocation.</p> <p><b>2.0 Extent of Safeguarded Land</b> <b>Introduction</b></p> <p>2.1 TWG provides evidence to demonstrate that the removal of Safeguarded Land from Gatwick Green under draft Policy GAT2 and identified on the Local Plan Map is justified. Evidence is also provided to demonstrate that Gatwick Green can be developed in a manner that is fully compatible with, and not prejudicial to, the future development of an additional wide-spaced runway at Gatwick Airport. TWG also proposes some minor adjustments to the Safeguarded Land to reflect GAL's requirements and TWG's landownership, and to policy wording to ensure that Gatwick Green can be fully developed in a land and resource-efficient manner which offers mutual compatibility with an additional runway in terms of highway / access infrastructure. The representation includes airport planning evidence by Mott MacDonald to support the case being made.</p> <p><b>Safeguarding under national policy</b></p> <p>2.2 The Aviation Policy Framework (APF, 2013) provides current Government policy on aviation. The APF recommends that airports continue to prepare Master Plans to address the future development and expansion of airports (paras 4.11-4.12). In preparing local plans, local authorities are required to have regard to policies and advice in the APF, along with other relevant planning policy and guidance (para 5.6). Airport Master Plans should, inter alia, include any long-term land requirements associated with future airport development (para B.5) and that this should be clearly identified on a safeguarding map (para 5.8) to minimise long-term uncertainty and non-statutory blight (para</p>

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			<p>B.5). However, the responsibility for safeguarding land for future expansion rests with local planning authorities based on guidance in the National Planning Policy Framework (NPPF). Similar guidance is contained in the UK Government's Aviation Green Paper, known as the draft Aviation Strategy (AS, 2018 – para 3.66), though this is not formal Government policy.</p> <p>2.3 The National Planning Policy Framework (NPPF, 2019) provides for the protection of sites and routes for future transport. The policy is contained at para 104(c), which states that planning policies should:  <i>"(c) identify and protect, where there is <u>robust evidence</u>, sites and routes which could be <u>critical</u> in developing infrastructure to widen transport choice and realise opportunities for large scale development;"</i> (Savills emphasis)</p> <p>2.4 The Aviation Policy Framework (APF3) reiterates the above policy from the NPPF at paragraphs 5.8-5.9, and goes on to state that Airport Master Plans should provide a clear statement of intent to enable future development of an airport to be given due consideration in local planning processes. It also requires that there should be wide consultation with local communities, including with local authorities. Furthermore, Airport Master Plans should contain <u>sufficient information and drawings</u> so that they may be clearly understood by the lay person as well as professionals and that any additional land should be clearly identified to <u>minimise long-term uncertainty and non-statutory blight</u>.</p> <p>2.5 Gatwick Airport Ltd (GAL) prepared a Master Plan in 2019 (GAMP). The Council should expect to see the robust evidence that supports the extent of the Safeguarded Land shown in the GAMP.</p> <p>2.6 National policy contains two tests for the inclusion of safeguarding in local plans (para 104 (c)), namely that the extent of the safeguarding must be based on <u>robust</u> evidence of its need and that it must relate to infrastructure that is <u>critical</u> to the development of the infrastructure so as to widen transport choice and realise opportunities for large scale development. The above tests are particularly important for the future of Crawley given the historic conflict between providing for unmet employment needs and safeguarding land for airport infrastructure. The NPPF is clear that any inclusion of safeguarding policies in a Local Plan is, in the first instance, a matter for the local plan-making authority to consider and justify. In the context of the policy and guidance contained in the NPPF and the APF, the need for any land to be safeguarded must be tested through the plan-making process.</p> <p>2.7 Any safeguarding must therefore be justified by robust evidence of need and the area should be no bigger than that which is critical to serve the purpose of the scheme, i.e. related to required operational airport infrastructure. TWG has long made the case that there is no justification for safeguarding all the land to the east of Balcombe Road as shown on Plan 21 of the GAMP (Appendix 2) for surface car parking as indicated on Plan 20 of the GAMP (Appendix 3). Safeguarding of the Site owned by TWG and comprising the Gatwick Green allocation is not considered to be justified by any 'robust' evidence in the GAMP. The GAMP does not establish that the Gatwick Green land is 'critical' to serving the purpose of delivering an additional wide-spaced runway. The Council should</p>

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			<p>expect to find the 'robust' evidence for the extent of safeguarding in the GAMP, but in relation to the significant provision for surface airport-related car parking, no such evidence is presented. The Council were therefore right to conclude that the case for safeguarding all the land east of Balcombe Road had not been made. No other evidence to explain and justify the extent of current safeguarding has been seen.</p> <p>2.8 Land east of Balcombe Road has been blighted by safeguarding since about 2004, which has had the effect of preventing the Council from allocating a strategic employment site and meeting its identified needs within the Crawley area. Gatwick Green has been consistently promoted for employment use by TWG throughout this period with its potential acknowledged through the Area of Search (AoS) in the adopted CBLP 2015 (Policy EC1) and the Area Action Plan (AAP) in the DCBLP 2020 (proposed Policy SD3).</p> <p><b>The extent of safeguarding for airport car parking – planning policy considerations</b></p> <p>2.9 Having properly considered and applied the safeguarding policy tests set out above, the Council has responded positively to the long-standing need for strategic employment land by allocating Gatwick Green for strategic employment development under Strategic Policies EC1 and EC4. The DCBLP therefore included an area of Safeguarded Land for a future additional wide-spaced runway at Gatwick Airport, but with 47 ha of previously Safeguarded Land excluded to accommodate an industrial-led Strategic Employment Location known as Gatwick Green.</p> <p>2.10 The Council set out its approach to planning for Gatwick Airport in Topic Paper 25 – in addition to addressing the future needs of the airport, it set out the strategy to bring forward new employment land/floorspace through the allocation of Gatwick Green, cross-referencing its economic evidence contained in Topic Paper 56. Taking account of the Inspector's advice at the Advisory Visit in April 2020, the Council considered the extent of safeguarding rather than the principle of it. In doing so, it took account of the longstanding constraint safeguarding had imposed on the Borough's land supply; the findings on the need for more employment land contained in the Economic Growth Assessment (EGA), and the need to accommodate a Strategic Employment Location (SEL) at Gatwick Green (Topic Paper 2, paras 2.3.4, 3.3.1, and 3.4.1). The DCBLP therefore retained safeguarding based on an amended land take, enabling a SEL to be allocated whilst safeguarding from development the land that would be required to accommodate a possible southern runway and associated infrastructure (para 3.3.5).</p> <p>2.11 Savills' assessment of the Industrial and Logistics (I&amp;L) market<sup>7</sup> supports the Council's assessment of employment land need contained in the Council's North West Sussex Economic Growth Assessment Focused Update for Crawley (EGA CU), and the Council's approach of expressing this need as a minimum in policy.</p> <p>2.12 Topic Paper 2 went on to conclude that the land to be allocated for Gatwick Green was not needed for the runway or related highway connections, but only for a large area of surface car parking. In light of the evidence, the proposed extent of surface car parking east of Balcombe Road (c 92 ha or 227 acres) did not represent an efficient</p>

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			<p>use of land given that there are more land-efficient approaches through decked and robotic parking, which the airport is adopting and are in line with the airport's Surface Access Strategy.</p> <p>2.13 The evidence therefore supports the Council's decision to remove some of the historically Safeguarded Land indicated as surface airport-related car parking related to a future additional wide-spaced runway to allow the allocation of Gatwick Green. The Council's decision is based on the conclusion that surface parking does not represent an efficient use of this land given proposals by GAL for more land-efficient car parking and sustainable surface access.</p> <p>2.14 GAL is already planning more land-efficient parking solutions. It is promulgating a Development Consent Order (DCO) for the continuous use of the emergency runway, which includes decked parking arrangements to free up land for other critical land uses to enable capacity to be increased from c 50 mppa (million passengers per annum) to c 74 mppa, an increase in capacity of 50%.</p> <p>2.15 In addition to the long-standing unmet need for employment land, the Council has more recently acknowledged the need for employment land to address the economic impacts of the COVID-19 pandemic. Whilst not referenced in the DCBLP, the Crawley Economic Recovery Plan notes one of five 'Flagship Interventions' to secure a diverse and resilient economy as unlocking "<i>sufficient suitable employment land to drive recovery</i>". This intervention is embodied in Strategic Policy EC4 of the DCBLP, which allocates Gatwick Green. The allocation has been made in light of long-term economic circumstances, but has since gained a further purpose to assist in addressing the impacts of the COVID-19 pandemic, recognising that retaining the Site for possible long term airport-related surface car parking would represent "<i>an inefficient use of the land</i>" in the context of:</p> <ol style="list-style-type: none"> <li>a. The Airport's plans for decked and robotic parking to serve its short-term expansion plans under its planned Development Consent Order (DCO).</li> <li>b. The increasing switch to more sustainable modes of transport under its Surface Access Strategy (para 3.4.1, Topic Paper 2: Gatwick Airport, January 2021).</li> </ol> <p>2.16 As previously stated, there is neither a critical need for, nor any robust evidence to support, the continued safeguarding of Gatwick Green for additional airport-related car parking.</p> <p>2.17 On behalf of TWG, Mott MacDonald's aviation team has undertaken a preliminary assessment of the need for airport-related surface long-stay car parking to serve the future additional wide-spaced runway at Gatwick Airport. The assessment considers whether there is a likely to be a need for 47 ha of airport-related surface car parking which would be lost to Gatwick Green, together with alternative approaches to accommodating future parking requirements – the assessment is contained in Appendix 4. The purpose of this work is to test the Council's assessment that the land in question would represent "<i>an inefficient use of the land</i>" when set against the context of the Airport's stated plans for decked parking, robotic parking, and higher yielding and more land-efficient valet</p>



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			<p>parking products, along with the success already achieved in increasing use of more sustainable modes of transport.</p> <p>2.18 The conclusion of the assessment is that there is very unlikely to be a need for the scale of surface car parking that would be displaced by Gatwick Green, and that any unmet need could be comfortably accommodated through alternative parking solutions within the existing operational area and the remaining Safeguarded Land identified under Policy GAT2. GAL is planning and trialling alternative intensive parking solutions and so the full extent of land safeguarded for additional surface car parking is most unlikely to be required in the future. The continued sterilisation of Gatwick Green for future car parking would represent an unnecessary, inefficient and inappropriate use of a key strategic site needed to meet the clear and urgent economic needs of the Borough.</p> <p>2.19 The policy in the NPPF requires robust evidence to justify safeguarding any land, and no such evidence has been provided in the GAMP with respect to the parking areas shown over Gatwick Green. TWG considers that the Council is correct in its decision that safeguarding Gatwick Green for surface car parking represents an inefficient use of land. In terms of the policy tests in the NPPF, namely the sustainability assessment of alternatives and the tests of soundness, the use of the Site as a Strategic Employment Location (SEL) as opposed to surface car parking is wholly justified. Surface car parking is, therefore, inefficient and the alternative use as a strategic employment site is justified not only through identified existing employment land needs, but also as a result of the ongoing economic difficulties associated with the COVID-19 pandemic.</p> <p>2.20 The Council has assessed the alternative options in its Sustainability Appraisal (SA/SEA). This evaluated three options: (1) safeguarding land as shown in the GAMP, (2) do not safeguard any land, and (3) safeguard land with an amended boundary to allow for strategic employment provision. Option 3 was selected as the most sustainable option as it responded to national policy to retain safeguarding, but with an amended boundary to accommodate Crawley's unmet employment land needs in the form of a SEL at Gatwick Green. This approach enabled land south of the airport required to accommodate the physical land take of a possible wide-spaced runway and its operations to be retained. The approach is summarised in the DCBLP as the justification for allocating Gatwick Green under Strategic Policy EC4 (para 9.53): <i>"The council does not consider parking to represent an efficient use of the site, particularly given the significant employment needs of Crawley borough, and is of the view that the airport could accommodate parking more efficiently through decked and robotic parking and other efficiency measures, should it be demonstrated that additional on-airport parking is required having regard to the airport's surface access obligations stated in the S106 legal agreement."</i></p> <p>2.21 The analysis outlined above is reflected in Topic Paper 2 on Gatwick Airport.</p> <p><b>The extent of safeguarding for airport car parking – airport masterplanning considerations</b></p> <p>2.22 More detailed evidence in this representation demonstrates that the Council's analysis is correct such that there is an overwhelming and sound case in support of Policy GAT2. That evidence is contained in the assessment by Mott MacDonald (Appendix 4), which can be summarised as follows:</p>

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			<ul style="list-style-type: none"> <li>• The Aviation Policy Framework recommends that airports continue to prepare Master Plans as a clear statement of intent so that this can be given due consideration in local planning processes.</li> <li>• The National Planning Policy Framework (NPPF) states that there must be 'robust evidence' to identify and protect sites and routes 'critical' to developing transport infrastructure.</li> <li>• An Airport Master Plan should provide the robust evidence to justify the requirements for safeguarded land for infrastructure that is critical to the expansion of the airport. No other evidence to explain and justify the extent of current safeguarding has been seen.</li> <li>• The GAMP does not include analysis or justification for the extensive area indicated for surface long-stay car parking between Balcombe Road and the M23, instead referring to preceding Master Plans, that also do not include these details.</li> <li>• Two trends have dominated car parking requirements at Gatwick Airport: (1) the significant improvement in public transport mode shift, from private cars to rail, and (2) additional car parking required to support growth in air traffic has been accommodated within existing airport owned land through intensification of parking density. Driven by GAL's own innovative parking initiatives and sustainable transport targets, these trends will continue so as to support anticipated growth over the next 15 years.</li> <li>• There is no robust evidence available to justify the extent of surface parking that was initially indicated over 15 years ago. Any analysis should have been published as a part of the Airport Master Plan and should have been updated over time to take into account these well established and continuing trends of mode share shift to sustainable public transport and parking density / automation.</li> </ul> <p>2.23 Consistent with these findings and foreshadowing Policy GAT2 and the allocation of Gatwick Green, paragraph 3.20 of the DCBLP 2020 stated that "the indicative plans for a southern runway provided in the Gatwick Airport Masterplan show a large area for surface car parking, indicating an inefficient use of valuable land in a constrained borough with high development needs. A more consolidated approach could potentially open up opportunities for other developments". In removing Gatwick Green from safeguarding, the Council recognised not only the historic and current evidenced need for employment land release, but also the urgent need to provide economic development opportunities in the face of an unprecedented economic downturn in the local economy arising from the COVID-19 pandemic. The impacts of the pandemic are borne out by two Centre for Cities assessments in April 2020 and January 2021, which set out a very bleak view of the economic impacts on Crawley:</p> <p><i>"Crawley for instance – the most vulnerable city or large town according to our classification – has the highest share of employees in the aviation and aircraft manufacturing industry of any city. Around 18 per cent of its workforce is employed in the aviation industry and related sectors compared to an average of around 1 per cent across British cities. The result is that over half of all of Crawley's jobs are at risk of being either furloughed or lost completely."</i></p> <p><i>"The economic impact of the pandemic has hit places that were doing okay before Covid — places where levelling up wasn't an issue. London, Slough and Crawley are among the hardest hit. Some, like London, should bounce</i></p>


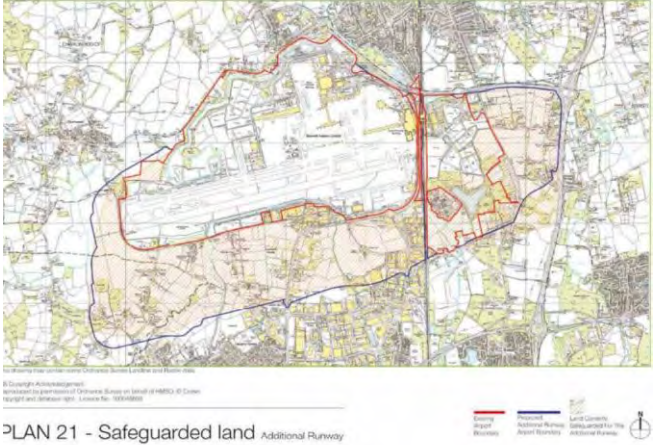

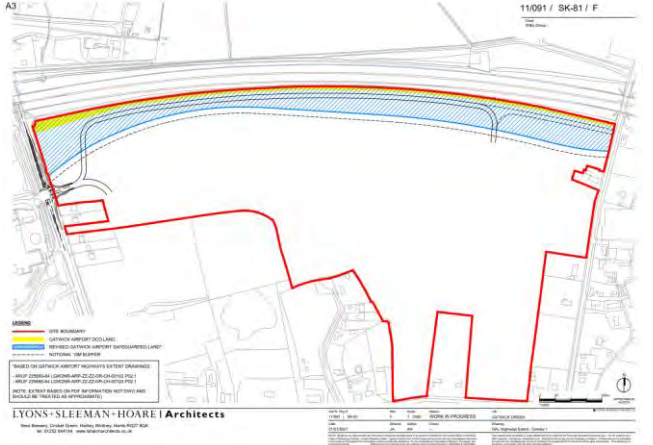
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			<p><i>back quickly once it is safe to lift restrictions. But for others, where the economic damage has hit key industries like aviation there could be 'levelling down'.</i></p> <p>2.24 In light of the above economic considerations, TWG notes the Council's approach to the principle of safeguarding and supports the general extent of Safeguarded Land under draft Policy GAT2 and as shown on the draft Local Plan Map, but subject to (1) minor adjustments to take account of three mapping errors relating to TWG's land ownership, and (2) an adjustment in respect of the extent of safeguarding south of the M23 spur road as explained in the remainder of this representation. These matters are addressed in more detail below.</p> <p><b>3.0 Compatibility between highway infrastructure associated with Gatwick Green and the additional wide-spaced runway</b></p> <p>3.1 Between the Gatwick Green allocation and the M23 spur road is a strip of Safeguarded Land retained to accommodate highway infrastructure required for the possible additional wide-spaced runway at the Airport and owned by TWG. This highway infrastructure comprises the following:</p> <ol style="list-style-type: none"> <li>1. Two slip roads (that merge into one) intended to connect the diverted A23 to Junction 9 on the M23, following an alignment close to the existing M23 spur road.</li> <li>2. The diversion of Balcombe Road to the east to follow the M23 and to re-join the diverted A23 to the south.</li> </ol> <p>3.2 In addition to the above, TWG intends to create highway infrastructure for the Gatwick Green site, parallel and close to the M23 spur road – this intention was noted in the Development Framework Plan submitted as part of TWG's representation on Policy EC1 of the DCBLP 2020. The adjoining Gatwick Green allocation requires access from Balcombe Road forming an east-west access road within this Safeguarded Land to serve Storage and distribution development: this would result in the potential for three roads to be constructed in broadly the same corridor and running parallel to the M23 spur road. This could be reduced to two roads with a more efficient approach. TWG has given consideration as to how the highway infrastructure for Gatwick Green could be accommodated within the Safeguarded Land in a more efficient manner and without prejudicing the future provision of the slip roads to serve the proposed additional runway.</p> <p>3.3 As part of this consideration, it has become apparent that the Safeguarded Land as shown on the draft Local Plan Map requires amendment to address a mapping error so as to fully accommodate the GAL future highway infrastructure. Appendix 5 contains a plan that shows the full extent of the land that needs to be safeguarded based on information provided to TWG by GAL. The plan also shows how the highway infrastructure for Gatwick Green can be accommodated in the revised Safeguarded Land. To avoid a land and resource-inefficient outcome, the Gatwick Green access road has been designed to coincide with a logical alignment of a diverted Balcombe Road within the Safeguarded Land, which could, in the future, form part of the diverted Balcombe Road and be upgraded as required by GAL. The access road has been designed with limited intersections so as to ensure it can perform</p>

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			<p>satisfactorily as the diverted Balcombe Road. The slip roads could be accommodated within the amended Safeguarded Land.</p> <p>3.4 The accommodation of these highway requirements have been discussed with GAL with a view to reaching an agreement that these arrangements meet the needs of both parties. Periodic engagement with GAL has identified matters which may usefully be resolved prior to the Examination in Public of the DCBLP. These matters remain under discussion pending further clarification of the position which GAL wishes to adopt on each matter.</p> <p>3.5 In the absence of an agreement with GAL, TWG is clear that the proposed arrangements are technically feasible and viable from a transport planning and highways perspective. TWG considers that this arrangements represent pragmatic, workable and resource and land-efficient solutions which should be embodied into policy in the DCBLP. It allows TWG to utilise the land it owns in the most efficient manner whilst not prejudicing the Airport's long term access plans. Further, it avoids the duplication of roads, thereby reducing the carbon footprint of the proposals, provides room for additional landscaping (as a buffer to the M23 spur) and would assist in reducing the cost of the future Airport highway infrastructure to the benefit of GAL.</p> <p>3.6 These arrangements can be accommodated via minor changes to the DCBLP:</p> <ol style="list-style-type: none"> <li>1. The strip of Safeguarded Land should be adjusted to reflect that on the plan at Appendix 5.</li> <li>2. A policy response to facilitate the dual use of the Safeguarded Land in this area – details are set out later in this representation.</li> </ol> <p>3.7 Whilst the former is a matter for the Council to address via Minor or Main Modifications to the draft Local Plan Map, the latter is being promoted by TWG and will require adjustments to two policies in the DCBLP to ensure that the Gatwick Green highway infrastructure can be accommodated in the Safeguarded Land. Based on investigations by TWG's transport consultants, this infrastructure can be accommodated in the Safeguarded Land without prejudicing the provision of the longer-term highway proposals associated with the additional runway at Gatwick.</p> <p>3.8 Such a policy approach has been adopted in other Local Plans to address situations where future possible infrastructure requirements need to be accommodated alongside planned urban development proposals in a compatible manner. The benefit of this approach is that it avoids the need to overlay the two designations, which would be unnecessary and overcomplicate the Local Plan Map, making it difficult to interpret. Details of the proposed changes are noted in the conclusions to this representation. TWG considers that these changes to policies GAT2 and EC4 would be acceptable in soundness terms.</p> <p><b>4.0 Compatibility of Gatwick Green and a future additional wide-spaced runway</b></p> <p>4.1 The technical assessment by Mott MacDonald (Appendix 4) also addresses the wider compatibility between Gatwick Green and the proposed additional wide-spaced runway and related infrastructure. The assessments conclude that the Gatwick Green allocation is considered to be compatible with the future development of the airport for the following reasons:</p>

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			<ul style="list-style-type: none"> <li>• It would not block or prevent any critical infrastructure (such as runways, railways or terminal buildings) that are required to safeguard for an additional wide-spaced runway to the south of the existing airport.</li> <li>• It would not hinder sustainable aviation growth at Gatwick Airport and is therefore fully compatible with any policy requirement to safeguard land for future national requirements.</li> <li>• The site can be developed so as to be fully compliant with the land use requirements for PSZs13, as described in the DfT's Circular 'Control of Development in Airport Public Safety Zones' published in March 2010, in terms of the types of buildings and infrastructure proposed and the intensity of people within the individual third party risk contours.</li> <li>• Gatwick Green can be designed so as to be fully compliant with all other aspects of Aerodrome Safeguarding that need to be considered to protect flight safety from the airport, i.e. in relation to heights of all buildings, bird strike hazard, cranes, lasers, glare and confusing patterns of lights. These will be taken into account and continue to be addressed as the scheme is developed through its design lifecycle.</li> <li>• Gatwick Green would be compatible with the Airport's short-term expansion plans for the use of the standby runway under GAL's proposed DCO application.</li> </ul> <p>4.2 The evidence contained in Appendix 4 therefore demonstrates that Gatwick Green can be developed in a way that is entirely compatible with an additional wide-spaced runway, to allow:</p> <ul style="list-style-type: none"> <li>• Future access to the retained surface airport-related car parking areas adjoining Gatwick Green.</li> <li>• Future access to Gatwick Green and airport related car parking from the A23 diversion under the additional runway scheme.</li> <li>• Highway infrastructure for Gatwick Green which is not prejudicial to the future provision of the additional runway highways.</li> <li>• An access road for Gatwick Green within the Safeguarded Land between the Gatwick Green allocation and the M23 spur road that can form part of the division of Balcombe Road required for the additional runway scheme, upgraded as required.</li> <li>• Land uses within the Gatwick Green site located within the Airport's existing Public Safety Zone (PSZ) that are compatible with the uses / activities permissible in the PSZ under current aviation regulations/guidance.</li> <li>• The development of Gatwick Green without it conflicting with the aerodrome safeguarding requirements<sup>14</sup>.</li> <li>• The development of Gatwick Green without it conflicting with any of the requirements under the Development Consent Order (DCO) proposals for the use of the standby runway.</li> </ul> <p><b>Discussions between TWG and GAL</b></p> <p>4.3 Appendix 6 contains a statement setting out the scope of matters discussed between TWG and GAL relating to access to Gatwick Green and safeguarding for the delivery of a wide-spaced second runway to the south of Gatwick. The discussions focused on points of technical detail on five key areas relating to the interface between the surface access infrastructure required to serve Gatwick Green and the proposed additional wide-spaced runway</p>

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			<p>south of Gatwick. No agreement has been reached between the parties, but some progress has been made and parties intend to continue discussions with intent to arriving at a Statement of Common Group (SoCG) prior to the DCBLP Examination.</p> <p><b>5.0 Minor adjustments to the Safeguarded Land and the allocation for Gatwick Green – amendments to the Local Plan Map</b></p> <p>5.1 The site plan submitted as part of TWG’s representations on the DCBLP 2020 (March 2020) contained three mapping errors with regard to the land owned by TWG. Two small parcels of land north west of Rivington Farm and adjacent to Royal Oak House owned by TWG were erroneously omitted from the land shown on the plan as being owned by TWG. In addition, the Council has in error omitted a parcel of land owned by TWG from the allocation – this relates to a parcel of land fronting Peeks Brook Lane north of Royal Oak House. It was Crawley Borough Council’s intention to allocate all of the land owned by TWG under Strategic Policy EC4 (except the Safeguarded Land south of the M23 spur road), but owing to the mapping errors, parts of the land near Rivington Farm and Royal Oak House were omitted from the allocation and inadvertently included as Safeguarded Land. The parcels of land are shown on the plans at Appendix 7.</p> <p>5.2 This error only affects 5,589 sqm (0.56 ha) of land – the inclusion of these areas would result in a very minor loss of Safeguarded Land. Based on the evidence provided by Mott Macdonald on the need for Safeguarded Land for airport-related surface car parking (Appendix 4), it is considered that loss of these small areas of future surface car parking would not prejudice the future development of an additional wide-spaced runway and associated surface access requirements. It is therefore proposed that in order to effect an efficient use of land resources and the proper and effecting planning of the area, the draft Local Plan Map should be adjusted to correct these mapping errors.</p> <p>5.3 There is also a discrepancy between the land safeguarded between the Gatwick Green allocation and the M23 spur road as detailed in para 3.3 above. This has resulted in a mapping error in respect of the amount of land required to be safeguarded south of the M23 spur road to accommodate all of GAL’s future additional runway related access infrastructure. The result is that the Safeguarded Land in this area is not sufficient to accommodate all the surface access infrastructure associated with the possible additional wide-spaced runway, comprising new slip roads from the M23. The revised extent of this Safeguarded Land is shown on the plan at Appendix 5. It is therefore proposed that the draft Local Plan Map should be adjusted accordingly to correct this additional mapping error.</p>

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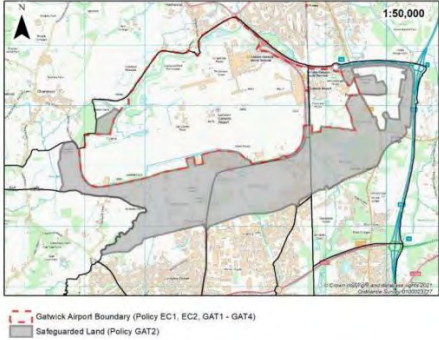
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			<p><b>Appendix 1: Site Plan</b></p>  <p><b>Appendix 2: Plan 21 from Gatwick Airport Master Plan, 2019</b></p>  <p><b>Appendix 3: Plan 20 from Gatwick Airport Master Plan, 2019</b></p>  <p><b>Appendix 5: Safeguarded Land south of the M23 spur road and a conceptual highway alignment for the access to Gatwick Green</b></p> 

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			<p><b>Appendix 4: Gatwick Green: Safeguarding - Mott MacDonald</b></p> <p><b>1 Introduction</b></p> <p>1. Crawley Borough Council released the Draft Crawley Borough Local Plan (DCBLP / Plan) for consultation on 6 January 2021, for responses by 30th June 2021. This statement forms an appendix to representations by Savills on behalf of the Wilky Group (TWG) to Policy GAT2 (Safeguarded Land), which relates to (1) land designated in the Plan as safeguarded for the potential future development of an additional wide-spaced southern runway for Gatwick Airport, and (2) the deletion of land previously safeguarded to accommodate the allocation of Gatwick Green as a comprehensive industrial-led development of predominantly storage and distribution uses.</p> <p>2. In this statement, Section 2 provides an Executive Summary. Section 3 addresses the importance of Airport Master Plans and what they should contain given they are required for land-use planning purposes. Section 4 assess the need for, and alternatives to, the land safeguarded for airport car parking related to a potential future wide-spaced southern runway. Section 5 will focus on compliance of Gatwick Green with aerodrome safeguarding requirements for operational flight safety. Section 6 addresses compatibility with the Airports DCO expansion proposals. Section 7 provides overall conclusions.</p> <p>3. This appendix has been prepared by Mott MacDonald's airport planning team, supported by transport planners who specialise in airport surface access within an Integrated Transport Division. Both the airport and transport planning teams are very experienced in providing airport masterplans and surface access strategies to airports of all sizes. They operate in a global market and have a track record of working for some of the busiest and most complex international hub airports. This includes providing both airport and transport planning services to Singapore Changi Airport, New York JFK Airport and London Heathrow Airport on major airport masterplans and new terminal development projects within the last 5 years.</p> <p><b>2 Executive Summary</b></p> <p>4. Crawley Borough Council has published the DCBLP with an area of Safeguarded Land under Policy GAT2 for a future additional wide-spaced runway at Gatwick Airport. The Plan also allocates 47 ha of previously Safeguarded Land to accommodate an industrial-led Strategic Employment Location (SEL) known as Gatwick Green to meet the long-standing unmet economic needs of the Borough.</p> <p>5. The Council set out its approach to planning for Gatwick Airport in a Topic Paper (Topic Paper 2: Gatwick Airport, January 2021). This sets out the in-principle case for safeguarding land for a future additional wide-spaced runway but excludes the land to be allocated for Gatwick Green. This is on the grounds it is not needed for critical airport infrastructure and that no robust evidence has been presented to justify its use for a large area of surface car parking.</p> <p>6. The Aviation Policy Framework (APF, 2013) is Government policy that introduced the need for airports, as critical transport infrastructure, to provide Master Plans. These are to be based on an analysis of options and under GAL's</p>



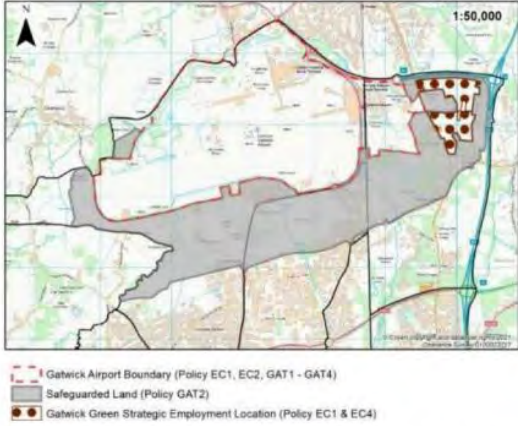
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			<p>Economic Regulation License are subject to consultation with the local community. The guidance supports the provision of a plan to show land safeguarded for these needs, which the National Planning Policy Framework (NPPF) requires is based on 'robust' evidence of the infrastructure that is 'critical' to the delivery of the expansion scheme. Master Plans form a key part of the evidence for local authorities to prepare local plans, including the designation of safeguarded land in line with national planning policy in the NPPF.</p> <p>7. Airport Master Plans are required to provide robust forecasts of passenger numbers and air transport movements and translate these into infrastructure requirements and the land needed to accommodate those. The Gatwick Airport Master Plan 2019 (GAMP) contains three plans that relate to the proposed additional wide-spaced runway (Plans 20, 21 and 22). However, in respect of the extent of long-stay car parking, these plans are not supported by the robust analysis and options development work that is required by the NPPF. The Council's Topic Paper is therefore supported in relation to its findings on airport related surface car parking.</p> <p>8. UK airports are all seeking to achieve an increasing rate of modal shift in passenger surface access from private vehicles to more sustainable modes of transport. These trends can be seen in increasingly ambitious mode-share targets that will continue in the context of the climate crisis. At Gatwick Airport, the share of passengers traveling to the airport by non-car modes of transport is forecast to increase from 44% in 2018, to 48% by 2022. This trend has and will continue to reduce the proportion of passengers that will require long-stay car parking. Consequently, the increase in passenger numbers over time will have a proportionally smaller effect on the need for long-stay airport car parking.</p> <p>9. There are various considerations for, and approaches to, the provision of airport-related car parking associated with an additional wide-spaced runway at Gatwick. The GAMP describes a short- to medium-term future (5 to 15 years) in which, consistent with these trends and other considerations, there is proportionally less land identified for airport-related long-stay car parking. This is being achieved through greater modal shift to public transport and denser (more land-efficient) car parking products that are common at UK airports.</p> <p>10. In contrast, the approach to safeguarding for the long-term future additional wide-spaced runway in the GAMP inconsistently reverts to largely conventional surface car parking, that does not acknowledge the trends in modal shift and recent parking intensification projects that have already been, or are planned to be, undertaken. The approach of safeguarding this land for surface parking does not therefore represent an efficient use of land given that there are more compact alternatives though decked and robotic parking, which the airport is already adopting and are in line with the Airport's Surface Access Strategy.</p> <p>11. The GAMP contains no robust evidence to justify the extent of land safeguarded for surface car parking, in terms of either demand or design solutions. Given this lack of evidence, the increasing use of alternative modes of surface access and the emerging alternatives to traditional surface car parking, the land occupied by Gatwick Green is not</p>

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			<p>considered to be critical to the delivery of an additional widespaced southern runway. No additional evidence to justify the current extent of safeguarding has been seen.</p> <p>12. The GAMP is GAL's public position on airport expansion and safeguarding for future expansion, required under Government policy. It is therefore reasonable for any public authority to expect the GAMP to justify future land use requirements and policy. In this regard, the GAMP falls short of fulfilling these requirements and accordingly the Council has allocated some of the surface parking area for critical economic infrastructure.</p> <p>13. In relation to Aerodrome Safeguarding, Gatwick Green is fully compatible with the requirements to protect flight safety from inappropriate developments and protecting third party risk in accordance with DfT Public Safety Zones.</p> <p>14. In the context of the Airport's Development Consent Order application for short-medium term expansion using the standby runway to expand the airport to 70 MPPA by 2032 (GAMP) and up to 74 MPPA by 2038 (EIA Scoping Report), Gatwick Green is fully compatible with these plans and no concerns have been raised by GAL in its discussions with TWG.</p> <p>15. Safeguarding considerations associated with highway access to an expanded Gatwick Airport, including additional slip roads from the M23, the diversion of the A23 and access to retained safeguarded longstay parking areas are addressed in a separate statement appended to representations by Savills on behalf of TWG.</p> <p>16. Overall, this appendix demonstrates that the development of Gatwick Green would be fully compatible with safeguarding for the development of an additional wide-spaced southern runway (and associated critical infrastructure) and would not hinder the sustainable growth of Gatwick Airport.</p> <p><b>3 Airport Master Plans: purpose and scope</b></p> <p>17. The Aviation Policy Framework (APF, 2013) provides current Government policy on aviation. The APF notes that the Government recommends that airports continue to prepare Master Plans as a clear statement of intent regarding the future development of an airport so that this can be given due consideration in local planning purposes. Guidance on Airport Master Plans is now contained in the APF, which recommends that the more ground covered and more extensive the consultation, the greater its value in informing future land use, transport and economic planning processes. Airport Master Plans are therefore the key document that should justify the extent of safeguarded land for future expansion.</p> <p>18. The APF states that whilst Master Plans are not expected to contain detailed engineering drawings, they should "...contain sufficient information, including drawings where appropriate, so that they may be clearly understood by the lay person as well as professionals..". The APF goes on to state that where long-term land requirements for future development need to be identified, the "...additional land and property involved, including those associated with PSZs and safety surfaces, should be clearly identified to minimise long-term uncertainty and non-statutory</p>

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			<p>blight". It is therefore clear that Airport Master Plans are expected to be prepared as the basis for longer term land-use planning (para B.1), and that any safeguarded land should minimise long term blight (para B.5).</p> <p>19. Past and current aviation policy envisages several pre-requisites for Airport Master Plans: (1) to be based on detailed analysis and planning work, (2) to contain sufficient information, and (3) that such land should minimise long-term uncertainty and blight.</p> <p>20. National planning policy contained in the National Planning Policy Framework (NPPF) adds further important advice on the scope and depth of evidence needed to justify the safeguarding of land for airport expansion. Airport Masterplans are a key evidence source for addressing the requirements of national planning policy. The NPPF states that planning policies should "identify and protect, where there is robust evidence, sites and routes which could be critical in developing infrastructure to widen transport choice and realise opportunities for large scale development; ..." (para 104(c)). This advice is replicated in the APF (para 5.8).</p> <p>21. It is therefore important to consider the Gatwick Airport Master Plan and examine whether it contains the robust evidence necessary including analysis into future demand needs, options development, evaluation and selection to justify the extent of land required to accommodate infrastructure that is critical to the expansion proposals. Safeguarding is not justified unless such robust evidence and clear justification is demonstrated.</p> <p><b>4 Airport – Safeguarded Land</b>  <b>4.1 Policy Context – GAT2: Safeguarded Land</b></p> <p>22. The DCBLP includes a chapter relating to Gatwick Airport, including Policy GAT 2, addressing land safeguarding for a second wide-spaced runway as shown in Figure 4-1 below.</p>  <p>Figure 4-1. Extract from DCBLP showing proposed safeguarding area</p>

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			<p>23. This is supported by Topic Paper 2 relating to Gatwick Airport, which provides further context regarding aviation safeguarding policy, referencing the national Aviation Policy Framework (APF, 2013) and the National Planning Policy Framework (NPPF, 2019).</p> <p>23. This is supported by Topic Paper 2 relating to Gatwick Airport, which provides further context regarding aviation safeguarding policy, referencing the national Aviation Policy Framework (APF, 2013) and the National Planning Policy Framework (NPPF, 2019).</p> <p>24. The DCBLP excludes the Gatwick Green employment site from the safeguarded area, which is shown in Figure 4-1 and justified in the supporting text to Policy GAT2 and in Topic Paper 2. The approach is justified by the need to meet Crawley's economic needs and that surface airport car parking does not represent an efficient use of the land given the availability of more land-efficient options, such as decked and robotic parking (para 3.4.1, Topic Paper 2).</p> <p>25. The policy framework for safeguarding land outside airports that may be required for future airport development is noted in the main representation on Policy GAT2 by Savills. This appendix focuses on assessing compliance with the NPPF based on the evidence in the GAMP. No other evidence to justify the extent of current safeguarding has been seen, and the key document where safeguarding needs would be expected to be set out and justified is the Masterplan.</p> <p>26. The NPPF (2019) notes that the means of protecting such land for future airport expansion is local plans. As noted at paragraph 19, it is required that in planning for such protection, land identified for future development should be based on 'robust' evidence to justify sites and routes that are 'critical' to that infrastructure.</p> <p>27. In summary, the basis for safeguarding land is local plans and safeguarding is not justified unless this NPPF test for 'robust' evidence and clear justification as to the 'critical' need for infrastructure and extent of land is demonstrated.</p> <p><b>4.2 Gatwick Green Development</b></p> <p>28. The Gatwick Green development proposes to provide a comprehensive industrial-led development of predominantly storage and distribution uses in an area of land to the east of Balcombe Road (Figure 4-2). The DCBLP states that, "This area excluded from safeguarding is essential to meet Crawley's employment floorspace needs and is allocated in Policy EC1 as a Strategic Employment Location". This is on the grounds that "Given the constrained land supply within the borough and its significant employment and housing needs the council does not consider surface parking to represent an efficient use of land."</p>

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			 <p>The map shows the Gatwick Airport area with a red dashed line for the airport boundary, a grey shaded area for safeguarded land, and several brown dots representing strategic employment locations. A scale of 1:50,000 and a north arrow are also present.</p> <p> <span style="color: red;">- - -</span> Gatwick Airport Boundary (Policy EC1, EC2, GAT1 - GAT4)  <span style="background-color: grey; border: 1px solid black; display: inline-block; width: 10px; height: 10px;"></span> Safeguarded Land (Policy GAT2)  <span style="color: brown;">●</span> Gatwick Green Strategic Employment Location (Policy EC1 &amp; EC4)         </p> <p><b>Figure 4-2. Extract from Draft Local Plan showing Strategic Employment Location</b></p> <p><b>4.3 Gatwick Airport Master Plan(s)</b>  <b>4.3.1 Current Gatwick Airport Master Plan (2019)</b></p> <p>29. Gatwick Airport Limited (GAL) published its most recent Gatwick Airport Master Plan in 2019 (GAMP). This document describes three possible future scenarios for the growth and development of the airport. Scenario 1 assumes the continuation of the existing single runway operation and indicates growth up to 61 million passengers per annum (MPPA) by 2032. Scenario 2 assumes the existing emergency runway, put into dependent use, could add between 10 and 15 aircraft movements in peak hours, increasing capacity to 70 MPPA by 2032 (GAMP) and up to 74 MPPA by 2038 (EIA Scoping Report). Scenario 3 considers that a new wide-spaced southern runway could be delivered within approximately 10 years of starting the planning process and could take capacity up to 95 MPPA.</p> <p>30. The GAMP includes clause 5.4.12 regarding southern runway safeguarding that states, “The area of land currently safeguard for the additional runway was based on a much earlier scheme developed by the previous airport owners, BAA. This currently safeguarded area is illustrated in Plan 21.” Figure 4-3 reproduces the GAMP Safeguarded Land. Figure 4-4 reproduces the conceptual Airport Layout within the Safeguarded Land.</p>

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			<div style="display: flex; justify-content: space-around;"> <div data-bbox="636 293 1200 678"> <p>PLAN 21 - Safeguarded land Additional Runway</p> <p>Figure 4-3. Safeguarded Land Extract from Gatwick Airport Master Plan 2019</p> </div> <div data-bbox="1361 293 1921 678"> <p>PLAN 20 - Airport Layout Additional Runway</p> <p>Figure 4-4. Airport Layout Extract from Gatwick Airport Master Plan 2019</p> </div> </div> <p>31. The landside transport section of the GAMP (published in 2019) summarises and is based on the preceding Airport Surface Access Strategy (ASAS), published in 2018. The ASAS includes information relating to car-parking provisions and public transport mode share (see section 4.5 below), which includes their ever increasing sustainable transport targets, but the ASAS does not indicate how these might affect the amount of land that may be needed in the future to accommodate car parking related to the decreasing proportion of passengers that will travel to the airport by private car.</p> <p>32. GAL has initiated a DCO process related to plans to put the Emergency Runway into continuous operational use. The government site for National Infrastructure Planning indicates that this is at preapplication stage, with EIA scoping reports having been submitted in September 2019. The scoping report indicates that GAL is pursuing Scenario 2 (emergency runway use), and not actively pursuing Scenario 3 (additional wide-spaced runway) but nevertheless GAL considers it in the national interest for land to continue to be safeguarded.</p> <p><b>4.3.2 History of Master Plans for Gatwick Airport</b></p> <p>33. In justification for the extent of land safeguarding for a future additional wide-spaced runway, the GAMP refers back to earlier Master Plans in clause 5.4.12, “The area of land currently safeguard for the additional runway was based on a much earlier scheme developed by the previous airport owners, BAA.</p> <p>34. GAL published previous Airport Master Plans in 2005 and 2012. The 2005 Master Plan states, “The area required for landside airport facilities to the east of the railway needs to be substantially extended, primarily for car parking and road access to the new (third) terminal.” and, “The boundary to the east of the railway corresponds with that indicated in the White Paper.” The 2012 Master Plan references safeguarding for a second runway stating, “The area for landside airport facilities to the east of the railway would need to be substantially extended to accommodate a transport</p>


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			<p>interchange (including areas for coach parking and car rental), car parks and front line ancillary facilities such as offices and hotels.” It should be noted that front line ancillary facilities such as offices and hotels are not referenced in the later GAMP 2019 as part of the basis for land safeguarding. Of critical importance is that these earlier Master Plans, like the GAMP, do not provide ‘robust evidence’ to justify the extent of land required for safeguarding for future car-parking needs. Nor is such evidence contained in the surface access strategy for Gatwick Airport (Airport Surface Access Strategy - ASAS, May 2018), which predated the GAMP.</p> <p>35. The safeguarded land associated with a wide-spaced runway originated in the Aviation White Paper (The Future of Air Transport, DfT, 2003), which has since been withdrawn. This paper did not include any justification for an extent of safeguarded land, but did state, “It must be stressed that the map was only indicative, pending detailed design work and submission of a planning application by the operator. The map should not therefore be taken to be a formal safeguarding map.”</p> <p>36. It is apparent that in all the published Airport Master Plans (2005, 2012, 2019) and also in the Airport Surface Access Strategy (2018), there is no explicit or evidenced design rationale for the extent of safeguarded land for car parking areas associated with an additional wide-spaced runway. The high-level plans provide the only basis for the extent of safeguarding, and in respect of land for long-stay parking, there is no assessment of need, alternative options development, evaluation and selection, as would constitute a rigorous master plan process. As such, the criterion for robust evidence in the NPPF is not considered to have been met.</p> <p><b>4.4 Gatwick Airport – Car Parking Trends</b></p> <p>37. The number of car parking spaces at Gatwick has been increased since the publication of the 2005 Master Plan. The projected demand for parking has also been updated with each subsequent Master Plan.</p> <p><b>Table 4-1 History of Existing and Projected Demand for Car Parking at Gatwick</b></p> <table border="1"> <thead> <tr> <th rowspan="2"></th> <th rowspan="2"></th> <th colspan="2">2005 Master Plan</th> <th colspan="2">2012 Master Plan</th> <th colspan="2">2019 Master Plan</th> </tr> <tr> <th>Existing</th> <th>2015 Demand Projection</th> <th>Existing</th> <th>2020 Demand Projection (40 MPPA)</th> <th>Existing</th> <th>2023 Demand Projection</th> </tr> </thead> <tbody> <tr> <td><b>Short-Stay</b></td> <td></td> <td>4,100</td> <td>4,720</td> <td>4,960</td> <td>6,500</td> <td>4,902</td> <td>9,402</td> </tr> <tr> <td rowspan="3"><b>Long-Stay</b> (inc. Valet and 'holiday')</td> <td>On Airport</td> <td>27,134</td> <td>30,000</td> <td>28,855</td> <td>30,000</td> <td>34,098</td> <td>39,163</td> </tr> <tr> <td>Off Airport Approved</td> <td>21,350</td> <td>21,350</td> <td>-</td> <td>-</td> <td>21,200</td> <td>21,200</td> </tr> <tr> <td>Un-approved</td> <td>2,400</td> <td>-</td> <td>5,800</td> <td>Decreased</td> <td>-</td> <td>-</td> </tr> <tr> <td></td> <td><b>Sub-total</b></td> <td><b>50,862</b></td> <td><b>51,350</b></td> <td>-</td> <td>-</td> <td><b>55,298</b></td> <td><b>60,363</b></td> </tr> <tr> <td><b>Staff</b></td> <td></td> <td>-</td> <td>10,000</td> <td>7,000</td> <td>-</td> <td>6,200</td> <td>6,200</td> </tr> <tr> <td><b>TOTAL</b></td> <td></td> <td><b>54,962</b> (exc. Staff)</td> <td><b>66,070</b></td> <td><b>33,815</b> (exc. staff &amp; off-airport)</td> <td><b>+6,000 by 2020</b></td> <td><b>60,200</b></td> <td><b>69,765</b></td> </tr> </tbody> </table> <p>38. The previous Master Plans show a trend of increasing parking provision to support growth in air-traffic. This is summarised in the GAMP as a growth of 19.5% from 32,640 public spaces in summer 2010 to 39,000 spaces in</p>			2005 Master Plan		2012 Master Plan		2019 Master Plan		Existing	2015 Demand Projection	Existing	2020 Demand Projection (40 MPPA)	Existing	2023 Demand Projection	<b>Short-Stay</b>		4,100	4,720	4,960	6,500	4,902	9,402	<b>Long-Stay</b> (inc. Valet and 'holiday')	On Airport	27,134	30,000	28,855	30,000	34,098	39,163	Off Airport Approved	21,350	21,350	-	-	21,200	21,200	Un-approved	2,400	-	5,800	Decreased	-	-		<b>Sub-total</b>	<b>50,862</b>	<b>51,350</b>	-	-	<b>55,298</b>	<b>60,363</b>	<b>Staff</b>		-	10,000	7,000	-	6,200	6,200	<b>TOTAL</b>		<b>54,962</b> (exc. Staff)	<b>66,070</b>	<b>33,815</b> (exc. staff & off-airport)	<b>+6,000 by 2020</b>	<b>60,200</b>	<b>69,765</b>
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			<p>summer 2017. Unapproved off-airport parking has been reduced, while more intensified car parking arrangements have been accommodated within the Airport's operational area.</p> <p>39. In each case, there has been a predicted growth in demand over the following 5 to 10 years. This has been accommodated within the existing land ownership boundary through a variety of measures to intensify the parking density on the site. For example, the 2012 Master Plan stated, "These additional spaces are expected to be provided by a mixture of decking and multi-storey car park construction on the site of existing surface car parks".</p> <p>40. Similarly, the GAMP describes recent and planned car parking projects that continue this intensification trend further within the next 5 years; "We have recently completed a project to deck part of South Terminal's long-stay car parking to provide an additional 1,565 spaces..." and "we have identified two sites for additional multi-storey car parking, one at each terminal. MSCP 7 would create approximately 3,000 spaces in a multi-storey structure on the site of a current staff car park located just to the north of North Terminal. MSCP4 at the South Terminal would create approximately 1,500 spaces...". Combined with "3,500 spaces delivered by consolidation of our long-stay self-park product into one site and optimising the configuration of current storage areas" these projects "deliver 9,565 extra spaces throughout the period, or an increase of 24.5% from 2017 capacity".</p> <p>41. Looking forward, the GAMP indicates that the same approach would be followed for longer-term growth over the next 15 years (corresponding to a capacity range of 57 to 61 MPPA); "Additional car parking, or parking required to replace existing spaces lost owing to other developments, can be provided by decking more of the long stay car parks at North and South Terminals, as required. We are also exploring the use of machine assisted parking technology in the longer term to increase the capacity and utilisation of existing car parks."</p> <p>42. The EIA scoping report for the emergency runway DCO describes that "approximately 46,700 parking spaces were available in summer 2018 within the airport boundary" (including staff parking) and a further 21,196 authorised spaces off-airport. Projects to increase car-parking associated with the application include, "a new multi-story car parking capacity: 4,250 spaces" and "Use of robotics technology within existing long stay parking areas resulting in an additional 2,500 spaces". This would result in a total of 53,450 spaces on-airport.</p> <p>43. The total provision of new parking also considers; "to replace existing parking spaces, lost due to development associated with the Project" ... "The overall net increase in car parking spaces would be approximately 17,500". Existing and new parking areas are shown in Figure 4-5 in green and purple respectively.</p>



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			 <p data-bbox="622 759 1167 778">Figure 4-5. Existing and Project car-parking – EIA scoping report, Volume 2, Figures.</p> <p data-bbox="622 810 2033 930">44. There are a number of trends in car parking provision under the DCO that should be highlighted including the ratio of parking spaces to airport passengers and staff; the correlation with mode-share shift and targets; the relative ratio of short-stay and long-stay parking, and the intensification of parking density through decking, MSCPs, configuration optimisation and robotic parking systems.</p> <p data-bbox="622 951 2033 1129">45. It is clear from these trends that considerable increases in car-parking provision have been achieved since the 2005 Master Plan (31,234 passengers + 7,200 staff) to summer 2018 (39,000 + 6,200 staff), with a further 9,565 spaces planned (GAMP 2019) up to a total of 17,500 new and replacement (EIA scoping). This has been achieved within the airport boundary (with a further 22,000 authorised spaces off-airport) enabling growth from 32.8 MPPA to a throughput of 46.4 MPPA in 2018 and more than doubling to a planned capacity of 70 MPPA by 2032 (GAMP) and up to 74 MPPA by 2038 (EIA Scoping Report).</p> <p data-bbox="622 1150 2033 1270">46. The land safeguarded for a wide-spaced runway to the south was first established in the Aviation White Paper in 2003 and has been carried forward with some adjustments through Airport Master Plans to date. It is apparent that the extent of the Safeguarded Land in the GAMP has not considered the achievements described above, including the intensification of car-parking land-use within the existing airport boundary between 2005 and 2032.</p> <p data-bbox="622 1291 1335 1318"><b>4.5 Gatwick Airport – Sustainable Transport Mode Share</b></p> <p data-bbox="622 1323 2033 1377">47. GAL has emphasised its commitment to a sustainable transport policy in its ASAS (2018); “Gatwick’s commitments are to improve our public transport mode share for passengers and staff, provide sustainable travel choices and</p>

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			<p>reduce the environmental impacts of surface access” and in the GAMP, “We expect to be held to our commitment to promote sustainable travel for our passengers and staff, and we will work with our partners and service providers to deliver safe and efficient access 24 hours a day, seven days a week”.</p> <p><b>Table 4-2. History of Mode Share at Gatwick</b></p> <table border="1"> <thead> <tr> <th></th> <th>2004</th> <th>2011</th> <th>2017</th> </tr> </thead> <tbody> <tr> <td>Private Car</td> <td>51.7%</td> <td>42.4%</td> <td>38.6%</td> </tr> <tr> <td>Hire Car</td> <td>2.3%</td> <td>1.8%</td> <td>0.9%</td> </tr> <tr> <td>Taxi</td> <td>15%</td> <td>13.3%</td> <td>15.4%</td> </tr> <tr> <td>Bus/Coach</td> <td>6.8%</td> <td>6.7%</td> <td>5.9%</td> </tr> <tr> <td>Rail</td> <td>24%</td> <td>35.5%</td> <td>39%</td> </tr> <tr> <td>Other</td> <td>-</td> <td>0.3%</td> <td>0.2%</td> </tr> </tbody> </table> <p><small>Source: 2005, 2012 Master Plans and 2018 ASAS, referencing CAA passenger surveys in preceding years</small></p> <p>48. The historical trend of a mode share shift towards public transport is apparent from the recent and past published Airport Master Plans. While taxi, bus and coach use has not altered significantly, the biggest transition is to rail (up by 15% over 13 years) and away from private cars (down by 13% in the same timeframe).</p> <p>49. In 2012, it was stated that of the 42.4% using private cars, “Car parking is an essential function of the airport operation with around 22% of passengers accessing the airport by a private car, which is parked here”.</p> <p>50. This led to GAL setting targets in the GAMP to further progress this trend of mode-share shift, as shown in Figure 4-6. This has in effect superseded the earlier mode share targets contained in the ASAS to 2022 and noted at paragraph 34. These include rail to increase to 45% by 2030, an increase in use of bus and coach by staff and passengers, and a reduction in staff parking spaces, all corresponding to sustainable travel initiatives.</p>		2004	2011	2017	Private Car	51.7%	42.4%	38.6%	Hire Car	2.3%	1.8%	0.9%	Taxi	15%	13.3%	15.4%	Bus/Coach	6.8%	6.7%	5.9%	Rail	24%	35.5%	39%	Other	-	0.3%	0.2%
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Figure 4-6. Mode share targets, extracted from GAMP 2019

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			<p>51. During the independent Airports Commission study, each of the sites made submissions to outline their proposals to deliver additional runway capacity. GAL's submissions included an indication of its plans for Surface Access that stated; "Gatwick will achieve the highest use of sustainable modes of transport: it will achieve a 60% public transport mode share for customers (46m by 2050) and a 50% sustainable mode share for staff". These were illustrated in the graphs shown in Figure 4-7 and Figure 4-8:</p> <div style="display: flex; justify-content: space-around;"> <div data-bbox="622 456 1285 820"> <p>FIGURE 1: CHANGE IN MODE SHARE (AIR PASSENGERS)</p> <table border="1"> <caption>Estimated data for Figure 1: Change in Mode Share (Air Passengers)</caption> <thead> <tr> <th>Year</th> <th>Private Car</th> <th>Public Transport</th> <th>Taxi &amp; Hire Car</th> </tr> </thead> <tbody> <tr> <td>2008</td> <td>48%</td> <td>35%</td> <td>15%</td> </tr> <tr> <td>2010</td> <td>42%</td> <td>42%</td> <td>15%</td> </tr> <tr> <td>2012</td> <td>40%</td> <td>45%</td> <td>15%</td> </tr> <tr> <td>2020</td> <td>35%</td> <td>50%</td> <td>15%</td> </tr> <tr> <td>2030</td> <td>30%</td> <td>55%</td> <td>15%</td> </tr> <tr> <td>2040</td> <td>28%</td> <td>60%</td> <td>12%</td> </tr> <tr> <td>2050</td> <td>28%</td> <td>62%</td> <td>10%</td> </tr> </tbody> </table> </div> <div data-bbox="1384 480 2002 820"> <p>FIGURE 2: CHANGE IN MODE SHARE (EMPLOYEES)</p> <table border="1"> <caption>Estimated data for Figure 2: Change in Mode Share (Employees)</caption> <thead> <tr> <th>Year</th> <th>Car Driver</th> <th>Public Transport</th> <th>Other sustainable modes</th> </tr> </thead> <tbody> <tr> <td>2012</td> <td>65%</td> <td>22%</td> <td>5%</td> </tr> <tr> <td>2020</td> <td>55%</td> <td>28%</td> <td>5%</td> </tr> <tr> <td>2030</td> <td>48%</td> <td>35%</td> <td>5%</td> </tr> <tr> <td>2040</td> <td>40%</td> <td>40%</td> <td>5%</td> </tr> <tr> <td>2050</td> <td>38%</td> <td>40%</td> <td>10%</td> </tr> </tbody> </table> </div> </div> <p>Figure 4-7. Mode share targets, extracted from SD6 Surface Access submitted to Airports Commission</p> <p>Figure 4-8. Mode share targets, extracted from SD6 Surface Access submitted to Airports Commission</p> <p>52. Significant progress has been made since 2004 in improving the public transport mode share from 31% in 2004 (bus/coach and rail) to 45% in 2017 for passengers. Targets associated with the development of a wide-spaced runway to the south aim to continue to improve to over 60% by public transport for passengers and over 50% for staff (up from 30% in 2012). All of this contributes to a decreasing dependency on surface access by private car (and thereby parking) by passengers and staff as a mode share percentage that offsets any growth in air-traffic.</p> <p>53. This significant change has taken place since the Aviation White Paper in 2003 and should also be considered when updating any assessment of the land area required to be safeguarded for landside infrastructure for surface access associated with an additional wide-spaced runway to the south.</p> <p><b>4.6 Airport Industry Trends in Car Park Intensification</b></p> <p>54. Airports typically cover considerable land areas, and within landside areas car parking is one of the significant drivers of land-use, of which a significant proportion of this can be surface parking for longstay. Airports are also in the relatively unique position of firstly knowing that many of these cars are going to be parked for a considerable period (from days to weeks) and having predictability of when the vehicles will require to be collected/accessed from</p>	Year	Private Car	Public Transport	Taxi & Hire Car	2008	48%	35%	15%	2010	42%	42%	15%	2012	40%	45%	15%	2020	35%	50%	15%	2030	30%	55%	15%	2040	28%	60%	12%	2050	28%	62%	10%	Year	Car Driver	Public Transport	Other sustainable modes	2012	65%	22%	5%	2020	55%	28%	5%	2030	48%	35%	5%	2040	40%	40%	5%	2050	38%	40%	10%
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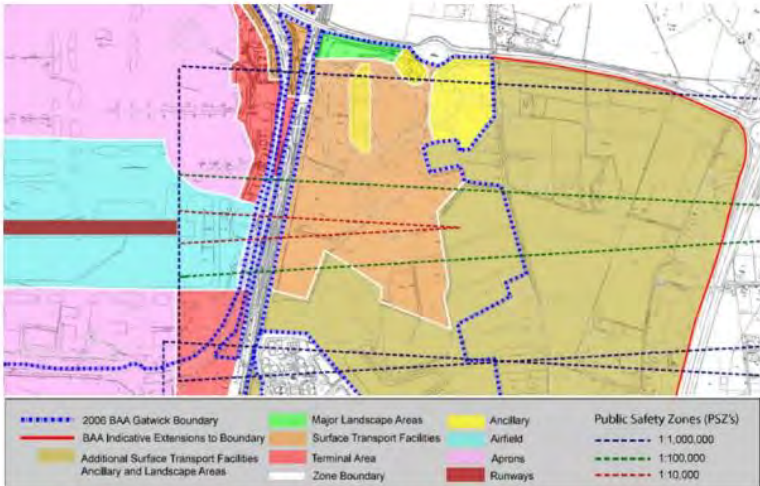
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			<p>booking systems. This enables unique opportunities for land-use efficiency, which have been adopted (due to valid business cases) at airports around the UK. The following paragraphs note some examples.</p> <p>55. Block parking is a system in which vehicles that do not need to be accessed for a finite period can be arranged in a dense grid without the need for circulation roadways (that can accommodate shuttle buses) that are typical of surface parking. This is often used for valet products and could also be applied to long-stay car parks with appropriate management. Figure 4-9 shows an example from Manchester Airport.</p> <p>56. Robotic parking is a further evolution of block parking. This approach uses robots to position cars in a grid array in a similar fashion to block parking. However, because there is not a valet driver who needs to exit the vehicle by opening the doors, it is possible to arrange cars with a smaller gap between adjacent vehicles. The robotic technology has been developed and has been trialled at Charles de Gaul Airport in Paris and at Gatwick Airport, which Stanley Robotics reports to achieve 50% more vehicles within the same area relative to conventional surface parking. Figure 4-10 shows an example image.</p> <div style="display: flex; justify-content: space-around;"> <div data-bbox="651 703 1290 1155">  </div> <div data-bbox="1335 711 2000 1147">  </div> </div> <p style="text-align: center;"> <span data-bbox="651 1174 1133 1193">Figure 4-9. Example of block parking at Manchester Airport, UK</span> <span data-bbox="1335 1166 1621 1185">Figure 4-10. Example of robotic parking</span> </p> <p>57. Decked car-parking provides a low-cost, light-weight structural solution that typically allows for an increase in parking density by creating a relatively easily accessible second level of parking, roughly doubling the number of cars that can be accommodated each area.</p> <p>58. Multi-storey car parks offer the greatest number of vehicles in a given area. They are typically used for short-stay applications at airports where space and land-value are at a premium. However, this is not universally the case. An</p>

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			<div data-bbox="622 293 1272 746" data-label="Figure"> </div> <p data-bbox="622 762 1272 783">Figure 4-11. Sites considered for long-stay car parking in the Heathrow 3<sup>rd</sup> runway EIA scoping report</p> <p data-bbox="622 810 2047 962">59. All these examples provide case studies of ways in which car-parking land use can be intensified in an airport context. It is also important to note that many of these options have been adopted by Gatwick Airport in the recent past and form part of its plans for future growth, including the emergency runway DCO application, while remaining within its existing operational/land-ownership boundary. These innovative and more intense parking arrangements could equally be applied to the Airport's further growth as part of its wide-spaced southern runway proposals.</p> <p data-bbox="622 979 1173 1007"><b>4.7 Conclusions – GAT2: Safeguarded Land</b></p> <p data-bbox="622 1015 2047 1102">60. Safeguarded land is required to protect for a future additional wide-spaced runway to the south of the existing airport. It is recognised that this expansion of the airport would require the development of a new terminal building and associated surface access infrastructure.</p> <p data-bbox="622 1120 2047 1208">61. The extent of the land required for long-stay car parking – for the increase in capacity from 74 MPPA to 95 MPPA and to replace existing car parking facilities displaced by other airport land-uses – has not been demonstrated with robust evidence to satisfy the requirements of the NPPF.</p> <p data-bbox="622 1225 2047 1378">62. This appendix has considered the significant developments in car parking provision since the DfT Aviation White Paper was produced in 2003. This includes considerations associated with sustainable transport policy; trends in mode share shift to public transport and the targets to progress these further to meet the objectives of the Airports Commission; the intensification of car parking land-use that has taken place and is planned under the DCO scoping proposals at Gatwick within existing land, block parking and valet parking products successfully adopted at other UK</p>

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			<p>airports and finally the automated parking products and solutions that are available for use today that would enable further intensification of long-stay parking.</p> <p>63. The GAMP provides no robust evidence to support the extent of land safeguarded for surface car parking: on the contrary, trends in automated and multi-storey parking point clearly to the ability of GAL to accommodate its parking requirements in a significantly reduced safeguarded area. Furthermore, the Gatwick Green development does not block or prevent any critical infrastructure (such as runways, railways, terminals, new or diverted primary access roads) that are fundamentally required to be safeguarded for an additional wide-spaced runway to the south of the existing airport.</p> <p>64. Taking all these factors into account Gatwick Green cannot be considered an incompatible development as it does not hinder sustainable aviation growth at Gatwick Airport. It is therefore fully compatible with any policy requirement to safeguard land for future national requirements. It also cannot be an inappropriate development, given the long-standing requirement for Strategic Employment Locations now addressed by the allocation of Gatwick Green in Strategic Policy EC1.</p> <p>65. As such, the Gatwick Green allocation is entirely consistent with the policy and guidance on safeguarding for transport / aviation infrastructure contained in the NPPF (2019), the APF (2013) and the draft Aviation Strategy (2018).</p> <p>66. The GAMP fails to justify safeguarding of the extent in the current adopted Policy GAT2 (adopted DCBLP, 2015). In the absence of such robust evidence, there is no case to justify the need for the Gatwick Green land for surface car parking as it is not critical to delivering the airport's infrastructure.</p> <p><b>5 Aerodrome Safeguarding</b></p> <p>67. This section focuses on the compliance of the Gatwick Green industrial-led proposal as provided for in the allocation in the DCBLP (Strategic Policy EC4) with the Gatwick Airport Public Safety Zones (PSZs).</p> <p><b>5.1 Compliance with Public Safety Zone requirements</b></p> <p>68. Public Safety Zones (PSZs) are areas of land at the ends of the runways at the busy airports, where restrictions are in place to reduce the risk of death or injury in the event of an aircraft accident on take-off or landing. These restrictions relate to development to avoid high density or high frequency uses within the higher risk zones.</p> <p><b>5.1.1 Risk Contours &amp; Permissible Development</b></p> <p>69. In a previous report produced by Arup (Gatwick Green-BAA Interim Master Plan Review Study, December 2006), the PSZs are shown for Gatwick Airport. The report states that the PSZs were derived from the DfT white paper consultation document (SERAS Stage Three: Appraisal of Findings Report, Figure 2.2, Option EIB) prepared by Halcrow. An extract of the PSZs is shown in Figure 5-1. Of the three risk contours in the Arup report, only the 1:100,000 and 1:1,000,000 PSZ risk contours extend across the Gatwick Green site:</p>

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			<p>a. The 1:100,000 PSZ covers only part of the development site situated either side of Fernhill Road.                      b. The 1:1,000,000 PSZ covers the entire Gatwick Green development site</p>  <p><b>Figure 5-1. Public Safety Zones for Gatwick Airport</b>                      Extract from the Gatwick Green-BAA Interim Master Plan Review Study, December 2006</p> <p>70. This report provides a description of the limitations on development uses within these two risk contours that were published by DfT at the time of the report in 2006, as follows:</p> <p>a. Permitted use within the 1:100,000 individual risk contour includes long stay car parking, open storage and low occupancy warehouses, low occupancy buildings for plant and machinery, and low intensity use public spaces.</p> <p>b. Permitted use within the 1:1,000,000 individual risk contour: any land uses, except high density land uses such as schools, hospitals and places of assembly that should generally be located outside the 10-6 (1 in 1,000,000) contour, but considered on a case-by-case basis.</p> <p>71. In summary, land uses are restricted in a small part of the Gatwick Green site within the 1:100,000 risk contour, and unrestricted in the area outside this contour. In the DfT Circular 'Control of Development in Airport Public Safety Zones' published in March 2010, updates are provided to the permissible development uses within the 1:100,000 risk contour and outside of the 1:10,000 risk contour (which at Gatwick lies within the airport boundary). This update excludes extensions and changes of use for new or replacement development, which involve a low density of people living, working or congregating – the changes are as follows:</p>

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			<p>a. Change of use of land should not increase the number of people living, working, or congregating in or at the property or land beyond the current level or, if greater, the number authorised by any extant planning permission. There is a general presumption against new developments (residential and non-residential) within Public Safety Zones (1:100,000 risk contour) with the following exceptions:</p> <p>b. Development Permissible within the 1:100,000 Public Safety Zone includes:</p> <ul style="list-style-type: none"> <li>i. Long stay and employee car parking where minimum stay is expected to exceed six hours.</li> <li>ii. Open storage and certain types of warehouse development in which a small number of people are likely to be present within a sizable site. This would exclude development for more intensive uses, such as distribution centres, sorting depots and retail warehouses.</li> <li>iii. Development of a kind likely to introduce very few people on to the site on a regular basis such as unmanned structures, and buildings housing plant or machinery.</li> <li>iv. Public open space, in cases where there is a reasonable expectation of low intensity use. This would exclude children's playgrounds or sports grounds.</li> </ul> <p>c. The planning of new Transport Infrastructure within the 1:100,000 risk contour requires careful consideration of the type and intensity of use:</p> <ul style="list-style-type: none"> <li>i. New transport infrastructure such as railway stations, bus stations and park and ride schemes should not be permitted within Public Safety Zones, as they would result in a concentration of people for long periods of the day.</li> <li>ii. Although people passing along a transport route are likely to be within the PSZ for only a very small part of the day, the average density of occupation within the zone may be significant. Major roads and motorways should be assessed in terms of the average density of people.</li> <li>iii. Low intensity transport infrastructure, such as minor or local roads, can be permitted within PSZs.</li> <li>iv. Careful attention should be given to the location of major road junctions and to related features such as traffic lights and roundabouts, which may lead to an increase in the number of stationary vehicles within the PSZ.</li> </ul> <p>72. Overall, these changes have no impact on development at Gatwick Green outside the 1:100,000 risk contour. The changes therefor apply to the small part of the Gatwick Green site within the 1:100,000 risk contour.</p> <p><b>5.1.2 Application to and considerations for the Gatwick Green Development Framework Plan</b></p> <p>73. The Gatwick Green Development Framework Plan (DFP) shown in Figure 5-2 below, shows the potential developable area, proposed access points and perimeter / core landscape buffers. The 1:100,000 PSZ depicted by the dashed black line, is an extract from the DfT White Paper referred to in paragraph 69.</p>



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			<div style="display: flex; justify-content: space-around;"> <div data-bbox="622 284 1256 699"> </div> <div data-bbox="1294 284 1989 699"> </div> </div> <p>Figure 5-2. Gatwick Green: Development Framework Plan</p> <p>Figure 5-3. Gatwick Green: Highway and Access Arrangements</p> <p>74. The DFP will not include any new non-residential building plots within this zone, which is appropriate.</p> <p>75. Some staff car-parking is likely to be included within the PSZ, which is compatible with the DfT regulation, provided that such is used for long-stay and employee car-parking where the minimum stay is expected to exceed six hours, i.e. this would be acceptable for regular commuting for a daily shift pattern, but would not be considered appropriate for short-stay or visitor parking.</p> <p>76. The local roads within the Gatwick Green development are likely to fall into the description of 'minor or local roads', which are therefore permitted within and crossing the PSZ.</p> <p>77. The roundabouts (or signalised junctions) within the PSZ could lead to an increase in the number of stationary (occupied) vehicles and would therefore need to be further assessed with regard to the intensity / density of people within the PSZ to demonstrate compatibility with the DfT guidelines. Relatively little congestion on these local roads would not be an issue but would need to be confirmed following a traffic assessment.</p> <p>78. A significant grade-separated roundabout is proposed on the diverted A23, within the Gatwick Airport highway scheme in GAL's submissions to the Airports Commission (relating to a new wide-spaced runway to the south of the existing airport). This is located within the PSZ.</p> <p>79. While this roundabout does not form a part of the Gatwick Green DFP, it could potentially be used as a future means of access to the Gatwick Green development. The roundabout is shown in the GAMP in the context of the DfT guidelines on PSZs.</p>

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			<p>80. As the Gatwick Green masterplan is developed as part of an outline planning application, further consideration can be given to whether other non-intense uses could be accommodated within the PSZ as being compatible with the DfT guidelines described above. Examples of other permissible uses could include:</p> <ol style="list-style-type: none"> <li>a. Unoccupied buildings such as sub-stations or other infrastructure plant.</li> <li>b. Drainage swales, reed beds or dry surface water attenuation ponds for rainfall attenuation, as part of a Sustainable Urban Drainage Scheme (SUDS), provided that any wet ponds are netted (if applicable) to mitigate the risk of bird strike hazard.</li> <li>c. Other landscaping features / biodiversity, provided that they do not encourage a high intensity of use by people (such as play-grounds or sports fields), or act as an attractant to birds (such as a food source or nesting grounds).</li> </ol> <p>81. It is worth noting that the required size of PSZ risk contours are generated from risk-based analyses that are undertaken every 7 years and are based on forecast air-traffic for the next 15 years, combined with historical accident data regarding the probability of air traffic accidents and typical impact areas.</p> <p>82. Over time, aircraft accidents have become increasingly rare (despite growing air-traffic) as aircraft technology and systems have improved flight performance in terms of safety and reliability, particularly with the fleet replacement to new aircraft types. PSZs have not changed significantly in the UK in the last decade, which has led to a review of PSZ policy. Globally, there is an initiative to reduce the protection areas around aerodromes to take account of the flight and safety performance of airports and new aircraft types.</p> <p><b>5.2 Other Aerodrome Safeguarding Requirements</b></p> <p>83. There are general aerodrome safeguarding requirements that must be considered for developments near airports. These include:</p> <ol style="list-style-type: none"> <li>a. Bird strike hazards</li> <li>b. Dangerous and confusing lights</li> <li>c. Obstacle limitation surfaces</li> </ol> <p>84. Gatwick Green will ensure that bird strike hazards are mitigated by considering all reasonable measures to discourage birds from gathering under the departure and arrival flights paths of Gatwick Airport. Such measures could include netting any open sources of water and avoiding vegetation that would be an attractive food source.</p> <p>85. Dangerous and confusing lights refer to general glare and glare from directional lighting, but more importantly lasers because brief exposure can cause temporary blindness. This will be considered in the design of Gatwick Green to ensure dangerous lighting risks are avoided or mitigated.</p>

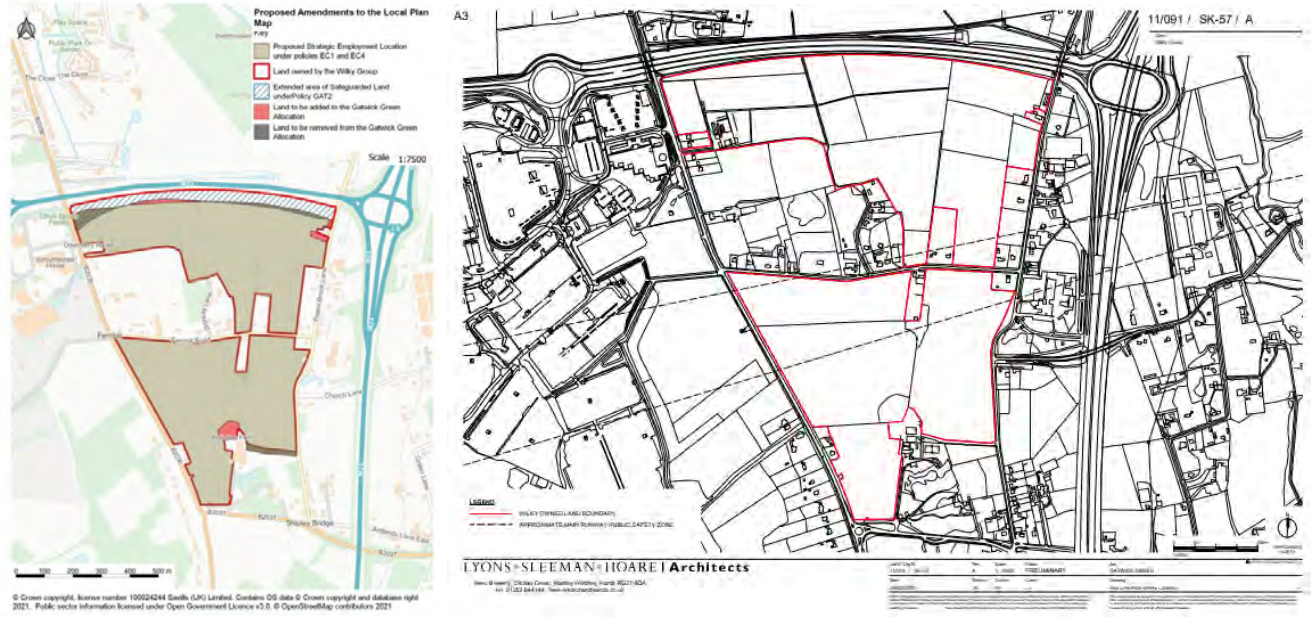
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			<p>86. Obstacle limitation surfaces that are applicable to Gatwick Green are the departure and arrival surfaces which prevent tall buildings from being built in the path of arriving and departing aircraft. This will be considered to ensure that any buildings do not infringe these surfaces, including temporary obstacles such as cranes during construction.</p> <p><b>5.3 Conclusions – Aerodrome Safeguarding</b></p> <p>87. The PSZ risk contours that are applicable to the Gatwick Green site have been identified. It has been demonstrated that the permitted uses related to the PSZs are well understood and that the development of Gatwick Green as an industrial-led scheme for predominately storage and distribution uses with ancillary offices, leisure and retail uses could be comfortably designed to be compliant.</p> <p>88. The general aerodrome safeguarding requirements applicable to Gatwick Green have been identified and these will be considered to ensure that the Gatwick Green development will be compliant.</p> <p><b>6 Accommodating the airport expansion DCO requirements</b></p> <p>89. GAL are in the process of applying for a Development Consent Order (DCO) to convert its standby runway (also referred to as its emergency runway) to an operational runway for regular use in dependent operating modes with the existing main runway. A review of the DCO proposals has indicated that there are no conflicts between the Airport’s standby runway expansion plans and Gatwick Green.</p> <p><b>7 Conclusions</b></p> <p>90. A review has been undertaken in relation to the future need for safeguarded land for airport-related car parking; the limitation on land uses and development within the PSZs; the requirements of the current airport expansion plans under the DCO, and considerations on aerodrome safeguarding. These reviews have concluded as follows:</p> <p>a) The Aviation Policy Framework introduced the need for airports, as critical transport infrastructure, to identify future airport expansion needs. It recommends that airports continue to prepare Master Plans as a clear statement of intent so that this can be given due consideration in local planning purposes.</p> <p>b) The National Planning Policy Framework (NPPF) states that there must be ‘robust evidence’ to identify and protect sites and routes ‘critical’ to developing transport infrastructure to widen choice and realise opportunities for large scale development.</p> <p>c) An Airport Master Plan should provide the robust evidence to justify the requirements for safeguarded land for infrastructure that is critical to the expansion of the airport via a new runway.</p> <p>d) The Gatwick Airport Master Plan, published in 2019, indicates an area of safeguarded land for a future additional wide-spaced runway to the south of the existing airport, including an extensive area indicated for surface long-stay car parking between the London-Brighton mainline and the M23. It does not include any analysis or justification for the extent of this land area, instead deferring to preceding Master Plans, that also omit these details.</p>

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			<p>e) In the recent past, two trends have dominated car parking requirements at Gatwick Airport, both of which are intended to be progressed further in current plans and targets. Firstly, there has been a significant improvement in modal shift to public transport principally from private cars to rail. Secondly, that additional car parking required to support growth in air traffic has been accommodated within existing airport owned land though the intensification of parking. GAL intends to continue both these trends to support anticipated growth over the next 15 years.</p> <p>f) There is no robust evidence available to justify the current extent of surface parking, that was initially indicated over 15 years ago. The Airport Masterplan of 2019, and hence the apparent justification for safeguarding, was not updated to take into account the well-established and continuing trends of a shift to sustainable public transport, parking density, valet parking and more recent innovative automated parking products that are more landefficient.</p> <p>g) GAL's approach of safeguarding for surface parking in its Master Plan does not represent an efficient use of land given that there are more land-efficient alternatives including valet, block, decked and robotic parking. Whilst the airport is already adopting some of these more efficient parking methods and these are included in the Airport's stated sustainable transport / surface access strategy, there is no reference to these efficiencies in the plan shown for extensive surface parking for the wide-spaced runway. This evidence supports the Council's decision to remove part of this land proposed for safeguarding for extensive surface car parking and instead allocate it for an industrial-led development to meet critical unmet needs is fully justified.</p> <p>h) The Gatwick Green allocation is also considered to be compatible with the future development of the airport for the following reasons:</p> <ul style="list-style-type: none"> <li>• It does not block or prevent any critical infrastructure (such as runways, railways, roads or terminal buildings) that are required to safeguard for an additional wided spaced runway to the south of the existing airport.</li> <li>• It does not hinder sustainable aviation growth at Gatwick Airport and is therefore fully compatible with any policy requirement to safeguard land for future national requirements.</li> <li>• The site can be developed to be fully compliant with the land use requirements for PSZs, as described in the DfT's Circular 'Control of Development in Airport Public Safety Zones' published in March 2010. This applies to the types of buildings and infrastructure proposed and the intensity of people within the individual third-party risk contours.</li> <li>• Gatwick Green can be designed to be fully compliant with all other aspects of Aerodrome Safeguarding that need to be considered to protect flight safety from the airport, i.e. in relation to heights of all buildings, bird strike hazard, cranes, lasers, glare and confusing patterns of lights. These will be considered and continue to be addressed as the scheme is developed through its design lifecycle.</li> <li>• Gatwick Green is compatible with the Airport's short-term expansion plans for the use of the standby runway under GAL's proposed DCO application.</li> </ul>

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			<p><b>Appendix 6: Matters for Discussion relating to Access Between Gatwick Airport Ltd and the Wilky Group</b></p> <p><b>Matters for Discussion Relating to Access Between Gatwick Airport Ltd and The Wilky Group</b></p> <p>The following summarises those matters associated with the proposed development at Gatwick Green, on which Gatwick Airport, (GAL) and The Wilky Group, have discussed technical feasibility in relation to surface access. It is recognised that this represents discussions on points of technical detail only and this note is therefore a report on their current position. Most of the issues relate to safeguarding for the delivery of the wide-spaced second runway to the south of Gatwick (herein referred to as R2) for which a Masterplan has been published.</p> <p>These discussions have not considered, nor do they relate to the determination of the Gatwick Green allocation for development within the Crawley Local Plan. Instead, the discussions consider some detailed aspects of the Gatwick Green Allocation that would benefit from review in the event that the principle of the allocation was to be taken forward, in order to minimise the incompatibility between any allocation and the R2 Masterplan.</p> <p><b>Relevant matters</b></p> <p>The following matters have been discussed between the parties.</p> <ol style="list-style-type: none"> <li>1. The diversion of Balcombe Road in an East/West alignment across the northern sector of the Gatwick Green site south of the M23 Spur</li> <li>2. The alignment of the proposed southbound off-slips from the M23 along with the northbound on-slips which have been designed to serve the new R2 terminal. These are shown on the plans received from GAL, to cross the northern sector of the GG site.</li> <li>3. The proposed access arrangements into GG from the re-aligned A23 road to the west of the GG site, currently shown as a link, off a new roundabout just south of Fernhill Road.</li> <li>4. The need to ensure access to zones, (retained in the areas surrounding GG) for the provision of airport parking, including where those access routes may impact on the Gatwick Green site.</li> <li>5. Access to Gatwick rail station via Buckingham Gate, (on Balcombe Road) for buses, pedestrians and cyclists</li> </ol> <p>The items for consideration focus on the issues which may be agreed in principle, (largely relating to matters of detail), should the allocation be confirmed as “sound” following the EIP and the Inspectors Report.</p> <p><b>Progress towards in principle understanding and agreement.</b></p> <p>Some progress has been made towards identifying the technical principles relating to access to Gatwick Green and the relationship with infrastructure associated with the R2 Masterplan. Whilst no agreement has been reached on any matter at this time, (June 2021), the parties will continue discussions. These will endeavour to support a formal</p>

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			<p>statement of common ground once the representations have been submitted and in the lead up to the Local Plan Examination. This would be without prejudice to GAL's position on the acceptability in principle of the proposed allocation on the Crawley Local Plan of Gatwick Green.</p> <p><b>Suggested Modifications:</b></p> <p><b>6.0 Conclusions</b></p> <p>6.1 It is concluded that against the tests of soundness at para 35 of the NPPF, <b>Policy GAT2 is sound</b> as it effectively reconciles the immediate need for critical economic development in Crawley Borough and the long term possibility of an additional wide-spaced runway at Gatwick Airport. This is a sound and positive approach to policy, which is justified by the Council's evidence contained in Topic Paper 2 (Gatwick Airport), Topic Paper 5 (Employment Needs and Land Supply) and the SA/SEA, and so is effective and consistent with national planning and aviation policy.</p> <p>6.2 Whilst Policy GAT2 is sound, there are some minor changes to policy to ensure that the efficient and effective use of land resources is achieved. These minor changes are referred to in this representation.</p> <p>6.3 It is therefore considered that the following two amendments should be made to the DCBLP to ensure that Gatwick Green's highway infrastructure can be accommodated in the Safeguarded Land between Gatwick Green and the M23 spur road in a way that is fully compatible with the future highway infrastructure required to serve the possible additional wide-spaced runway:</p> <p><b>1. Strategic Policy EC4 (Gatwick Green) should include a clause that allows for the required highway infrastructure to encroach into the Safeguarded Land between the Site and the M23 spur road</b>, on the proviso that it is designed and implemented so as to provide part of the future diversion of Balcombe Road and that the highways would not prejudice the future provision of motorway slip roads associated with the possible future additional wide-spaced runway. A proposed change to Strategic Policy EC4 is addressed in Savills representation on behalf of TWG on Policy EC4.</p> <p><b>2. Policy GAT2 (Safeguarded Land) should include a provision that states that any highway infrastructure associated with the Gatwick Green allocation under Strategic Policy EC4 can be accommodated in the Safeguarded Land between the Site and the M23 spur road</b>, on the proviso that such infrastructure must not prejudice the future provision of motorway slip roads associated with the possible future additional wide-spaced runway.</p> <p>6.4 In addition, the following amendments should be made to the Safeguarded Land on the Local Plan Map.</p> <p><b>3. Amend the Safeguarded Land on the draft Local Plan Map between Gatwick Green and the M23 spur road so as to accommodate the proposed spur roads from Junction 9 on the M23</b> to serve a future possible additional wide-spaced runway –the extent of the Safeguarded Land is as show on the Plan at <b>Appendix 5</b>. As a consequence, some small parcels of land would be removed from / added to the land allocated as a Strategic Employment Location (Gatwick Green) on the draft Local Plan Map under Strategic Policy EC4.</p>

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			<p><b>4. Amend the Safeguarded Land on the draft Local Plan Map</b> to exclude the small parcels of land owned by TWG on the plan at <b>Appendix 7</b>. As a consequence, these parcels of land would be included in the area allocated as a Strategic Employment Location (Gatwick Green) on the draft Local Plan Map under Strategic Policy EC4.</p> <p>6.5 In relation to the proposed changes to the DCBLP at 1 and 2 above, revisions to Policy GAT2 have been made and are attached at <b>Appendix 8</b>.</p> <p><b>Appendix 7: Proposed Amendments to the Local Plan Map Red Line Plan (Wilky Control)</b></p>  <p><b>Appendix 8: Proposed Changes to Policy GAT2</b>  <b>Proposed changes to the Draft Crawley Borough Local Plan 2021-2037 (January 2021)</b>  <b>Savills on behalf of the Wilky Group</b>  <b>Changes to policy / text</b>  Proposed changes to the policies and text of the DCBLP are set out below and are indicated by the following means:  Additions: underlined  Deletions: crossed out</p>

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			<p><b>Policy GAT2: Safeguarding Land</b>  <b>“Safeguarding for a second runway</b>  <i>The Local Plan Map identifies land that is safeguarded from development which would be incompatible with expansion of the airport to accommodate the construction of an additional wide-spaced runway (if required by national policy) together with a commensurate increase in facilities that contribute to the safe and efficient operation of the expanded airport. Small scale development within this area, such as residential extensions, will normally be acceptable. <u>In addition, access/highway infrastructure associated with the Gatwick Green allocation will be acceptable within the Safeguarded Land between the allocation and the M23 spur road, and can be provided in a way that is compatible with the expansion of the airport to accommodate highway infrastructure associated with the construction of an additional wide-spaced runway.</u> The airport operator will be consulted on all planning applications within the safeguarded area. Planning applications for noise sensitive development will be considered on the basis of Air Noise Map – Additional Runway – Summer Day – 2040 as shown at Plan 31 of the Gatwick Airport Master Plan and in the Local Plan Noise Annex.”</i></p> <p><b>Reasoned Justification</b>  .....  <i>“10.21 The Gatwick Airport Master Plan requests that local planning authorities use the revised safeguarding boundary shown in the Master Plan. The council has considered the Airport Layout: Additional Runway shown in Plan 20 of the Master Plan and has included within the Local Plan safeguarded boundary the land that would be required to accommodate a southern runway, including the diversion of the A23. However, the Local Plan safeguarded boundary has not included all the land east of the Balcombe Road which is shown in the Master Plan as being utilised for a large area of surface car parking. Given the constrained land supply within the borough and its significant employment and housing needs, the council does not consider surface parking to represent an efficient use of land. The Airport is already accommodating parking more efficiently through decked and robotic parking, and its Surface Access Strategy seeks to reduce access to the airport by car. This area excluded from safeguarding is essential to meet Crawley’s employment floorspace needs and is allocated in Policy EC1 as a Strategic Employment Location. <u>Access to the Strategic Employment Location from Balcombe Road and a road to serve the Gatwick Green allocation can be accommodated in the Safeguarded Land between the allocation and the M23 spur road, in a manner that is compatible with the future provision of highway infrastructure associated with an additional wide-spaced runway: Policy GAT2 provides for this arrangement.”</u></i></p>
REP/056	Gatwick Airport Limited	GAT2	<p>4. We support the new Policy GAT2.</p> <p>5. We also support the detailed wording of the policy (compared to Policy GAT of the 2015 Crawley Local Plan). In particular the revised wording closes loopholes in the previous wording on temporary uses that some developers had sought to exploit.</p>



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			<p>6. However, as we object to the loss of safeguarded land through the new allocation of 24.1 hectares to the east of Gatwick as a strategic employment site (Draft Policies EC1 and EC4), for reasons set out later in these representations; we also contend that para 10.21 of the reasoned justification should be removed and the Local Plan Map and Figure on page 133 updated accordingly.</p> <p><b>Suggested Modifications:</b></p>
REP/068	Sussex Wildlife Trust	GAT2	<p>We note that there has been uncertainty from the LPA about this policy throughout the consultation process, but that it has now been incorporated back into the submission version of the plan. SWT is concerned that points we raised in our original early engagement consultation September 2019 have not been clearly addressed. We highlighted that CBC have not currently made it clear what the safeguarded land would be considered potentially suitable for if the safeguarding was removed. SWT does not support the expansion of the airport, it must be made clear what the potential impacts on the land, and in particular those areas of high biodiversity value, will be if the safeguarding is removed to ensure that the policy is in line with section 170 and 174 of the NPPF.</p> <p><b>Suggested Modifications:</b></p>
REP/087	Woodland Trust	GAT2	<p>The policy should ensure that no areas of ancient woodland or veteran trees are included in this land safeguarded for future airport development.</p> <p>In particular, we are concerned that the proposed area includes the following ancient semi-natural woodlands (ANSW):</p> <ul style="list-style-type: none"> <li>• Allen's Wood ASNW (Grid reference: TQ3003540208)</li> <li>• Huntsgreen Wood ASNW (Grid reference: TQ2828540024)</li> <li>• Horleyland Wood ASNW (Grid reference: TQ2898240539)</li> <li>• Rowley Wood ASNW (Grid reference: TQ2791939226)</li> <li>• Unnamed ASNW at TQ2955640750</li> </ul> <p>In addition, we are concerned about the proximity of the site to Black Corner Wood ASNW (Grid reference: TQ2996939934).</p> <p><b>Suggested Modifications:</b></p> <p>The policy should be amended to ensure that no areas of ancient woodland or veteran trees are included in this land safeguarded for future airport development.</p>
REP/091	Brunel Planning on behalf of COIF Nominees LTD c/o CCLA	GAT2	<p><b>Object:</b>  <b>Proposals Map 2021: Boundary of Gatwick Airport Safeguarded Land</b>  <b>Policy GAT2 – Safeguarded Land Not Sound</b></p> <p>The Gatwick Airport Safeguarded Land boundary as set out on the draft Proposals Map 2021 has been expanded further to the south and is proposed to cover a much larger area, than its position on the adopted Proposals Map 2015.</p> <p>The Gatwick Airport Safeguarded Land area on the draft Proposals Map 2021 now partially includes a significant portion of The Atrium site as shown above in Figure 1 (ii).</p>

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			<p><b>Brief Background</b></p> <p><b>Earlier Crawley Acceptance of Safeguarded Land</b>  For many years Crawley Borough Council has accepted having a safeguarded area north of the Manor Royal Industrial Estate and south of the Southern Perimeter Road of Gatwick Airport.</p> <p>But the Council always recognized that that a Strategic Employment Location between Manor Royal and Gatwick Airport would be welcome because ‘...this area is sustainably located adjacent to Manor Royal...’.</p> <p>However, the Council states in the current Local Plan that ‘...this area is currently constrained by safeguarding for a possible new runway at Gatwick...’ The Council stated that it would only assess opportunities in this area once the government has determined its approach towards additional runways.</p> <p>The area identified on the Local Plan Map was the area where it was considered that new development would be incompatible with the expansion of the airport to accommodate the construction of an additional wide spaced runway.</p> <p><b>2003 Aviation White Paper</b>  The original requirement to safeguard land for a second runway at Gatwick was contained in the 2003 Aviation White Paper. The land originally shown as safeguarded for a second runway in the Local Plan Map reflected that shown in the 2012 Gatwick Airport Masterplan.</p> <p><b>Airports Commission’s Final Report</b>  The Airports Commission Final Report considered the three shortlisted schemes, one of which was Gatwick Airport Ltd.’s Gatwick Second Runway Scheme (LGW-2R) proposal for a new full length runway to the south of and parallel to the existing runway at Gatwick.</p> <p>The Airports Commission concluded that the best answer was to expand Heathrow’s runway capacity, which would deliver the most ‘...substantial economic and strategic benefits...’ than the other options, and would best boost the productivity of the UK economy.</p> <p>Crawley Council fully recognized that the Airports Commission’s Final Report came down on the side of recommending to the Government that a further runway should be provided by the expansion of Heathrow Airport.</p> <p>However, the Council noted that this was a recommendation and stated at the time of the current Local Plan the area would continue to be safeguarded until a decision had been made by the Government, and depending on the Government’s response the Local Plan may need to be reviewed.</p> <p>The Council recognized that the review may need to include the future use of the currently Safeguarded Land ‘... if it is concluded at a national level that there is no requirement to safeguard it for additional runways...’</p>

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			<p><b>Government Agreement to Heathrow Expansion</b>  The Government confirmed that it agreed with and accepted the Airports Commission recommendation to build a new runway at Heathrow, as the best way to deliver new runway capacity in the South East.</p> <p>Crawley Council now have the opportunity to take advantage of the opportunity to remove their previously identified constraint and ‘...assess the opportunities in this area..’ as the Government has clearly determined its approach towards an additional runway.</p> <p><b>Gatwick Airport Master Plan 2019</b>  Gatwick Airport Ltd (GAL) appeared to have accepted the Government’s decision and reconsidered its approach to the provision of future runway capacity.</p> <p>GAL presented three growth scenarios for the airport’s longer-term future. These were:  Scenario 1: where Gatwick remains a single runway operation using the existing main runway;  Scenario 2: where the existing standby runway is routinely used together with the main runway;  Scenario 3: where GAL continue to safeguard Land for an additional runway to the south.</p> <p>GAL has decided to pursue Scenario 2 which they stated would make best use of the existing runways, and provide additional operational resilience, whilst offering capacity benefits whilst minimising development outside the existing airport boundary.</p> <p>They stated that this scenario would have the potential for an increase in passenger numbers of greater than 10 million passengers per annum, and would assist in delivering ‘...unmet Department for Transport forecasted aviation demand to 2050.’ That forecasted aviation demand was before the impact of the Covid pandemic.</p> <p>GAL state in the latest Master Plan that they will apply for a Development Consent Order following the nationally Significant Infrastructure Project (NSIP) route under the Planning Act 2008, to gain planning permission for the Scenario 2 development of a second full runway.</p> <p>However, GAL has also made the inconsistent statement that they ‘...would continue to safeguard land...’ for another runway to the south of the airport.</p> <p>Notwithstanding the Airports Commission’s work and recommendations, and the subsequent decision by the Government, GAL is in effect proposing to make Gatwick a three-runway airport.</p> <p>Rather than dramatically reducing or removing the previous Safeguarded Land for a potential second runway, as one might expect, GAL is suggesting this should remain in place, in effect to allow a potential third runway, and indeed that it should be expanded further cutting further into existing commercial development within Manor Royal.</p> <p>This is clearly a perverse planning response in the light of the Government decisions.</p>

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			<p>It is of course open to GAL as a commercial operator to attempt to bring about their preferred commercial approach, it would clearly be irrational for Crawley Borough, as the Local Planning Authority, to also adopt such an approach.</p> <p>In the Gatwick Master Plan 2019 GAL ask Crawley Council to accept their approach, stating that they 'recommend' to the Local Planning Authorities that they accept that their previous Safeguarded Land area is expanded, which would allow them to accommodate their third runway.</p> <p>The rational response from Crawley Council as the Local Planning Authority would be to not accept this recommendation from the airport operator. There is now no need to safeguard land to the north of Manor Royal.</p> <p><b>The Objection</b>  <b>Object:</b>  <b>Proposals Map 2021: Boundary of Gatwick Airport Safeguarded Land</b>  <b>Policy GAT2 – Safeguarded Land</b>  <b>Not Sound</b></p> <p>Draft Policy GAT2 – Safeguarded Land states that 'the Local Plan Map identifies land that is safeguarded from development which would be incompatible with expansion of the airport to accommodate the construction of an additional wide spaced runway together with a commensurate increase in facilities that contribute to the safe and efficient operation of the expanded airport...'</p> <p>COIF Nominees Ltd strongly objects to draft Policy GAT2 and the Gatwick Airport Safeguarded Land boundary as set out on the Draft Proposals Map 2021 (extract above, Figure 1 (ii)).</p> <p>The Atrium site and its location within Manor Royal is recognised throughout the Draft Local Plan 2021 as a principal business location and this area has been identified as being critical to the function of Crawley and that of the wider sub-region.</p> <p>In addition, the Draft Local Plan 2021 recognises that 'positive planning' and the Local Plan have a 'key role' to play in supporting the business led economic role of Manor Royal and must set 'a framework in place for wider improvements so that Manor Royal can go from strength to strength.'</p> <p>The approach Crawley Borough Council has taken in setting out the Gatwick Airport Safeguarded Land boundary on the draft Proposals Map 2021 is irrational and is not sound and goes against the positive planning strategy for employment land set out in Section 9 – Economic Growth of the Draft Local Plan 2021.</p> <p>As set out above, The Gatwick Master Plan 2019 confirms that Gatwick is no longer actively pursuing plans for an additional runway and that they will look to utilise the existing standby runway to the North for additional flights. There is therefore no need for safeguarded land to the south of Gatwick Airport.</p>

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			<p>It cannot be that GAL in deciding to use the existing standby runway as their seconds full runway, can reasonably propose to further increase the 'Safeguarded Land' boundary and not instead remove it, or dramatically reduce it from the adopted Local Plan position, so that they can pursue a third runway in the future.</p> <p>This approach will blight the strategic employment land and good employment growth prospects in critical areas of Crawley including Manor Royal.</p> <p>COIF Nominees Ltd have future plans to develop the Atrium site further for increased employment use. This accords with a key aim of both the Development Plan and the Draft Local Plan 2021.</p> <p>The expanded Safeguarded Land approach set out on the draft Proposals Map 2021 is not sound for the reasons set out above and conflicts with other key parts of the Draft Local Plan 2021.</p> <p>COIF Nominees Ltd therefore wish to see the Safeguarded Land boundary along the northern edge of Manor Royal, removed in light of the findings set out within the Gatwick Masterplan 2019 so that crucial employment land does not remain under this unnecessary constraint.</p> <p>4.14 COIF Nominees Limited strongly objects to Policy GAT2 and the Gatwick Airport Safeguarded Land boundary as set out on the draft Proposals Map 2021.</p> <p>4.15 The approach Crawley Borough Council has taken in setting out the Gatwick Airport Safeguarded Land boundary on the draft Proposals Map 2021 is irrational and not sound and goes against the positive planning strategy for employment land set out in Section 9 – Employment Growth of the Draft Local Plan 2021.</p> <p>4.16 As set out in this report, The Gatwick Master Plan 2019 confirms that Gatwick is no longer actively pursuing plans for an additional runway and that they will look to utilise the existing standby runway to the North for additional flights. There is therefore no need for safeguarded land to the south of Gatwick Airport.</p> <p>4.17 It cannot be that GAL in deciding to use the existing standby runway as their seconds full runway can reasonably propose to further increase the 'Safeguarded Land' boundary and not instead remove or dramatically reduce it from the adopted Local Plan position, so that they can pursue a third runway in the future.</p> <p>4.18 This approach will blight the strategic employment land and good employment growth prospects in critical areas of Crawley including Manor Royal.</p> <p><b>Suggested Modifications:</b></p> <p>4.19 COIF Nominees Ltd therefore wish to see the Safeguarded Land boundary along the northern edge of Manor Royal, removed in light of the findings set out within the Gatwick Master Plan 2019 so that crucial employment land does not remain under this unnecessary constraint.</p>

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REP/ 111	Resident 44	GAT2	<p>The land our property sits on has been safeguarded since 2007 and is to continue being safeguarded until 2037. This has blighted our home and impacted our life choices including our ability to downsize now our children have left home and I was medically retired from my job following an accident.</p> <p><b>Suggested Modifications:</b>  We would like to know which schemes are in place to support homeowners blighted by the safeguarding of land for future development of Gatwick Airport, such as the schemes in place for Heathrow and HS2, ie Property Hardship Scheme, Statutory Blight Notice and Express Purchase Scheme. We hold a Property Support Bond from Gatwick Airport and have had our house valued for this purpose, we would like to downsize as soon as possible. Having tried to sell our house repeatedly only to lose buyers when they find out the land is safeguarded for the foreseeable future, we need assistance from yourselves, the stress and hardship this has caused us is now taking its toll. Thank you.</p>
REP/ 120	Squires Planning on behalf of Residents	GAT2	<p>3.2. Should the plan be considered to be legally compliant we would flag the following areas where we do not consider the plan to be sound.</p> <p>Safeguarding for a second runway at Gatwick Airport</p> <p>3.3. The early engagement draft local plan and initial publication local plan are not available to view on the council's website. However, the published Topic Papers provide a useful chronology of how the strategy has evolved over time. The early reg 18 consultation draft echoed the adopted Local Plan in protecting and maximising the economic function of the designated main employment areas whilst supporting small extensions to Manor Royal. That consultation identified a shortfall of employment land supply of between 44.6ha and 57.63ha of business land between 2020 and 2035. An area of search for employment land was identified but with this area being within the land safeguarded for a second runway it could only take place once safeguarding had been clarified at a national level.</p> <p>3.4. The draft aviation strategy 'Aviation 2050' (December 2018) states in para. 3.66, "...it is prudent to continue with a safeguarding policy to maintain a supply of land for future national requirements and to ensure that inappropriate developments do not hinder sustainable aviation growth".</p> <p>3.5. It also references the National Planning Policy Framework (NPPF): "Planning policies should identify and protect, where there is robust evidence, sites and routes which could be critical in developing infrastructure to widen transport choice and realise opportunities for large scale development;" (para104 of the 2019 NPPF).</p> <p>3.6. The Aviation 2050 consultation document then goes on to state that: "The government believes that this provides sufficient guidance for local authorities to consider the future needs of airports and their associated surface access requirements, when developing local plans."</p> <p>3.7. It is therefore clear that the draft national guidance is to retain a safeguarding policy to maintain a future supply of land for national requirements. Paragraph 104(c) of the NPPF does however, qualify that guidance by requiring that policies should identify and protect such land only where there is 'robust evidence' that the area is critical in developing infrastructure to widen transport choice and realise opportunities for large scale development.</p>

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			<p>3.8. The view of Crawley Borough Council is that this does not 'provide a definitive steer as to whether or not the council would be required to safeguard land moving forward' (para 4.10 Topic Paper 5).</p> <p>3.9. Considering this interpretation, Crawley Borough Council through the Regulation 18 consultation sought views on two options. Option 1 to continue with the current safeguarding policy, or Option 2, not to include a policy to safeguard land for a potential future wide-spaced runway and instead to designate the area for a future Area Action Plan. It was hoped by the council that the principle of lifting safeguarding would be considered first through the Local Plan Examination. The onus would be on the airport operator (Gatwick Airport Ltd) to provide the "robust evidence" to justify the growth needs of the airport (i.e. a second runway) and the extent of the area needed to accommodate that growth.</p> <p>3.10. The issue with Option 2 is that there is a definitive steer as to whether the council is required to safeguard land. There has been no suggestion from Government that safeguarding of land at Gatwick for a possible new runway is no longer required and therefore paragraph 5.9 of the Aviation Policy Framework 2013 (APF) is extant: "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"</p> <p>3.11. The Airports Commission report (July 2015) shortlisted 3 schemes, one new northwest runway at Heathrow Airport; a westerly extension of the northern runway at Heathrow Airport; and one new runway at Gatwick Airport. Whilst the Gatwick option was found to be a credible option with lower environmental impacts, the commission felt that there were broader advantages to Northwest Runway at Heathrow Airport and concluded in favour of that option. The Government at that time neither supported nor rejected the recommendation.</p> <p>3.12. The current Crawley Local Plan was adopted in December 2015 after the airport commissions' recommendation and continued to safeguard the extent of land identified in the Gatwick Airport Masterplan as needed for the delivery of a second runway. The "Gatwick Green" site was, at that time, being promoted for an employment use, but the inspector rejected the proposals as the land may be required should a second runway be required. He commented in his Report to Crawley Borough Council (Nov 2015): "there is no compelling evidence to suggest it would not all be required should a second runway be built" and concluded that "it is difficult to identify on a contingent basis the precise area of land required for such a complex major project and it is not unreasonable to include some flexibility even if not all the land is ultimately used".</p> <p>3.13. The Government confirmed support for the Heathrow option on 25th October 2016 and subsequently published the Airports National Policy Statement (ANPS) in July 2018. This statement covered development required to 2030 and chose a new runway at Heathrow as the option to provide additional runway capacity in the south east. The Government has not 'established any relevant policies and proposals in response to the findings of the Airports Commission' (para 5.9 APF) beyond the Heathrow option. There is no strategy/policy after 2030 which would remove the need to protect land for future aviation needs. Indeed, the evidence suggests otherwise. The ANPS states: 'All major</p>

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			<p>airports in the South East of England (Gatwick, Heathrow, London City, Luton and Stansted) are expected to be full by the mid-2030s with four of the five full by the mid 2020s...There is relatively little scope to redistribute demand away from the region to less heavily utilised capacity elsewhere in the country' (para 2.12).</p> <p>3.14. The governments' aviation strategy 'Aviation 2050' has not progressed further and therefore the Aviation Policy Framework 2013 remains the relevant national policy guidance regarding safeguarding land for new runways, as it is not dealt with in the ANPS beyond 2030. Therefore, beyond 2030, a second runway at Gatwick could be needed and, in line with paragraph 5.9 of the APF, the land that may be required should be protected from incompatible development.</p> <p>3.15. In response to the DFT's aviation forecasts (2017), which predicted higher levels of growth than those taken account of in the Airports Commission's work due to accelerated growth at London's main airports, the government published "Beyond the Horizon - The Future of UK Aviation" (June 2018) which supports airports making the best use of existing runways to meet aviation demand to 2030. The document does not look beyond 2030.</p> <p>3.16. Further to this, the government states in Aviation 2050: While the government is not at the point of making a decision on long term need, it wants to seek views on how best to make any future decision, should that be required (3.12) The government will need to consider whether there is a need for further runways. Based on the current evidence, the government believes that any new framework for growth could accommodate additional runways beyond 2030 if a needs case is proven and suitable conditions are met in respect of sustainability (3.13)</p> <p>3.17. It is clear therefore that there may be a need for further runways beyond 2030 so it seems prudent to safeguard land that may be needed until further work has been undertaken. 2030 is only 9 years away and as land has been safeguarded for a possible second 18 runway at Gatwick Airport for such a long time it would be premature and short-sighted to lift safeguarding.</p> <p>3.18. Crawley Borough Council 'Topic Paper 2: Gatwick Airport' which is submitted by the council as part of this consultation confirms this in paragraph 3.3.2 and 3.3.3: "...the Inspector at the council's Advisory Visit from the Planning Inspectorate in April 2020 did not support the AAP approach. He advised that the Local Plan had to include a strategy to address Crawley's employment needs and stated that the removal of safeguarding cannot be regarded as certain." "...the Inspector advised that the submitted plan should continue to safeguard and instead contain a review trigger enabling the plan's whole development and spatial strategy to be reexamined should certainty be gained over national aviation policy on safeguarding and additional land become available for possible development."</p> <p>3.19. This advice is entirely correct and in accordance with national policy, existing and emerging as set out above. In addition, and about the need for 'robust evidence' as stated on para 104(c) of the NPPF to justify the extent of the safeguarded area, this is provided in the Gatwick Airport Masterplan 2019 which is based on extensive work over a number of years to identify the land needed to deliver a second runway should it be required.</p>



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			<p>3.20. The council, in response, has sought to retain the principle of safeguarding in line with the Inspector’s advice, but crucially, proposes to meet Crawley’s employment needs within the borough by reducing the area currently safeguarded, as shown on the adopted Local Plan Map. The area that has been promoted by and owned<sup>1</sup> by The Wilky Group for many years has been removed from the safeguarded area and allocated as an employment site under proposed Policy EC4. This, on the face of it, deals with both the issues of safeguarding and employment need.</p> <p>3.21. The issue with this approach is that it is not supported by evidence and is therefore contrary to current national policy in the Aviation Policy Framework 2013 (APF) and the governments draft aviation strategy ‘Aviation 2050’ (December 2018). The APF requires that ‘Land outside existing airports that may be required for airport development in the future needs to be protected against incompatible development’. Existing Crawley Borough Council Local Plan Policy GAT2 does just that and defines ‘incompatible development’ in the supporting text: “Incompatible development within safeguarded land is regarded as development which would add constraints or increase the costs or complexity of the development or operation of an additional runway” (paragraph 9.18).</p> <p>3.22. The policy itself provides clarity on what type of development is acceptable: “Minor development within this area, such as changes of use and small scale building works, such as residential extensions, will normally be acceptable.”</p> <p>3.23. The council is now, after protecting the safeguarded area from anything greater than minor development, proposing a major employment site within it without evidence that a second runway can still be delivered if required. By the council’s own definition of ‘incompatible development’ the proposed allocation cannot possibly be considered in line with paragraph 5.9 of the APF and para. 3.66 of the governments’ draft aviation strategy ‘Aviation 2050’.</p> <p>3.24. Historically the Local Plan Map has shown the safeguarded area and the extent of it has reflected that shown on the Gatwick Airport Masterplan of that time. If the council were to continue that approach the safeguarded area shown on the local plan map would reflect that of the Gatwick Airport Masterplan 2019. There is no evidence to suggest that the extent set out in that document is not needed and that Gatwick Airport Ltd are not best placed to determine the extent.</p> <p>3.25. The Council’s new approach does not address the inspector’s advice that the plan should continue to safeguard. The inspector was advising a ‘strategy’ to address Crawley’s employment needs, not that those employment needs must necessarily be met within Crawley’s boundary through an allocation, as clearly, a lack of available land may justifiably preclude that possibility. It is perfectly reasonable and sound to continue to safeguard and instead contain a review trigger when there is certainty gained over safeguarding. Until that time it would be appropriate to provide employment land through intensification of existing employment sites, underutilised sites and working with other adjacent local authorities to deliver employment land within the Gatwick Diamond LPA’s. The submission Local Plan and evidence base identifies a shortfall of 24.1ha of employment land that needs to be delivered by 2037. It is entirely possible through joint working and the suggested review trigger for that land to be identified and delivered within this timeframe either within Crawley and/or other LPAs.</p>

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			<p>3.26. The Gatwick Airport Masterplan (July 2019) identifies the area that is required to deliver a second runway in Plan 21 and the proposed layout on Plan 20. 3.27. The implication of requiring the extent of on off airport parking to be provided in a considerably smaller space is inevitably a significant increase in cost and complexity over the use of the existing safeguarding area.</p> <p>3.28. Further to this, there is no evidence that this number of spaces can be provided within the remaining extent of safeguarded land. The GAL Masterplan 2019 paragraph 5.4.12 states: “The area of land currently safeguarded for the additional runway was based on a much earlier scheme developed by the previous airport owners, BAA. This currently safeguarded area is illustrated in Plan 21. In developing our proposals for the Airports Commission, we sought to contain the development within this land boundary wherever possible. However, to meet operational requirements, we found it necessary to make some adjustments to this boundary. The revised land boundary for the additional runway is also shown in Plan 21. We recommend that the area safeguarded for the additional runway by the Local Planning Authorities, is modified to conform to this latest boundary.”</p> <p>3.29. It is clear therefore that GAL have sought to contain the development to within the existing Local Plan boundary but found that land is needed for additional parking and other operational needs to be able to deliver a second runway, should it be required. There is no reason to doubt this and there is no risk that GAL would be overproviding car parking spaces as a S106 legal agreement exists between GAL, CBC and WSCC that places a legal obligation on GAL to provide car parking commensurate with increasing public transport modal share.</p> <p>3.30. Paragraph 2.3.4 of the Draft Duty to Cooperate states: The extent of land required to be safeguarded for a potential future southern runway at Gatwick Airport has also been assessed, facilitating the identification of a Strategic Employment Location to meet Crawley’s employment land needs.</p> <p>3.31. With regard to the above mentioned ‘assessment’, the Submission Draft Local Plan (para 10.21) explains that the justification for removing the area of safeguarded land is that its utilisation as surface car parking does not represent an efficient use of land. Decked/robotic parking is mentioned as a way of accommodating parking more efficiently. Topic Paper 5 (para 4.58 and 4.32) and Topic Paper 2 - Gatwick Airport (para 3.4.1) repeat this and also state: The detail of the Gatwick Master Plan was assessed to determine whether there was an appropriate location to bring forward new employment land/ floorspace to meet the needs of the economy whilst still safeguarding land that may be required for the physical land take of a potential future southern runway and associated infrastructure including essential road diversions (para 4.32).</p> <p>3.32. However, there is no evidence/assessment to show how efficiently space could be utilised, where the parking would go, what it would displace, the cost and the amount land this would ‘free up’ to demonstrate a quantity of land that can safely be removed from safeguarding. Paragraph 2.3.4 of the Draft Duty to Cooperate states: The extent of land required to be safeguarded for a potential future southern runway at Gatwick Airport has also been assessed, facilitating the identification of a Strategic Employment Location to meet Crawley’s employment land needs.</p>

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			<p>3.33. There is no justification or assessment for the extent of the area allocated and remaining area being sufficient to deliver a second runway. The allocated area merely reflects the 47.3ha area of land owned of The Wilky Group which is 'deliverable' with no justification that it is surplus to requirements for a second runway and that it would not be incompatible with delivering a second runway. To have any certainty that this would not be incompatible with delivery of a second runway, this proposal would need to be demonstrated through a detailed assessment and a review of the safeguarded area in dialogue with GAL. Contrary to what Crawley Borough Council state, there has been no assessment. In addition, there does not appear to be any attempt to engage with GAL on the matter.</p> <p>3.34. In our view, the cost and complexity of providing parking elsewhere would inevitably be substantial and at odds with the council's interpretation of 'incompatible development' being anything greater than minor development. Should GAL be unable to accommodate sufficient parking it would need to be provided off airport by other operators. This would not be in the most sustainable locations, may not be appropriate for parking and may lead to the loss of the countryside or employment sites elsewhere. Provision would not be in the context of proposals for achieving a sustainable approach to surface transport access to the airport as they currently are under GAT3. It is crucial that the safeguarded area includes land needed for operational development such as car parking not just the land take and essential road diversions needed. Not including operational land would undermine the principle of safeguarding and prejudice the delivery of a second runway.</p> <p>3.35. Based on the above, the Inspectors reasoning in rejecting "Gatwick Green" in his report on the Crawley Local Plan 2015-30 still stands: "there is no compelling evidence to suggest it would not all be required should a second runway be built" and "it is difficult to identify on a contingent basis the precise area of land required for such a complex major project and it is not unreasonable to include some flexibility even if not all the land is ultimately used".</p> <p>3.36. The proposed removal of safeguarded land lacks the evidence to demonstrate that it would not be incompatible with delivery of a second runway. The Submission Draft Local Plan is not consistent with national aviation policy (APF) and the NPPF (para 104), is not the appropriate strategy and is lacking in evidence and therefore unjustified. There is no certainty that the removal of this large area of safeguarded land would not impact on the sustainability of development and potentially damage the national and regional economy as well as the local economy through the loss of significant positive employment opportunities that would arise from a nationally significant infrastructure scheme. For these reasons the plan should be found unsound.</p> <p><b>Suggested Modifications:</b></p> <p>3.37. The most appropriate way forward, in line with national policy and the advice of the Inspector is to retain the safeguarded area with its extent reflecting that of Plan 21 of the Gatwick Airport Masterplan 2019, delete Policy EC4 and insert a trigger in the submission Local Plan: "Should changes to national aviation policy allow for the removal of the safeguarding of all the land for Gatwick Airport expansion, the opportunities and constraints of this land will be considered comprehensively through a review of the Local Plan, rather than as piecemeal development."</p>

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			<p>3.38. The Crawley Local Plan, with regard to safeguarding land for a second runway, would then be considered sound.</p> <p>3.39. As set out in the Duty to Cooperate section above, there is significant opportunity for the council to work with the Gatwick Diamond and LEP local authorities in the supply of employment land as well as protecting and intensifying existing employment sites within Crawley.</p>
REP/ 127	The Arora Group	GAT2	<p><u>Introduction</u></p> <p>The Arora Group is a successful UK-focused private group of companies involved principally in hotel operations, property asset management and construction. It owns and manages a diverse portfolio of assets (circa. £1.5 billion in value) across the nation's key business locations, which include 11 directly operated hotels, partnering with some of the world's most recognised brands to deliver consistently high service levels and sustainable growth.</p> <p>The group has a particular focus towards UK airports and, amongst its wider portfolio, owns hotels and properties in and around London Heathrow, London Gatwick and London Stansted airports.</p> <p>With regards to London Gatwick Airport, the Arora Group acquired a portfolio of circa. 30 properties in the area in 2008 which included an office known as 'Schlumberger House' from the Airports Property Partnership for £315m, and since that time it has acquired further properties in and around the airport.</p> <p>The group is pro-aviation and supports appropriate expansion of UK aviation as evidenced by promotion of its own alternative Heathrow West Limited Development Consent Order proposals for expanding airport capacity at Heathrow.</p> <p>This submission considers the soundness of policies within the Regulation 19 draft plan relating to Group properties within the Gatwick area that are particularly adversely affected by airport safeguarding and we therefore wish to participate in the Examination in Public.</p> <p>The primary objection is the continuation of safeguarding around the airport, promoted by the airport operator, continues to prevent commercial development and investment in existing businesses indefinitely. There is no objection made to technical aerodrome safeguarding as addressed by Policy DD5: Aerodrome Safeguarding.</p> <p>Attached at Appendix 1 is a schedule and location plan of the Group's 13 key property holdings at the airport and within the proposed safeguarding zone. Our other properties within the town of Crawley are not shown and are unaffected by safeguarding.</p> <p><u>Safeguarding</u></p> <p>The 1979 legal agreement between West Sussex County Council and the then airport operator prevented construction of a second runway for a period of 40 years expiring in 2019. Safeguarding was first formally identified for a wide spaced second runway in the Gatwick 2006 Interim Masterplan and then in the statutory development plan via the 2007 Local Development Framework Core Strategy and the 2015 Crawley Local Plan. These safeguarding measures stemmed principally from the 2003 Air Transport White Paper, followed by the Government's 2013 Aviation Policy</p>

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			<p>Framework. There has been much scrutiny, assessment and promotion of possible options for future runways in the South East since the 2003 Air Transport White Paper promoted a third runway at Heathrow with a second runway at Gatwick should Heathrow not proceed. Despite all of this there appears no clearer certainty as to whether a new runway will be located at Heathrow. Arguably, there is now a greater likelihood that no major new runway will be provided due to the heightened significance given to wider environmental issues and even to whether demand for flying ought to be met.</p> <p>Given that no new major runway has been built in South East England since the Second World War and that there appears no willingness on the part of Government to proactively press ahead with additional runways, it is likely to be many years before the construction of a wide spaced second runway at Gatwick could take place - if ever. With the airport operator currently pursuing its proposal for use of the standby runway to increase airport capacity via a DCO application (following the initial scoping exercise) it will be many years before Gatwick considers an additional wide spaced runway which it "<i>is no longer actively pursuing</i>" (paragraph 5.4.1 Gatwick Airport Masterplan 2019). Given the above, it is not considered feasible to maintain rigid safeguarding indefinitely, so continuing the widespread uncertainty and sterilization of current employment sites.</p> <p><u>Schlumberger House</u> Schlumberger House is an office building of around 11,700m2 (GIA) over 4 floors with an extensive surface level car park that was originally permitted in 1977 under planning application ref: CR/250/77 and initially let, under a 5-year user condition to the airport operator and thereafter to Schlumberger a geophysical services company in 1994 who remain the sole tenant. It has an unrestricted Class B1 use. The current 5-year lease is due to expire in May 2022 and a temporary extension is being considered, but the building requires redevelopment for the future as it does not provide the quality of modern office accommodation now required. Redevelopment could potentially be either for Schlumberger to continue their occupation or, at a future date, an alternative office user, or for a new development such as a surface level or multi-deck airport car park, logistics facility, hotel, other use or a mixed use if there is limited demand for office use.</p> <p>Schlumberger house is shown as site no. 5 on the schedule and plan at Appendix 1 and is currently located within the boundary of the airport as shown on the adopted Local Plan Proposals Map (as well as the Regulation 18 Proposals Map). The Regulation 19 Local Plan Proposals Map removes the property from this designation so that it would be "off-airport" and also included within the safeguarding zone. This fundamental amendment is considered unsound for the following reasons:</p> <ul style="list-style-type: none"> <li>• It specifically prevents the site being redeveloped for airport uses such as surface level airport car parking (Policy GAT3: Gatwick Airport Related Parking) while an airport hotel (Policy EC7: Hotel and Visitor Accommodation) requires a sequential test for land outside the town centre or Gatwick Airport notwithstanding that road access is obtained via the south terminal airport road system and that its proximity to the South Terminal makes it a highly sustainable location within the airport for a range of airport related developments.</li> </ul>

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			<ul style="list-style-type: none"> <li>The only justification for the change appears to be the non-airport ownership of the site but this should be immaterial to such planning policy as ownerships can change.</li> <li>The need to safeguard the site for the potential Western Link Road is noted but the site <u>could</u> separately be included within the second runway safeguarded area to retain that control. Airport parking permitted on a temporary basis would be an appropriate use for the site in principle and would be a more sustainable use should it not be possible to find alternative occupiers if Schlumberger vacate the building.</li> <li>Should the building be vacated, the empty rates bill would rapidly lead to its demolition as such costs would be unsustainable. Its temporary use for airport car parking would then be contrary to policy as it would be “off-airport” despite being closer to the terminal (and therefore more sustainable) than much of the existing airport parking located at South Terminal.</li> <li>The value of the site, should it ever need to be acquired by the airport operator to construct a new second runway would undoubtedly be lower as a derelict site compared to one in continuing use. Such an outcome would no doubt be of financial advantage to the airport operator and to the long-term disbenefit of the owner and local economy.</li> <li>It is noted that Crawley Borough Council in their Local Plan Topic Paper 2: Gatwick Airport (January 2021) raise the issue of GAL’s inconsistency in: <ul style="list-style-type: none"> <li><i>...identifying a surplus of office space within the airport boundary, and its Master Plan approach which identifies new office space as being required. The new office space is shown in the Master Plan as being located on land close to the terminals that is currently occupied by airport parking, this seemingly necessitating the relocation of this car parking to sites further away from the terminals (as discussed in para 3.1.2 above). Such relocation of car parking could potentially be seen as reducing the effectiveness of Gatwick’s approach to sustainably manage surface access to the airport and make the most efficient use of its limited land, and the council has urged GAL to maximise the use of its existing on-airport office portfolio for airport-related uses before new office provision is made.</i> [paragraph 3.7.3]</li> </ul> </li> </ul> <p>A similar situation applies in respect of Tinsley House Immigration Removal Centre which is shown as site no. 10 on the schedule and plan at Appendix 1 and is currently located within the boundary of the airport as shown on the adopted Local Plan Proposals Map (as well as the Regulation 18 Proposals Map). The Regulation 19 Local Plan Proposals Map removes the property from this designation so that it would be “off-airport” and also included within the safeguarding zone. The property, which can only be accessed via the airport’s private road network is leased until 2033 to the Secretary of State for Communities and Local Government, is in good condition and is considered likely to remain in operation until at least 2033 though there are break clauses in the lease that could be exercised. Should redevelopment / change of use / alterations to the building be required if it is vacated, its range of potential uses will be drastically limited by changing its local plan designation from on-airport to off-airport safeguarded land.</p> <p><b>Suggested Modifications:</b></p>

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			<p>It is recommended that the draft Proposals Map is amended by retaining the Schlumberger House and Tinsley House sites within the airport boundary and removing their proposed safeguarding designation.</p> <p><u>City Place</u>  City Place is a high-quality industrial estate set around the Grade II* listed circular Beehive Building (the World's first integrated airport terminal) opened in 1936 and now converted to serviced offices. Its original subway link to an adjacent airport railway station is no longer evident and neither is the station. The Arora Group currently owns 4 sites and the estate roads having disposed of the City Place 3 office building which was the last to be constructed prior to the imposition of safeguarding.</p> <p>The 4 sites are numbered 6, 7, 8 and 9 on the attached schedule and plan at Appendix 1. Sites 6 and 9 comprise existing buildings and car parking and sites 7 and 8 are currently vacant having been previously used for off-airport parking. The buildings on sites 6 and 9 are many decades old and inefficient. A 4-storey office building on site 6 (attached to the warehouse building) has been vacant for the past 15 years as it is not economic to re-use yet planning permission for its redevelopment is contrary to safeguarding policy. Similarly, site no. 9 had a large shed type storage building demolished around 10 years ago as it was outdated and uneconomic yet could not be replaced due to safeguarding policy.</p> <p>Planning permission was granted following an enforcement appeal in 2012 for a 3-year temporary permission for off-airport car parking on sites 7 and 8 (refs: APP/Q3820/C/12/2171971 and APP/Q3820/C/12/2171972). It is considered unsustainable to leave such sites without productive uses or unable to be updated for the needs of tenants or to provide e.g. new Class B8 logistics sheds to meet outstanding local needs.</p> <p>The Inspector who considered the 2007 Crawley Core Strategy Development Plan Document advised in his report of 20 August 2007 at paragraph 110. That:  110. <i>In my view the clear implication of a policy protecting land from 'incompatible development' is that planning permission will be refused for most forms of development, other than minor changes of use and small-scale building works. Otherwise there is a clear risk that substantial development could be built on land which (perhaps only a few years later) has to be compulsorily purchased in order to implement national policy. I cannot see that this would be in the public interest. I fully recognise that such safeguarding causes negative and unfortunate consequences for some local landowners during an indeterminable period....Although this uncertain situation may be highly undesirable, it seems to me strongly preferable in the public interest to the alternative scenarios favoured by some. Under those, developers would (all other planning considerations aside) be constrained in what they built only by their (i) degree of confidence that the runway will never be required, (ii) belief/hope that the layout of any eventual additional airport development could work around obstacles built in the meantime, or (iii) reliance on recovering the costs of abortive short-term development through the compulsory purchase procedure.</i></p>

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			<p>However, it is doubted that the Inspector believed that the second runway issue would remain unresolved 14 years later or that the airport operator would be “no longer actively pursuing” the project. It is likely to be very many years yet before Heathrow Airport Limited decides whether or not to proceed with a third runway assuming it has also managed to progress an application through the planning process and received approval from the Secretary of State of whichever government is in power at the time.</p> <p>Unfortunately, the high-quality City Place Estate remains half built and can only continue to decline without the ability to redevelop its outdated buildings and re-use its brownfield sites.</p> <p><b>Suggested Modification:</b> It is recommended that proposed Policy GAT2: Safeguarded Land be reworded to enable greater flexibility for existing occupiers to modernise their businesses premises and to facilitate appropriate changes of use of existing buildings. The underlined text in proposed Policy GAT2: Safeguarded Land below is recommended to be inserted:</p> <p><b><i>Policy GAT2: Safeguarded Land</i></b> <b><i>Safeguarding for a second runway</i></b> <i>The Local Plan Map identifies land that is safeguarded from development which would be incompatible with expansion of the airport to accommodate the construction of an additional wide spaced runway (if required by national policy) together with a commensurate increase in facilities that contribute to the safe and efficient operation of the expanded airport.</i></p> <p><i>Small scale development within this area, such as residential extensions <u>and the redevelopment of existing employment / commercial sites</u>, will normally be acceptable. The airport operator will be consulted on all planning applications within the safeguarded area.</i></p> <p><i>Planning applications for noise sensitive development will be considered on the basis of Air Noise Map – Additional Runway – Summer Day – 2040 as shown at Plan 31 of the Gatwick Airport Master Plan and in the Local Plan Noise Annex</i></p>
REP/044	Tim North & Associates Ltd on behalf of Hx Properties Ltd	GAT3	<p>See attached correspondence dated 18 February 2021</p> <p><b>Draft Crawley Borough Local Plan 2021-2037 January 2021 Regulation 19 Consultation</b> This company raised an objection on behalf of my clients, HX Properties Ltd, to Policy GAT2 of the Regulation 19 version of the Draft Crawley Borough Local Plan 2020-2035, along with paragraphs 10.16 to 10.19 inclusive, providing the reasoned justification behind the same policy.</p> <p>Policy GAT3 concerned with “<i>Gatwick Airport Related Parking</i>” found in the latest Regulation 19 version of the Draft Crawley Borough Local Plan 2021-2037 (hereinafter referred to as DCBLP 2021-2037) reflects the previous version of the same policy, but with less force as the word “<b>must</b>” has been omitted before the phrase “<i>be justified demonstrable</i>”</p>



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			<p><i>need in the context of proposals for achieving a sustainable approach to surface transport access to the airport</i>". The two limbs comprising Policy GAT3 have now been separated, where previously they formed a single paragraph.</p> <p>My clients object to Policy GAT3 along with paragraphs 10.24 to 10.27 forming part of the reasoned justification behind the same policy, on the grounds that they have not been positively prepared, neither are they justified, nor are they consistent with national policy.</p> <p>The reasoned justification behind Policy GAT3 is fundamentally flawed, in that it takes no account of and is inconsistent with, the provisions of Schedule 2 Part 8 Class F of the Town &amp; Country Planning (General Permitted Development) (England) Order 2015 (As Amended). The Airport Owner on "<i>Operational Land</i>" can construct surface car parking or build multi-storey car parks in accordance with the above mentioned "<i>permitted development rights</i>", for which no express planning permission is required, and more importantly, without having to justify "...<i>a demonstrable need in the context of proposals for achieving a sustainable approach to surface transport access to the airport</i>". This situation applies, irrespective of whether the word "<b>must</b>" is to be inserted before the phrase "<i>be justified</i>".</p> <p>There is no disputing these facts. What it means is that Policy GAT3 as set out in the DCBLP 2021-2037 is completely unnecessary and serves no valid purpose, nullifying the reasoned justification set out in paragraphs 10.24 to 10.27 inclusive of the same version of the emerging Local Plan. There is no requirement for GAL to justify any form of airport-related car parking on operational land within its boundary, and equally no requirement to provide a demonstrable need in the context of achieving a sustainable approach to surface transport access to the airport. Put simply, "<i>permitted development rights</i>" do not require a demonstrable need to be met.</p> <p>The fact that the Airport Operator is under no obligation to produce an assessment of demonstrable need to justify any on-airport surface or multi-storey car park on land forming part of its operational area, in accordance with the second limb of Policy GAT3, becomes immediately apparent from the decision taken by your Council to raise no objection to Application No. CR/2017/0523/CON.</p> <p>It is a well-known fact that Crawley Borough Council rely on GAL to support the central issue of "<i>demonstrable need</i>" on applications refused by your authority for long term off-airport car parking in its administrative area. The involvement of GAL means that, by association, it occupies a central position in the decision-making process, particularly in cases where an applicant proceeds to appeal against the Local Planning Authority's refusal or non-determination of a long term off-airport car parking proposal. However, that is not a justifiable reason for incorporating a policy into the emerging Local Plan concerning a form of development in which your Authority have no control.</p> <p>GAL as a private company, enjoys a dominant position in surface access facilities provided at Gatwick Airport, being present in the upstream market (i.e. facilities at an airport, such as bus stations or car parks), as well as the downstream market (i.e. allowing providers to access the facilities at an airport), where they relate to surface access provision. GAL's presence as an important integral part in the decision-making process, means that land use planning decisions governing airport related car parking proposals cannot be considered to be transparent. That is, they cannot be divorced</p>

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			<p>from, and understandably are influenced by, private sector decisions promoted through GAL's own Capital Investment Programmes.</p> <p>The insertion of Policy GAT3 into the Regulation 19 version of the DCBLP 2021-2037, where it is not necessary to do so for the reasons stated above, leads on to the question of whether its provisions unnecessarily restrict competition in respect of certain forms of long term off-airport car parking, in particular the <i>"park and ride"</i> model, which dependent on the selected location, is equally well placed to achieve a sustainable approach to surface transport access to the airport.</p> <p>Paragraph 14 of the NPPF 2019 states that for plan-making - <i>"plans should positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to change"</i> (my emphasis). Policy GAT3 fails to achieve the sufficient flexibility sought by national policy, despite the fact that the location of Gatwick Airport is not included in one of the selected areas which provide a strong reason for restricting development in Footnote 2 of the same paragraph of current national policy.</p> <p>It follows from these representations that if Policy GAT3 is to be retained in the Regulation 19 version of the DCBLP 2021-2037, then consideration should be given to removing <i>"permitted development rights"</i> through an Article 4 Direction, where it relates to on-airport car parking provision on <i>"Operational Land"</i> within Gatwick Airport. The Article 4 Direction process will then provide the purpose behind the same policy and its reasoned justification, allowing for more transparent decision-making, if only for reasons of having to justify a demonstrable need.</p> <p>This is not considered to be an unreasonable request in that GAL in its own representations to the earlier Regulation 19 version of the DCGLP 2020-2035, when considering the use of existing employment sites in the Borough which it states could be used more efficiently by means of intensification, redevelopment and design improvements, add:- <i>"It is crucial that the Council uses Article 4 Directions to prevent the further loss of employment sites to residential development via Permitted Development Rights. The Council has continued to lose valuable employment sites due to the conversion of office buildings to residential accommodation via the prior approval process, and the draft Plan should proactively seek means to restrict such loss of its existing employment land stock."</i></p> <p>A methodology should be agreed in which to assess long term demand and capacity issues concerning both on and off airport-related car parking provision, involving your Authority, GAL and representatives of those involved in lawful long term off-airport car parking facilities. This will reduce issues of dispute, or at least highlight those specific areas where agreement cannot be reached, surrounding existing and future demand for and capacity (supply) of airport related car parking, according to the concept that the same two factors are <i>"in balance"</i> as argued by GAL. To this end, through collaboration, a sound base for deciding applications will be provided, not dissimilar to the way in which the NPPF requests Local Planning Authorities to use the standard methodology in order to establish a minimum local housing needs figure (LHN) in their administrative areas.</p> <p>The contents of supporting paragraph 10.24 to Policy GAT3 refer to the 2019 Section 106 Planning Obligation entered into between Crawley Borough Council, West Sussex County Council and GAL, which sets out an obligation for the</p>

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			<p>Airport Operator to achieve a target of 48% of passengers travelling to the airport by public transport by 2022. The figure of 48% is used as a metric to show that the amount of airport related car parking that needs to be provided for airport passenger throughput, in accordance with the Airport Operators Interim Car Parking Strategy April 2017, is in some way commensurate with public transport modal share. The 48% figure is not considered to be a challenging target, in that in the fourth quarter of 2017, (October to December), CAA's O &amp; D data reveals that a public transport modal share figure of 48.3% was reached, being in excess of the 48% target figure set down for 2022 (See the evidence of Mr Tom Nutt, Crawley BC to the Former Gasholder Station Car Park Appeal, the inquiry of which took place on 15-17 May 2017).</p> <p>No evidence has been produced to demonstrate that long term off-airport car parking has prevented the modal share in favour of public transport from being reached, as set out in the various iterations of the Gatwick Airport Surface Access Strategy (hereinafter referred to as GASAS) and associated Section 106 Planning Obligations. The target figure of 48% is in all probability likely to be met, even in the event that the figure were to be increased, when it is realised that visitors to the UK are always more likely to use public transport than those living and working in the UK.</p> <p>The contents of paragraph 10.25 providing part of the reasoned justification to Policy GAT3 refer to a number of lawful long term off-airport car parking businesses, serving the needs of passengers using Gatwick Airport. The figure for long term off-airport car parking spaces set out at paragraph 2.3.30 of the Gatwick Airport Masterplan 2019, namely 21,196 authorised spaces is strongly disputed. There has been a consistent and marked reduction in the supply of long term off-airport car parking provision serving the airport, since the Gatwick Airport Interim Master Plan was published in 2006.</p> <p>Long term off airport car parking provides an important contribution to airport related car parking, meaning that it has a role to play in the supply of the same product, meeting not only a quantitative, but also a qualitative requirement. A number of long term off airport car parks have been found to occupy "<i>sustainable locations</i>" whilst at the same time offering "<i>customer choice</i>" (See appeal decisions at Acacia Grove, Copthorne (PINS Ref 2153589); City Place, Crawley (PINS Ref 2171971 &amp; 2071972; and the Case Officer's report at Southways Business Park (Crawley BC Ref. No. CR/2033/0094/FUL); Site E2 Crawley Business Quarter (Crawley BC Ref. No. CR/2014/0080/FUL and the Former BOC Edwards Site (CR/2014/0615/FUL).) This becomes evident from Inspectors' appeal decisions in your Council's administrative area, as well as the contents of Case Officers' reports granting planning permission for the same use.</p> <p>A more flexible approach is required in the consideration of airport related car parking provision, given that issues of sustainability, when taken to an extreme as is the case with Policy GAT3, results in locations being defined solely by reference to whether a site lies within or outside the boundary of Gatwick Airport. That approach produces an anomalous situation, in that were your Council to accept an alteration to the boundaries of Gatwick Airport, so that it is commensurate with that indicated on Plan 20 in the Gatwick Masterplan 2019, (i.e. leading to an extension to the east beyond the London to Brighton Railway Line towards the M23 Motorway); what is at present considered to be an unsustainable location, would automatically become sustainable.</p>

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			<p>In devising a policy devoted to “<i>Gatwick Airport Related Parking</i>”, requires sustainability issues to extend beyond consideration of whether a site is situated within or outside the boundaries of Gatwick Airport. A restrictive policy of the kind set out in GAT3 has adverse implications, with associated disadvantages for airport related car parking, with inadequate account taken of other related issues surrounding airport car parking provision, significant amongst which is unauthorised provision found in adjoining Authorities’ administrative areas, some distance from the airport.</p> <p>Indeed, Policy GAT3 takes no account of i) access arrangements from the particular car park whether on or off airport to the terminal buildings; or ii) the advantages of transporting a number of passengers to the Airport’s terminals utilising low emissions/eco-friendly buses. These benefits associated with a traditional park and ride off-airport parking facility have the ability to lead to a reduction in traffic movements, thereby alleviating congestion at strategically located junctions situated in close proximity to Gatwick Airport, at the same time having the propensity to reduce carbon emissions on-airport.</p> <p>It is said in GAL’s representations to the July 2019 version of the DCBLP that the aim is to offer an attractive on airport car parking product as a means of discouraging use of less sustainable car parking options, which double the amount of car trips, whilst generating extra surface access journeys, which it is argued, add to congestion and CO<sub>2</sub> emissions compared with “<i>park and fly</i>”. These comments are wholly predicated on the “<i>kiss and fly</i>” and “<i>meet and greet</i>” car parking modes serving Gatwick Airport, which are the least sustainable. They take no account of traditional long term park and ride facilities, which are infinitely more sustainable than encouraging passengers to park on-airport. To the extent that GAL refer to a “<i>residual and increasing demand for parking for those passengers who choose to use the car</i>” dictates that the long term off-airport “<i>park and ride</i>” model has the ability to be the most sustainable option after dependence on public transport. Their importance will no doubt increase as electric vehicles become increasingly popular.</p> <p>It is a known fact that unless additional resources are provided to the Authority, and a proactive approach is taken to enforcement proceedings in respect of unlawful off-airport car parking uses, the ability to ensure a sustainable approach to airport related car parking will never be realised. Your Authority are on record as stating that unauthorised long term airport related car parking will continue to be a source of capacity (supply) into the future. Given these circumstances, to pursue a strategy which perpetuates, at the same time places reliance on unauthorised long term off-airport car parking, in preference to a properly managed lawful long term off-airport car parking facility, is the very antithesis of “<i>managing</i>” airport related car parking provision into the future.</p> <p>Evidence reveals that adopting the tact outlined in the previous paragraph will encourage long term off-airport car parking facilities of all models, in least sustainable locations seen in terms of distance to the north and south terminals, and is required to be compared with what otherwise may arise from lawful long term off-airport park and ride facilities which from a locational perspective, are sited in close proximity to the same terminals. It is also infinitely more</p>

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			<p>sustainable to have sites granted planning permission, than for long term off-airport car parking facilities to be made lawful through CLEUDs.</p> <p>To impose an embargo on lawful long term off-airport car parking uses based on the park and ride model, would simply play into the hands of those unauthorised long term off-airport car parking businesses operated by rogue traders, with all the ensuing bad publicity for airport related car parking. It simply hands the impetus to those seeking CLEUDs for long term off-airport car parking uses on sites distant from the airport, catering for the “<i>meet and greet</i>” mode, which is the least desirable from a transport sustainability perspective.</p> <p>Policy GAT3 pays no regard to the increasing provision of organisations such as JustPark, a technological platform matching drivers with car parking spaces through its website and app, representing what is referred to as the “<i>sharing economy</i>”, having a profound impact on the ability to reduce the private car mode in favour of public transport, and appearing less sustainable than the provision of a traditional long-term off-airport car parking facility. To these considerations can also be added the increasing focus placed on the use of on-street car parking, sometimes known as transit parking, in residential areas, before walking or taking a cab to the airport’s terminals.</p> <p>In conclusion, Policy GAT3 represents an abrogation of the responsibilities concerning the topic of airport related car parking from the Local Planning Authority to a private company, namely the Owner/Operator of Gatwick Airport, who is then passed the remit of meeting the modal split target of passengers, through total reliance placed on on-airport related car parking, without assessing alternative forms of access by private car to the same international airport. There are forms of long term off-airport car parking use which are in a position to contribute to sustainable transport through the provision of a public transport levy, in the same way a GAL provides for those travellers who have no alternative but to rely on the private car to access Gatwick Airport.</p> <p><b>Suggested Modifications:</b>  Policy GAT3 along with paragraphs 10.24 to 10.27 has not been positively prepared, neither is it justified, nor is it consistent with national policy. The reasoned justification behind Policy GAT3 is fundamentally flawed in that it takes no account of, and is inconsistent with, the provisions of Schedule 2 Part 8 Class F of the Town &amp; Country Planning (General Permitted Development) (England) Order 2015 (As Amended) as the Airport Owner can construct surface car parking or build multi-storey car parks on "Operational Land" for which no planning permission is required , and more importantly, without having to justify "... a demonstrable need in the context of proposals for achieving a sustainable approach to surface transport access to the airport". This situation applies irrespective of whether the word "must" is to be inserted before the phrase "be justified". Hence Policy GAT3 is completely unnecessary; serves no valid purpose, nullifying the reasoned justification set out in paragraphs 10.24 to 10.27 inclusive.</p>
REP/056	Gatwick Airport Limited	GAT3	<p>7. We support Policy GAT3 for reasons set out in para 4.1 and 4.2 of our previous representations.</p> <p><b>Suggested Modifications:</b></p>

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REP/087	Woodland Trust	GAT3	<p>We seek clarification of this policy to confirm that any future car parking provision within the airport site would not be allowed in harmful proximity to areas of ancient woodland or veteran trees. As noted in our comments on policy GAT1, the land safeguarded for future airport development includes several areas of ancient semi-natural woodlands (ANSW).</p> <p><b>Suggested Modifications:</b> The policy should be amended to ensure that no areas of ancient woodland or veteran trees are included in land to be used for carparking within the area safeguarded for future airport development. Even if the argument were to be made that the runway itself is “wholly exceptional” development as set out in the NPPF para 175c, car parking is not.</p>
REP/056	Gatwick Airport Limited	GAT4	<p>8. We support Policy GAT4 for reasons set out in para 5.1 and 5.2 of our previous representations.</p> <p><b>Suggested Modifications:</b></p>

<b>Chapter 11. Crawley Town Centre</b>			
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REP/106	Crawley Town Centre Bid Board		<p><b>Permitted Development</b> New permitted development (PD) rights coming into force on 1 August 2021 will enable the change of use from the new Class E (Commercial, Business and Service) to residential use (Class C3). The Government hopes this change will help support housing delivery and enable more homes to be created in town centres. However, the CTCBID are concerned that this could have a detrimental impact on the town centre. Consequently, we would urge the LPA to consider imposing an Article 4 Direction, to restrict the PD right on the Primary Shopping frontages to ensure that the LPA retain control over ground floor uses.</p> <p><b>Suggested Modifications:</b></p>
REP/106	Crawley Town Centre Bid Board	TC1	<p>The CTCBID TCP fully supports the aims of Policy TC1 in preserving the retail function of the Primary Shopping Area, whilst allowing flexibility for other town centre uses to be justified. We support the policy in relation to amalgamation/sub-division and the encouragement of efficient use of upper floors.</p> <p><b>Suggested Modifications:</b></p>
REP/131	SMB Town Planning Limited	TC1 to TC5	<p>Oxford Match Limited have aspirations for the development of their freehold property interests within Crawley town centre.</p> <p>Therefore, the following draft policies relating to development within Crawley town centre are directly relevant:</p> <ul style="list-style-type: none"> <li>• EC1 and EC2,</li> <li>• TC1 to TC5, and</li> <li>• H2, H3c and H5.</li> </ul> <p>Taken together these above policies are generally supportive of the principle of, inter alia, development comprising the conversion of the upper floors of existing properties for residential use together with appropriate upward extensions of buildings to provide additional dwellings. This is particularly in the situation that Crawley Borough Council find themselves in being heavily reliant on neighbouring local planning authorities and windfall sites to assist in meeting the identified housing need over the period of the Local Plan.</p> <p><b>Suggested Modifications:</b></p>
REP/132	Quod on behalf of Aberdeen Standard Investments	TC1	<p><b>Section 11 – Crawley Town Centre</b> 2.12 Section 11 considers Crawley Town Centre specifically and draft Policy TC1 sets out strategic requirements for the Primary Shopping Area. As previously noted, the draft Policy states that development that enhances the vitality and viability of Crawley Town Centre as a competitive sub-regional town centre will be supported, and that within Primary Shopping Frontages at ground floor level, development within Use Class E (Commercial, Business and Service Use) will normally be permitted. ASI are supportive of this progressive approach which is in line with national guidance for town centre development.</p> <p>2.13 The draft policy goes on to state that: “the effective and efficient use of upper floors within the Primary Shopping Area for main town centre uses, town centre neighbourhood facilities, or residential use, is supported, subject to meeting the requirements of Policy EC2 where a net loss of employment floorspace is proposed” and that “the</p>

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			<p>amalgamation or sub-division of units at ground and upper floor levels will be supported, subject to the requirements of Policy EC2 where loss of employment floorspace is proposed.”</p> <p>2.14 The relationship of Policy TC1 with the proposed requirements of draft Policy EC2 is of concern and its inclusion is not supported. As identified above, the employment floorspace tests proposed within Policy EC2 are in direct conflict with the requirements of the NPPF which promotes flexibility to provide a range of Main Town Centre Uses, including residential uses, in order to ensure the vitality and viability of town centres.</p> <p><b>Suggested Modifications:</b></p> <p>2.17 As per the comments previously noted, we consider that these inclusions would be detrimental to the future vitality and viability of Crawley Town Centre, which is in conflict with the NPPF, as well as other policies within the draft Plan. We therefore request that the relationship between policy EC2 and the other policies within the draft Plan identified above be reconsidered.</p>
REP/106	Crawley Town Centre Bid Board	TC2	<p>The CTCBID TCP supports Policy TC2 and encourages flexibility in policy and development control decisions within the Town Centre, where change in the character and needs of the Town Centre given the increased provision of residential accommodation is likely to bring about demand for new uses.</p> <p><b>Suggested Modifications:</b></p>
REP/132	Quod on behalf of Aberdeen Standard Investments	TC2	<p>2.15 Similarly, whilst draft Policy TC2 (Town Centre Neighbourhood Facilities) is supported in respect of the approach to development of town centre neighbourhood facilities to meet the needs of its growing residential population, the link with Policy EC2 is of concern:</p> <p><i>“Where the provision of town centre neighbourhood facilities would result in a net loss of employment floorspace, the requirements of Policy EC2 must be met.”</i></p> <p><b>Suggested Modifications:</b></p> <p>2.17 As per the comments previously noted, we consider that these inclusions would be detrimental to the future vitality and viability of Crawley Town Centre, which is in conflict with the NPPF, as well as other policies within the draft Plan. We therefore request that the relationship between policy EC2 and the other policies within the draft Plan identified above be reconsidered.</p>
REP/033	Horsham District council	TC3	<p>We support this policy in principle, but consider it is not justified as stands and that its effectiveness could be improved. It is considered that there may be further opportunities for mixed-use proposals which enhance the town centre to include a greater element of residential development, which can contribute to reducing the unmet need. This should be reflected in the policy.</p> <p>This view has been formed on the premise that there has not been evidence presented alongside the draft Local Plan to quantify opportunities to provide further residential units, of a higher-density nature, to complement and support the vitality of the town centre.</p>



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			<p><b>Suggested Modifications:</b></p> <p><b>Change sought:</b> It is considered necessary to complete the Densification Study to justify the policy. This should include detailed analysis of redevelopment and regeneration opportunities in the town centre area, in a way that maximises opportunities to address the unmet housing need, and make a clear link between the evidence set out in the study and the assessed site capacities. This may lead to an increase to the 1,500 net dwellings increase set out in Policy TC3(iv).</p>
REP/106	Crawley Town Centre Bid Board	TC3	<p>The CTCBID TCP supports Policy TC3 but there should be sufficient flexibility to allow other sites to come forward rather than only those currently mentioned given the length of the plan period – the policy should acknowledge this.</p> <p><b>Suggested Modifications:</b></p>
REP/129	Planning Potential on behalf of Aldi Stores Ltd	TC3	<p><b>1. introduction</b></p> <p>1.1. These representations are submitted on behalf of Aldi Stores Ltd to the Regulation 19 consultation on the Draft Crawley Borough Local Plan (DCBLP).</p> <p>1.2. Aldi have an existing store on the Acorn Retail Park, however, are looking for further representation within Crawley. At the present time a site has not been identified. The emerging Policy has been reviewed within the context of Aldi seeking additional representation and whether there is a planning policy framework to support the delivery of additional convenience goods retail floorspace.</p> <p>1.3. The Regulation 19 consultation relates to the ‘Tests of Soundness’ as set out in the National Planning Policy Framework 2018 (NPPF), paragraph 35. Plans are ‘sound’ if they are:</p> <ul style="list-style-type: none"> <li>a) positively prepared – providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;</li> <li>b) Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;</li> <li>c) Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and</li> <li>d) consistent with national policy enabling the delivery of sustainable development in accordance with the policies in this Framework.</li> </ul> <p>1.4. These representations consider the objective need and community benefits of foodstore development in light of the jobs that will be created both during construction and operation and the economic benefits that developments of this type deliver, and recognise the consistency with national policy of the commercial nature of retail development in the recent changes to the Use Classes Order. A foodstore development delivers significant economic growth and productivity and is therefore in accordance with paragraph 80 of the NPPF this should be afforded significant weight in plan making. Therefore, based on the relevant tests established in the NPPF we consider that facilitation of foodstore development in emerging policy is paramount to the soundness of the DCBLP.</p>

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			<p><b>2. Job Creation</b></p> <p>2.1. To ensure the soundness of the DCBLP compliance with national policy it must be positively prepared and provide a strategy to meet the area’s objectively assessed needs.</p> <p>2.2. As set out in the Economic Growth – Key Issues section (para 9.6) of the submission DCBLP <i>“it is also important that the Local Plan looks forward, planning pro-actively to meet Crawley’s significant job growth, business land and floorspace needs as the economy recovers, whilst supporting delivery of the upskilling, connectivity and infrastructure needs to support economic growth”</i>. Retail jobs make a significant contribution to the economy of Crawley and therefore such uses should be enabled through policy.</p> <p>2.3. An Aldi foodstore typically creates around 50 new jobs a well as other investment within the surrounding areas a result of the multiplier effect that occurs during the construction phase and ultimately through provision of additional jobs in the area. The soundness of the DCBLP should be considered in terms of consistency with local ambitions and national policy, as well as the objectively assessed needs of the borough. Retail job opportunities should be recognised as contribution towards meeting the job growth target and allowed for within policy in order for the plan to be considered.</p> <p><b>3. Class E – Commercial Development</b></p> <p>3.1. To ensure the soundness of the DCBLP compliance with national policy must be demonstrated.</p> <p>3.2. The Government has made a number of revisions to the Use Classes Order, including the introduction of Class E (Commercial, Business and Service) this includes amongst others the following uses:</p> <ul style="list-style-type: none"> <li>• The display of retail sale of goods to visiting members of the public;</li> <li>• An office to carry out any operational or administrative function;</li> <li>• The research and development of products or processes; and</li> <li>• Any industrial processes (being a use which can be carried out in any residential area without detriment to the amenity of that area by reason of noise, vibration, smell, fumes, smooth, soot, ash, dust or git).</li> </ul> <p>3.3. The Explanatory Guidance published in connection with the amended Use Classes Order notes at paragraph 7.3. that: <i>“Bringing these uses together and allowing movement between them will give business greater freedom to adapt to changing circumstances and response more quickly to the needs of their communities.”</i></p> <p>3.4. it is therefore clear that the introduction of the revisions to the Use Classes Order and other changes being brought forward by the Government are designed to enable flexibility and encourage development that responds quickly to the needs of their communities. This is also set out in the spatial context for Crawley in the DCBLP, which seeks to ensure sustainable economic growth and supports greater <i>“flexibility to help Crawley’s economy adapt to future change”</i> (para 2.15). Development which responds to the needs of local communities and contributes to a sustainable, diverse and thriving economy is supported and consistent with policy at both a national and local level and should be considered in</p>

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			<p>assessing the soundness of the DCBLP. The DCBLP fails to incorporate the revised use classes and therefore policies and allocations are not consistent with national policy and cannot be considered sound.</p> <p><b>4. Positively and proactively encouraging sustainable economic growth</b></p> <p>4.1. The NPPF is clear that:  “Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. The approach taken should allow each area to build on its strengths, county any weaknesses and address the challenges of the future.” (paragraph 80)</p> <p>4.2. this was written before the recent Covid pandemic which has further highlighted the valuable contribution that the retail sector makes both in terms of providing employment opportunities and ensuring that communise have easy access to healthy and affordable food. With the increasing drive towards a more sustainable future providing crucial facilities such as food sopping in accessible locations is increasingly important. Crawley Borough Council declared a Climate Emergency on 17 July 2019, and recommendations from the Climate Change Scrutiny Panel Final Report published in February 2021 indicate that there needs toe be a change in the type of vehicles used for travel and the promotion of active and sustainable transport options. The success of active transport depends on the distance to be travelled; therefore, the provision of accessible food shopping facilities is key to meeting this objective.</p> <p>4.3. The NPPF states that planning policies should:  <i>“set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth, having regard to Local Industrial Strategies and other local policies for economic development and regeneration.”</i>  (Paragraph 81a)  Planning policies should be flexible enough to accommodate needs not anticipated in the plan, allow for new and flexible working practice (such as live-work accommodation), and to enable a rapid response to changes in economic circumstances.” (Paragraph 81d)</p> <p>4.4. The DCBLP acknowledges this, as set out in the Economic Growth – Key Issues sections (paragraph 9.6.), <i>‘The NPPF is clear that planning policies should help create the conditions in which businesses can invest, expand and adapt, setting out a clear economic vision and strategy that positively and proactively encourages sustainable economic growth. Recognising the immediate economic situation facing the borough as a result of the Covid-19 pandemic, it is vital to plan positively to support economic recovery.’</i></p> <p>4.5. It is clear that there have been a number of macro and micro changes since the Retail, Commercial Leisure &amp; Town Centre Neighbourhood Needs Assessment was prepared and published in January 2020. The development aspirations within the borough and wider area need to be considered within the context of changes that have occurred. When considering the existing supply and land allocated for employment generating floorspace and town centre uses the</p>

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			<p>current approach is not justified and effective in light of the recent changes of the Use Classes Order, therefore the DCBLP cannot be considered sound.</p> <p><b>Suggested Modifications:</b></p> <p><b>5. Retail Considerations in the Crawley Local Plan</b></p> <p>5.1. In light of the changes that have occurred and the need to proactively encourage sustainable economic growth, the potential economic contribution in terms of investment and job creation offered by the retail sector should be considered more positively in the DCBLP.</p> <p>5.2. Policy EC2 'Economic Growth in Main Employment Areas' covers the development of allocated employment sites within the borough. This states that '<i>Employment generating development will be supported in the Main Employment Areas where it makes for an efficient use of land or buildings and contributes positively to sustainable economic growth in the Main Employment Area, and to the overall economic function of Crawley.</i>'</p> <p>5.3. This policy acknowledges the need for use of land that contributes positively to sustainable economic growth and the policy text directs employment generating uses to the Main Employment Areas. We again highlight the recent introduction of Class E which has merged Class A uses with B1, amongst others, and is recognition of the importance of the rail sector of the UK's economic success. Therefore, this policy is not justified and effective in the light of recent economic changes or consistent with national policy as it is not clear how Class E is addressed. As such the DCBLP cannot be considered sound.</p> <p>5.4. Given the economic considerations in the current climate and the economic contribution fo retail development, it is considered that proposed retail uses align with the overall objective of this policy and should therefore be considered positively in this policy.</p> <p>5.5. Policy TC3 'Town Centre Key Opportunity Sites' covers the development of allocated underutilised town centre sites. This sates that '<i>Town Centre Key Opportunity Sites are identified for development that enhances town centre vitality and viability and helps to meet the economic and housing needs of the borough</i>' and that '<i>development will be supported where it is for: main town centre uses, or mixed-use development for residential and main town centre uses and/or town centre neighbourhood facilities.</i>'</p> <p>5.6. These policies cannot be considered justified in light of recent economic changed or compliant with national policy in light of revisions to the use classes order, therefore the DCBLP cannot be considered sound.</p> <p><b>6. Summary</b></p> <p>6.1. As set out in this document the background position has changed significantly since the Retail, Commercial Leisure &amp; Town Centre Neighbourhood Needs Assessment was published. Recent changes to the Use Classes Order have clearly signalled a change, offices and retail development are now both considered to be commercial uses, recognition</p>

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			<p>of the contribution that retail makes to the local economy and the fact that the jobs created by retailers are equal to those created by more traditional employment generating uses.</p> <p>6.2. Considering these changes, a test of the soundness of the DCBLP should consider whether proposed policies are positively prepared in terms of consistency with national policy and the objectively assessed needs of the borough are still effective and justified. As such, policies which fail to acknowledge the necessity of commercial development to meet the local need in light of economic changes or policies which fail to recognise revisions to the use classes order cannot be considered positively prepared, justified, or consistent with national policy. Considering this the DCBLP cannot be considered sound.</p> <p>6.3. This DCBLP provides an opportunity which will enable higher levels of employment in the borough, creating jobs and investment while providing many other economic benefits associated with introducing a popular national retailer to an area. As such we highlight the need to ensure the soundness of the DCBLP to provide the necessary facilities in allocations and policies for foodstore development, that will be required to support economic growth and secure investment and jobs in the borough across the plan period.</p>
REP/106	Crawley Town Centre Bid Board	TC4	<p>The CTCBID TCP supports Policy TC4</p> <p><b>Suggested Modifications:</b></p>
REP/106	Crawley Town Centre Bid Board	TC5	<p>The CTCBID TCP supports Policy TC5 and the 'Town Centre First' approach as advocated in the NPPF.</p> <p><b>Suggested Modifications:</b></p>

<b>Economic Growth Assessment</b>			
<b>Ref. No.</b>	<b>Respondent</b>	<b>Policy/ Para</b>	<b>Comments</b>
REP/120	Squires Planning on behalf of Residents		<p><b>Economic Growth Assessment</b></p> <p>3.40. Whilst joint working between local authorities is welcomed it is considered that purely focusing on Horsham, Crawley and Mid Sussex areas in meeting employment land needs is too narrowly defined.</p> <p>3.41. There is no justification for CBC continuing with a West Sussex-centric approach that has taken no real account of the wider sub-regional area known as the 'Gatwick Diamond' or regional area known as the 'Coast to Capital'. These are widely accepted economic functional areas that Crawley sits within. The Gatwick Diamond straddles the 6 adjoining local authority areas: Crawley Borough; Mid Sussex District, Horsham District, Reigate and Banstead Borough, Tandridge District and Mole Valley District as far south as Brighton and north to Croydon.</p> <p>3.42. Paragraph 025 of the Planning Practice Guidance states: Functional economic market areas can overlap several administrative areas so strategic policy-making authorities may have to carry out assessments of need on a cross-boundary basis with neighbouring authorities within their functional economic market area. Local Enterprise Partnerships (and county councils) can play a key role in this process.</p> <p>3.43. Paragraph 019 of the Planning Practice Guidance states that it is possible to define a functional economic market area taking account of factors including the extent of any Local Enterprise Partnership within the area.</p> <p>3.44. On this basis the identified functional economic area of Crawley Horsham and Mid Sussex appears to be too narrowly defined. The lack of any meaningful engagement with LPAs outside this area or with the LEP demonstrates that the submission draft local plan is not based on effective joint working on cross-boundary strategic matters of employment land supply within the appropriate economic area.</p> <p>3.45. Crawley Borough Council's approach therefore falls short of the approach required in both the NPPF and PPG and fails the test of soundness with regard to it being effective or consistent with national policy.</p> <p><b>Suggested Modification:</b></p>

# Crawley

Local Plan

## Housing

Regulation 19 January 2021 Representations

Local Plan Chapters 12 & 13 and Strategic Housing Availability Assessment

<b>Chapter 12. Housing Delivery</b>			
<b>Ref. No.</b>	<b>Respondent</b>	<b>Policy/ Para</b>	<b>Comments</b>
REP/022	Sussex Ornithological Society	2.33 H3g	<p><b><u>RESPONSE TO CRAWLEY LOCAL PLAN S.19 SUBMISSION DRAFT</u></b></p> <p>We have examined the Regulation 19 Submission Draft of the Crawley Local Plan, and in broad terms we would wish to maintain our position on the comments we made in March 2020 in response to the previous draft. It is understood that these will be forwarded to the Planning Inspector, and unless stated otherwise should still stand.</p> <p>It remains a matter of concern to the Society that the Council proposes to offload more than 50% of its housing allocation to other authorities, and that this proportion has in fact increased from 53% to 56% since the Regulation 19 Consultation Draft. We feel that, in the light of shifts in Central Government thinking regarding changes to the planning system, and in view of the effects that will follow the current health crisis (particularly the possible long-term brake on aviation growth and the rise in home working and on-line retail making office and retail sites potentially available for housing), Crawley should be more robust in stating that, if the Council is certain that more of these houses cannot be built within Crawley, it is not acceptable to ask neighbouring Local Authorities to build the huge numbers remaining.</p> <p>It remains a particular concern that there needs to be firmer protection relating to the High Weald AONB, which has not really been addressed in this draft, and regarding which we refer back to our observations in response to the Consultation Draft.</p> <p>We would like to make the following specific comments in relation to this Submission Draft of the Plan –</p> <p><b>Suggested Modifications:</b></p> <p><b>Strategic Policy H3g – Urban Extensions</b></p> <p>It is a matter of particular regret that this Policy has been deleted altogether, and that the additions we suggested with a view that the AONB should be protected from development have not been included. We would like to see the wording we suggested regarding this at paragraph 21 of our submission be inserted following paragraph 2.33 of the Submission Draft.</p>
REP/033	Horsham District Council	12.17 – 12.23	<p><b>Urban Extensions: ‘At Crawley’</b></p> <p><u>Paragraphs 12.17 to 12.23</u> set out a very detailed narrative on landscape character within the setting of Crawley, and a ‘shadow’ policy framework for development, for areas outside its administrative area. This would seem to replace former Policy H3g that was included in the previous Regulation 19 Plan (and is now deleted). We consider that this whole suite of paragraphs is <b>not effective</b>.</p> <p>The new paragraphs go a great deal further than text and policy wording included in the previous version of the Plan. Whilst we appreciate the intention is to set a framework for shaping any ‘At Crawley’ developments and deliver on the aspirations of CBC, we consider it is inappropriate for inclusion in the Crawley Local Plan. This is because it seeks heavily to shape development outside Crawley’s administrative area, and is therefore ineffective. It is for other Local</p>



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			<p>Plans that have legal remit as the adopted development plan to set these parameters in the areas concerned. Otherwise, there may be conflicting policy statements in respective local plans, causing confusion.</p> <p>HDC notes the strong history of successful joint working arrangements between CBC and HDC on cross-boundary matters. Most recently HDC and CBC have been in regular discussions on our respective plans to help ensure that the needs arising from Horsham and Crawley District can be met. CBC has also been part of ongoing discussions as part of the Planning Performance Agreement with Homes England in relation to the proposals for development to the West of Ifield, which is primarily located in Horsham District's administrative area. The authorities are in the process of agreeing a Statement of Common Ground that it is envisaged will address the potential for allocations that will extend the built form of Crawley but are located in Horsham District. We consider a continuation of this collaborative approach is the most effective place-shaping mechanism.</p> <p>We have a particular concern regarding reference in paragraph 12.20 which asserts that any urban extension on the edge of Crawley should be meeting the unmet housing needs arising from Crawley, and should therefore meet Crawley's specific needs for affordable housing, housing mix, type and tenure. Whilst HDC supports working towards a joint approach on such matters, this principle has not been agreed with HDC and, insofar as it relates to development in Horsham District, is ineffective. It must be borne in mind that Horsham District itself has a very high assessed need for housing, including an affordable housing need of 503 homes per year, meaning that there may be limited opportunity to meet a significant proportion of Crawley's affordable housing need in addition to our own requirements.</p> <p><b>Suggested Modifications:</b></p>
REP/041	IVCAAC	H3g 12.17	<p><b>Urban extensions 'At Crawley'</b></p> <p>IVCAAC notes in 12.17 the comment that much piecemeal development has occurred on the periphery of Crawley and linked to the existing urban infrastructure. The logic of this is followed through into 12.23 ii where a 'comprehensive Western Link Road connecting the A264 to the A23 should be agreed prior to any development west of Crawley'. Admittedly the plan reads 'If development is proposed to the western side of Crawley...',</p> <p>If a comprehensive Crawley Western Link road were built, the result will be a town completely surrounded by traffic noise: Gatwick to the north; M23 to the East; A264 to the South and the Western Link Road to the West. And there is the A23 running through the centre.</p> <p>Such a road (and subsequent development) would have detrimental effects on the character of the Ifield Village Conservation Area (IVCA) and the amenity that the Conservation Area and surrounding countryside offer for health walks away from urban areas. This countryside links IVCA to the rest of the rural parish of Ifield and is crossed by well used footpaths.</p> <p>We also note that this access to the countryside helps part of the town to meet the standards of Natural England and the Woodland Trust for access to open green space and woodland (as set out in 14.16).</p> <p><b>Suggested Modifications:</b></p>

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REP/066	Mid Sussex District Council	2.17 - 12.22	Mid Sussex <b>objects</b> to this section of the Plan. It is neither <b>justified nor effective</b> .  Mid Sussex notes the removal of Strategic Policy H3g from the January 2021 Submission version. The context of the policy can now be found at paragraphs 12.17 to 12.22, along with 'At Crawley' Urban Extensions Key Considerations at paragraph 12.23, which will be used to inform discussions with neighbouring local authorities.  However, the concerns set out in the response of January 2020 are still applicable to this supporting text.
			<b>Suggested Modifications:</b> <b>Change required:</b> This section of the Plan needs significantly redrafting to address Mid Sussex District Council's concerns set out in our previous response.
REP/068	Sussex Wildlife Trust	12.23	We note that the submission version of the Crawley Local Plan, has now had the Strategic Policy H3g: Urban Extensions removed. Instead pages 152-154 appear to consider similar points to those incorporated into the policy. We welcome Crawley's acknowledgement that the matter of Urban Extensions will be a significant cross boundary matter and that the policies of adjoining Local Authorities will be imperative in this process. SWT ask whether it is prudent to still consider the inclusion of a formal policy in relation to this issue to ensure a consistent and accountable approach. We make this statement as we are unclear of the weight given to the supporting text and want to ensure that the potential impact of this form of development is captured appropriately within the Local Plan.
			<b>Suggested Modifications:</b>
REP/119	Turley on behalf of A2Dominion Group	12.18 12.23	<b>CRAWLEY LOCAL PLAN REVIEW – REPRESENTATIONS ON BEHALF OF A2DOMINION HOUSING GROUP</b> We write to set out representations on behalf of A2Dominion Housing Group to the Regulation 19 Crawley Local Plan Review which has been published for consultation. We note that additional material has been published and the deadline for comments extended. Although we do not expect to do so, we may make further comments if additional material is published after these representations have been published.  <b>A2Dominion</b> A2Dominion is a residential property group and award-winning housing developer. They pursue their business with a social purpose, reinvesting profits from private sales into building new affordable homes, managing existing homes and supporting local communities. They deliver on all tenures on their development sites, retaining a long term interest via the ownership and management the affordable housing and open areas. A2Dominion's vision is to improve people's lives through high-quality homes and services. A2Dominion has over 38,000 homes across London and southern England and are committed to developing new homes that are genuinely sustainable. A2Dominion have led the development of a new flagship eco town at North West Bicester; a pioneering project backed by environmental integrity and a long-term vision for the area.  <b>Cottesmore Village</b> A2Dominion has recently promoted an area of land to the west of Pease Pottage for residential development to Mid Sussex District Council. However more recently, A2Dominion has provided details to Horsham District Council of a

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			<p>wider opportunity referred to as 'Cottesmore Village' where the vision is for a sustainable new community located in close proximity to Crawley.</p> <p>The site is circa 83ha, and is currently in use as Cottesmore Hotel and Country Club. Due to the recent decline in Golf the site opens up a new opportunity to create a sustainable community incorporating the existing Hotel and Country Club, open space, community sports facilities and business hub within a landscaped setting. The site can be separated into two areas of land connected by a pedestrian footpath. Current access into the site is taken from Forest Road to the south, where the current Club main facilities are located including a Club House, Hotel and Spa.</p> <p>A Vision Document, setting out key considerations, and the form of development which could be accommodated, is included at Appendix 1 of this letter.</p> <p>Cottesmore Village is in a strategically significant location on the edge of the major urban area of Crawley (and its range of facilities, employment opportunities and transport connections), close to the strategic highway network and within the 'Gatwick Diamond' which has followed from the consistent recognition of this area's importance in regional planning.</p> <p>The interaction between Horsham District and Crawley was acknowledged in the HDPF which states explains how the 2001 Census showed 40% of working people who live in Horsham District commute outside it to work. Of these, 58% travelled to Crawley and London. The HDPF also explains how the District has been recognised as operating at a pivotal point of a triangle of large urban communities between Crawley/Gatwick and Portsmouth and Brighton on the south coast.</p> <p>A number of local authorities in the area (Surrey County Council, West Sussex County Council, Crawley Borough Council, Horsham District Council, Mid Sussex District Council, Mole Valley District Council, Reigate and Banstead Borough Council, Tandridge District Council) have formed the Gatwick Diamond local authorities. The Authorities published a Gatwick Diamond Local Strategic Statement in 2012, with an updated version published in June 2017. A Memorandum of Understanding (MoU) exists between the Gatwick Diamond authorities as a mechanism for interauthority co-operation to promote the planning of sustainable development across the area. The Local Strategic Statement from 2017 explains that the Vision to 2031 is "<i>By 2031 the Gatwick Diamond will be a worldclass, internationally recognised business location achieving sustainable prosperity and growth.</i>"</p> <p>A2Dominion consider that these considerations, allied with the significant unmet housing need arising from within Crawley Borough reinforce the strategic location of the area and the role in which Cottesmore Village could play.</p> <p>The work undertaken by A2Dominion demonstrates that Cottesmore Village could provide:</p> <ul style="list-style-type: none"> <li>Residential areas totalling circa 19.67ha across the site. There will be differing character areas to each parcel with lower densities around the development edge and set back from a listed building adjoining the site. All residential development is within a landscape country park setting respecting the natural character of the site;</li> </ul>

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			<ul style="list-style-type: none"> <li>• A local centre, which could include uses such as a doctors' surgery, community hall, coffee shop, convenience store and Business and Innovation Hub including a delivery hub as we change to online shopping more and other facilities subject to detailed masterplanning;</li> <li>• A primary school;</li> <li>• Sports/play pitches;</li> <li>• A community food production area; and</li> <li>• Significant levels of open space.</li> </ul> <p>Vehicular access to the site is proposed from Forest Road via a new roundabout junction. The scheme can be designed to facilitate home working, e.g. through ensuring that there is a space within the home where it is possible to work productively in terms of having sufficient room, segregation from the rest of the household as well as having somewhere comfortable, well ventilated and well lit. In addition, fast broadband speeds will be important.</p> <p>Cottesmore Village will bring forward new facilities to offer new and existing residents much greater opportunity to travel locally on foot and by bicycle. The emerging masterplan shows the following connections:</p> <ul style="list-style-type: none"> <li>• A connection eastwards to a signed cycle route to Crawley and off-site enhancements of that cycle route;</li> <li>• A connection northwards to Crawley via Bridleway 1546 which will benefit from improved surfacing, drainage and lighting (particularly the well-used underpass beneath the A264) all of which can be delivered by Cottesmore Village;</li> <li>• A connection north-eastwards via Footpath 1545 through Buchan Country Park and connecting with Horsham Road, Crawley.</li> <li>• A connection south-eastwards via Footpath 1545 to Forest Road. It is proposed to provide a footway in the existing highway verge along the northern side of Forest Road/Horsham Road to connect the site to Pease Pottage and vice versa.</li> </ul> <p>In addition to the site's location close to Crawley, there is good opportunity for future bus routes (e.g. extended and enhanced existing services and/or new services) to be incorporated into Cottesmore Village. The proposed scheme could enhance the public transport connections in a number of ways including:</p> <ul style="list-style-type: none"> <li>• Increasing the frequency of an existing bus route and divert it to serve Pease Pottage and the site e.g.; <ul style="list-style-type: none"> <li>- Extend the existing 271/273 Crawley to Brighton buses from eastern Pease Pottage to the site and increase the frequency from 1 to 2 per hour to every 20-minutes; and/or</li> <li>- Divert the existing 23 Crawley to Worthing via Horsham buses from the A264 to serve Pease Pottage and the site and increase the frequency to every 20-minutes; and/or</li> <li>- Deliver a new hopper bus service between the site, Pease Pottage and central Crawley and/or Horsham (including the station(s)) operating with a circa 20-minute frequency.</li> </ul> </li> <li>• The provision of bus stops with seating, timetable information and shelter within the site so that new residents have a very short walk to access buses.</li> </ul>

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			<ul style="list-style-type: none"> <li>The provision of real time information at the bus stops and on local buses.</li> </ul> <p>The concept of development in the area where Cottesmore Village is located is outside of Crawley Borough and primarily within Horsham District and so A2Dominion acknowledge that it is not the role of the Crawley Borough Local Plan Review to allocate development in this area. However, as these representations consider, it is appropriate for the Local Plan Review to include text regarding the scale of unmet housing need, its economic significance and the way in which these matters could be addressed.</p> <p>Furthermore, we expect that Crawley Borough Council will be familiar with the concept of development in the area where Cottesmore Village is located as this was considered in a document published in September 2005 and titled 'Feasibility Study for Development Options at Crawley'.</p> <p>Urban Extensions: 'At Crawley' Paragraph 12.18 We welcome the recognition that sustainable new neighbourhoods could play an important role in meeting Crawley's housing needs. We also welcome the recognition that other potential urban extensions to Crawley outside its administrative area could be explored in the future in order to meet the arising housing need of the borough. As with our earlier comments, the Local Plan should not be used as a tool to support/discourage specific locations for that growth as all such opportunities should be considered. Paragraph 12.23 We welcome the fact that Crawley Borough Council has provided guidance as to the circumstances where it will support housing development through urban extensions on or close to its administrative borough boundaries. The following table sets out A2Dominion's explanation as to how the proposal at Cottesmore Village could achieve those expectations:</p>

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			<p>v. Developments are designed and progressed as comprehensive neighbourhoods rather than incremental ad hoc development.</p> <p>vi. Neighbourhood centres containing local facilities and services are provided in order to meet the day-to-day needs of residents.</p> <p>vii. The development helps address unmet development needs arising from Crawley, including in relation to housing mix, type, tenure and affordability (including meeting the 40% affordable housing levels and agreements in relation to the nomination rights for those on the Crawley housing register); complementary employment and economic growth needs; social, education and health needs; and strategic recreation and leisure requirements.</p> <p>viii. Linkages are maintained from Crawley's neighbourhoods through new development to the countryside beyond (both in terms of active transport and visual links) as well as prioritising sustainable modes of transport links (public transport, cycling and walking routes) into existing Crawley neighbourhoods and the town centre, making car journeys a longer, more circuitous option.</p> <p>ix. A landscape character, setting and heritage appraisal has been undertaken which:</p> <p>a. identifies the scale, extent and spatial characteristics of the existing landscape structure and grain, including natural and man-made features, field patterns, views, landscape structure, tranquillity and sense of space or enclosure, and provides an understanding of how they are experienced, used and perceived; and this</p> <p>b. has led to an assessment of the impact of the development on the landscape character, setting and heritage of the area, and the setting of Crawley's neighbourhoods and development is planned to ensure the key landscape features, character areas, areas of tranquillity and settings are protected, and the way they can be experienced is enhanced.</p> <p>x. Development has been designed and planned to carefully address both its connections to existing Crawley neighbourhoods as well as the wider countryside beyond, providing defensible boundaries which both prevents inappropriate merging of settlements or the effects of</p>	<p>Cottesmore Village offers the opportunity to design a new community in a comprehensive manner.</p> <p>Cottesmore Village is envisaged as a new community including a local centre to meet day-to-day needs.</p> <p>Cottesmore Village is strategically located so as to help meet the market and affordable housing needs of Crawley Borough. A2Dominion would be willing to engage with local stakeholders, including local planning authorities, in relation to the affordable housing obligations.</p> <p>Cottesmore Village is located close to the existing communities within Crawley and the accompanying material demonstrates how connections with be achieved to these neighbourhoods, including via public transport.</p> <p>Cottesmore Village has been informed by a detailed analysis of the landscape character and further design and masterplanning work can be undertaken.</p> <p>A2Dominion would work with stakeholders to develop a scheme of high quality urban design which is informed by the detailed understanding of landscape and heritage considerations for example..</p> <p>Cottesmore Village will not lead to the merging (actual or perceived) of settlements. It is located close to the existing communities within Crawley and the</p>
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			<p>urban sprawl and ensures the careful stitching together of existing and new built form where appropriate.</p> <p>accompanying material demonstrates how connections with be achieved to these neighbourhoods.</p> <p>The landscape structure around the site offers the potential to accommodate the new community within defensible boundaries.</p> <hr/> <p>xi. Ancient woodland or veteran trees would not be damaged or lost and an appropriate buffer, in accordance with national guidance, is provided between any such trees and the edge of the development's construction. Any TPO protected trees should be retained where possible and measures to avoid damage and root compaction should be implemented. Where the loss of existing trees is unavoidable, appropriate replacement trees are to be provided.</p> <p>The initial proposals for Cottesmore Village have been prepared based on assessments of the site and area, including in relation to arboricultural matters. A2Dominion's further masterplanning will develop these elements of the proposal as part of a holistic scheme.</p> <hr/> <p>xii. Development must incorporate strategic Green Infrastructure throughout, providing ecological linkages, in particular to support pollination, and result in a Net Gain to biodiversity.</p> <p>The initial proposals for Cottesmore Village have been prepared based on assessments of the site and area, including in relation to ecology and landscape matters. A2Dominion's further masterplanning will develop these elements of the proposal in order to support biodiversity net gain.</p> <hr/> <p>xiii. Development must be designed to exemplar sustainability standards, taking advantage of the potential of a masterplanned approach and economies of scale, and must design in tight energy and water efficiency targets from the outset in order to futureproof developments for a zero carbon future and a changing climate.</p> <p>If Cottesmore Village is to be taken forward then A2Dominion would commit to working with relevant stakeholders through the masterplanning and detailed design stages so that these considerations are taken into account throughout the process.</p> <hr/> <p>xiv. Development proposals use bespoke Area Wide Design Assessment tools from the outset which will aim to set out and enable development proposals to identify, understand and fit in with the overall form and layout of their surroundings.</p> <p>If Cottesmore Village is to be taken forward then A2Dominion would commit to working with relevant stakeholders through the masterplanning and detailed design stages so that the scheme is informed by a detailed analysis and understanding of the wider area and its character.</p> <hr/> <p><b>Suggested Modifications:</b></p> <p>Rusper Parish Council would like to comment on your Local Plan Review.</p>



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REP/134	Rusper Council		<p>Councillors and many Rusper residents are concerned about the Land West of Ifield development site that has been proposed under a duty to cooperate with Horsham District Council. They feel this would impact negatively on the proposed Crawley Local Plan as follows:-</p> <ul style="list-style-type: none"> <li>• The need for open space and access to local facilities which support healthy lifestyles would be reduced.</li> <li>• Landmarks, views, vistas and woodland would be destroyed.</li> <li>• The proposal does not take into account the existing character of the area.</li> <li>• Individual specimens or groups of trees that make a positive contribution to visual and biodiversity amenity wouldn't be retained.</li> <li>• There is a need to retain an area of special local character (Ifield golf club) which has social and communal value. It also has heritage significance and is a local landmark.</li> <li>• The loss of farmland would adversely affect the rural economy; the NPPF supports rural businesses.</li> <li>• Valued landscapes and biodiversity would be destroyed.</li> <li>• There would be light pollution on intrinsically dark landscapes and nature conservation.</li> <li>• Ifield Brook Meadows is included as an area of enjoyment, visual amenity, tranquillity and wild life. The western link road would have an adverse effect on this as the proposals seem to have cycle ways through parts of this conservation area.</li> <li>• Flash flooding would increase.</li> <li>• The site would suffer from noise from Gatwick Airport.</li> </ul> <p><b>Suggested Modifications:</b></p>
REP/122	Inspired Villages	12.26-12.28	<p>It is welcomed that Crawley Borough Council are able to acknowledge some of the benefits of specialist housing for older people at Paragraph 12.26 of the Draft Local Plan, including the freeing up of family homes as well as lower traffic generation resulting from such developments. However we would also like to draw attention to some of the additional benefits outlined within the attached representation document particularly the health and wellbeing benefits such as savings to the NHS, as well as reduced mental and physical health problems. Please refer to paragraphs 3.14 to 4.15 of the attached representation for further details:</p> <p>Attached Inspired Villages Document Paragraphs 3.14 – 4.15:</p> <p><u>Evidence base and approach for local plan-making</u></p> <p>3.14 The government's Social Care White Paper, 'Caring for our Future',<sup>29</sup> committed to provide support to help local authorities develop their market capacity to provide greater choice for users and drive up quality in care services. The Developing Care Markets for Quality and Choice programme, launched by the Department of Health in 2012, is intended to support local authorities to improve capacity through preparing or improving their market position statements.</p>

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			<p>3.15 The 2013 'Top of the Ladder' report by Demos,30 the leading cross-party think tank, provided some key findings:</p> <ul style="list-style-type: none"> <li>• 'Retirement properties make up just 2% of the UK housing stock, or 533,000 homes, with just over 100,000 to buy. One in four (25%) over-60s would be interested in buying a retirement property – equating to 3.5 million people nationally.</li> <li>• More than half (58%) of people over 60 were interested in moving. More than half (57%) of those interested in moving wanted to downsize by at least one bedroom, rising to 76% among older people currently occupying three, four and five-bedroom homes.</li> <li>• If just half of the 58% of over-60s interested in moving (downsizing and otherwise) were able to move, this would release around £356 billion worth of (mainly family-sized) property – with nearly half being three-bedroom and 20% being four-bedroom homes.'</li> </ul> <p>3.16 The report suggested a number of national policy recommendations to assist in overcoming these problems:</p> <ul style="list-style-type: none"> <li>• 'Giving retirement housing special planning status akin to affordable housing, given its clear and demonstrable social value.</li> <li>• Tackling S106 and community infrastructure levy (CIL) planning charges, which make many developments untenable and affect them disproportionately compared with general needs housing developments'.</li> <li>• Quotas and incentives for reserving land for retirement housing, and linking this to joint strategic needs assessment and health and well-being strategies for local areas.'</li> </ul> <p>3.17 Inspired Villages recommends clear policies in development plans to support new retirement communities. The evidence is clear, as are the benefits to support the approach and deliver much-needed specialist accommodation for the elderly.</p> <p>3.18 The 'Shining a Spotlight on the hidden housing market' report included a survey of 200 individuals from a variety of backgrounds in the UK later living sector, from local authorities to private developers, care operators and designers. Some 97% of respondents thought that the development of later living accommodation would play a key role in alleviating the housing crisis and 73% thought that the demand for later living accommodation would significantly increase in the next 5 years, while 89% felt that planning laws would need to change to boost later living development and 33% are calling for a 'Retirement Villages Act'.</p> <p>3.19 Some of the strategic recommendations from the report is that there should be legislative and policy suggestions for local and national government, including reform of planning policies, tax breaks for older people looking to 'right-size', and the appointment of a dedicated minister responsible for the needs of older people.</p> <p><u>Local planning authority plan-making</u></p> <p>4.1 Many local authorities are increasingly aware of the variety of accommodation and care options available to enable the elderly to receive care within their own homes, and as a more cost-effective alternative to residential</p>

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			care. In certain areas, they are considering the potential for the reconfiguration of dated and under-used sheltered housing stock to provide additional, affordable extra care housing.
			4.2 In reality, upgrading sheltered housing to extra care suitable for those with increasing care needs is rarely the most efficient solution, as existing developments are often too small to enable the required economies of scale to deliver 24-hour on-site care, nor are they able to provide the layout and additional communal facilities necessary to form a genuine extra care community.
			4.3 Housing LIN consider that the later living market needs to be made both acceptable and financially viable to enable older people to move from unsuitable accommodation (too large to manage, costly to maintain, poorly located or ill-equipped to deal with changing needs) to better, thoughtfully designed homes in sought-after places. 'Right-sizing does not mean a compromise on design' and new homes that are accessible and adaptable and can meet with the current and future lifestyle goals of potential residents.
			4.4 There is a strong wish for older people to remain independent for as long as possible, and extra care housing appeals to this desire. The key issues leading people to move into extra care are health and care requirements, frequently prompted by the death of a spouse or partner. The decision to move is often strongly influenced by immediate relatives, and the more frail or vulnerable the elderly person, the more this applies. Aspects such as accessibility and convenience for visiting play a major role in the decision making.
			4.5 An estimated six million people provide significant support to elderly relatives, neighbours and friends across the UK. This factor contributes additional demand, as carers understand the benefits associated with their charges moving to an environment where some of the care burden can be shared, allowing them to remain, sometimes indefinitely, outside of the care home environment. Additionally, the family is often involved in a decision to move a loved one to an extra care scheme located more conveniently, so that regular visits are more easily made and concerns over 'welfare at a distance' can be eliminated.
			4.6 In 2019, ARCO partnered with ProMatura to conduct the biggest ever study of retirement communities, <sup>30</sup> with surveys of residents representing 81 communities and 15 different care operators, which provided evidence of the huge health, wellbeing and security benefits for residents.
			4.7 The main reasons given for moving to a retirement community were cited as being: less need for property maintenance, access to communal facilities, and the availability of 24-hour support and domiciliary care on site. The benefits of living in extra care included: being more active and healthier for longer, the ability to enjoy life, having greater control, and feeling safe and secure, with a consequent reduction in loneliness.
			4.8 The resultant recommendations for action set out, amongst others, that the government and local authorities should:

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			<ul style="list-style-type: none"> <li>• ‘Develop a legal and regulatory framework for Retirement Communities to bring the UK into line with leading countries around the world • Develop a clear definition and terminology for Retirement Communities and recognise the significant contribution they are making to our health and social care systems</li> <li>• Provide more funding and land for affordable housing in Retirement Communities</li> <li>• Undertake further research on the level of Retirement Community supply and demand in their areas</li> <li>• Ensure they have provisions in their local plans for Retirement Community housing</li> <li>• Partner with specialist Housing Associations with expertise in extra care Retirement Communities to increase provision.’</li> </ul>
			<p>4.9 Tailored housing that is accessible, well designed and well located for facilities may reinvigorate a person’s social life through their offer of a wide range of activities and communal areas that provide opportunities for making new friends. There is evidence that residents have better health outcomes than older people living elsewhere; designs that minimise the risk of falling, for example, and social facilities that reduce feelings of loneliness.</p>
			<p>4.10 By providing an attractive alternative type of accommodation in the form of extra care housing, older homeowners may benefit from releasing equity from their existing properties, which they can use to fund their retirement years. Extra care housing can also contribute to addressing wider housing market concern, by releasing their homes onto the market for families.</p>
			<p>4.11 There are other benefits in promoting care villages as they can reduce the demand upon health and social care. Research from Aston Research Centre<sup>31</sup> in 2015 set out that the NHS saved more than £1,000 per year on each resident living in Extra Care Charitable Trust’s schemes between 2012 and 2015. The Homes for Later Living ‘Healthier and Happier’ report<sup>32</sup> suggests that each person living in older people’s housing contributes to a fiscal saving to the NHS and social care of approximately £3,500 per annum. Inspired Villages typical model providing 150 units would generate a population of approximately 195 residents (average occupancy 1.3 persons per unit) being equivalent to over £680,000 savings to the NHS and social care every year, a significant benefit.</p>
			<p>4.12 As an operator, unlike residential developers, Inspired Villages considers the long-term ownership and management of the site; therefore, it is vital that we secure suitable sites and planning permissions that allow the implementation of a viable development. It is often very difficult for an operator, such as Inspired Villages to secure sites on the open market due to competition from residential developers who do not provide the level of facilities or care that a retirement community does.</p>
			<p>4.13 The inclusion of positive policies to support extra care housing could give landowners an incentive to proceed with this type of development over a residential developer and can be partly justified on the basis that extra care / retirement community developments are relatively self-contained (because of the extensive communal</p>

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			<p>facilities on-site); lower traffic generation, which are predominantly off-peak (because residents do not commute to work); are employment generators; and can result in savings to the NHS and adult social care, amongst other significant benefits.</p> <p>4.14 We recommend that the local planning authority properly engages with the extra care sector regarding the potential for including this form of development in strategic site allocations to ensure this would be deliverable, or an appropriate site location. The sector is an emerging market and operators do not tend to have strategic land, meaning they may not be able to promote potential sites at the time the local plan is being prepared.</p> <p>4.15 To avoid being prejudiced, LPAs should consider whether policies allow for a greater degree of flexibility for proposals for specialist housing for older people on land that may otherwise be inappropriate for standard residential development, for example, adjacent to settlement boundaries where those settlements provide a certain level of services and facilities. Such a policy approach has been applied in local planning authorities, such as Hart District, South Northamptonshire and Horsham District. (See examples at back of document.)</p> <p>Policy DD2 'Inclusive Design' stipulates that new developments should meet Building Regulations Part M Category 2 to adapt to the changing needs of residents in the Borough. The policy does not however include any detail on how specialist housing for older people will be planned for outside of the Building Regulations requirements. This is however, further referenced within the draft Local Plan at Paragraph 12.28 discussed below. Conversely, the Draft Local Plan acknowledges at paragraph 5.19 that those within the population over 65 is expected to increase by 55% in 20 years, with those with health or disability problems increasing by 7,000 persons by 2039. Whilst it is accepted as per paragraph 5.20, some older people will wish to remain in their own homes, National Planning Practice Guidance identifies that the need to provide housing for older people is 'critical', the only group identified as such in national policy guidance (Paragraph: 001 Reference ID: 63-001-20190626).</p> <p>Housing has been recognised as one of the key outputs of the Local Plan, a target of 5,320 new homes will be delivered over the lifetime of the plan. Outside of the enhanced Building Regulations at Policy DD2, Paragraph 12.28 of the Draft Local Plan identifies a need for an additional 1,027 units to meet the population's specialist accommodation need for older people and a further 1,029 residential/ nursing bedspaces. This is welcomed and is in line with PPG advising that plan-making authorities "<i>could also provide indicative figure figures or a range for the number of units of specialist housing for older people needed across the plan area throughout the plan period</i>" (Paragraph: 006 Reference ID: 63-006-20190626). However, Inspired Villages would suggest that this target should be included within the policy wording of Strategic Policy H1 to ensure delivery. The provision of housing for older people is also recommended to be included in the monitoring process when preparing the Annual Monitoring Report (AMR) (NPPG Paragraph: 007 Reference ID: 63-007-20190626).</p> <p><b>Suggested Modifications:</b> We would recommend that the Draft Local Plan should include a specific policy related to the provision of specialist housing for older people, this should provide detailed targets as set out in Paragraph 12.28 of the draft Local Plan, as</p>

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			<p>well as the site specific criteria upon which proposals to meet older persons needs will be supported by the Council. Examples of which are included at pages 22 and 23 of the attached representation document. We request that you review the eight recommendations in the attached document set out at Page 5 and request that the Local Plan includes a specific policy (or policies) to encourage the development of specialist housing for older people, sets targets for the delivery of such housing, and allocates specific development sites to ensure this delivery.</p> <p>Attached Inspired Villages Document Page 5: Inspired Villages Recommendations: Inspired Villages makes the following eight recommendations which should be incorporated into the emerging local plan to support the practical delivery of specialist housing for older people and meet the ever-growing need. The local plan and its evidence base should:</p> <ol style="list-style-type: none"> <li>1. Be based on a clear understanding of specialist housing for older people drawing upon national guidance and other sources, particularly regarding the use class and recognise the different types of specialist housing which exist.</li> <li>2. Be based on a robust evidence base that identifies the housing requirements of specialist housing for older people drawing upon appropriate sources recognised within the sector.</li> <li>3. Set out clear and specific policy / policies to address housing needs for older people (e.g. care villages and extra care), on land in, or adjacent to settlement boundaries where those settlements that provide a certain level of services and facilities, where the proposed development provides sustainable transport measures and communal facilities and where there is an identified need.</li> <li>4. Set indicative figures or a range for the number of specialist housing for older people needed across the plan area throughout the plan period and this must recognise the diverse models that exist.</li> <li>5. Monitor the delivery of housing for older people and deliver action plans to address under provision.</li> <li>6. Consider the inclusion of specialist housing for older people within appropriate strategic or other site allocations subject to consideration of need, site and locational factors and deliverability.</li> <li>7. Must recognise the significant benefits associated with specialist housing for older people and this can inform planning decision making.</li> <li>8. Set out different policy requirements, for example, affordable housing, for a retirement community (C2 use) compared to residential development (C3 use) and the evidence base and viability should take into account the different circumstances between the uses (e.g. retirement communities provide significant levels of communal facilities / non saleable floorspace and their ongoing maintenance and management, staffing, funding, etc). Where there is doubt, policies should provide sufficient flexibility for specific circumstances, which may include viability, to be assessed through a planning application.</li> </ol>
REP/022	Sussex Ornithological Society	H1	<p><b><u>RESPONSE TO CRAWLEY LOCAL PLAN S.19 SUBMISSION DRAFT</u></b> We have examined the Regulation 19 Submission Draft of the Crawley Local Plan, and in broad terms we would wish to maintain our position on the comments we made in March 2020 in response to the previous draft. It is understood that these will be forwarded to the Planning Inspector, and unless stated otherwise should still stand.</p>

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			<p>It remains a matter of concern to the Society that the Council proposes to offload more than 50% of its housing allocation to other authorities, and that this proportion has in fact increased from 53% to 56% since the Regulation 19 Consultation Draft. We feel that, in the light of shifts in Central Government thinking regarding changes to the planning system, and in view of the effects that will follow the current health crisis (particularly the possible long-term brake on aviation growth and the rise in home working and on-line retail making office and retail sites potentially available for housing), Crawley should be more robust in stating that, if the Council is certain that more of these houses cannot be built within Crawley, it is not acceptable to ask neighbouring Local Authorities to build the huge numbers remaining.</p> <p>It remains a particular concern that there needs to be firmer protection relating to the High Weald AONB, which has not really been addressed in this draft, and regarding which we refer back to our observations in response to the Consultation Draft.</p> <p>We would like to make the following specific comments in relation to this Submission Draft of the Plan –</p> <p><b>Suggested Modifications:</b>  <b>Housing Policy H1 – Housing Provision</b></p> <p>a) We note that, while the wording we referred to at 19(b) of our previous submission no longer appears in H1, it is still clearly stated at paragraph 4.14 on page 38 of the Submission Draft in the chapter on Landscape and Form. While we absolutely understand the reasoning behind the statement, we consider that the sheer numbers of houses being off-loaded onto neighbouring Local Authorities renders it unacceptable.</p> <p>b) (b) It is noted that the protection for the AONB we requested at 19(c) of our submission has not been included (see comments above).</p>
REP/023	Savills on behalf of St Catherine's Hospice	H1	<p><b>Section 12: Housing Delivery</b>  <b>Strategic Policy H1: Housing Provision</b></p> <p>3.35. St Catherine's Hospice recognise the significant land constraints facing Crawley and applaud the Council for increasing their housing supply since the Regulation 18 consultation and their positive approach to meeting housing need in the Borough.</p> <p>3.36. However, whilst we support Strategic Policy H1, it is important to reflect on the context of housing need in the South-East. Notably, the significant levels of unmet need across the Gatwick Diamond and the Coastal West Sussex and Greater Brighton LEP. All authorities recognise the need for a sub-regional response to the challenges facing the South-East.</p>

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			<p>3.37. In light of this, the onus is on CBC to facilitate as much housing delivery as possible within the District boundary. As such, the implications of Strategic Policy H1 should be considered across the entirety of the Plan, mindful of the cumulative impacts of policy on the viability and deliverability of residential development in the Borough.</p> <p><b>Suggested Modifications:</b></p>
REP/033	Horsham District Council	H1	<p>We support aspects of this policy, in particular that all reasonable opportunities will be considered to develop on brownfield sites and surplus green space; capitalise on town centre living, and seek out further opportunities on the edge of Crawley.</p> <p>However, we consider that the policy <b>is not completely justified as stands.</b></p> <p>We acknowledge that land supply in Crawley is highly constrained, and accept that Crawley Borough Council will be unable to meet their full housing requirement within its administrative boundary during the plan period. It is however considered that clearer evidence is required to fully determine the precise level of unmet need, which will assist Horsham District in considering the extent to which any need could be met as part of the review of the Horsham District Local Plan. For example, Policy CL5 sets minimum densities for development, and Policy TC3 identifies a number of Key Opportunity Sites in the Town Centre. Paragraph 11.22 states that at least 1,500 dwellings are anticipated across all of these sites (consistent with Policy H1). Whilst this is welcome it is considered that the clearer evidence is required to fully demonstrate how this number has been arrived at, including a comprehensive study of opportunity sites within the town centre, and appropriate densities within these.</p> <p>Secondly, it is also not clear how opportunities for estate regeneration (and associated densification) have been looked at. The draft Local Plan in paragraph 12.68 states that there are no estate regeneration projects planned in Crawley. We would welcome discussion as to why this has not been taken forward as an option for increasing housing delivery within Crawley Borough whilst also delivering significant community benefits</p> <p>We do however welcome that the windfall assumption has been increased significantly from 55 dpa to 90 dpa which we agree is a more realistic figure. We note that Topic Paper 4: Housing Supply helpfully sets out the reasons for this increase (including permitted development rights allowing conversion of offices in recent years), and detailed analysis included in the Windfall Statement 2021.</p> <p>To ensure that a robust unmet need figure can be agreed, it is requested that the Densification Study is completed, including to consider further, or robustly evidence, that appropriate capacities have been assumed for sites in the SHLAA. This is essential to ensure a full understanding of how much of the Crawley housing needs will remain unmet, and ensure that HDC can also robustly demonstrate it is planning appropriately for cross-boundary needs. An increase in small site delivery in the earlier years of the Plan period would be particularly helpful for meeting the needs of the wider HMA, given that HDC, as part of the preparation of its own local plan is considering the potential to deliver new homes on large strategic sites which have longer lead-in times in delivering new homes.</p> <p><b>Suggested Modifications:</b></p>



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			<p><b>Change sought:</b> To ensure that a robust unmet need figure can be agreed, it is requested that the Densification Study is completed, to consider the points above, and others as appropriate. This is essential to ensure a robust understanding of how much of the Crawley housing need should in principle be accommodated by neighbouring authorities including Horsham District. Continued discussions on these matters would be welcome as part of our ongoing Duty to Co-operate discussions.</p>
REP/063	Pegasus Group	H1	<p><b>INTRODUCTION</b></p> <p>1.1 These representations are made on behalf of Persimmon Homes.</p> <p>1.2 Following our representations to Regulation 18 and 19 of the Crawley Borough Local Plan Review 2020-2035 consultations, Pegasus Group welcomes the opportunity to submit representations to the second round of the Regulation 19 Public Consultation to the Crawley Borough Council Local Plan Review 2021- 2037.</p> <p><b>2. MEETING THE HOUSING NEEDS WITHIN THE BOROUGH</b></p> <p>2.1 Paragraph 11b of the NPPF requires that strategic policies provide for the objectively assessed needs for housing as well as any needs that cannot be met within neighbouring areas as a minimum unless either the application of specific policies that protect areas or assets of importance provide a strong reason for restricting the scale of development or any adverse impacts of meeting needs would significantly and demonstrably outweigh the benefits</p> <p>2.2 Strategic Policy H1 identifies that the Council will not be able to meet its own housing needs.</p> <p>2.3 It sets out that the Local Plan will make provision for the development of a minimum of 5,320 dwellings across the plan period (2021-2037) in response to the minimum local housing need for 11,488 homes. Consequently, there will be a 6,168 dwelling shortfall over the plan period as compared to the shortfall of 5,925 dwellings identified in the previous consultations. The Council therefore propose to accommodate only 46% of its housing need within its boundaries. The reasoned justification section states that the housing figure identified in the Policy H1 represents a ‘supply-led’ requirement.</p> <p>2.4 In order to accord with paragraph 11b of the NPPF it would therefore be necessary to demonstrate both that the specific policies referred to in footnote 6 of the NPPF provide a clear reason to restrict the level of growth to this extent and that the adverse impacts of better responding to housing need would significantly and demonstrably outweigh the benefits.</p> <p>2.5 The evidence base does not appear to undertake these necessary assessments to justify the proposed ‘supply-led’ requirement. As a result, the housing requirement of Strategic Policy H1 is unsound as it does not accord with national policy, it is not effective in responding to housing needs, it is not justified in accordance with the tests provided by national policy and it is not positively prepared.</p> <p>2.6 Instead, the justification for the ‘supply-led’ housing requirement is identified in paragraph 12.38 as being provided by the SHLAA. A SHLAA does not determine whether or not sites should be allocated as set out in the PPG (3-001) and</p>

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			<p>therefore it cannot be used as a substitute for the proper test to determine the ability of the Council to better respond to housing needs as articulated in paragraph 11b of the NPPF.</p> <p>2.7 In order to rectify this departure from national policy it will be necessary to apply paragraph 11b of the NPPF and to identify any specified policies that may affect other sites and to consider whether these provide a strong reason for restricting development.</p> <p>2.8 If not, it will then be necessary to consider whether any adverse impacts arising from other potential sites would significantly and demonstrably outweigh the benefits. Once this exercise has been undertaken, depending upon the findings it is likely that it will be necessary to modify the proposed housing requirement and the allocations proposed to better respond to housing need.</p> <p>2.9 The sites proposed for intensification by Persimmon Homes as part of the Forge Wood development are not subject to any of the policies identified in footnote 6 of the NPPF such that the delivery of these parcels should be facilitated and reflected in the housing requirement of Strategic Policy H1 unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits.</p> <p>2.10 These parcels could be delivered with appropriate mitigation to ensure that the residents are protected from the noise arising from Gatwick Airport and that they integrate with and complement the remainder of the Forge Wood development, such that any adverse impacts arising from these proposed developments will be minimal, as compared to the very significant benefits arising from the provision of housing to address some of the unmet need. Persimmon Homes look forward to working collaboratively with the Council to identify necessary solutions.</p> <p>2.11 In such circumstances, paragraph 11b of the NPPF requires that the housing requirement is increased to reflect the opportunities provided by sites such as the parcels at Forge Wood.</p> <p>2.12 Strategic Policy H1 also states that the Council will continue to work closely with its neighbouring authorities, particularly those which form the Northern West Sussex Housing Market Area, in exploring opportunities and resolving infrastructure and environmental constraints in order to meet this unmet need in sustainable locations.</p> <p>2.13 Paragraph 12.39 indicates that the remaining unmet need will need to be considered through Duty to Cooperate discussions as part of the Local Plan Reviews of other authorities, primarily Horsham and Mid Sussex and a small part of Reigate and Banstead. It states that Horsham and Mid Sussex are anticipated to identify an additional capacity of 3,000 towards Crawley's unmet need in their adopted Local Plans.</p> <p>2.14 It is however acknowledged that the Standard Method also increases the housing needs in Horsham and Mid Sussex. Based on the updated results of the standard method the housing need has increased by 247 dwellings per annum in Horsham District and 217 in Mid Sussex District. These increases may reduce the contribution that Horsham</p>

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			<p>and Mid Sussex are able to make to the unmet needs of Crawley as acknowledged in paragraph 12.39 of the draft Local Plan Review.</p> <p>2.15 The North West Sussex Statement of Common Ground was signed in May 2020 by Crawley Borough Council, Horsham District Council, Mid Sussex District Council and West Sussex County Council. The document states that the authorities agree to continue to work positively together to seek to address the future housing needs of the Housing Market Area as far as possible, taking into account local constraints, and the need for sustainable development. It also states that the authorities will explore the potential opportunities and mechanisms for meeting the housing needs for different groups in the community across the Housing Market Area.</p> <p>2.15 The North West Sussex Statement of Common Ground was signed in May 2020 by Crawley Borough Council, Horsham District Council, Mid Sussex District Council and West Sussex County Council. The document states that the authorities agree to continue to work positively together to seek to address the future housing needs of the Housing Market Area as far as possible, taking into account local constraints, and the need for sustainable development. It also states that the authorities will explore the potential opportunities and mechanisms for meeting the housing needs for different groups in the community across the Housing Market Area.</p> <p>2.17 There is therefore no effective plan in place to ensure that unmet need of 6,168 dwellings will be addressed at all.</p> <p>2.18 Strategic Policy H1 states the Council will adopt a positive approach in considering proposals for residential developments and will take a pro-active approach to identifying suitable sites for housing development and working to overcome constraints wherever possible.</p> <p>2.19 Pegasus Group welcomes this approach and the attempt to secure more development within the Borough where possible especially given the potential for unmet needs in Crawley.</p> <p>2.20 However, whilst welcome, this is not a sufficient substitute for maximising the housing requirement and allocating sustainable sites</p> <p><b>3. HOUSING PROVISION ACROSS THE BOROUGH</b></p> <p>3.1 Strategic Policy H1: Housing Provision indicates that all reasonable opportunities will be considered for residential developments, including parcels of brownfield land or surplus green spaces as long as consistent with other Local Plan Policies.</p> <p>3.2 Pegasus Group promoted a number of parcels of land through the Regulation 18 and Regulation 19 consultation process on behalf of Persimmon Homes. Five parcels of land within the Forge Wood Area were identified by Persimmon Homes as available and suitable for development. These are presented on the appended plan (shown as highlighted against the background context of the approved Forge Wood Masterplan).</p>

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			<p>3.3 Pegasus Group would like to remind the Council that the attached sites are still suitable and available for the development.</p> <p>3.4 Indeed, through the previous rounds of the consultation, Pegasus Group identified that the Policies Map indicating Key Housing Sites (Policy H2) was unclear. Therefore, the policy did not provide a clear indication as to which areas of land were subject to key housing allocations. It is acknowledged that the reviewed map provides redefined the allocation and includes one of the parcels of land Pegasus Group highlighted as suitable for an infill development which is to be welcomed.</p> <p>3.5 However, the remaining parcels of land which were identified to the Council have not even been considered within the evidence base of the Draft Local Plan. As these parcels form reasonable alternatives for residential development which the Council were aware of, these must be assessed to accord with Regulation 12(2)(b) of the Environmental Assessment of Plans and Programmes Regulations 2004 and the reasons for selection or non-selection provided in accordance with the PPG (11-018)</p> <p>3.6 These parcels provide reasonable opportunities in accordance with the wording of Strategic Policy H1 and should be allocated for development to accord with the paragraph 11a of the NPPF to ensure that the policies of the Local Plan “positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change”.</p> <p>3.7 The delivery of these parcels will contribute towards reducing the unmet need that arises in Crawley. This would have positive implications for the households in Crawley and on a range of other policies set out in the Draft Local Plan.</p> <p><b>4. HEALTH AND WELLBEING</b></p> <p>4.1 One of the policies that would be more effective as a result of the better response to addressing housing needs that would arise from the allocation of additional sites including the parcels promoted on behalf of Persimmon Homes is Strategic Policy SD2: Enabling Healthy Lifestyles and Wellbeing.</p> <p>4.2 Paragraph 3.6 of the supporting text to the policy states that:  “There is now a strong evidence base that our health is impacted by the environments and places within which we live. Government planning policy is explicit that ‘planning for health’, achieving healthy and safe places is a material consideration to enable and support healthy lifestyles to address identified local health and wellbeing needs. Creating and enabling healthy places and improving the wider determinants of health can help to promote good health, better lifestyles, prevent poor health and have a positive impact on reducing health inequalities.”</p>

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			<p>4.3 The policy however fails to acknowledge that one of the key determinants of health and well-being is access to suitable housing.</p> <p>4.4 As set out in the Strategic Policy H1: Housing Provision the Local Plan makes provision for the development of a minimum of 5,320 net dwellings. The remaining unmet housing need of 6,168 dwellings is not being planned for in Crawley, and the ability of neighbouring authorities to address this is uncertain.</p> <p>4.5 As a result, there will be a substantial under-provision of housing relative to need in at least the short-term with substantial adverse effects on the ability of households to access the housing they need and consequent adverse effects on the health and wellbeing of the population.</p> <p><b>Suggested Modifications:</b></p> <p>4.6 In order to make Strategic Policy SD2 more effective it will therefore be necessary to minimise the unmet need as far as is possible including through the allocation of the parcels of land promoted on behalf of Persimmon Homes at Forge Wood.</p>
REP/103	Carter Jonas LLP on behalf of Southern Gas Networks (SGN)	H1	<p><b>CRAWLEY LOCAL PLAN REVIEW – REGULATION 19 CONSULTATION - REPRESENTATIONS</b></p> <p>On behalf of our client, Southern Gas Networks (SGN), we enclose representations to the Crawley Borough Council ('the Council') Regulation 19 consultation on its emerging Local Plan Review. Our client is the freehold owner of the land at the disused gasholder, Forge Wood, RH10 3SX (hereafter known as 'the Site'). The exact land ownership is indicated on the Site Location Plan appended to this letter.</p> <p>At the request of the Council, we have also appended two Representation Forms that should be read in conjunction with this cover letter.</p> <p><b>Background</b></p> <p>SGN are one of four gas distribution companies which operate eight networks across the UK. The company's primary responsibility is to ensure that gas is delivered safely, reliably and efficiently to almost six million homes in the south of England and Scotland, making SGN one of the country's most important utility providers.</p> <p>SGN originally owned and managed 110 gasholders across the UK (mainly located in Scotland and the South East of England). However, the gasholders themselves are no longer required for gas storage purposes as advances in technology allow gas pressure to be controlled and stored within the underground pipeline.</p> <p>SGN have an obligation to dismantle all their gasholders by 2029. In tandem with this exercise, SGN are exploring the development potential of all their sites and recognise that their Forge Wood site offers an opportunity for redevelopment during the Local Plan Review plan period. From the outset of our representations, we make the Council aware that SGN</p>

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			<p>are currently in the process of preparing a Prior Approval application for the demolition of the gasholder. We therefore consider that the Site is deliverable within years one to five of the plan period. As a result of activity taking place on the Site, we make comment on several aspects of the Local Plan Review (including the supporting evidence base) to ensure its development potential is realised through this iteration.</p> <p><b>Suggested Modifications:</b>  <b>Draft Strategic Policy H1 (Housing Provision)</b>  Draft Strategic Policy H1 confirms that the identified housing need over the Plan period (2021-2037) is 12,000 dwellings. However, the Local Plan Review is only proposing to make provision for the development of 5,320 dwellings, This would result in a significant unmet need of 6,680 dwellings, equivalent to 56%.</p> <p>In recognition of this unmet need, the Council include the following statement in draft Strategic Policy H1:  ‘The Council will continue to work closely with its neighbouring authorities, particularly those which form the Northern West Sussex Housing Market Area, in exploring opportunities and resolving infrastructure and environmental constraints in order to meet this need in sustainable locations. This will include continued assessment of potential urban expansions to Crawley.’</p> <p>NPPF Paragraph 35 is clear that Plans are ‘sound’ if they are (inter alia) positively prepared – providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving development.</p> <p>To determine whether this soundness test has been met, we have reviewed the Unmet Needs and Duty to Cooperate Topic Paper. Following this review, we are not satisfied that the Council are certain whether their unmet need can in fact be delivered elsewhere within the Housing Market Area (HMA). For example, paragraph 3.1.6 states, ‘it is acknowledged that the Standard Method has increased the objectively assessed housing need for the other authority areas within the HMA and so the final outcomes of meeting the full housing need of the HMA will need to be established through the reviews of each of the Local Plans independently’.</p> <p>Similarly, reference is made to the importance of urban extensions to meet unmet housing need. Paragraph 3.1.7 notes that ‘further development is being explored through the Horsham District Local Plan review process, through the promotion by Homes England of strategic scale development to the West of Crawley for up to 10,000 new dwellings. The draft submission is due to be published for Regulation 19 consultation in February 2021’. This confirms that the allocation is not guaranteed and could significantly hinder the Council’s ability to meet its unmet need if it is not included within the Horsham Local Plan Review.</p> <p>We also note that the HMA are failing to meet their adopted overall housing need, giving further reason to doubt whether the Council’s increased housing need can truly be delivered elsewhere.</p>

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			<p>We conclude that the Council remain uncertain at an advanced stage of the plan making process as to whether their unmet need can be met elsewhere within the HMA. Instead, they should be exploring every possible opportunity to meet it as far as possible within its own boundary by undertaking further call for sites consultations and reviewing sites previously deemed unsuitable in the SHLAA, as well as providing a degree of certainty that any outstanding need can be met elsewhere.</p> <p>The Council are at serious of failing to meet this soundness test if further work is not carried out before the Local Plan Review is submitted for examination.</p>
REP/ 116	Neame Sutton Limited on behalf of Danescroft (RLP Crawley) LLP	H1 12.1 – 12.43	<p><b>3.0 Housing Need, Housing Requirement/Target and, Supply</b>  <b>Policy H1, SA (Topic Area C) and Table 5.1, Paragraphs 12.1 – 12.43 – OBJECT: Unsound</b></p> <p>3.1 As a starting point it is important to note that the Plan is being prepared in the context of the current National Planning Policy Framework 2019 (“the Framework”).</p> <p><b>Local Housing Need (“LHN”):</b></p> <p>3.2 The basis for the calculation of the LHN is therefore set out in the Framework and corresponding National Planning Practice Guidance (“PPG”), namely, the Government’s Standard Method as updated in December 2020.</p> <p>3.3 The Council has correctly identified that it must apply the Standard Method to calculate its LHN as set out at Paragraph 12.8 on Page 149 of the Plan.</p> <p>3.4 The LHN figure calculated by the Council equates to 12,000 dwellings or 750 dpa for the period 2021 – 2037 (See Table at bottom of Page 149 of Regulation 19 draft Plan and also Table 1 and Paragraph 3.1.2 of Housing Needs Topic Paper – January 2021).</p> <p>3.5 The PPG advises that the LHN figure should be updated to reflect the latest data and should only be fixed for a period of 2 years from the date the Plan is submitted to the Planning Inspectorate for examination (Housing and Economic Need Assessment section of PPG - Paragraph: 008 Reference ID: 2a-008-20190220 Revision date: 20 02 2019).</p> <p>3.6 In this respect the LHN figure for Crawley will need to be updated to reflect the position as at 2020 because the current figure contained in the Plan has been calculated to a base date of 2019.</p> <p>3.7 Further to our Regulation 18 and earlier Regulation 19 Representations the Council does now appear to have quantified its affordable housing need, which equates to 739 dpa (Table 67 on Page 156 of the SHMA November 2019). That level of affordable housing need is substantially greater than the level identified in the context of the adopted Local Plan (527 dpa at the upper end of the scale identified). In fact the affordable housing need identified equates to some 98.5% of the total LHN and 148% of the actual number of dwellings planned for as set out in Policy H1 of the Plan</p>

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			<p>3.8 The Plan as currently drafted is therefore set up to fail in terms of meeting the acute affordable housing needs of the Borough. This cannot be a Sound approach.</p> <p>3.9 The Unmet Needs and Duty to Cooperate Topic Paper (January 2021) acknowledges the scale of the problem but does not identify an action plan for how the needs will be met (See Paragraph 3.1.10 on Page 12 of the Unmet Needs and Duty to Cooperate Topic Paper – January 2021). This matter must be resolved before the plan is submitted for examination because it forms part of the DtC consideration and is therefore a matter of legal compliance.</p> <p><b>Housing Requirement/Target:</b></p> <p>3.10 The Council's approach to the identification of a suitable housing requirement or target has been largely to rely on the existing supply sources identified in the adopted Local Plan housing trajectory. Little if any work appears to have been undertaken to identify new sources of supply or indeed to establish if those existing sources have the capability to deliver further housing over and above the numbers previously identified. The Council does not appear to have advanced its consideration of new supply sources since the last Regulation 19 consultation either.</p> <p>3.11 Given that the LHN has increased and the affordable housing need has grown exponentially it is incumbent upon the Council to explore all avenues for meeting as much of its own needs within the Borough boundaries.</p> <p>3.12 Instead the Council has taken the approach that 5,320 dwellings (332.5 dpa) is the maximum that can be delivered and the remaining 6,680 dwellings will need to be provided by its neighbours. This of course is where the problem lies in the Council's strategy because no agreement has been reached with any of its neighbours for provision to be made.</p> <p>3.13 By way of example Horsham District Council in its Regulation 18 draft Plan set out three growth scenarios: 1,000 dpa, 1,200 dpa and 1,400 dpa (See Paragraph 6.14 on Page 52 of the Regulation 18 consultation version of the Horsham District Local Plan 2019 – 2036). These options were set against its LHN of 965 dpa, which would indicate an allowance for unmet need ranging from 35 dpa – 435 dpa. Horsham's position on the extent of unmet need arising from Crawley that it is prepared to accommodate is therefore unclear at the present time.</p> <p>3.14 It is not acceptable for the Council to reach such an advanced stage in the preparation of its Plan without having any agreements in place as to the extent of its unmet need that can be addressed by neighbouring authorities.</p> <p>3.15 The Council's approach as set out in the Plan is therefore completely unsound in that it fails to plan positively, it is not effective and certainly does not accord with the Framework. Furthermore, the Council's cooperation thus far with its neighbours under the DtC must be called into question.</p> <p>3.16 Furthermore the Council's position has become materially worse since the previous Regulation 19 consultation took place. In that version of the Plan the Council proposed a minimum housing provision of 5,355 dwellings over a 15 year period (359 dpa), which lead to a shortfall of 5,940 dwellings. In effect this updated Regulation 19 consultation</p>



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			<p>version plans for less housing over a longer plan period that leads to a greater level of unmet need. This cannot represent positive planning.</p> <p>3.17 The Council's approach is also not entirely supported by the conclusions of its own Sustainability Appraisal (January 2021) ("SA"). The SA includes an option that meets both the full affordable housing requirement (generating a housing target of 1848 dpa) along with an option that meets the Standard Method calculation of 750 dpa. Both options score considerably better than the chosen option (Option 5) in terms of meeting housing needs (Pages 203-206 of the SA – January 2021). It is however unclear why some of the negative scores in relation to employment growth, health and infrastructure have been attributed to these higher housing growth options. The negative scores are attributed to 'anticipated impacts' rather than being based on any tangible evidence. It must be the case that the Council hasn't based the assessment on tangible evidence because it has already identified that significant portions of the evidence base in relation to matters such as Transport modelling are yet to be completed and published.</p> <p>3.18 In this respect the conclusions of the SA cannot be relied upon and a further SA should be undertaken once the evidence base is complete.</p> <p><b>Housing Supply and Trajectory:</b></p> <p>3.19 The Council's housing requirement/target as set out in Policy H1 of the Plan is entirely based, it says, on the available housing supply. It is however clear to Danescroft that the Council has not properly considered all sources of supply to determine the true extent of available land and its capacity to provide new homes.</p> <p>3.20 A prime example of this is Danescroft's land interest at Steers Lane, which gained Outline Planning Consent for upto 185 no. dwellings in January 2020. This is a site that the Council currently has allocated within the adopted Local Plan for a minimum of 75 no. dwellings and which it proposed to remove as an allocation in the first Regulation 19 draft consultation but now includes for 185 no. dwellings based on the Outline Consent (Table on Page 17 of the Housing Supply Topic Paper – January 2021).</p> <p>3.21 Further consideration is given to Danescroft's promotion site in Section 4 below.</p> <p>3.22 Turning to the Council's housing trajectory appended to the Plan it is apparent that there are problems with the supply the Council has identified and relies upon to meet its heavily reduced housing target of 5,320 dwellings.</p> <p>3.23 The Council proposes a stepped housing trajectory of:</p> <ul style="list-style-type: none"> <li>• 350 dpa – Years 1-5</li> <li>• 450 dpa – Years 6-10</li> <li>• 220 dpa – Years 11-16</li> </ul> <p>3.24 This compares with the previous Regulation 19 consultation version of the Plan as follows:</p> <ul style="list-style-type: none"> <li>• 500 dpa – Years 1-5</li> </ul>

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			<ul style="list-style-type: none"> <li>• 450 dpa – Years 6-10</li> <li>• 121 dpa – Years 11-15</li> </ul> <p>3.25 The application of the stepped housing trajectory is in order to engineer a rolling 5- year supply of deliverable housing land in accordance with Paragraph 73 of the Framework. It is clear from above that rather than seek to rectify the deficiencies in the supply that Neame Sutton (and others) identified in the context of the previous Regulation 19 consultation the Council has simply modified its stepped trajectory to lower the initial 5-year requirement even further.</p> <p>3.26 When the Council's supply sources are examined and, in the absence of any clear evidence from the Council to demonstrate compliance with the deliverability test set out at Annex 2 of the Framework, it is apparent that even with a modified stepped trajectory the Council is unable to demonstrate a rolling 5-year supply of deliverable housing sites.</p> <p>3.27 The position is made worse if the Council was to seek to apply Paragraph 74 of the Framework<sup>12</sup> and a 10% buffer is applied to the calculation.</p> <p>3.28 The tables attached at Appendix 3 of these representations demonstrate the deficiencies in the Council's housing trajectory when the Annex 2 test is applied to the following supply sources:</p> <ul style="list-style-type: none"> <li>• Policy H2 Key Housing Sites</li> <li>• Broad Location East of London Road</li> <li>• Broad Location Town Centre</li> <li>• SHLAA Sites</li> <li>• Windfalls</li> </ul> <p>3.29 Neame Sutton considers that a number of the Council's other supply sources may also fail the Annex 2 test, but it is clear from the headline analysis set out in Appendix 3 to these Representations that the trajectory fails even if only windfalls are reduced.</p> <p>3.30 The Council therefore needs to rectify the deficiencies in its heavily reduced housing trajectory as a bare minimum for the Plan to be found Sound. The simple solution to this is to identify more supply. These points were put to the Council by Neame Sutton and others in the context of the first Regulation 19 consultation and the current version of the Plan has not rectified those deficiencies.</p>

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			<p>Town and Country Planning Act 1990 (As Amended)                      County Borough Council - Local Plan 2023 (Regulation 23)</p> <p><b>Housing Trajectory - COUNCIL POSITION - stepped trajectory - Sedgfield and 5% Buffer</b> <span style="float: right;"><b>Table 1</b></span></p> <p>26-Apr-23</p> <table border="1"> <thead> <tr> <th rowspan="2">Supply Sources</th> <th colspan="10">Plan Period</th> <th rowspan="2">TOTAL</th> </tr> <tr> <th>Years 1-5</th> <th>1</th> <th>2</th> <th>3</th> <th>4</th> <th>5</th> <th>6</th> <th>7</th> <th>8</th> <th>9</th> <th>10</th> <th>11</th> <th>12</th> <th>13</th> <th>14</th> <th>15</th> </tr> <tr> <th></th> <th>2023/24</th> <th>2024/25</th> <th>2025/26</th> <th>2026/27</th> <th>2027/28</th> <th>2028/29</th> <th>2029/30</th> <th>2030/31</th> <th>2031/32</th> <th>2032/33</th> <th>2033/34</th> <th>2034/35</th> <th>2035/36</th> <th>2036/37</th> <th>2037/38</th> <th>2038/39</th> </tr> </thead> <tbody> <tr> <td>Permitted (Large Sites)</td> <td>37</td> 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SUPPLY</b>	<b>238</b>	<b>447</b>	<b>455</b>	<b>295</b>	<b>182</b>	<b>852</b>	<b>852</b>	<b>852</b>	<b>509</b>	<b>400</b>	<b>187</b>	<b>123</b>	<b>105</b>	<b>50</b>	<b>50</b>	<b>50</b>	<b>1362</b>	Requirement	368	368	368	368	368	368	368	368	368	368	368	368	368	368	368	368	368	Annual Shortfall/Surplus	-130	-97	-113	-73	-186	-416	-416	-416	-416	-416	-416	-416	-416	-416	-416	-416	-130	Five Year Requirement	1790	1850	1790	1790	1790	1790	1790	1790	1790	1790	1790	1790	1790	1790	1790	1790	9050	Shortfall/Surplus (Five Year)	-552	-1000	-1000	-1000	-1000	-1000	-1000	-1000	-1000	-1000	-1000	-1000	-1000	-1000	-1000	-1000	-552	5 Year Requirement with 5% Buffer	1790.0	1790.0	1790.0	1790.0	1790.0	1790.0	1790.0	1790.0	1790.0	1790.0	1790.0	1790.0	1790.0	1790.0	1790.0	1790.0	9050.0	Adjusted Annual Requirement with 5% Buffer	367.5	366.5	366.5	366.5	366.5	366.5	366.5	366.5	366.5	366.5	366.5	366.5	366.5	366.5	366.5	366.5	366.5	Adjusted Annual Requirement (5%)	367.5	412.7	413.9	413.2	413.8	413.7	413.8	413.7	413.8	413.9	413.7	413.8	413.9	413.7	413.8	413.9	413.7	5 Year Supply	2024	2023	1789	1791	1790	1791	1790	1791	1790	1791	1790	1791	1790	1791	1790	1791	9049	Supply in Years	4.48	6.58	7.81	9.38	8.87	6.48	6.48	7.33	7.33	7.19	6.35	6.83						Supply Sources	Plan Period										TOTAL	Years 1-5	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15		2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	2033/34	2034/35	2035/36	2036/37	2037/38	2038/39	Permitted (Large Sites)	37	42															89	Permitted (Small Sites)	15	18	2														37	Key Housing Sites (Policy H2) that are Deliverable	113	141	375	189	97	50	50	50	50	50	47						1177	Key Housing Sites (Policy H2) that are Undevelopable						294	245	50	50	50							789	Local Plan Key Town Centre Opportunity Sites (Policy H2)		372				400	402	338	200	200							1462	Broad Location East of Liddon Road						25	26	31									82	Broad Location Town Centre						55	54	48									157	SHAA Sites (Deliverable)	32	8	16														56	SHAA Sites (Undevelopable)						23	20	28				30	15				114	Windfall	50	50	50	50	50	50	50	50	50	50	50	50	50	50	50	50	650	<b>TOTAL SUPPLY</b>	<b>331</b>	<b>447</b>	<b>455</b>	<b>295</b>	<b>182</b>	<b>852</b>	<b>852</b>	<b>852</b>	<b>509</b>	<b>400</b>	<b>187</b>	<b>120</b>	<b>105</b>	<b>50</b>	<b>50</b>	<b>50</b>	<b>1362</b>	Requirement	368	368	368	368	368	368	368	368	368	368	368	368	368	368	368	368	368	Annual Shortfall/Surplus	-137	-97	-113	-73	-186	-416	-416	-416	-416	-416	-416	-416	-416	-416	-416	-416	-137	Five Year Requirement	1790	1850	1790	1790	1790	1790	1790	1790	1790	1790	1790	1790	1790	1790	1790	1790	9050	Shortfall/Surplus (Five Year)	-560	-1000	-1000	-1000	-1000	-1000	-1000	-1000	-1000	-1000	-1000	-1000	-1000	-1000	-1000	-1000	-560	5 Year Requirement with 10% Buffer	1790.0	1790.0	1790.0	1790.0	1790.0	1790.0	1790.0	1790.0	1790.0	1790.0	1790.0	1790.0	1790.0	1790.0	1790.0	1790.0	9050.0	Adjusted Annual Requirement with 10% Buffer	367.5	414.1	415.3	414.6	415.2	415.1	415.2	415.1	415.2	415.3	415.1	415.2	415.3	415.1	415.2	415.3	415.1	Adjusted Annual Requirement (10%)	367.5	413.3	413.9	413.9	413.9	413.9	413.9	413.9	413.9	413.9	413.9	413.9	413.9	413.9	413.9	413.9	413.9	5 Year Supply	2024	2023	1789	1791	1790	1791	1790	1791	1790	1791	1790	1791	1790	1791	1790	1791	9049	Supply in Years	5.21	6.58	8.89	8.81	6.36	6.09	6.35	6.37	7.17	6.86	5.29	5.18					
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5 Year Requirement with 10% Buffer	1790.0	1790.0	1790.0	1790.0	1790.0	1790.0	1790.0	1790.0	1790.0	1790.0	1790.0	1790.0	1790.0	1790.0	1790.0	1790.0	9050.0																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																												
Adjusted Annual Requirement with 10% Buffer	367.5	414.1	415.3	414.6	415.2	415.1	415.2	415.1	415.2	415.3	415.1	415.2	415.3	415.1	415.2	415.3	415.1																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																												
Adjusted Annual Requirement (10%)	367.5	413.3	413.9	413.9	413.9	413.9	413.9	413.9	413.9	413.9	413.9	413.9	413.9	413.9	413.9	413.9	413.9																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																												
5 Year Supply	2024	2023	1789	1791	1790	1791	1790	1791	1790	1791	1790	1791	1790	1791	1790	1791	9049																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																												
Supply in Years	5.21	6.58	8.89	8.81	6.36	6.09	6.35	6.37	7.17	6.86	5.29	5.18																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																	

**Chapter 12. Housing Delivery**

**Ref. No.**      **Respondent**      **Policy/ Para**

**Comments**

Town and Country Planning Act 1990 (As Amended)  
 Crawley Borough Council - Local Plan 2015 (Regulation 19)

**Housing Trajectory - NS POSITION - stepped trajectory - Sedgefield and 5% Buffer**      **Table 3**

26-Apr-21

Supply Sources	Plan Period																TOTAL
	Years 1-5				Years 6-10				Years 11-15								
	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	2033/34	2034/35	2035/36	2036/37	
Permitted (Large Sites)	17	42															
Permitted (Small Sites)	15	30	2														
Key Housing Sites (Policy H2) that are Deliverable	113	141	355	189	92	60	60	60	60	47							
Key Housing Sites (Policy H2) that are Developable						294	265	50	50	50							
Local Plan Key Town Centre Opportunity Sites (Policy H2)						402	108	200	200	152	400						
Broad Location East of London Road						22	26	31									
Broad Location Town Centre						10	54	48									
SHEAA Sites (Deliverable)						12	8	16									
SHEAA Sites (Developable)						21	60	28			35	15					
Windfall						90	90	90	90	90	90	90	90	90	90	90	
<b>TOTAL SUPPLY</b>	<b>145</b>	<b>191</b>	<b>357</b>	<b>189</b>	<b>92</b>	<b>914</b>	<b>671</b>	<b>525</b>	<b>400</b>	<b>319</b>	<b>520</b>	<b>105</b>	<b>90</b>	<b>90</b>	<b>90</b>	<b>90</b>	
Requirement	350	350	350	350	350	450	450	450	450	450	220	220	220	220	220	220	
Annual Shortfall/Surplus	-205	-159	7	-161	-258	464	221	75	-50	-111	300	-115	-130	-130	-130	-130	
Cumulative Shortfall/Surplus		-205	-198	-359	-617	-153	-332	-257	-307	-418	-118	15	-120	-250	-380		
Base 5 Year Requirement	1750	1850	1950	2050	2150	2250	2350	2450	2550	2650	2750	2850	2950	3050	3150	3250	
Shortfall/oversupply (Sedgefield)	0.0	-100.0	-100.0	-150.0	-300.0	-750.0	-100.0	100.0	150.0	200.0	300.0	120.0	120.0	120.0	120.0	120.0	
5 Year Requirement with Shortfall/oversupply	1750.0	2050.0	2150.0	2400.0	2650.0	3000.0	2850.0	2700.0	2400.0	2150.0	1850.0	1630.0	1410.0	1190.0	970.0	750.0	
Adjusted 5 Year Requirement with 5% Buffer	1837.5	2137.5	2437.5	2737.5	3037.5	3337.5	3262.5	3087.5	2912.5	2662.5	2412.5	2162.5	1912.5	1662.5	1412.5	1162.5	
Adjusted Annual Requirement (5yr)	367.5	427.5	487.5	547.5	607.5	667.5	632.5	607.5	572.5	537.5	502.5	467.5	432.5	397.5	362.5	327.5	
5 Year Supply	976	1346	2216	2386	2656	2926	2861	2691	2521	2351	2181	2011	1841	1671	1501	1331	
Supply vs Years	1.3	1.8	3.1	3.4	3.7	4.0	3.9	3.8	3.6	3.5	3.4	3.3	3.2	3.1	3.0	2.9	

**Notes:**  
 No Clear Evidence of Delivery Demonstrated in Council evidence base - Removal of 524 from first 5 years  
 No Clear Evidence of Delivery Demonstrated in Council evidence base - Removal of 88 from first 5 years  
 Windfalls removed from first 5 years as no compelling evidence

Town and Country Planning Act 1990 (As Amended)  
 Crawley Borough Council - Local Plan 2015 (Regulation 19)

**Housing Trajectory - NS POSITION - stepped trajectory - Sedgefield and 10% Buffer**      **Table 4**

26-Apr-21

Supply Sources	Plan Period																TOTAL
	Years 1-5				Years 6-10				Years 11-15								
	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	2033/34	2034/35	2035/36	2036/37	
Permitted (Large Sites)	17	42															
Permitted (Small Sites)	15	30	2														
Key Housing Sites (Policy H2) that are Deliverable	113	141	355	189	92	60	60	60	60	47							
Key Housing Sites (Policy H2) that are Developable						294	265	50	50	50							
Local Plan Key Town Centre Opportunity Sites (Policy H2)						402	108	200	200	152	400						
Broad Location East of London Road						22	26	31									
Broad Location Town Centre						10	54	48									
SHEAA Sites (Deliverable)						12	8	16									
SHEAA Sites (Developable)						21	60	28			35	15					
Windfall						90	90	90	90	90	90	90	90	90	90	90	
<b>TOTAL SUPPLY</b>	<b>145</b>	<b>191</b>	<b>357</b>	<b>189</b>	<b>92</b>	<b>914</b>	<b>671</b>	<b>525</b>	<b>400</b>	<b>319</b>	<b>520</b>	<b>105</b>	<b>90</b>	<b>90</b>	<b>90</b>	<b>90</b>	
Requirement	350	350	350	350	350	450	450	450	450	450	220	220	220	220	220	220	
Annual Shortfall/Surplus	-205	-159	7	-161	-258	464	221	75	-50	-111	300	-115	-130	-130	-130	-130	
Cumulative Shortfall/Surplus		-205	-198	-359	-617	-153	-332	-257	-307	-418	-118	15	-120	-250	-380		
Base 5 Year Requirement	1750	1850	1950	2050	2150	2250	2350	2450	2550	2650	2750	2850	2950	3050	3150	3250	
Shortfall/oversupply (Sedgefield)	0.0	-100.0	-100.0	-150.0	-300.0	-750.0	-100.0	100.0	150.0	200.0	300.0	120.0	120.0	120.0	120.0	120.0	
5 Year Requirement with Shortfall/oversupply	1750.0	2050.0	2150.0	2400.0	2650.0	3000.0	2850.0	2700.0	2400.0	2150.0	1850.0	1630.0	1410.0	1190.0	970.0	750.0	
Adjusted 5 Year Requirement with 10% Buffer	1925.0	2225.0	2525.0	2825.0	3125.0	3425.0	3350.0	3175.0	2925.0	2675.0	2425.0	2175.0	1925.0	1675.0	1425.0	1175.0	
Adjusted Annual Requirement (5yr)	385.0	445.0	505.0	565.0	625.0	685.0	650.0	625.0	590.0	555.0	520.0	485.0	450.0	415.0	380.0	345.0	
5 Year Supply	976	1346	2216	2386	2656	2926	2861	2691	2521	2351	2181	2011	1841	1671	1501	1331	
Supply vs Years	1.3	1.8	3.1	3.4	3.7	4.0	3.9	3.8	3.6	3.5	3.4	3.3	3.2	3.1	3.0	2.9	

**Notes:**  
 No Clear Evidence of Delivery Demonstrated in Council evidence base - Removal of 522 from first 5 years  
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 Windfalls removed from first 5 years as no compelling evidence

Chapter 12. Housing Delivery			
Ref. No.	Respondent	Policy/ Para	Comments
			<p><b>Suggested Modifications:</b></p> <p>5.3 As part of addressing the significant deficiencies in the Plan's evidence base the following key changes are required to the Plan for it to be made Sound:</p> <ul style="list-style-type: none"> <li>Restarting the SHLAA process to properly assess the potential from all land sources within the Borough to accommodate the housing needs of the Borough;</li> <li>Consider the opportunities for allocating further land that may be released from the Gatwick Airport noise constraint as a result of the revisions proposed in these representations to draft Policy EP4 and the inevitable change in approach that GAL will need to take regarding the future of the airport in the context of the Government's current accelerated Climate Change agenda combined with the long lasting affects of the Global Pandemic i.e. Steers Lane Area B;</li> <li>Addressing the delivery deficiencies in the housing trajectory to ensuring a rolling 5-year housing land supply can be achieved across the Plan period i.e. addressing the Annex 2 deliverability test.</li> </ul>
REP/ 118	Resident 49	H1	<p>CBC's OAN of 750 homes per year needs to be adjusted to 718 homes per year to reflect the latest (1/4/2021) Standard Formula calculation. CBC have already noted this in their draft DtC document of March 2021 but not yet modified the main plan. This ripples into a reduction of 32 homes per year against the declared annual average unmet need. Further the CBC retained (proposed stepped) requirement has been established with an unnecessary &amp; unjustified 10% buffer. This buffer should be reduced to 5% thereby increasing, in the first 10 years of the plan, the retained requirement by 5%. This further reduces the unmet need over the first 10 years of the plan to fewer than 3000 homes which is then 'covered' by the already in place commitments from North West Sussex HMA neighbours (Horsham and Mid Sussex) under their existing adopted local plans. As Horsham, and eventually Mid Sussex, review their local plans they will then only be challenged with having to increase their support for CBC's unmet need (if they are able) from 1st April 2031. The DtC principles surely require CBC to take this approach in order to both preserve the integrity of existing plans and minimise unnecessary changes of previously planned unmet need support, as well as to give their NWS-HMA neighbours the maximum time to implement further strategic sites in support of their declared unmet need.</p> <p><b>CBC Reg 19 Consultation local plan</b></p> <ul style="list-style-type: none"> <li>The draft DtC statement (March 2021) in para 2.3.2 onwards acknowledges that the latest government published metrics reduce the CBC need from 750 to 718 per annum giving an overall requirement of 11488 dwellings for the 16 year plan period.</li> <li>Strategic Policy H1 consequently needs amending to reduce the stepped unmet needs stated therein by 32 homes per year, for each of the 16 years.</li> <li>On Page 156 of the CBC R19 plan, it notes a 10% buffer 'as required by NPPF para 73'. This 10% buffer, will of course have influenced the values set out in the proposed stepped requirement for CBC's retained need.</li> <li>However, the 10% buffer noted in NPPF 73 refers to the situation where it is intended to 'confirm' the housing land supply position. There is no explanation or confirmation as to if that is the actual intent, or if it is a simple misinterpretation of the wording in the NPPF paragraph.</li> </ul>

**Chapter 12. Housing Delivery**

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			<ul style="list-style-type: none"> <li>Given the extent of unmet need proposed in the local plan, it is inappropriate to propose 'confirming' the housing land supply as working with the standard 5% buffer will reduce the unmet need over the first 10 years of the local plan, by increasing the retained requirement (by 5%). (See attached calculations, with an alternative working to a 5% buffer).</li> <li>Moreover taking this step creates the 'ideal' equitable situation that all of the proposed Crawley BC unmet need up to 31st March 2031 will be met by the fulfilment of existing commitments of Horsham and Mid Sussex district councils under their existing adopted local plans, crucially without any amendment.</li> <li>CBC would then only be seeking additional support from these 2 neighbouring local authorities (in the North West Sussex HMA) from 1st April 2031, thereby giving these neighbouring authorities time to incorporate additional into their own local plan reviews, but not for the first 10 years of their new plans.</li> <li>CBC should be doing as much as it can to avoid ceding housing need to its NWS-HMA neighbours. Adopting the 5% buffer and adjusting its own retained requirement upwards by 5% (to reflect the buffer decreasing by 5%) makes perfect sense and allows CBC to advise Horsham/Mid Sussex that if its proposed new plan housing numbers are approved then it will only need additional support (to that already contracted) from 1st April 2031.</li> <li>This would demonstrate that CBC has done all it can to avoid disturbing the existing planned DtC support from its neighbours, and only requesting additional support when it is needed i.e. after 2031.</li> </ul> <p><b>CRAWLEY Borough Council - Reg 19 Local Plan - 2021 to 2037 (16 years)</b>  Standard Formula homes per year = 718      16 Years      Total = 11488</p> <p><b>Scenario (A) as currently proposed in the CBC Reg 19 consultation plan</b></p> <table border="1"> <thead> <tr> <th>10% Buffer</th> <th>2021/22</th> <th>2022/23</th> <th>2023/24</th> <th>2024/25</th> <th>2025/26</th> <th>2026/27</th> <th>2027/28</th> <th>2028/29</th> 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<td>3550</td> <td>4000</td> <td>4220</td> <td>4440</td> <td>4660</td> <td>4880</td> <td>5100</td> <td>5320</td> </tr> <tr> <td>Projected/Requirement %</td> <td></td> <td></td> <td></td> <td></td> <td>113.5%</td> <td>133.6%</td> <td>137.2%</td> <td>133.7%</td> <td>128.0%</td> <td>118.3%</td> <td>115.0%</td> <td>111.6%</td> <td>108.3%</td> <td>105.2%</td> <td>102.5%</td> <td>99.9%</td> </tr> </tbody> </table> <table border="1"> <thead> <tr> <th></th> <th>Total Reqt</th> <th>CBC Reqt</th> <th>Unmet</th> <th>Per Year</th> </tr> </thead> <tbody> <tr> <td>Years 1-10</td> <td>7180</td> <td>4000</td> <td>3180</td> <td>318</td> </tr> <tr> <td>Years 11-16</td> <td>4308</td> <td>1320</td> <td>2988</td> <td>498</td> </tr> <tr> <td><b>Total</b></td> <td><b>11488</b></td> <td><b>5320</b></td> <td><b>6168</b></td> <td><b>386</b></td> </tr> </tbody> </table> <p><b>Scenario (B) as suggested to meet a 5% buffer with 10 year CBC retained reqt increased by 5% from 4000 to 4200</b></p> <table border="1"> <thead> <tr> <th>5% Buffer</th> <th>2021/22</th> <th>2022/23</th> <th>2023/24</th> <th>2024/25</th> <th>2025/26</th> <th>2026/27</th> <th>2027/28</th> <th>2028/29</th> <th>2029/30</th> <th>2030/31</th> <th>2031/32</th> <th>2032/33</th> <th>2033/34</th> <th>2034/35</th> <th>2035/36</th> <th>2036/37</th> </tr> </thead> <tbody> <tr> <td>Projected</td> <td>220</td> <td>437</td> <td>453</td> <td>295</td> <td>582</td> <td>952</td> <td>696</td> <td>509</td> <td>400</td> <td>187</td> <td>120</td> <td>105</td> <td>90</td> <td>90</td> <td>90</td> <td>90</td> </tr> <tr> <td>...cumulative</td> <td></td> <td></td> <td></td> <td></td> <td>1987</td> <td>2939</td> <td>3635</td> <td>4144</td> <td>4544</td> <td>4731</td> <td>4851</td> <td>4956</td> <td>5046</td> <td>5136</td> <td>5226</td> <td>5316</td> </tr> <tr> <td>Requirement</td> <td>360</td> <td>360</td> <td>360</td> <td>360</td> <td>360</td> <td>480</td> <td>480</td> <td>480</td> <td>480</td> <td>480</td> <td>190</td> <td>190</td> <td>190</td> <td>190</td> <td>190</td> <td>170</td> </tr> <tr> <td>...cumulative</td> <td></td> <td></td> <td></td> <td></td> <td>1800</td> <td>2280</td> <td>2760</td> <td>3240</td> <td>3720</td> <td>4200</td> <td>4390</td> <td>4580</td> <td>4770</td> <td>4960</td> <td>5150</td> <td>5320</td> </tr> <tr> <td>Projected/Requirement %</td> <td></td> <td></td> <td></td> <td></td> <td>110.4%</td> <td>128.9%</td> <td>131.7%</td> <td>127.9%</td> <td>122.2%</td> <td>112.6%</td> <td>110.5%</td> <td>108.2%</td> <td>105.8%</td> <td>103.5%</td> <td>101.5%</td> <td>99.9%</td> </tr> </tbody> </table> <table border="1"> <thead> <tr> <th></th> <th>Total Reqt</th> <th>CBC Reqt</th> <th>Unmet</th> <th>Per Year</th> </tr> </thead> <tbody> <tr> <td>Years 1-10</td> <td>7180</td> <td>4200</td> <td>2980</td> <td>298</td> </tr> <tr> <td>Years 11-16</td> <td>4308</td> <td>1120</td> <td>3188</td> <td>531</td> </tr> <tr> <td><b>Total</b></td> <td><b>11488</b></td> <td><b>5320</b></td> <td><b>6168</b></td> <td><b>386</b></td> </tr> </tbody> </table> <p><b>Existing Adopted Local Plan Commitments under DtC to meet CBC unmet need (only for the years relating to CBC new local plan)</b></p> <table border="1"> <tbody> <tr> <td>Horsham</td> <td>150 yearly</td> <td>2021 to 2031</td> <td>10 years</td> <td>1500</td> </tr> <tr> <td>Mid Sussex</td> <td>214 yearly</td> <td>2024 to 2031</td> <td>7 years</td> <td>1498</td> </tr> <tr> <td></td> <td></td> <td></td> <td></td> <td>2998 which meets unmet need of</td> </tr> <tr> <td></td> <td></td> <td></td> <td></td> <td>2980 in example scenario (B) i.e. with a 5% buffer, not 10%.</td> </tr> </tbody> </table> <p>Horsham &amp; Mid Sussex additional DtC support from 1/4/2031 to be dealt with as their existing local plans are reviewed.</p>	10% Buffer	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	2033/34	2034/35	2035/36	2036/37	Projected	220	437	453	295	582	952	696	509	400	187	120	105	90	90	90	90	...cumulative					1987	2939	3635	4144	4544	4731	4851	4956	5046	5136	5226	5316	Requirement	350	350	350	350	350	450	450	450	450	450	220	220	220	220	220	220	...cumulative					1750	2200	2650	3100	3550	4000	4220	4440	4660	4880	5100	5320	Projected/Requirement %					113.5%	133.6%	137.2%	133.7%	128.0%	118.3%	115.0%	111.6%	108.3%	105.2%	102.5%	99.9%		Total Reqt	CBC Reqt	Unmet	Per Year	Years 1-10	7180	4000	3180	318	Years 11-16	4308	1320	2988	498	<b>Total</b>	<b>11488</b>	<b>5320</b>	<b>6168</b>	<b>386</b>	5% Buffer	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	2033/34	2034/35	2035/36	2036/37	Projected	220	437	453	295	582	952	696	509	400	187	120	105	90	90	90	90	...cumulative					1987	2939	3635	4144	4544	4731	4851	4956	5046	5136	5226	5316	Requirement	360	360	360	360	360	480	480	480	480	480	190	190	190	190	190	170	...cumulative					1800	2280	2760	3240	3720	4200	4390	4580	4770	4960	5150	5320	Projected/Requirement %					110.4%	128.9%	131.7%	127.9%	122.2%	112.6%	110.5%	108.2%	105.8%	103.5%	101.5%	99.9%		Total Reqt	CBC Reqt	Unmet	Per Year	Years 1-10	7180	4200	2980	298	Years 11-16	4308	1120	3188	531	<b>Total</b>	<b>11488</b>	<b>5320</b>	<b>6168</b>	<b>386</b>	Horsham	150 yearly	2021 to 2031	10 years	1500	Mid Sussex	214 yearly	2024 to 2031	7 years	1498					2998 which meets unmet need of					2980 in example scenario (B) i.e. with a 5% buffer, not 10%.
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			<p><b>Suggested Modification:</b> Amend numbers in Policy H1 to reflect all of the above. There are also numerous references to the 'old' OAN of 750 (base date 1/4/2020) that need to be updated to 718. N.B. Page 296 (Housing Trajectory) will then also require amendment.</p>
REP/ 119	Turley on behalf of A2Dominion Group	H1	<p>Strategic Policy H1: Housing Provision A2Dominion welcome the specific reference in Policy H1 to the remaining unmet housing need and the commitment that the Council will “work closely with its neighbouring authorities, particularly those which form the Northern West Sussex Housing Market Area, in exploring opportunities and resolving infrastructure and environmental constraints in order to meet this need in sustainable locations”. We reserve the opportunity to submit further comments and evidence regarding the extent of the housing requirement, supply and unmet need as the Plan progresses and further evidence emerges. SUMMARY We trust that these representations are useful and would be willing to engage with Crawley Borough Council and other stakeholders to explore the important contribution which Cottesmore Village could play in addressing the unmet needs of Crawley.</p> <p><b>Suggested Modification:</b></p>
REP/ 121	Waverley Borough Council	H1	<p>Waverley acknowledges that Strategic Policy H1 of the draft Crawley plan seeks to deliver 5,320 homes from 2021 to 2037. This is 6,680 homes short of the housing need assessed under the government’s standard method. Waverley recognises that Policy H1 states that this shortfall will be met by working closely with its neighbouring authorities, particularly those which form the Northern West Sussex Housing Market Area and will include continued assessment of potential urban extensions to Crawley.</p> <p>Waverley Borough Council welcomes the policy making an explicit reference that Crawley Borough Council will continue to work closely with its neighbours in the Northern West Sussex Housing Market Area to explore opportunities to meet this unmet need which will include the assessment of potential urban extension to Crawley. It also welcomes paragraph 12.39 that states that this will primarily involve working with Horsham and Mid Sussex along with a small part of Reigate and Banstead, particularly an overlap with Horley. This is because Waverley considers that Crawley’s unmet need must be met within the Housing Market Area that Crawley lies within. Waverley is unlikely to be able to take any further housing to meet unmet need from other local planning authorities when we review our Local Plan. Our adopted Local Plan already includes unmet need from Woking which is very challenging to meet given the significant planning constraints that cover our Borough. These constraints include the Green Belt, an AONB and the proximity of European sites in the form of Special Protection Areas.</p> <p>This is an officer response agreed with the Council’s Portfolio Holder for Planning Policy and Services.</p> <p><b>Suggested Modification:</b></p>
		H1	<b>Housing need</b>

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REP/ 123	Barton Willmore on behalf of The Sogno Family Trust		<p>2.6 As set out in the Introduction, in order for a Local Plan to be found sound, it must be positively prepared, justified, effect and consistent with national policy.</p> <p>2.7 With regard to the latter, paragraph 65 of the NPPF requires that strategic policy-making authorities should establish a housing requirement figure for their whole area, which shows the extent to which their identified housing need can be met over the plan period.</p> <p>2.8 Further, paragraph 35 of the NPPF 2019 requires the council to demonstrate that the strategy as a minimum seeks to meet the area's objectively assessed needs, and is informed by agreements with other authorities so unmet need is accommodated.</p> <p>2.9 In this regard, the Local Plan identifies a housing need of 750 dwellings per annum (dpa), totalling 12,000 homes across a 16 year plan period (2021-2037). The 750 dpa figure is derived from the government's standard method for housing need, as required by paragraph 60 of the NPPF. Therefore, the method for calculating the minimum housing need for the Plan period is considered to be sound. The council should review and revise this figure as necessary once the updated Affordability Ratios are published.</p> <p>2.10 Whilst the baseline housing need, as per the standard method, is considered to be sound, the council must be certain they have suitably considered other strategic matters that could influence the actual housing need that will be present across the proposed plan period.</p> <p>2.11 As set out in the National Planning Practice Guidance (NPPG) paragraph 010 Reference ID: 2a-010-20201216, there are circumstances where it might be appropriate for authorities to plan for a higher housing need figure than the standard method, and that this should be assessed prior to and separate from considering how much of the overall need can be accommodated within the Borough. This is then translated into a housing requirement figure for the strategic policies in the plan. Examples of where this might be appropriate includes <i>"where strategic infrastructure improvements that are likely to drive an increase in the homes needed locally."</i></p> <p>2.12 In this regard, Gatwick Airport lies within Crawley Borough Council's authority area and in August 2019 submitted a Scoping Report to the Planning Inspectorate for the use of the Northern Runway to grow capacity of the airport. It is understood that Gatwick are now preparing the environmental information and a planning application through the Nationally Strategic Infrastructure Project (NSIP) Development Consent Order (DCO) route. The proposed use of the northern runway is anticipated to grow passengers by more than 10 million per year (<a href="https://www.gatwickairport.com/business-community/future-plans/long-term-plans/">https://www.gatwickairport.com/business-community/future-plans/long-term-plans/</a>), which in turn would create approximately 20,000 new jobs (both direct and indirect) (Making Best Use of Gatwick, August 2019). According to the airport's Masterplan (2019), the anticipation is that the runway could be operational by the mid-2020's. Therefore, given the Crawley Local Plan period runs until 2037, there is a clear potential that Gatwick will be planning for growth that will require supporting housing within the Plan period.</p>



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			<p>2.13 The Gatwick Diamond Local Strategic Statement, provided as evidence to the draft Local Plan, states at paragraphs 2.16 that <i>“The national and international importance of Gatwick Airport as a global business and leisure aviation hub will continue to remain central to the economic development of the area.”</i> However, given the age of this document, it does not reflect up to date positions on Gatwick’s influence on future growth within Crawley. Whilst the Northern West Sussex Statement of Common Ground (May 2020) states that the authorities are working collaboratively with the Airport in relation to their DCO application, there does not appear to be any Statement of Common Ground or evidence which has clearly considered the potential future needs arising from growth at Gatwick Airport within the emerging Plan period.</p> <p>2.14 Given the proposed scale of growth, which is known at the time of the drafting of this Local Plan, there is a likely need to plan for additional housing over and above the local housing needs arising from the ‘standard method’. As per the NPPG paragraph 010 Reference ID: 2a-010-20201216, this should be accounted for prior to any decisions about the amount of housing that may be accommodated within the Borough.</p> <p><b>Suggested Modification:</b></p> <p>2.15 Therefore, it is recommended that further or updated evidence is provided to ensure the draft Local Plan can be considered sound and positively prepared; particularly to demonstrate it has been shaped by early, proportionate and effective engagement with local infrastructure providers such as Gatwick (paragraph 16 of the NPPF) and does not <i>“provide for any large scale transport facilities that need to be located in the area, and the infrastructure and wider development required to support their operation, expansion and contribution to the wider economy ”</i> (our emphasis).</p>
REP/ 124	Gladman Developments	H1	<p>4.3.1 Policy H1 highlights that the Local Plan makes provision for the development of a minimum of 5,320 net dwellings in the Borough between 2021 and 2037. It is proposed that the supply-led requirement will be stepped over the plan period, as follows:</p> <ul style="list-style-type: none"> <li>• Years 1-5 (2021-26): 350 dwellings per annum (dpa)</li> <li>• Years 6-10 (2026-31): 450dpa</li> <li>• Years 11-16 (2031-37): 220dpa</li> </ul> <p>Due to proposed stepped requirement, Policy H1 outlines that there will be a remaining unmet housing need of 6,680 dwellings against the identified housing need of 12,000 dwellings between 2021 and 2037.</p> <p>Gladman welcome the publication of a Statement of Common Ground (SOCG) (May 2020) between CBC, Horsham District Council, Mid Sussex District Council and West Sussex County Council which evidences progress and co-operation between neighbouring planning authorities, particularly in relation to housing need. The SOCG sets out that 5,995 dwellings will not be met within Crawley Borough between 2020- 2035 highlighting that the aforementioned authorities will work positively together to seek to address the housing needs of the Housing Market Area (HMA).</p> <p>4.3.3. Nonetheless, the SOCG does not provide an indication of how Crawley’s unmet need will be distributed across the Northern West Sussex authorities. In addition, since the publication of the SOCG, the proposed unmet need arising</p>

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			<p>from Crawley Borough has changed twice. Firstly, the unmet need figure increased to approximately 6,680 dwellings, as confirmed in Topic Paper 1 (Crawley Borough Local Plan Topic Paper 1: Unmet Needs and Duty to Cooperate). Then in March 2021, the Council published a draft Duty to Cooperate Statement (DtC) which amends Crawley's housing requirement over the plan period on the basis of the latest Standard Method Local Housing Need figure following the publication of the 2021 House price to workplace-based earnings ratio.</p> <p>4.3.4. As highlighted in Table 2.3 of the draft DtC, the updated Standard Method Local Housing Need figure stands at 718 dwellings per annum, 11,488 dwellings over the period 2021-2027. Subsequently, the amount of housing need that cannot be met within Crawley's boundaries has reduced from the figure quoted in Strategic Policy H1 of the submission draft Local Plan to 6,168 dwellings over the plan period.</p> <p>4.3.5. At the same time Horsham District Council have progressed their plan preparation with a Regulation 19 consultation anticipated in Autumn 2021. This consultation follows the Regulation 18 Plan which tested options for overall level of growth and the amount of Crawley's unmet need to be met.</p> <p>4.3.6. The Statement of Common Ground and draft Duty to Cooperate, alongside the emerging Horsham Local Plan demonstrate that ongoing engagement and cooperation is being undertaken in line with national planning guidance; yet, Gladman highlight that in line with the PPG a further SOCG update should outline the distribution of needs across the Northern West Sussex (NWS) authorities (Planning Practice Guidance Paragraph: 011 Reference ID: 61-011-20190315). This would provide greater certainty and clear signposting on how Crawley's unmet need will be dealt with which can then be confirmed through the Local Plan examination process. Indeed, this would also clarify the approaches required for both Horsham and West Sussex in their emerging plan documents.</p> <p>4.3.1. Finally, while the Council has opted to alter the housing requirement on the basis of the revised standard method figure published in March 2021 there must be consistency across the evidence base in relation to local housing needs figure. In this regard, Strategic Policy H1 and the evidence base must be updated to reflect the amended housing need figure of 11,488 dwellings (718dpa).</p> <p><b>Suggested Modification:</b></p>
REP/122	Inspired Villages	H1	<p>It is welcomed that Crawley Borough Council are able to acknowledge some of the benefits of specialist housing for older people at Paragraph 12.26 of the Draft Local Plan, including the freeing up of family homes as well as lower traffic generation resulting from such developments. However, we would also like to draw attention to some of the additional benefits outlined within the attached representation document particularly the health and wellbeing benefits such as savings to the NHS, as well as reduced mental and physical health problems. Please refer to paragraphs 3.14 to 4.15 of the attached representation for further details.</p> <p>Policy DD2 'Inclusive Design' stipulates that new developments should meet Building Regulations Part M Category 2 to adapt to the changing needs of residents in the Borough. The policy does not however include any detail on how specialist housing for older people will be planned for outside of the Building Regulations requirements. This is however,</p>

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			<p>further referenced within the draft Local Plan at Paragraph 12.28 discussed below. Conversely, the Draft Local Plan acknowledges at paragraph 5.19 that those within the population over 65 is expected to increase by 55% in 20 years, with those with health or disability problems increasing by 7,000 persons by 2039. Whilst it is accepted as per paragraph 5.20, some older people will wish to remain in their own homes, National Planning Practice Guidance identifies that the need to provide housing for older people is 'critical', the only group identified as such in national policy guidance (Paragraph: 001 Reference ID: 63-001-20190626).</p> <p>Housing has been recognised as one of the key outputs of the Local Plan, a target of 5,320 new homes will be delivered over the lifetime of the plan. Outside of the enhanced Building Regulations at Policy DD2, Paragraph 12.28 of the Draft Local Plan identifies a need for an additional 1,027 units to meet the population's specialist accommodation need for older people and a further 1,029 residential/ nursing bedspaces. This is welcomed and is in line with PPG advising that plan-making authorities "could also provide indicative figure figures or a range for the number of units of specialist housing for older people needed across the plan area throughout the plan period" (Paragraph: 006 Reference ID: 63-006-20190626). However, Inspired Villages would suggest that this target should be included within the policy wording of Strategic Policy H1 to ensure delivery. The provision of housing for older people is also recommended to be included in the monitoring process when preparing the Annual Monitoring Report (AMR) (NPPG Paragraph: 007 Reference ID: 63-007-20190626).</p> <p><b>Suggested Modifications:</b> Inspired Villages would suggest that this target should be included within the policy wording of Strategic Policy H1 to ensure delivery.</p> <p>The provision of housing for older people is also recommended to be included in the monitoring process when preparing the Annual Monitoring Report (AMR) (NPPG Paragraph: 007 Reference ID: 63-007-20190626).</p>
REP/006	WSCC Property and Asset Management	H2	<p>Developable land adjacent to Desmond Anderson, Tilgate (150 dwellings)</p> <p>WSCC will actively support future proposals to put this land forward for residential development.</p> <p><b>Suggested Modifications:</b> None</p>
REP/022	Sussex Ornithological Society	H2	<p><b>RESPONSE TO CRAWLEY LOCAL PLAN S.19 SUBMISSION DRAFT</b></p> <p>We have examined the Regulation 19 Submission Draft of the Crawley Local Plan, and in broad terms we would wish to maintain our position on the comments we made in March 2020 in response to the previous draft. It is understood that these will be forwarded to the Planning Inspector, and unless stated otherwise should still stand.</p> <p>It remains a matter of concern to the Society that the Council proposes to offload more than 50% of its housing allocation to other authorities, and that this proportion has in fact increased from 53% to 56% since the Regulation 19 Consultation Draft. We feel that, in the light of shifts in Central Government thinking regarding changes to the planning system, and in view of the effects that will follow the current health crisis (particularly the possible long-term brake on aviation growth and the rise in home working and on-line retail making office and retail sites potentially available for</p>

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			<p>housing), Crawley should be more robust in stating that, if the Council is certain that more of these houses cannot be built within Crawley, it is not acceptable to ask neighbouring Local Authorities to build the huge numbers remaining.</p> <p>It remains a particular concern that there needs to be firmer protection relating to the High Weald AONB, which has not really been addressed in this draft, and regarding which we refer back to our observations in response to the Consultation Draft.</p> <p><b>Suggested Modifications:</b>  <b>Housing Policy H2 – Key Housing Sites</b>  It is noted that the proposal for 15 houses on land east of Balcombe Road/Street Hill at Pound Hill is still going forward, and would wish to maintain the comments we made in our previous submission with regard to this.</p>
REP/023	Savills on behalf of St Catherine's Hospice	H2	<p><b>REGULATION 19 (PART 2) LOCAL PLAN REPRESENTATIONS ST CATHERINE'S HOSPICE, CRAWLEY (SITE REFERENCE: 83)</b></p> <p>Please find enclosed representations on the Proposed Submission Draft Local Plan, submitted on behalf of our client, St Catherine's Hospice ('St Catherine's'). The Council will be aware that St Catherine's control land at St Catherine's Hospice, Malthouse Road, Crawley, which has been allocated for development within Strategic Policy H2 of the emerging Local Plan.</p> <p>This representation highlights and where necessary expands upon representations submitted by St Catherine's at the previous Regulation 18 and Regulation 19 stages of the Local Plan process. The Hospice's Regulation 19 representations are appended to this letter for ease of reference and to save for unnecessary repetition.</p> <p>Strategic Policy H2 allocates Malthouse Road for development, recognising the multiple benefits of redevelopment at this site. Whilst welcomed, it is considered that the proposed restrictions for elderly care (residential Class C3 use for older people and/or residential rooms as Class C2) placed on the site are overly prescriptive. It is St Catherine's position, as outlined within their previous representations, that additional flexibility should be provided in the wording of emerging Policy H2 to ensure that if there is demonstrable need, or a lack of demand in the market for elderly care in this location, the site can be redeveloped for C3 use.</p> <p><u>The Site</u>  As detailed within in earlier representations, whilst there are some constraints on the site, these are not considered significant enough to negatively affect the opportunities for a comprehensive development to come forward. It is considered that there are numerous opportunities across the site, owing to the existing access points and close proximity to the train station and town centre.</p> <p>The illustrative masterplans appended to the previous Regulation 19 representation demonstrate that a comprehensive redevelopment, comprising either: a care facility of approximately 60-70 beds (use class C2); or, residential development of circa 60-70 dwellings (use class C3), could readily be delivered without prejudicing the existing urban</p>

		<p>grain. Both masterplan options demonstrate the capacity of the site to accommodate a higher density of development than currently identified in Draft Policy H2.</p> <p><b>Commentary on the Evidence Base</b></p> <p>The evidence which has been updated/ published since the submission of St Catherine's previous representation in March 2020 is has been referred to in this Representation where appropriate.</p> <p><u>Strategic Housing Land Availability Assessment (September 2020)</u></p> <p>Assessed under 'Site Reference 83', CBC acknowledge that the Land at Malthouse Road is available, suitable and achievable, highlighting that,  <i>'Subject to re-provision of hospice facilities elsewhere within the wider area. The site is located in a residential area in reasonable proximity to the town centre, and would in principle be suitable for residential development.'</i></p> <p>St Catherine's concur with the Council's review of the site, sharing the opinion that due consideration will need to be made to the proposal's design response to Malthouse Road Conservation Area. However, as demonstrated in the illustrative masterplans appended to the previous representations, the site is capable of delivering up to 70 dwellings on the site. This should be reflected in the allocation, which should be positively worded to deliver a 'minimum of 60 dwellings'.</p> <p>In addition, the assessment recognises the Hospice's intention to relocate the Hospice to Pease Pottage, outlining the Council's support for the redevelopment as the Local Planning Authority and part-landowner. However, there is little information available to support the proposed restrictions to 'housing for older people.</p> <p>This is contrary to Paragraph 31 of the NPPF, which outlines that [emphasis added] '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 <i>take into account relevant market signals.</i>'</p> <p>Whilst St Catherine's support the Council's preference for elderly care provision, it is important to recognise the influence of the market and enable some flexibility for unrestricted use on the site if an elderly care provider is not forthcoming.</p> <p><u>Crawley Densification Study (January 2021)</u></p> <p>The Council's Densification Study outlines how important it is that Crawley, as a borough, re-visits how its existing urban areas are used and organised, to enable existing land to be used more efficiently. This is particularly in regard to how the scale and layout of the existing built fabric could, or should, facilitate new compact forms of development within the Built-Up Area Boundary.</p> <p>The Study outlines that there are no major Greenfield sites suitable for strategic residential development remaining within the borough's administrative boundaries after Forge Wood is completed. Therefore, any future development in the borough will have to be compact in order to make effective use of the land supply available.</p> <p>As detailed in the following section, St Catherine's strongly supports the Council's proposals to introduce minimum density standards to targeted areas in Crawley (Strategic Policy CL5). Indeed, the NPPF is clear that in setting new</p>
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		<p>policies, plans must contain policies to optimise the use of land in their area and meet as much of the identified need for housing as possible and that this should include the use of minimum density ranges. However, St Catherine's are of the mind that the findings of the Council's Densification Study have not been disseminated fully enough into the remainder of the Local Plan.</p> <p>The illustrative masterplans appended to the previous representations demonstrate the ability of the site to comfortably accommodate 60-70 units i.e. a notably <u>higher density</u> of development than currently identified in Draft Policy H2.</p> <p>It is well understood that Crawley is considerably constrained due to the limited land available in the Borough, as such, it is of paramount importance to maximise the development potential within, and close to, the Town Centre. The redevelopment of the Hospice will increase the density of accommodation provided on the site, whilst enhancing the setting of the neighbouring Conservation Area. This should be reflected in the allocation, which should be positively worded to deliver a '<u>minimum</u> of 60 dwellings'.</p> <p><b>Summary</b></p> <p>This representation highlights and where necessary expands upon representations submitted by St Catherine's at the previous Regulation 18 and Regulation 19 stages of the Local Plan process. St Catherine's supports the changes that have been made to certain policies as part of this current consultation exercise, however, it is maintained Policy H2 remains overly prescriptive and unless positively re-worded may delay the redevelopment of the site.</p> <p>It is requested that Strategic Policy H2 is amended to provide additional flexibility to ensure that if there is a lack of developer interest and/or market demand, the site can be redeveloped for unrestricted C3 use. Allied to this, it is requested that Policy H2 should be positively re-worded to deliver a 'minimum of 60 dwellings' in order to reflect the density requirements of emerging Policy CL4.</p> <p>Importantly, the requested amendments to Policy H2 will help St Catherine's to achieve adequate land receipts and help contribute to the building of the new facility at Pease Pottage by attracting the most market interest in the land. This will also ensure St Catherine's are able to demonstrated best value, required by the Charities Act, and ensure the earliest possible delivery of the site.</p> <p>Ultimately, the allocation of the site at St Catherine's Hospice is supported, and should remain in the emerging Local Plan for development for residential Class C3 use for older people and/or residential rooms as Class C2, with flexibility to bring forward unrestricted residential dwellings (use class C3) if it can be demonstrated that there is a lack of developer interest via a marketing period of 3 months or demonstrably evidence of need for unrestricted C3 use at the planning application stage.</p> <p>In our earlier representations, we outlined our preference to participate in the public examination hearings as the Site has a draft allocation in the emerging Plan and a vested interest in the outcome of the EIP. As such, Savills and St Catherine's Hospice would like to maintain this request and reserve the right to comment on further iterations of the emerging Local Plan.</p>
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		<p>St Catherine's Hospice would like to thank CBC for the opportunity to comment on the Regulation 19 (Part 2) Local Plan Consultation and welcome the opportunity to work closely with the Council to realise the development of a positively prepared, justified and effective new Local Plan.</p> <p><b>Representations to the Crawley Borough Local Plan Review: Crawley 2035 Regulation 19 Consultation</b></p> <p>1.1. This representation is made to the Crawley Borough Council (CBC) Regulation 19 Consultation on the Emerging Local Plan. The consultation is open from 20 January 2020 until 02 March 2020.</p> <p>1.2. This representation is submitted on behalf of St Catherine's Hospice and provides commentary on the key aspects of the consultation and evidence base as applicable to the land and buildings at St Catherine's Hospice, Malthouse Road ("the site"), which is being actively promoted to the Local Plan for residential development (Use Class C2 or C3).</p> <p>1.3. The site currently comprises St Catherine's Hospice, a facility for palliative health care. St Catherine's services are to be provided in an alternative enhanced facility, roughly 2.5 miles from the existing site, in neighbouring Mid Sussex (planning permission for the new facility is granted under ref: DM/15/4711). The provisioning of these services has rendered the existing buildings at Malthouse Road unnecessary for St Catherine's Hospice and provides the opportunity for redevelopment on the site.</p> <p>1.4. The emerging plan makes provision for the development of 5,355 net additional dwellings over the Plan Period 2020-2035; which is broken down into a stepped annual requirement of 500 dwelling per annum (dpa) between years 1-5; 450 dpa between years 6-10; and, 121 dpa between years 11-15. This is a significant reduction from the Government's Standardised Methodology, which sets the housing need of 752 dpa, c. 11,252 dwellings over the plan period.</p> <p>1.5. Though it is widely accepted that the land constraints faced by CBC severely limits the capacity for housing growth in the Borough, the high levels of unmet need in Crawley merely attests to the need for the Council to ensure the delivery of all appropriate development sites in the Plan. To achieve this, CBC should provide sufficient flexibility within the Plan to facilitate development.</p> <p>1.6. Strategic Policy H2 in the emerging Plan allocates Malthouse Road for development, recognising the multiple benefits of redevelopment at this site. Whilst welcomed, it is considered that the proposed restrictions for elderly care (residential Class C3 use for older people and/or residential rooms as Class C2) placed on the site are overtly prescriptive.</p> <p>1.7. St. Catherine's is mindful that the trustees have an obligation under the Charities Commission to demonstrate best value within reasonable constraints. In planning terms, the site is ideal for housing of a broad range of types given its setting and proximity to good transport. We would not want to restrict usage at this stage, particularly when initial analysis shows that the site may only deliver marginal capacity to enable effective care home operation.</p>
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		<p>1.8. Whilst St Catherine's Hospice would prefer elderly accommodation on this site; additional flexibility should be provided to ensure that if there is demonstrated need, or a lack of demand in the market for elderly care in this location, the site can be redeveloped for unrestricted C3 use.</p> <p>1.9. Within this representation comments are provided on CBC's Local Plan review where policies relate to the redevelopment of the Malthouse Road site. The conclusion is drawn that the allocation of the site at St Catherine's Hospice is supported, and should remain in the emerging Local Plan for development for residential Class C3 use for older people and/or residential rooms as Class C2, with flexibility to bring forward unrestricted residential dwellings (use class C3) if it can be demonstrated that there is a lack of developer interest via a marketing period of 3 months or demonstrably evidence of need for unrestricted C3 use at the planning application stage.</p> <p>2. Background to the Site  <u>The Site</u></p> <p>2.1. The 0.73 Ha site is situated on the southern side of Malthouse Road Crawley, which is a predominantly residential road, located approximately 0.7 miles south of Crawley town centre and railway station.</p> <p>2.2. The site comprises four existing buildings, including the Main Hospice care building, the Turner Centre, the Awbrook building and the Mynthurst building. The Main Hospice is situated on the northern part of the site fronting onto Malthouse Road. The Turner Centre is located to the rear of the site and adjacent the southern boundary. The Awbrook building is located in the centre of the site, immediately east of the Main Hospice building. The Mynthurst building is located on the northern part of the site and fronts onto Malthouse Road (No. 128 Malthouse Road).</p> <p>2.3. Vehicular and pedestrian access is provided via Malthouse Road, which abuts the northern boundary of the site.</p> <p>2.4. Immediately south of the main hospice building is a larger building accommodating an extra care residential scheme. This is a reasonably large part 2, 3 and 4-storey building, known as Hogshill Gardens. To the west of the hospice building are No.s 60, 62 and 64 Brighton Road, these are 2- 2.5 storeys in height.</p> <p>2.5. The eastern boundary of the site (and No. 128) intersects Malthouse Road Conservation Area, with Goffs Park Road Area of Special Local Character located within 200m of the Hospice. Future development will be designed sympathetically to conserve and enhance the setting of the Conservation Area.</p> <p>2.6. Malthouse Road predominantly comprises semi-detached, two storey, Edwardian houses which has largely influenced the character of the road. At present, the general scale, massing and design of St Catherine's Hospice does not respond well to the local vernacular.</p> <p>2.7. There are a number of mature trees along the boundary of the site, these will to be assessed as part of an arboriculture survey to inform future development schemes. The neighbouring property, Hogshill Gardens on Brighton Road is known to have several trees protected by Tree Preservation Orders (TPO).</p> <p>2.8. The site is in Flood Risk Zone 1, and therefore has the lowest chance of fluvial flooding, therefore flooding is not a constraint on the site. 2.9. A preliminary ecology survey has confirmed that the habitats on the site are</p>
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		<p>“predominately common and widespread throughout the local area..... Buildings, hardstanding, amenity grassland and introduced shrubs were dominant on site, which are of limited value.</p> <p>2.10. Whilst there are some constraints on the site, these are not considered significant enough to negatively affect the opportunities for a comprehensive development to come forward. It is considered that there are numerous opportunities across the site, owing to the existing access points and close proximity to the train station and town centre.</p> <p><u>The Proposals</u></p> <p>2.11. As set out above, the aspiration for the site is to provide a comprehensive development, comprising either: a care facility of approximately 60-70 beds, for use as a residential care home or nursing home (use class C2); or, residential development of circa 60-70 dwellings (use class C3). The appended illustrative masterplans comprises 69 beds for the care home (Appendix 2.0) and 63 residential C3 units (Appendix 3.0), demonstrating the capacity of the site to accommodate higher density development than currently identified in Draft Policy H2.</p> <p>2.12. Crawley is considerably constrained due to the limited land available in the Borough, as such, it is of paramount importance to maximise the development potential within, and close to, the Town Centre. The redevelopment of the site will increase the density of accommodation provided on the site, whilst enhancing the setting of the neighbouring Conservation Area.</p> <p>2.13. As the development is still in its infancy, the illustrative masterplans are only a initial study on what can be achieved on the site. These demonstrate that redevelopment can increase the density of residential accommodation without prejudicing the urban grain.</p> <p><u>Relocation of St Catherine’s Hospice Facilities</u></p> <p>2.14. St Catherine’s Hospice is currently in the process of developing an enhanced care facility in Pease Pottage, two miles south of the Malthouse Road site. The relocation of St Catherine’s Hospice will considerably improve the level of care offered at St Catherine’s, providing a modernised and bespoke enhanced palliative care facility.</p> <p>2.15. As the hospice will be relocated just outside of the Borough, the hospice will still provide services to Crawley residents and therefore the move will not affect the care provisions available in the area.</p> <p>3. The Local Plan Review</p> <p>3.1. These representations address the strategic policies set out in Section 2 (Sustainable Development); Section 4 (Character, Landscape and Development Form); Section 6 (Heritage); Section 12 (Housing Delivery); and, Section 17 (Sustainable Transport). Though some comments relate to the broader interpretation of policy, they are primarily focused on sections relevant to the site.</p> <p>3.2. For clarity, representations were made to the Regulation 18 Consultation on the emerging Local Plan on behalf of St Catherine’s Hospice earlier in the consultation process. This site has been allocated for development at draft Strategic Policy H2, and is referred to in the Strategic Housing Land Availability Assessment as St Catherine’s Hospice, Malthouse Lane (ref: 83).</p>
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		<p>3.3. Draft Strategic Policy H2 allocates the site for “residential Class C3 use for older people (60 dwellings) and/or residential rooms as Class C2 (Residential Home) use”. Though welcomed, St Catherine’s Hospice seeks to increase the quantum of development allocated on the site to c. 60- 70 dwellings and additional flexibility in the policy to enable unrestricted C3 uses if a care provider is not forthcoming.</p> <p>3.4. These representations considers the Plan against the tests of soundness, as set out in the National Planning Policy Framework (NPPF); highlighting elements of the Plan which would benefit from alterations to ensure that the Plan is found sound.</p> <p>3.5. Paragraph 35 of the NPPF sets out the four tests to ensure the Plan is sound:</p> <ol style="list-style-type: none"> <li>a) “Positively prepared – providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;</li> <li>b) Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;</li> <li>c) Effective – deliverable over the plan period, and based on effective joint working on crossboundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and</li> <li>d) Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework”</li> </ol> <p>3.6. Whilst the representation follows the section order set out in the Plan, we do not consider this to be the most logical approach to organise the policies. As such, it is suggested that the chapters on Economic Growth and Housing are presented earlier in the Plan as they help to set the context for new development, clearly outlining the opportunities and challenges facing the Borough.</p> <p><i>*See representations on:</i></p> <ul style="list-style-type: none"> <li>• <i>Policy SD1: Presumption in Favour of Sustainable Development</i></li> <li>• <i>Policy CL1: Neighbourhood Principle</i></li> <li>• <i>Policy CL4: Effective Use of Lane: Sustainability, Movement and Layout</i></li> <li>• <i>Policy CL5: Form of New Development: Layout, Scale and Appearance</i></li> <li>• <i>Policy HA2: Conservation Areas</i></li> <li>• <i>Policy IN1: Infrastructure Provision</i></li> <li>• <i>Policy H1: Housing Provision</i></li> <li>• <i>Policy H4: Future Housing Mix</i></li> <li>• <i>Policy ST2: Car and Cycle Parking Standards*</i></li> </ul> <p>Strategic Policy H2: Key Housing Sites</p> <p>3.38. St Catherine’s supports the allocation of their Malthouse Road site in Strategic Policy H2. However, the allocation for “residential Class C3 use for older people (60 dwellings) and/or residential rooms as Class C2 (Residential Home) use” is too restrictive and may delay delivery on the site. Whilst it is St Catherine’s preference to accommodate elderly accommodation, additional flexibility is sought within the policy to enable unrestricted C3</p>
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		<p>development at the site if a care provider is not forthcoming. This amendment to the policy would ensure the policy is effective and able to adapt where justified at the application stage via evidence of marketing or demonstrated need for general housing needs.</p> <p>3.39. The suitability of the Site is recognised in the SA (Appendix 5.0), which highlights the Significant Positive Impacts/Positive Impacts development would have on the site. Significantly, the site has been acknowledged as having a significant positive impact for SA Objectives 1, 2 and 3; including positive impacts for SA objectives 5, 6, 7 and 8. These positive outcomes will not change if the site is developed for traditional housing over elderly housing, therefore, the redevelopment will still result in positive impacts to the immediate and wider environs.</p> <p>3.40. Additionally, the SHLAA (appendix 4.0) assesses the site (ref: 83) as being suitable, available and achievable. This demonstrates that the site is both “suitable and developable for housing, subject to reprovision of the hospice facility and development of an appropriate scheme.”</p> <p>3.41. In accordance with the SHLAA assessment, Policy H2 should recognise the reprovision of St Catherine’s Hospice to Pease Pottage, circa. 2.5 miles from Malthouse Road. As such, there will be no net loss of infrastructure to the residents of Crawley.</p> <p>3.42. St. Catherine’s is mindful that the trustees have an obligation under the Charities Commission to demonstrate best value within reasonable constraints. In planning terms the site is ideal for housing of a broad range of types, given its setting and proximity to good transport. We would not want to restrict usage at this stage, particularly when initial analysis shows that the site may only deliver marginal capacity to enable effective care home operation.</p> <p>3.43. Whilst St Catherine’s have been gifted the land at Pease Pottage, St Catherine’s still requires an adequate land receipt to contribute to building the new facility. Creating flexibility in the policy will attract the most market interest and ensure the earliest possible delivery of the site.</p> <p>3.44. In light of this, we request that Strategic Policy H2 is reworded to allow higher densities at this location and ensure that if there is a lack of developer interest or demand in the market, the site can be redeveloped for unrestricted C3 use.</p> <p>3.45. As part of this, the expectations for Building Regulations Part M, Category 3 should be omitted if the site is not developed for elderly housing. This will recognise the opportunities available at the site, demonstrating the Council’s commitment to facilitating housing delivery in Crawley.</p> <p>3.46. In addition, it is important that the largest allocations identified in Policy H2 include an allowance for C2/C3 older person accommodation. This will enable a balanced mix of supply and is required in the context of making the best use of land in response to CBC’s acknowledged unmet needs.</p> <p><b>4. Conclusions</b></p> <p>4.1. This representation is made to the Crawley Borough Council (CBC) Regulation 19 Consultation on the Emerging Local Plan. The consultation is open from 20 January 2020 until 02 March 2020.</p>
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		<p>4.2. The representation is submitted on behalf of St Catherine’s Hospice and provides commentary on key aspects of the Emerging Plan as applicable to site at St Catherine’s Hospice, Malthouse Road, which is being promoted to the CBC Local Plan Review for residential development.</p> <p>4.3. The relocation of St Catherine’s Hospice to enhanced facilities in Pease Pottage provides the opportunity to provide modern, attractive and sensitively designed new dwellings on the Malthouse Road site. The redevelopment of the site demonstrates the capacity for medium sites to enhance the surrounding area whilst contributing to housing delivery in the District.</p> <p>4.4. Strategic Policy H2 in the emerging Plan allocates the St Catherine’s Hospice for development, recognising the multiple benefits of redevelopment at this site. Whilst St Catherine’s preference is for elderly care accommodation, it is considered that this proposed policy is overtly prescriptive and may delay the redevelopment of the site.</p> <p>4.5. It is requested that the Strategic Policy H2 is amended to provide additional flexibility to ensure that if there is a lack of developer interest and/or market demand, the site can be redeveloped for unrestricted C3 use.</p> <p>4.6. Though it is widely accepted that the land constraints faced by CBC severely limits the capacity for housing growth in the Borough, the high levels of unmet need in Crawley merely attests to the need for the Council to ensure the delivery of all appropriate development sites in the Plan. To achieve an effective Plan, CBC should provide sufficient flexibility within the Plan to facilitate development and ensure density is maximised.</p> <p>4.7. The requested amendments to Policy H2 will also help St Catherine’s to achieve adequate land receipts to help contribute to the building of the new facility at Pease Pottage by attracting the most market interest in the land. This will also ensure St Catherine’s are able to demonstrated best value, required by the Charities Act, and ensure the earliest possible delivery of the site.</p> <p>4.8. As demonstrated by the illustrative masterplans, the Malthouse Road site is able to accommodate 60-70 dwellings and it is requested the housing number in draft Strategic Policy H2 is amended for St Catherine’s accordingly.</p> <p>4.9. Within this representation comments are provided on CBC’s Local Plan review. The conclusion is drawn that the allocation of the site at St Catherine’s Hospice is supported, and should remain in the emerging Local Plan for development for residential Class C3 use for older people and/or residential rooms as Class C2, with flexibility to bring forward unrestricted residential dwellings (use class C3) if it can be demonstrated that there is a lack of developer interest via a marketing period of 3 months or demonstrably evidence of need for unrestricted C3 use at the planning application stage.</p> <p>4.10. These representations are underlined by the promotion of the site for residential development. As such, Savills and St Catherine’s Hospice reserve the right to comment on the emerging Local Plan.</p>
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**St Catherine's Hospice,  
Malthouse Road,  
Crawley**



**Appendix 1.0 Site Plan**

<b>Site Reference</b>	83	<b>Neighbourhood</b>	Southgate													
<b>Site Name / Address</b>	St Catherine's Hospice, Malthouse Road															
<b>Existing Land Use (s)</b>	Hospice providing palliative care.															
<b>PA Number</b>	-	<b>Gross Dwellings</b>	60													
<b>Lapse Date</b>	-	<b>Demolitions</b>	0													
<b>PDL / Greenfield</b>	PDL	<b>Net Dwellings</b>	60													
<b>Site Area (Gross hectares)</b>	0,73	<b>Current Density</b>	-													
<b>Site Suitability</b>	Yes – Subject to re-provision of hospice facilities elsewhere within the wider area, the site is located in a residential area in reasonable proximity to the town centre, and would in principle be suitable for residential development. The site is allocated in the submission draft 2020 Local Plan as 'housing for older people', either in the form of dwellinghouses (C3) or a residential home (C2 use).															
<b>Site Availability</b>	Yes – St Catherine's Hospice is due to relocate to new premises in Phase Potage by 2022. The site is partly owned by Crawley Borough Council, which is supportive of redevelopment.															
<b>Site Achievability</b>	Yes – The site is considered to be viable for the purposes of residential and development is considered achievable in the first five years of the 2020 Local Plan. Design will have to be carefully considered and respond appropriately to the character of the surroundings, including Malthouse Road Conservation Area, which overlaps with the site.															
<b>Action Required / Constraints</b>	Further collaboration between the council and St Catherine's Hospice to agree a general approach and develop an appropriate scheme.															
<b>Phasing for development</b>																
19/20	20/21	21/22	22/23	23/24	24/25	25/26	26/27	27/28	28/29	29/30	30/31	31/32	32/33	33/34	34/35	35/36
						60										
<b>Summary</b>		This site is considered both suitable and developable for housing, subject to re-provision of the hospice facility and development of an appropriate scheme.														



**Appendix 2.0 Illustrative Care Home (Use Class C2) Masterplan**



**Appendix 3.0 Illustrative Residential (Use Class C3) Masterplan**



**Appendix 4.0 SHLAA Excerpt**

Chapter 12. Housing Delivery																											
Ref. No.	Respondent	Policy/ Para	Comments																								
			<p><b>Assessment of Key Housing for Older People Sites (Policy H2)</b></p> <p><b>Site Name:</b> St. Catherine's Hospice, Southgate</p> <p><b>Site Potential Allocation:</b> Housing for Older People</p> <p><b>Site Description:</b> the site is located within an established residential area, close to the town centre, The site currently includes an existing Hospice which is to be relocated to a new site at Pease Pottage.</p> <table border="1"> <thead> <tr> <th colspan="2">Impacts of the Development</th> </tr> <tr> <th>SA Objective</th> <th>Commentary and/or Impact</th> </tr> </thead> <tbody> <tr> <td>1. Minimise Climate Change &amp; Local Pollution</td> <td>close to town centre, sustainable location within the urban area, Brownfield site, Sustainable design and construction will apply to new build, There are no known issues with land contamination or noise, air or water pollution, <b>Significant Positive Impact (++)</b></td> </tr> <tr> <td>2. Adapt to Climate Change</td> <td>The site is not within an area of identified flood risk, It is currently a brownfield site and would form the reuse of land, Sustainable design and construction and water management measures could improve the drainage and run-off associated with this site, <b>Significant Positive Impact (++)</b></td> </tr> <tr> <td>3. Protect and/or Enhance the Built Environment</td> <td>The site is located within the built up area, The site is previously developed and its reuse will address a vacant site, part of which lies within a Conservation Area so will need appropriate design, <b>Significant Positive Impact (++)</b></td> </tr> <tr> <td>4. Decent/ Affordable Homes</td> <td>Could offer a proportion of new homes, Increasing the capacity of the town to meet very specific needs for older people emerging from the population either as a care home or as housing designed to adapt to the needs of older people to allow for them to retain independence for longer, Include 40% affordable housing and/or affordable care, <b>Significant Positive Impact (++)</b></td> </tr> <tr> <td>5. Maintain/ Support Employment</td> <td>The provision of new housing is closely linked to supporting economic growth, <b>Positive Impact (+)</b></td> </tr> <tr> <td>6. Conserve/ Enhance Biodiversity and Landscape</td> <td>Biodiversity enhancements should be designed into any scheme, <b>Positive Impact (+)</b></td> </tr> <tr> <td>7. Promote Sustainable Journeys</td> <td>The site is located within the urban area, and close to the town centre, <b>Positive Impact (+)</b></td> </tr> <tr> <td>8. Provide Sufficient Infrastructure</td> <td>The site is located adjacent to the existing residential area which are served by existing infrastructure services, <b>Positive Impact (+)</b></td> </tr> <tr> <td>9. Promote Sustainable Communities and Encourage Active Lifestyles</td> <td>Specific development of the site to meet the needs of Crawley's older people addresses existing shortfalls in this type of provision, The site is located within the urban area, close to the town centre, By providing specialised housing provision for older people it will be for the residents to be active and independent in later life, <b>Significantly Positive Impact (++)</b></td> </tr> <tr> <td><b>Conclusions</b></td> <td>The site is located within the built up area, close to amenities within the town centre and neighbourhood health care services, It is a secluded site and offers advantages for its development either as a residential care home or for the general housing needs of older people.</td> </tr> </tbody> </table> <p><b>Suggested Modifications:</b></p> <p><b>Strategic Policy H2: Key Housing Sites</b></p> <p>St Catherine's Hospice would like to take this opportunity to reiterate their concerns about this policy, specifically, the respective rigidity in the policy wording. The previous representations have consistently highlighted the need for flexibility within Policy H2 to enable unrestricted C3 development at the site if a care provider is not forthcoming. This amendment to the policy would ensure the policy is effective and able to adapt where justified at the application stage via evidence of marketing or demonstrated need for general housing needs.</p> <p>In accordance with the SHLAA assessment, Policy H2 should recognise that the re-provision of St Catherine's Hospice to Pease Pottage, circa. 2.5 miles from Malthouse Road, will not result in a net loss of infrastructure to the residents of Crawley.</p> <p>As previously noted, the trustees at St Catherine's Hospice have an obligation under the Charities Commission to demonstrate best value within reasonable constraint and whilst St Catherine's have been gifted the land at Pease Pottage, St Catherine's still requires an adequate land receipt to contribute to building the new facility.</p> <p>Significantly, the site is ideal for housing of a broad range of types, given its setting and proximity to good transport. We would not want to restrict usage at this stage, particularly when initial analysis shows that the site may only deliver</p>	Impacts of the Development		SA Objective	Commentary and/or Impact	1. Minimise Climate Change & Local Pollution	close to town centre, sustainable location within the urban area, Brownfield site, Sustainable design and construction will apply to new build, There are no known issues with land contamination or noise, air or water pollution, <b>Significant Positive Impact (++)</b>	2. Adapt to Climate Change	The site is not within an area of identified flood risk, It is currently a brownfield site and would form the reuse of land, Sustainable design and construction and water management measures could improve the drainage and run-off associated with this site, <b>Significant Positive Impact (++)</b>	3. Protect and/or Enhance the Built Environment	The site is located within the built up area, The site is previously developed and its reuse will address a vacant site, part of which lies within a Conservation Area so will need appropriate design, <b>Significant Positive Impact (++)</b>	4. Decent/ Affordable Homes	Could offer a proportion of new homes, Increasing the capacity of the town to meet very specific needs for older people emerging from the population either as a care home or as housing designed to adapt to the needs of older people to allow for them to retain independence for longer, Include 40% affordable housing and/or affordable care, <b>Significant Positive Impact (++)</b>	5. Maintain/ Support Employment	The provision of new housing is closely linked to supporting economic growth, <b>Positive Impact (+)</b>	6. Conserve/ Enhance Biodiversity and Landscape	Biodiversity enhancements should be designed into any scheme, <b>Positive Impact (+)</b>	7. Promote Sustainable Journeys	The site is located within the urban area, and close to the town centre, <b>Positive Impact (+)</b>	8. Provide Sufficient Infrastructure	The site is located adjacent to the existing residential area which are served by existing infrastructure services, <b>Positive Impact (+)</b>	9. Promote Sustainable Communities and Encourage Active Lifestyles	Specific development of the site to meet the needs of Crawley's older people addresses existing shortfalls in this type of provision, The site is located within the urban area, close to the town centre, By providing specialised housing provision for older people it will be for the residents to be active and independent in later life, <b>Significantly Positive Impact (++)</b>	<b>Conclusions</b>	The site is located within the built up area, close to amenities within the town centre and neighbourhood health care services, It is a secluded site and offers advantages for its development either as a residential care home or for the general housing needs of older people.
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**Appendix 5.0 Sustainability Appraisal Excerpt**

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			<p>marginal capacity to enable effective care home operation. As such, providing flexibility in the policy will attract the most market interest and ensure the earliest possible delivery of the site.</p> <p>Therefore, we would like to reiterate our request that Strategic Policy H2 is reworded to allow higher densities at this location and ensure that if there is a lack of developer interest or demand in the market, the site can be redeveloped for unrestricted C3 use – As such, the following changes are recommended:</p> <p>“[St Catherine’s Hospice (developable) as residential Class C3 use for older people (<b>minimum of 60 dwellings</b>) and/or residential rooms as Class C2 (Residential Home) use.</p> <p>Development on these sites should specifically meet the needs of older people, either as a care facility in the form of Extra-Care or Residential Care or to provide general housing designed to meet particular needs of older people including being wheelchair adapted dwellings meeting Building Regulations Part M, Category 3 accessibility standards] <b><u>unless it can be demonstrated that there is a lack of developer interest via a marketing period of 3 months or an evidenced need for unrestricted C3 use at the planning application stage.</u></b>”</p> <p>This amendment to the policy would ensure the policy is effective, positively prepared and consistent with national policy (NPPF Paragraph 35).</p>
REP/024	Tony Fullwood Associates on behalf of Landowners	H2	<p><b>Response to Regulation 19 Crawley Borough Local Plan 2021 – 2037, January 2021</b></p> <p><b>Support Policy H2: Land east of Balcombe Road/Street Hill, Pound Hill</b></p> <p>Tony Fullwood Associates act on behalf of the Bucknall family – owners of the Housing, Biodiversity and Heritage Site allocated within Policy H2 (Key Housing Sites) in the Crawley Borough Local Plan 2021 – 2037. It is common ground with the Borough Council that the site remains suitable, available and achievable (SHMA, 2020).</p> <p><u>Site Suitability</u></p> <p>There are no changes in national policy which either diminish the need for housing in the Borough or further constrain development. Recent evidence (Worth Conservation Area Statement, February 2018, Non-designated Heritage Asset</p>

		<p>Assessment: Historic Parks and Gardens, September 2020, Flood Risk and Sequential Test for Site Allocations, October 2020 and Crawley Transport Study, May 2021) confirms that the site remains suitable for development.</p> <p>The scale of unmet need in the Borough over the Plan period has increased to approximately 6,680 dwellings since publication of the Regulation 19 Draft Crawley Borough Local Plan 2020 – 2035. It is clear from local evidence that effective use must be made of land already allocated within the Borough in the adopted Local Plan.</p> <p>The site remains eminently suitable to deliver 15 dwellings as previously confirmed by extensive evidence, the Local Plan Inspector’s report and its allocation in the adopted Local Plan. The landowner accepts adopted Local Plan Policy H2.</p> <p><u>Site Availability</u> The site remains immediately available and would already have been brought forward for housing development but for a frustration caused by the difficulties encountered by the Borough Council in the production of a satisfactory and lawful Development Brief referred to in Policy H2.</p> <p>A Development Brief was first issued for consultation in July 2017 and has still to be adopted by the Borough Council despite allocation of the site in the adopted Local Plan in December 2015. The Borough Council should continue to engage with the landowner and progress the Development Brief to adoption. The Bucknall family look forward to positive engagement in order to ensure an acceptable and lawful Development Brief that facilitates the early delivery of a sensitive and viable housing development.</p> <p><u>Site achievability</u> The site can be, and should already have been, delivered and is considered to be viable and achievable provided the Development Brief does not impose further restrictions and requirements beyond those agreed by the Local Plan Inspector and contained within adopted Local Plan Policy H2.</p> <p><u>Conclusion</u> There is strong justification for retaining Land east of Balcombe Road/Street Hill, Pound Hill as a deliverable Housing, Biodiversity and Heritage Site allocation within Policy H2 (Key Housing Sites) and the Bucknall family wish to strongly support its retention in the emerging Crawley Borough Local Plan 2021 – 2037.</p> <p><b>Objection to Policy H2 Housing, Biodiversity and Heritage Site allocation criterion (v)</b> The Bucknall family wish to object to the proposed amended wording in criterion v. The criterion now seeks to ‘avoid’ rather than ‘limit’ harm to grassland on the site - as currently worded in the adopted Local Plan H2 allocation.</p> <p>This is the only change to the criteria wording for this allocation when compared with the adopted Local Plan. Whilst this single change may appear to be minor, inclusion of this proposed wording would result in this part of the Regulation 19 Local Plan not being effective or consistent with national policy – consequently making this part of the Local Plan unsound.</p>
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		<p><u>Effective</u>  The restriction to avoid harm to grassland within the housing site could be detrimental to the site being deliverable over the plan period.</p> <p>In considering the allocated site, the adopted Local Plan Inspector stated:  <i>The most important attribute of the SNCI, the species-rich meadow grassland, has diminished appreciably since designation as a result of encroaching bramble scrub. Without intervention all the meadow grassland habitat will in time be replaced by bramble and, ultimately, woodland. Proper management of the two-thirds of the SNCI not affected by development would enable the decline of the remaining species-rich meadow habitat to be arrested. Mitigation of this nature, secured as part of the development, would offset the harm caused by the loss of part of the meadow and (as with the heritage assets) represents a balanced approach to meeting the housing needs of the area.</i></p> <p>It is clear that the Inspector's decision was based on an acceptance that part of the grassland within the housing area would be lost, and that the objective of securing net gains for biodiversity would be delivered on the other parts of the Site (hence the allocation of the wider Housing, Biodiversity and Heritage Site). The attempt to impose the revised wording to 'avoid harm' would severely undermine the ability of the site to deliver housing development in line with the Inspector's conclusions and the adopted Local Plan.</p> <p>The Local Plan Inspector clearly had in mind the wider tests of achieving sustainable development when allocating this site. In particular he referred to the social benefits of achieving a 'nonetheless significant contribution towards meeting Crawley's housing need on a site within Crawley'. He was also clearly mindful of the environmental benefits which can be achieved as a result of development but was no doubt aware that achieving a certain scale of development would result in some limited and acceptable harm to the grassland.</p> <p>This is reflected in his proposed modification (now included in the Local Plan) which sought to 'limit' harm in the adopted Local Plan.</p> <p>Criterion (v) of the policy as worded even contradicts the Local Plan which states:  <i>'The potential impact of the development and long-term degradation of the valuable habitat on the site ... can be mitigated against through the appropriate high quality enhancement of the remainder of the site.'</i> (Para. 12.58)</p> <p>This is confirmed in the Sustainability Appraisal which in relation to the Housing, Biodiversity and Heritage Site states:  <i>...it is essential that appropriate mitigation measures are in place and secured to limit the negative impacts of development (my emphasis).</i></p> <p>It is not acceptable, and should not be necessary, to rely on the phrase at the foot of Policy H2 which states that where impacts cannot be avoided adequate mitigation and compensation measures will be provided to offset any harm caused to the site's important assets. This leaves greater uncertainty over how the Borough Council will apply criterion (v) in their interpretation of NPPF Para 175 (a) in the future. In any event, in the case of the allocated Housing, Biodiversity and Heritage Site the change to criterion (v) represents an unnecessary change to Policy H2 when it has already been</p>
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			<p>accepted by the Local Plan Inspector and in the adopted Local Plan that, as a consequence of this allocation, there will be limited harm to the grasslands.</p> <p>The need for this change is compounded by the revisions to Policy CL8: Development Outside the Built Up Area. Policy H2 Housing, Biodiversity and Heritage allocation sits within the Tilgate/Worth Forest and Fringes. This part of Policy CL8 has been amended to include reference to biodiversity:</p> <p>Proposals within Tilgate Country Park and Worth Conservation Area/Worth Way LWS should conserve and enhance their high landscape <b>and biodiversity</b> value and potential for improved green infrastructure links to other areas. <b>(my emphasis)</b></p> <p>There is no caveat to this policy to allow for mitigation.</p> <p>The restriction to avoid harm to grassland within the housing site adds unnecessary uncertainty and could undermine the delivery of this otherwise suitable, available and achievable site in the early part of the plan period - rendering this part of the plan ineffective.</p> <p><u>Consistency with national policy</u> The NPPF (Para 170) states: <i>Planning policies ... should contribute to and enhance the natural and local environment by:</i> a) <i>protecting and enhancing ... sites of biodiversity... (in a manner commensurate with their statutory status or identified quality in the development plan)...</i> d) <i>minimising impacts on and providing net gains for biodiversity...</i></p> <p>The attempt in Criterion (v) to avoid harm is not consistent with national policy for a Local Wildlife Site.</p> <p><b>Suggested Modifications:</b> <b>Modification necessary to resolve the issue identified</b> Amend wording to Policy H2 Housing, Biodiversity and Heritage Site creation (v) to that included in the Adopted Local Plan: v. <b>limit</b> harm to the species-rich meadow grassland which contributes to the Local Wildlife Sites (LWS)</p>
REP/033	Horsham District Council	H2	<p>We support this policy in principle, <b>but consider it is not completely justified as stands</b>. As set out in our comments to earlier policies (and in particular Policy H1), further evidence is required to support the overall number of dwellings suggested, given that there may be some further capacity identified through a completed Densification Study.</p> <p><b>Suggested Modifications:</b> <b>Change sought:</b> The Densification Study should be completed and any necessary changes to housing site capacities and allocations made accordingly</p>
REP/050	Homes England	H2	NB: Separate Homes England reps will be sent in relation to other key sites/ matters. This representation relates to Tinsley Lane allocation only.

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			<p>The allocation of 120 units is not based on the most up to date / credible evidence. We propose that <b>138 units</b> is a suitable allocation quantum for the reasons below:</p> <p>The site's northern land parcel has been proven to accommodate the sports facilities and all associated infrastructure, leaving the central and southern land parcels entirely free for residential development. Masterplanning work has determined that approximately 138 units can be comfortably achieved.</p> <p>For context, the Inspectors Report (Nov 2014) on the Examination of the 2015-2030 Local Plan concluded that:  <i>Para 44... it is evident that the stated capacity of 138 dwellings involves the full range of facilities being provided on the retained playing field. Given my concern about whether this can be achieved, it is prudent to allow for the possibility that some of these facilities (most likely the car park) might have to be sited on the northern part of the adjacent housing site, with a consequent reduction in the number of dwellings. Thus a modest reduction in site capacity to 120 dwellings is a more robust figure at this stage, though the potential for 138 dwellings remains if at detailed design stage the northern field is found to have the capacity to deliver the full range of playing pitch facilities</i></p> <p>Homes England recently submitted an outline application in line with adopted allocation requirements. Whilst refused (against officer's advice) due to concerns regarding amenity impacts, the sports provision delivered entirely on the northern land parcel was fully discussed with, and supported by, Sport England and the Council. Homes England will shortly prepare a revised application enhancing the scheme layout, however the northern sports provision will remain as proposed, leaving the remainder of the site with capacity for 138 dwellings in line with the Inspector's conclusions. Increasing the allocation quantum to 138 dwellings is therefore appropriate given Sport England and Council endorsement during the application process.</p> <p>NB: The 138 dwelling number is proposed in the context that all allocations are indicative (as per policy text in H2). We support this approach - placing maximum limits on allocated sites will limit development and may impact on Crawley's housing supply.</p> <p><b>Suggested Modifications:</b>  Homes England supports retained allocation Tinsley Lane, Three Bridges (within Policy H2 Key Housing Sites), however the following changes are sought:</p> <ol style="list-style-type: none"> <li>1. Site Capacity  Homes England seeks the replacement of 120 dwellings with <b>138 dwellings</b>.</li> </ol> <p>In line with the above, this is based on the latest credible evidence and approved by Sport England as Crawley planning DM officers as statutory consultees. Increasing the allocation quantum to acceptable agreed levels will enable Crawley BC to make the most of allocated sites.</p>

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			<p>2. Allotments Regarding vi the provision of allotments. Proposed rewording to <b>Consideration of</b> provision of allotments <b>subject to need and viability</b>.</p> <p>The addition of 'Consideration of' will ensure consistency with the adopted Tinsley Lane Development Brief SPD. The addition of 'subject to need and viability' will enable provision to reflect local need at the time of development and within the context of overall scheme viability.</p>
REP/078	Resident 23	H2	<p>you state the following in the last paragraph of the H2 policy section on page 160:</p> <p><b>Broad Locations</b> The remainder of the land within the Town Centre Boundary outside the identified Town Centre Key Opportunity Sites (above), and Land East of London Road, Northgate are identified as broad locations for housing development in years 6–10 and 11–15 with the capacity to deliver a minimum of 112 and 84 net dwellings respectively.</p> <p>You identify a minimum of 112 and 84 residences in years 6-10 and 11-15 respectively. You do not, however, stipulate a maximum and whether or not these figures will be as a result of a shortfall from the Town Centre Key Opportunity Sites (1,500 net dwellings).</p> <p>Please may you clarify the maximum figure expected in this Broad Location and the criteria that would have to be met in order to meet said figure.</p> <p><b>Suggested Modifications:</b> Please may you stipulate a maximum number of houses that would be expected to be built in the Broad Location area as outlined in H2 in years 6-10 and 11-15. I do not feel the statement contained currently in H2 is a sound one when all other stated locations in the plan have expected maximum/expected number of housing number commitments, yet the Broad Location does not. It reads as though the Broad Location is an over fill area that could have any number of houses, in order to meet the expected total target in the plan, with the only requirement being that it is a minimum of 112 and 84 in years 6-10 and 11-15 respectively.</p>
REP/084	Resident 27	H2	<p>As stated in the council's own assessments and reports the area proposed for 15 houses is in a conservation area - any building here does not take into consideration the council's own demands for enhancement and/or preservation of character, biodiversity and heritage. There is significant evidence that this site is the habitat of Greater Crested Newts, along with other amphibious life forms. A number of aged trees are located at and around the site, which formed part of the historic parkland. The moat indicates that this is an archeologically sensitive and valuable site. This is a valuable green pocket that links with the large parkland and churchyard and the ancient Worth forest, any development here will be detrimental to the character of Worth, and more catastrophically, to protected species.</p> <p>In addition - I find it hard to understand why anyone would consider that site - adjacent to the motorway and a commercial development, fit for homes. Frequently there is a stench of solvents/paint, continual alarms, lorries reversing, bright lights and disturbance.</p>

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			<p>In addition, there will be increased traffic, and the road built for access to these planned houses will be used for parking by the employees of the commercial development.</p> <p><b>Suggested Modifications:</b>            You need to state why this modification will make the Local Plan legally compliant or sound. It would be helpful if you are able to suggest how the wording of any policy or text should be revised. Please be as clear as possible. Any non-compliance with the duty to co-operate is incapable of modification at examination.</p>
REP/087	Woodland Trust	H2	<p>In line with policy GI2, and the NPPF para 175c, development which would result in the loss of ancient woodland, aged or veteran trees should not be permitted.</p> <p>In particular, we object to the allocation of land for housing that includes the following ancient semi-natural woodlands (ANSW):</p> <ul style="list-style-type: none"> <li>• Black Corner Wood ASNW (Grid reference: TQ2996939934)</li> <li>• Black Corner Wood ASNW (Grid reference: TQ2980139854)</li> <li>• Black Corner Wood ASNW (Grid reference: TQ2971939604)</li> <li>• Titchmeres Wood ASNW (Grid reference: TQ2957539239)</li> <li>• Forge Wood ASNW (Grid reference: TQ2964738891)</li> <li>• Unnamed ASNW at TQ2965338714</li> <li>• Unnamed ASNW at TQ2984538749</li> <li>• The Birches ASNW (Grid reference: TQ2921138575)</li> <li>• Tinslow Shaw / Mine Pit Wood ASNW (Grid reference: TQ2901638590)</li> <li>• Unnamed ASNW at TQ2900238628.</li> </ul> <p>In addition, we are concerned about the proximity of the site allocations to Summersveres Wood (Grid reference: TQ2868538572) and to Tilgate Forest &amp; Lodge ASNW (Grid reference: TQ2704334553).</p> <p><b>Suggested Modifications:</b>            We urge safeguarding these irreplaceable areas of woodland by excluding them from any future development sites, with an appropriate buffer. We recognise the intense pressure to identify and bring forward new sites for housing and employment uses. This pressure makes it all the more important that vital protections for ancient woodland and veteran trees are upheld.</p>
REP/099	Resident 35	H2	<p>As usual these forms are sent to totally <u>confuse the public</u>.            As you well know we have NO IDEA what this form is about.            My RESPONSE is I-We-Bewbush West want a simple response From You.</p> <p><b>Suggested Modifications:</b>            The modification is to STOP this build! 9,9 other residents of Masefield Road are totally AGAINST this build – we have emailed, put in writing, filled in forms &amp; <u>STILL</u> we have NO information from you – No answers – just continue to be fobbed off.            You have until the 31<sup>st</sup> July to answer – through the “Freedom of Information Act” I am waiting for that information.</p>

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REP/103	Carter Jones LLP on behalf of SGN	H2	<p><b>Draft Strategic Policy H2 (Key Housing Sites)</b></p> <p>Draft Policy H2 identifies sites proposed to be allocated for residential development in the Local Plan Review. The sites proposed are considered critical to the delivery of future housing in Crawley and are identified as being ‘deliverable’ within the first five years of the Plan or ‘developable’ in years 6-16.</p> <p>Of relevance to our representations, we note that the Forge Wood Masterplan Area, Pound Hill is proposed to be carried forward to deliver the remaining 1,083 dwellings of its planning permission, along with Land at Steers Lane (185 dwellings) and land to the south east of Heathy Farm (150 dwellings). These latter two proposed allocations are currently earmarked as ‘broad locations’ for housing development in the adopted Local Plan.</p> <p>We also note that the draft Proposals Map has been amended to no longer illustrate a blanket allocation of the entire Forge Wood area as a ‘Key Housing Site’. However, we do note that it has been replaced by a newly proposed allocation titled the ‘Forge Wood Neighbourhood’, which covers SGN’s site and the wider assessed area in the SHLAA (Site 73). The draft Proposals Map links this newly proposed allocation to Draft Strategic Policy H2 but there is no specific mention of it in the draft policy wording. We therefore seek clarification from the Council to confirm its purpose and what it means for land that is proposed to be included in it.</p> <p>We believe the proposed allocation should link to commentary noted on several occasions in the Local Plan Review in which Forge Wood is the last full neighbourhood which can be built on within the borough boundary. Similarly, it should link to the commentary in paragraph 12.50 which states:</p> <p style="padding-left: 40px;">“Beyond this [proposed allocations in Forge Wood], there may be opportunities within the masterplan area to consider further small-scale housing development, as infill opportunities, subject to considerations of infrastructure capacity, open space and amenity requirements, biodiversity and ancient woodland, and the requirements of Policy EP4 relating to noise affected areas. Development of residential uses in land affected by the noise contours above 60dB would not be in accordance with Policy EP4 and would be refused”.</p> <p>To ensure that the Forge Wood Neighbourhood is fully utilised, it should be specifically highlighted in Draft Policy H2 that any remaining brownfield land in Forge Wood is deemed residual land in which the Council support the principle of development. Therefore, if the Council conclude that the Site and wider assessed area (Site 73) remain unsuitable for allocation in the Local Plan Review (following the application of the Sequential and Exceptions Test), the principle of development of the land will at least be secured in advance of a planning application and supporting technical work.</p> <p>We also wish to add two further comments relating to paragraph 12.50. Firstly, reference should be made to the Forge Wood Neighbourhood rather than the masterplan area (as the masterplan area refers to the Pound Wood allocation for 1,083 dwellings) and secondly, SGN’s site falls outside of the area affected by the noise contours exceeding 60dB (as per Figure 1 of the Noise Annexe at page 295).</p>

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			<p><b>Suggested Modifications:</b></p> <p><b>Conclusions</b></p> <p>In summary, we consider the Local Plan Review as it is currently drafted and evidenced is unsound.</p> <p>The Council can only demonstrate enough housing land supply to deliver just 44% of its objectively assessed housing need. Not enough has been done to demonstrate that every possible land opportunity within its own boundaries has been exhausted; nor can they provide certainty that the unmet need can be provided elsewhere within the HMA.</p> <p>We have reviewed the SHLAA to determine the Council's conclusions regarding the Site and wider assessed area ('North East Sector, Gas Holder site' - Site 73) and note that the area has been precluded for reasons concerning flood risk and land contamination. These are matters that can be addressed through further investigatory work (the application of the Sequential and Exceptions Test), appropriate design and remediation.</p> <p>As a result, we would urge the Council to work positively and proactively to overcome constraints in the pursuit of delivering their objectively assessed need.</p> <p>In addition, whilst we welcome the Site's recognition as forming part of the proposed Forge Wood Neighbourhood allocation, we recommend that the brownfield land within it is defined and classified as residual land in which the principle of development is supported. This would at least demonstrate the Council's commitment to utilising all available land within the last full neighbourhood which can be built within.</p> <p>We trust that the information enclosed clearly sets out the work that is required to ensure the Local Plan Review can be found sound. We ask the Council to undertake further assessment of the Site and wider area forming Site 73 to determine its development potential and make the appropriate changes to Draft Policy H2 prior to submitting it to the Secretary of State for examination. We also ask to be notified about future EIP hearing sessions.</p>
REP/104	Resident 38	H2	<p>a. As far as we can tell, after speaking to many residents and none of us have been consulted by the council on any potential changes to our local amenities (i.e. Bewbush West Playing Fields). We all consider this to be unacceptable, as we value our outdoor space and would not like to see any detrimental changes.</p> <p>b. In our opinion, the plans to build on a public playing fields cannot be legally compliant. The playing fields are used very often by many local residence, visitors, children and animals. Building on this area will take away vital amenities that are crucial for the health and wellbeing of our local community:</p> <p>a. the area is used by many children for playing ball games etc. The gardens in the Bewbush area are generally small as original Bewbush West plans allowed for increased shared open spaces for our communities to live in.</p> <p>b. many use the area for walks and exercise (which is crucial, considering the recent worldwide health issues). With fitness being deemed as paramount to the ability to fight off any illness.</p>

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			<p>c. our children need open spaces to keep active and we should not be taking these areas away from them but encouraging them to use them more.</p> <p>c. Building flats on this area will obstruct the light to the adjacent properties and this will have a detrimental effect on:</p> <ol style="list-style-type: none"> <li>health to the adjacent residence. As we know that sunlight is particularly important to staying healthy.</li> <li>renewable energy efficiency (Solar Panels) will be reduced by obstructing sun light to the solar panels of adjacent properties.</li> <li>privacy and security for local residence will be compromised, with flats overlooking properties (Gardens) and through windows.</li> <li>there is a significant amount of wildlife living in the playing fields. The wildlife habitats should not be disturbed. The residents enjoy the animal life and see the need to maintain wildlife sanctuaries within our communities.</li> <li>the woodland should be protected as trees (etc.) improve the air quality and produce vital oxygen and reduce toxins.</li> </ol> <p>d. With the devastating loss of jobs in Crawley, due to Covid and the likelihood of extremely high unemployment (as much as 60%), we feel the council should reframe from bringing more people to the town, that will only add to the unemployment burden on the local community. The need for homes will change in the near future as the need is driven by jobs.</p> <p>e. Building on the parkland will reduce the value of Bewbush houses and anything that is build, would not be in keeping with the design of the Bewbush area.</p> <p>f. The local community has suffered enough with the building of Kilnwood Vale and would not want any further disruption to our lives by more building work closer to our homes.</p> <p>g. We feel any building on the parkland would seriously spoil the area for local all residents.</p> <p><b>Suggested Modifications:</b></p> <ol style="list-style-type: none"> <li>Refrain from building on our vitally important open spaces within our community.</li> <li>Build on the many Brownfield sites in Crawley and stop building on Greenfield sites.</li> </ol>
REP/107	Resident 40	H2	<p>Building on greenfield land for 24 dwellings especially when the land in question is so well used and loved by local residents is a massive mistake.</p> <p>This land is relied on by many to live a good quality of life, and many young children play on the land regularly. Not just the playground but the green space too.</p> <p>The 24 dwellings planned could be in 3 story buildings which would be an awful eyesore and a potential invasion of privacy on neighbouring properties due to higher floor dwellings being able to see directly into gardens and rooms.</p>



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			<p>There are houses in Masefield Road and Henty Close that will significantly lose light and the ability to use solar panels which will only infringe on the health of residents but also affect renewable energy production.</p> <p>The damage that this particular development and others nearby like the Kilnwood Vale bus route link will cause to the local ecosystem is dramatic. The loss of that green link between Buchan Park and Ifield West via the Water Gardens will do damage to the numbers of local species.</p> <p>I have just been made aware of the Henty Close proposed housing plan for 24 dwellings on top of the existing playground and Greenfield land.</p> <p>As a nearby resident and regular walker of the area, I'd like to make it known how upsetting this is for many in the area.</p> <p>The existing corridor of trees between Buchan Park and Bewbush Water Gardens is already down to its last row of trees, and this plan to build on the land is yet another dent in the natural ecosystem.</p> <p>This is also just another sneaky way of building on the Bewbush West Playing fields by stealth and without actually building on the football pitches. Instead, the plan to destroy the play area, just comes across as yet another example of this council betraying the children of Crawley. Especially Bewbush, who are already never going to enjoy the Waterfield Adventure playground in the same way again.</p> <p>I hope that there is strong Council opposition to this. I know it goes towards Crawley housing stock but at what cost? 24 dwellings for the destruction of a nature corridor and a children's play area? It seems like a trade that really doesn't hit the mark to me.</p> <p>Also, I remember writing a reply to the proposal to build the link Road between Kilnwood Vale and Sullivan Drive in Bewbush, and it was mentioned then that the playground would be saved or moved, and that the Green corridor would be protected to the best of their ability.</p> <p>I'm quite frankly, disgusted by this plan, and at the end of the day, it is yet more Greenfield land used for housing.</p> <p><b>Suggested Modifications:</b> Remove the Henty Close development from the Local Plan.</p> <p>This development is damaging to neighbours, invasive of privacy and awful for the natural world.</p> <p>If any revision is to be recommended it is to reduce the amount of dwellings to a number that would not be invasive of privacy or cause a loss of sunlight. Even then, any development is still likely to be unacceptable for the surrounding environment.</p>
REP/108	Resident 41	H2	<p>I do not think putting flats on the field at Henty close is a good idea, the wildlife in Crawley are suffering because all their homes are being destroyed. Also we will be losing a safe space for children to play and be independent. This green space is used by many people for exercise and dog walk and socialise. This could be the perfect place for two</p>

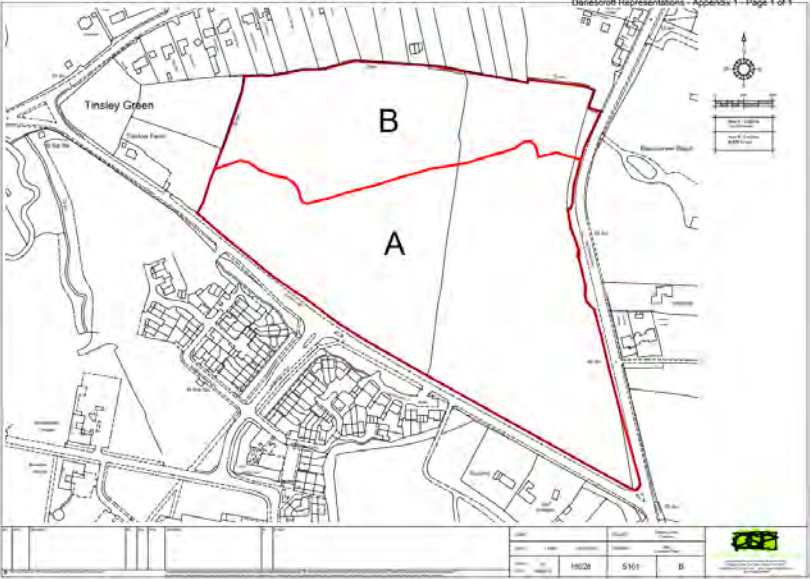
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			<p>neighbourhoods to come together. I feel that they process for building on this green space has not being done properly as people haven't been informed will and it is very hard to find information on it on the internet. I feel a rethink in informing residents needs to be assessed. I like next door to Tilgate park but it gets too busy in the summer so I love to take my kids over to Bewbush, do a loop of the parks and play on the fields because it is such a safe place to feel the children be children.</p> <p><b>Suggested Modifications:</b>  All information should be delivered to the local people in a letter, through everyone's front door, that way you know everyone has the full fax and if not then they can contact. I know a lot of people living near Henty close were not inform of the development of 24 flats, just the bus route.</p> <p>Also your website is not user friendly and you make it hard for anyone to reject plans which I know goes in your favour.</p>
REP/ 109	Resident 42	H2	<p>The area is a flood plain, it is a haven for wild life and flowers, house will have their privacy encroached on by the flats. Increase traffic pollution, disregard for our areas to walk and exercise especially when they are playing or training for football it's a safe place for everyone to enjoy.</p> <p>I am writing to object to the above development, not only will we see a further increase in traffic on Sullivan Drive (there has been a noticeable increase since the Kilnwood Vale development) i would like to point out</p> <ul style="list-style-type: none"> <li>• The damage to the wild life and environment in that area.</li> <li>• The further reduction in our natural park and safe open space area.</li> <li>• Infringement of people's privacy with flats overlooking their homes and gardens</li> <li>• Extra burden on our doctors, schools etc.</li> </ul> <p>The slow but continued elimination of areas for people to walk and take exercise safely must stop. I understand that people need homes, but there has to be a better way of doing this.</p> <p><b>Suggested Modifications:</b>  Don't build there, leave it as a green space. It's environmentally important.</p>
REP/ 110	Resident 43	H2	<p>I am emailing to add my voice to the many against the proposed development of Bewbush West Playing Field. This area is often used by groups of young people playing football or socialising. This is a vital outdoor space for people to use to get exercise and to make the most of good weather. Once the land is built on it will be gone forever and there will be no way to undo the damage. Small children use the playing areas for recreation and the flats will remove this opportunity.</p> <p>The stream that runs through that area and the bridleway will be forever destroyed. The wildlife that now occupies that space will not return if there are flats built on that area.</p> <p>The houses nearby would suffer from the increase in noise, the increase in traffic and the large numbers of people. There is no infrastructure for the additional people; we do not have the schools or the doctors to support an additional</p>

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			<p>influx. Sullivan Drive is busy enough as it is, with the additional road from Kilnwood Vale it will already become unmanageable. The last thing we need is an increase in car volume threatening our children on an already busy road.</p> <p>Why do we need additional housing? There has already been a huge development on Kilnwood Vale which hasn't even been completed. Why do we need even more houses? The Kilnwood Vale development took a large chunk of countryside out and has blighted the view, do we now need an additional tower block on one of the last remaining areas of open space we have? Crawley is already a densely populated area and there is really no need to increase the number of houses when there are so many new housing developments being built.</p> <p>I urge you to reconsider the application and look to the interests of the inhabitants that already live in the Bewbush area.</p> <p><b>Suggested Modifications:</b> to not build on open space available to us</p>
REP/113	Natural England	H2	<p><b>Development Sites</b> We note that an updated SHELAA will be published as part of the Local Plan submission and will be happy to comment regarding environmental constraints in relation to new allocations within it.</p> <p>The following comments relate to the areas identified as development sites (identified as deliverable and without existing planning permission) on the 'Crawley Local Plan Map' and within 'Policy H2: Key Housing Sites', where relevant environmental constraints have not been addressed within the constraints outlined in the current SHELAA.</p> <p><u>Forge Wood – Proposed Housing</u> It is noted that the majority of the overall neighbourhood of Forge Wood site is already subject to outline planning permission. Constraints in relation to this area as shown on the above map, include a number of public rights of way and areas of deciduous woodland priority habitat, some of which is also ancient woodland.</p> <p><u>Heathy Farm</u> – from the map shown in the latest available SHELAA document, this entire site consists of deciduous woodland priority habitat, about which the National Planning Policy Framework states:  <i>"Habitats and biodiversity</i>  174. To protect and enhance biodiversity and geodiversity, <b>plans should:.... b) promote the conservation, restoration and enhancement of priority habitats</b>, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity."</p> <p>Priority habitat, is that identified on a list, (required by section 41 of the Natural Environment and Rural Communities Act 2006) of habitat type (and living organisms) that are in the Secretary of State's opinion, of principal importance for the purpose of conserving biodiversity. In addition, these habitat types are identified as being the most threatened and requiring conservation action under the UK Biodiversity Action Plan. We are, therefore, disappointed to see this site being allocated for development.</p>

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			<p><u>Town Centre Housing Sites</u></p> <ul style="list-style-type: none"> <li>• Crawley Station and Car Parks (deliverable) – Public right of way through site.</li> <li>• Cross Keys (developable) – Public right of way along southern boundary.</li> </ul> <p><u>Housing and Open Space Sites</u></p> <ul style="list-style-type: none"> <li>• Henty Close, Bewbush 24 dwellings – This site lies outside of the existing built up area and is in close proximity to the High Weald Area of Outstanding Natural Beauty (AONB). The proposed use of the site for the development of 24 dwellings would need to address any potential impact on the nearby AONB and would need to be in accordance with the requirements of the High Weald AONB’s Management Plan. In addition, there is a public right of way along the site’s western boundary.</li> </ul> <p><u>Housing, Biodiversity and Heritage Site</u></p> <ul style="list-style-type: none"> <li>• Land east of Balcombe Road/Street Hill, Pound Hill (deliverable) 15 dwellings - This site also lies outside of the existing built up area and is in close proximity to the High Weald Area of Outstanding Natural Beauty (AONB). The proposed use of the site for the development of 15 dwellings would need to address any potential impact on the nearby AONB and would need to be in accordance with the requirements of the High Weald AONB’s Management Plan. The site also contains several areas of deciduous woodland priority habitat, for which as outlined above, the NPPF requires that plans provide their conservation, restoration and enhancement. The constraints section in the SHELAA refers to the site also forming part of a Site of Nature Conservation Importance (SNCI). Although Natural England does not hold records of such sites, we advise that the NPPA requires that such sites should be safeguarded:</li> </ul> <p>“171. Plans should: ... allocate land with the least environmental or amenity value,...” and “174. To protect and enhance biodiversity and geodiversity, plans should: a) Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity;...”</p> <p><b>Suggested Modifications:</b> (Our suggested modifications are incorporated in the above advice).</p>
REP/ 115	Resident 47	H2	<p>I have reviewed the above referenced planning application and would like to register my objection to what I believe to be a massive overdevelopment of this site. Apparently there has already been 2 rounds of consultation but I am not aware of anybody locally being consulted on this.</p> <p>For a few years now we have had to put up with the building development works at Kilnwood Vale, bringing with it noise and dust on a daily basis. As if a development of that site was not enough, we are now to have the last bit of green taken away, completely overshadowing and changing the character of the area.</p> <p>The children’s play area and green surrounding it is a much-valued area by local people. Not only children and dog walkers. During lockdown many families living in flats especially those with children only had this area to use and I and many others have needed this for our wellbeing during Covid.</p>

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			<p>The wide grassed area with its well established mature trees proving a buffer between the Kilnwood Vale and our homes will now be destroyed. Damaging the environment even more and taking away and killing the wildlife in this area.</p> <p>The new development of 24 flats you are proposing will make us feel like we are suffocating. We already feel that we have no privacy with flats from Kilnwood Vale. More flats will now overlook our gardens and homes. There are not many areas of open green land as it is and once you build on it, it cannot be undone.</p> <p>I am not alone when I say that the large majority of local people do not support a further development on our door step. More flats will bring in more people and ultimately creating more problems and generating more crime.</p> <p><b>Suggested Modifications:</b></p>
REP/ 116	Neame Sutton Limited on behalf of Danescroft (RLP Crawley) LLP	H2 12.47 – 12.50	<p><b>4.0 Site-Specific Representations in Relation to Land at Steers Lane, Crawley</b> <b>Policy H2, Paragraphs 12.47 – 12.50 – OBJECT: Unsound</b></p> <p>4.1 At the point of the Regulation 18 consultation stage in September 2019 the Council included Danescroft’s promotion site within the Plan as an allocation for a minimum of 75 no. dwellings.</p> <p>4.2 In the context of the first Regulation 19 consultation the Council had inexplicably removed the site as an allocation albeit that the land remained within the defined urban area on the draft Plan Proposals Map. The only evidence produced by the Council to support its removal if the site as a housing allocation at that time was contained in Strategic Housing Land Availability Assessment (“SHLAA”) (January 2020) wherein the Council concludes the site was not suitable due to the presence of a noise constraint relating to the potential second runway at Gatwick Airport (Page 146 of SHLAA January 2020).</p> <p>4.3 The justification set out in the SHLAA for the removal of the site was based on a revision to the Council’s Noise Annex contained at Page 270 of the draft Plan, which lowered the previously accepted predicted noise level for the proposed second runway from 66 dB down to 60dB. No evidence was presented by the Council to support the change in the noise level that it considered as the threshold for residential development.</p> <p>4.4 The change was particularly odd given that the Council remained of the opinion (as set out in the draft Noise Annex at that time) that 66dB was the appropriate noise level in relation to surface transport. In other words it was acceptable for a residential proposal to come forward in an area affected by road transport noise up to 66 dB, but not if aviation noise is at 60dB. This cannot be right.</p> <p>4.5 Since that time Area A of the promotion site has received Outline Consent for up to 185 no. dwellings allowed on Appeal in February 2020 based on 66dB for aviation noise being the appropriate level to consider. The Council now</p>

		<p>acknowledges the developability of Area A in this latest Regulation 19 consultation version of the Plan and proposes the allocation of Area A for 185 no. dwellings in draft Policy H2.</p> <p>4.6 All of the above points relate to Area A of the promotion site, which equates to just over half of the area.</p> <p>4.7 The remainder of the land (Area B on the plan attached at Appendix 1) has the capability to deliver up to a further 100 no. dwellings. The only constraint on this land relates to the potential second runway at Gatwick Airport and the consequent impact in terms of noise contours.</p> <p>4.8 Danescroft’s acoustic specialists Bickerdike Allen Partners (“BAP”) has undertaken a sensitivity check of the Gatwick Airport noise contours having regard to the changes in national aviation policy and in particular the change in appropriate for the future of Gatwick Airport as set out by Gatwick Airport Limited (“GAL”) (see Appendix 2).</p> <p>4.9 The sensitivity check prepared by BAP confirmed that the whole of Area B is actually situated outside of the key 66dB contour based on the most likely foreseeable future contour for land use planning i.e. 2028 using the main and standby runways. It is therefore clear that Area B is unconstrained by aviation noise and with no other impediments to development should be released as an allocation for housing in the Local Plan.</p> <p>4.10 Danescroft’s acoustic specialists Bickerdike Allen Partners (“BAP”) has also undertaken an Acoustic Review with specific reference to draft Policy EP4, which is attached at Appendix 2.</p> <p>4.11 It is clear that, as drafted, Policy EP4 is unsound and requires modification. BAP has set out in detail why the unacceptable daytime noise level proposed by the Council of 60dB is not appropriate and does not reflect the evidence base.</p> <p>4.12 BAP has set out a recommended modification to the draft Policy to provide a simplified approach to daytime noise levels set at a common threshold of 66 dB and night-time levels set at 63dB (See Table 5 on Page 31 of BAP Acoustic Review in Appendix 2).</p> <p>4.13 Without these changes Policy EP4 is unsound because it does not reflect the evidence nor government policy on the matter of aviation noise.</p> <p>4.14 As a consequence of the Council’s overly restrictive and flawed approach to aviation noise levels it has failed to properly assess the suitability of Area B for residential development. The opportunity to deliver a further 100no. dwellings on Area B comprising a mix of open market and affordable homes has therefore been missed by the Council.</p> <p>4.15 Area B should therefore be included as land suitable for residential development, particularly in the light of the recent report by the Government’s Climate advisors (Climate Change Committee) regarding the future of air travel in the context of the accelerated climate change agenda<sup>15</sup> i.e. no net increase in airport capacity in the UK.</p> <p>4.16 The inclusion of Area B as a housing allocation would enable the Council to deliver up to another 100no. dwellings (40 no. of which would be affordable) making a valuable contribution to the significant housing needs in the Borough.</p>
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			<p>4.17 Danescroft would welcome the opportunity to work with the Council in relation to the allocation of Area B for housing as part of the emerging Local Plan.</p>  <p><b>Suggested Modifications:</b> 5.3 As part of addressing the significant deficiencies in the Plan's evidence base the following key changes are required to the Plan for it to be made Sound:</p> <ul style="list-style-type: none"> <li>• Allocate Area B for 100 no. residential units capable of release immediately;</li> </ul>
REP/117	Resident 48	H2	<p>There has been no consultation with residents of gardens that back onto the play park nor the residents who rent garages on the proposed site.</p> <p><b>Suggested Modifications:</b> Not to build on a great green space that children regularly use to play cricket, rounders etc.</p>
REP/122	Inspired Villages	H2	<p>Dear Strategic Planning,</p> <p>Please find attached and below representations made on behalf of Inspired Villages to the Crawley Draft Local Plan Regulation 19 Consultation, the deadline for which has been extended to 30<sup>th</sup> June 2021.</p> <p>The accompanying representation form has been completed, however the main body of the representation is below for formatting reasons. This representation specifically responds to Policies DD2 and H2 of the draft Local Plan. I also</p>

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			<p>attach a Local Plan representation document for your attention which discusses specialist housing for older people, the Use Class (C2) and be read alongside the below response.</p> <p><b><u>Who is Inspired Villages?</u></b>  Inspired Villages is a developer and operator of retirement communities in the UK. We are majority owned and fully funded by Legal &amp; General. We currently have six operating villages, with a further 14 sites legally secured with a number of those under construction, consented or in planning/pre-planning. Our business plan is to have 60 operational villages within the next ten years providing purpose built housing for 12,000 residents.</p> <p>A retirement community falls under the extra care model and our developments are within the C2 use class. Inspired Villages is a member of Associated Retirement Communities Operators (ARCO) and we encourage Crawley Borough Council to engage with ARCO to assist with your understanding of the Retirement Community Sector, and would recommend you view their website:- <a href="https://www.arcouk.org/what-retirement-community">https://www.arcouk.org/what-retirement-community</a></p> <p>Recent consents we have secured / or resolution to approve include:-</p> <ul style="list-style-type: none"> <li>• Land at Chandlers Ford in Test Valley Borough Council – LPA accepted development as Use Class C2 (construction starts in 2021)</li> <li>• Land at Leeds village in Maidstone Borough Council – LPA accepted development as Use Class C2 (under construction)</li> <li>• Land at Turvey Station in Bedfordshire Borough Council – LPA accepted development as Use Class C2 (under construction)</li> <li>• Land at Caddington in Central Bedfordshire Council – LPA accepted development as Use Class C2 (under construction)</li> <li>• Land at Kingswood in Reigate &amp; Banstead Borough Council – LPA accepted development as Use Class C2 (construction starts in 2021)</li> <li>• Land at Frant in Wealden District Council – LPA accepted development as Use Class C2 (construction starts in 2021)</li> </ul> <p><b><u>Representation to the Draft Local Plan Policies H2 and DD2</u></b>  It is welcomed that Crawley Borough Council are able to acknowledge some of the benefits of specialist housing for older people at Paragraph 12.26 of the Draft Local Plan, including the freeing up of family homes as well as lower traffic generation resulting from such developments. However we would also like to draw attention to some of the additional benefits outlined within the attached representation document particularly the health and wellbeing benefits such as savings to the NHS, as well as reduced mental and physical health problems. Please refer to paragraphs 3.14 to 4.15 of the attached representation for further details.</p> <p>Policy DD2 'Inclusive Design' stipulates that new developments should meet Building Regulations Part M Category 2 to adapt to the changing needs of residents in the Borough. The policy does not however include any detail on how</p>



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			<p>specialist housing for older people will be planned for outside of the Building Regulations requirements. This is however, further referenced within the draft Local Plan at Paragraph 12.28 discussed below. Conversely, the Draft Local Plan acknowledges at paragraph 5.19 that those within the population over 65 is expected to increase by 55% in 20 years, with those with health or disability problems increasing by 7,000 persons by 2039. Whilst it is accepted as per paragraph 5.20, some older people will wish to remain in their own homes, National Planning Practice Guidance identifies that the need to provide housing for older people is 'critical', the only group identified as such in national policy guidance (Paragraph: 001 Reference ID: 63-001-20190626).</p> <p>Housing has been recognised as one of the key outputs of the Local Plan, a target of 5,320 new homes will be delivered over the lifetime of the plan. Outside of the enhanced Building Regulations at Policy DD2, Paragraph 12.28 of the Draft Local Plan identifies a need for an additional 1,027 units to meet the population's specialist accommodation need for older people and a further 1,029 residential/ nursing bedspaces. This is welcomed and is in line with PPG advising that plan-making authorities "<i>could also provide indicative figure figures or a range for the number of units of specialist housing for older people needed across the plan area throughout the plan period</i>" (Paragraph: 006 Reference ID: 63-006-20190626). However, Inspired Villages would suggest that this target should be included within the policy wording of Strategic Policy H1 to ensure delivery. The provision of housing for older people is also recommended to be included in the monitoring process when preparing the Annual Monitoring Report (AMR) (NPPG Paragraph: 007 Reference ID: 63-007-20190626).</p> <p>There are two allocations for specialist housing for older people at Policy H2, however, these represent just 200 units in total, or just 4% of the total allocations in the draft Local Plan, and therefore will not meet the need identified at Paragraph 12.28. These two allocations are not sufficient to plan for older persons housing needs within the borough, even in combination with the design measures set out at Policy DD2. Instead, further allocations should be made for Use Class C2. Many Councils argue that older persons accommodation should be provided through windfall sites alone. The provision of specialist housing for this population through windfall sites alone is not sufficient. In combination, the allocation of sites through strategic housing areas, windfall sites, and specific specialist accommodation allocations will allow Crawley Borough Council to set a minimum provision for the number of specialist housing for older people with a more targeted approach to the provision of housing for this growing population. Finally, I would also draw your attention to the NPPG Paragraph 4 (Reference ID: 63-004-20190626) which states that the future need for specialist accommodation for older people should broken down by tenure and type.</p> <p>The allocations set out at Policy H2 also discuss the Use Classes C2 and C3. We would also request that the Council fully understands that a retirement community falls within the C2 Use Class. A retirement community is clearly different from C3 dwelling houses as evidenced in Paragraphs 2.21 to 2.25 of the attached document. For example, Inspired Villages is responsible for the long term operation, management and ownership of the site, and maintenance of significant communal facilities. The typical quantum of such communal facilities in a typical Inspired Villages retirement community comprise approximately 25% of its floorspace as non-saleable space. This includes the communal and care</p>

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			<p>facilities available to its residents. Furthermore, a retirement community is a single planning unit – the communal and care facilities and units are integrally linked, one cannot exist without the other. Legal &amp; General retain the freehold ownership of the land and Inspired Villages is the operator. This means there is a long term interest in the operation of the village. It is not possible to subdivide a village to provide on-site affordable housing given the single planning unit and residents' obligations to pay service charge to contribute towards the provision of the facilities, staffing, etc. Again, we would direct you to understand the key ways in which specialist housing for older people differs in a number of ways that affect its viability as set out in the attached representation document. We would encourage the Council to take a proportionate approach to the requirement of affordable housing contributions from specialist operators such as Inspired Villages. Where retirement housing / age restricted housing is proposed, and which falls within the C3 use class (i.e. it provides housing with little, if any, facilities) then it is understood affordable housing may be sought – however, this is not the case with a retirement community as proposed by Inspired Villages.</p> <p>We would recommend that the Draft Local Plan should include a specific policy related to the provision of specialist housing for older people, this should provide detailed targets as set out in Paragraph 12.28 of the draft Local Plan, as well as the site specific criteria upon which proposals to meet older persons needs will be supported by the Council. Examples of which are included at pages 22 and 23 of the attached representation document. We request that you review the eight recommendations in the attached document set out at Page 5 and request that the Local Plan includes a specific policy (or policies) to encourage the development of specialist housing for older people, sets targets for the delivery of such housing, and allocates specific development sites to ensure this delivery.</p> <p>Should you have any questions regarding the above or attached, please do not hesitate to contact me directly.</p> <p><b>Suggested Modifications:</b></p>
REP/ 123	Barton Willmore on behalf of The Sogno Family Trust	H2	<p>2.21 In addition, given it is identified that the council cannot meet their housing needs in full within the Borough administrative area, it is critical that the draft allocations policy H2 is positively prepared to provide flexibility to accommodate as much need within the Borough as possible.</p> <p>2.22 Policy H2 as currently worded provides the indicative capacity of each proposed allocation site as a fixed number. Whilst the capacities are identified as 'indicative', in order for the plan to be consistent with national policy as above and unambiguous, we recommend the policy is worded more flexibly, such that it is clear the capacities can be exceeded where feasible.</p> <p>2.23 This is particularly relevant as Topic Paper 4 sets out at paragraph 3.4 how a number of sites that were previously allocated within the adopted Local Plan with indicative capacities have since been capable of delivering a larger number of homes after more detailed site assessment work was undertaken. Based on past evidence, and the high level nature of technical work undertaken to support plan-making, it is reasonable that the key sites under Policy H2 may also achieve additional housing numbers once detailed site work is undertaken. To be found sound, effective and consistent</p>

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			<p>with national policy, the council's policy should not be worded ambiguously (paragraph 16d of the NPPF 2019) such that the allocations may be conceived by the public, and officers, as an upper 'limit' to housing on any site.</p> <p><b>3.0 Land to the southeast of Heathy Farm, Balcombe Road, Forge Wood</b></p> <p>3.1 Land to the southeast of Heathy Farm is allocated under Policy H2 in the Draft Crawley Borough Local Plan 2021-2037.</p> <p>3.2 The Trust are supportive of the site's allocation and as set out below, agree with the Strategic Housing Land Availability Assessment (SHLAA, 2020) that it is sustainable, suitable, achievable and available to deliver housing within the emerging Local Plan period. As per paragraph 32 of the NPPF 2019 and set out further below, the allocation of this site avoids significant adverse impacts and delivers environmental, social and environmental benefits.</p> <p>3.3 In this regard, the plan is considered to be sound as the council has positively sought the opportunity to identify sites to accommodate housing in sustainable locations within the borough (consistent with paragraph 11 and 32 of the NPPF).</p> <p><b>Sustainable and suitable</b></p> <p>3.4 The site is comprised of two linked parcels which both lie adjacent to the Forge Wood neighbourhood that was allocated in the adopted Local Plan, and has since received planning consent and is in the process of being built out. Specifically, the site is located adjacent to Phase 3 of Forge Wood neighbourhood which will include sports provision, play space and will be served by a bus route connecting into the centre of Crawley. The wider Forge Wood development includes a local centre, school and other facilities which are within walking distance from land southeast of Heathy Farm. Therefore, given the relationship with Forge Wood, the site is sustainably located and has opportunities to support non-vehicular travel to meet the emerging policy CL3 requirements for being within an 8-minute walk of a bus service.</p> <p>3.5 In this regard, we consider that the site should be upgraded to having a <b>positive impact</b> on promoting sustainable journeys (SA objective 7) within the Borough, and agree that the site would have a <b>significant positive impact</b> on promoting sustainable communities and encouraging active lifestyles (SA objective 9).</p> <p>3.6 The M23 is located to the east of the site; acceptability of development adjacent to the M23 has been established to the north, and suitable noise mitigation achieved. Similar mitigation could be achieved on this site. Further, the sites relationship with Forge Wood, and opportunities for active travel, means the site can contribute to minimising climate change from growth, and local pollution. Therefore, we consider the site should be upgraded to <b>positive impact</b> for SA objective 1.</p> <p>3.7 The site is surrounded by woodland to the south and south west, some of which is classified as Ancient Woodland. An appropriate buffer could be incorporated into any development layout, to avoid harm to the Ancient Woodland.</p>

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			<p>3.8 No trees directly on the application site are subject to a Tree Protection Order or classified as Ancient Woodland. Whilst the proposal would result in the removal of trees in order to deliver an efficient scheme that supports the council in meeting their housing needs, at application stage a tree survey would identify any key trees within the site and wherever possible, these could be sensitively masterplanned into the proposal. Furthermore, as per the draft amendments to national policy consulted upon in early 2021, the development would be able to incorporate street trees to support climate mitigation and provide shade for pedestrians as well as occupiers of housing. Furthermore, as will be required by the Environment Bill, any development would be required to demonstrate 10% biodiversity net gain, either on or off site. Therefore, overall, the site would have a <b>positive impact</b> on conserving and enhancing biodiversity and landscape (SA Objective 6).</p> <p>3.9 The site has potential to be accessed from either the B2036 or through Phase 3B of Forge Wood Neighbourhood to the north, which provided opportunity for connection onto Emerald Drive. The future access points can be evolved through detailed highways work and engagement with the council and West Sussex Highway Authority and is not considered to be constraint to delivery.</p> <p>3.10 Wider infrastructure improvements, as necessary to mitigate the development, could be achieved through Section 106 agreement and CIL. Therefore, we consider the site should be upgraded to having a <b>neutral impact</b> on SA Objective 8 (providing sufficient infrastructure).</p> <p>3.10 Wider infrastructure improvements, as necessary to mitigate the development, could be achieved through Section 106 agreement and CIL. Therefore, we consider the site should be upgraded to having a neutral impact on SA Objective 8 (providing sufficient infrastructure).</p> <p><b>Achievable</b></p> <p>3.12 Given the site has opportunity for direct access from the B2036 or the neighbouring Forge Wood development, and there are no overriding constraints that would impede the delivery of the site for housing, it is achievable for development to come forward within the emerging Local Plan.</p> <p><b>Available</b></p> <p>3.13 The site is being promoted by the landowners, the Sogno Family Trust, who have confirmed they are willing to enter into discussions with developers to bring the site forward at the earliest opportunity. Therefore, the site is available for development.</p> <p><b>Draft allocation policy</b></p> <p>3.14 As set out in Section 2 above, draft allocation policy H2 sets an indicative capacity figure of 150 dwellings for Heathy Farm. It appears that this is derived from the SHLAA. Given the constraints within the Borough to meet their housing needs, and the drive towards densification and efficient use of land in accordance with the NPPG, it is critical that the allocation policy states the figures are indicative, but can be exceeded where feasible, such that the draft Local</p>

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			<p>Plan be considered unambiguous (paragraph 16d of the NPPF 2019), positively prepared and effective to meet as much of Crawley's needs as possible, and therefore be found sound.</p> <p>3.15 Supporting text paragraph 12.48 of the draft Local Plan states, in relation to Land south east of Heathy Farm, that <i>"the site is also likely to need to incorporate on-site open space, including allotment provision, which should be designed into a scheme from the outset to ensure its satisfactory accommodation"</i>.</p> <p>3.16 Given the relationship of the site to Forge Wood and the facilities that are secured within that development, there may be opportunity to generate more efficient use of land through an off-site contribution that supports or improves these facilities, as per draft Policy OS2. The flexibility of the allocation policy and open space policy, for detailed studies at application stage to determine appropriate on and off-site open space provision, is supported as it ensures that the Plan does not overly restrict the efficient delivery of homes.</p> <p>3.17 A review of the wider detailed policies that are relevant to the proposed allocation of Land to the southeast of Heathy Farm is contained in Section 4.</p> <p><b>Suggested Modifications:</b></p>
REP/131	SMB Town Planning Limited	H2 & H3c	<p>Oxford Match Limited have aspirations for the development of their freehold property interests within Crawley town centre.</p> <p>Therefore, the following draft policies relating to development within Crawley town centre are directly relevant:</p> <ul style="list-style-type: none"> <li>• EC1 and EC2,</li> <li>• TC1 to TC5, and</li> <li>• H2, H3c and H5.</li> </ul> <p>Taken together these above policies are generally supportive of the principle of, inter alia, development comprising the conversion of the upper floors of existing properties for residential use together with appropriate upward extensions of buildings to provide additional dwellings. This is particularly in the situation that Crawley Borough Council find themselves in being heavily reliant on neighbouring local planning authorities and windfall sites to assist in meeting the identified housing need over the period of the Local Plan.</p> <p><b>Suggested Modifications:</b></p>

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REP/ 133	The Planning Bureau Ltd	H3	<p>McCarthy Stone and Churchill Retirement Living are independent and competing housebuilders specialising in sheltered housing for older people. Together, we are responsible for delivering approximately 90% of England's specialist owner-occupied retirement housing.</p> <p>Paragraph 1 of the PPG Housing for Older and Disabled people states:  <i>"The need to provide housing for older people is critical. People are living longer lives and the proportion of older people in the population is increasing. .... Offering older people, a better choice of accommodation to suit their changing needs can help them live independently for longer, feel more connected to their communities and help reduce costs to the social care and health systems. Therefore, an understanding of how the ageing population affects housing needs is something to be considered from the early stages of plan-making through to decisiontaking".</i></p> <p><i>Paragraph: 001 Reference ID: 63-001-20190626</i></p> <p>The overview in the Housing Chapter of the Local Plan (paragraphs 12.24 to 12.32) details that the population aged 65 and over is projected to increase by 9,600 people by between 2019 and 2039, an increase of 63%. Evidence in the Strategic Housing Market Assessment concluded that there is a need for an additional 1,027 units (51 per annum) to meet the population's specialist accommodation need for older people and an additional 1,029 residential and nursing care bedspaces over the 20-year period from 2019 to 2039. Of these, 56% are anticipated to be in the market sector, with the remaining 44% needed in affordable tenures.</p> <p>We both note and commend the manner in which the housing needs of older people have been comprehensively addressed in the Council's assessments of housing needs. We were therefore disappointed that the housing typology approach detailed in H3a) to f) did not address the specialist housing needs of older people.</p> <p>We support the part allocation of some strategic sites for the delivery of specialist older person's housing in Policy H2: Key Housing Sites. We would however stress the importance of such developments being appropriately located - both representees typically bring forward development in close proximity to existing shops and services (within 0.5miles of a town or local centre) to facilitate continued independence in later life.</p> <p>We would also highlight, that despite the positive manner in which the Council has addressed the specialist older persons housing needs, it is undermined by inconsistencies in the viability assessment older persons' housing typologies in the Crawley Local Plan Review: Whole Plan Policies &amp; Community Infrastructure Levy Viability Assessment. This matter is addressed comprehensively in our representation to Policy H5 and in our supporting viability appraisal.</p> <p><b>Suggested Modifications:</b></p> <ol style="list-style-type: none"> <li>1. We would encourage a standalone policy that encourages the provision of specialist older persons' housing and acknowledges the already identified need for such accommodation. While we appreciate that no one planning</li> </ol>

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			<p>approach will be appropriate for all areas, an example policy is provided that, we hope, will provide a useful reference for the Council:</p> <p><i>“The Council will encourage the provision of specialist housing for older people across all tenures in sustainable locations.</i></p> <p><i>The Council aims to ensure that older people are able to secure and sustain independence in a home appropriate to their circumstances by providing appropriate housing choice, particularly retirement housing and Extra Care Housing/Housing with Care. The Council will, through the identification of sites, allowing for windfall developments, and / or granting of planning consents in sustainable locations, provide for the development of retirement accommodation, residential care homes, close care, Extra Care and assisted care housing and Continuing Care Retirement Communities.”</i></p>
REP/033	Horsham District Council	H3a	<p>We support this policy in principle, but <b>consider it is not justified as stands</b> and that <b>its effectiveness could be improved</b>. Given the pressing need for housing in the area and unmet housing need, it is considered imperative that estate regeneration opportunities are explored as this is a potential source of additional housing supply that is, to a great extent, within the control of CBC. This could form part of the Densification Study.</p> <p><b>Suggested Modifications:</b>  <b>Change sought:</b> It is considered necessary to complete the Densification Study. This should include analysis of whether estate regeneration could play a part in providing additional housing within Crawley’s administrative boundaries.</p>
REP/033	Horsham District Council	H3b	<p>We support this policy which is clear in its encouragement of efficient use of land in a number of ways.</p> <p><b>Suggested Modifications:</b></p>
REP/033	Horsham District Council	H3c	<p>We <b>support</b> this policy. It is considered that there may be further opportunities for the town centre area and mixed use developments to provide more housing to help meet the unmet need in Crawley, as set out in our comments to Policies H1 and H2.</p> <p><b>Suggested Modifications:</b></p>
REP/106	Crawley Town Centre Bid Board	H3c	<p>The CTCBID CP supports Policy H3c and H3d particularly as the more efficient use of town centre sites will aid sustainability and the aims of policy CL4 to drive up residential densities.</p> <p><b>Suggested Modifications:</b></p>
REP/132	Quod on behalf of Aberdeen Standard Investments	H3c	<p>2.16 Draft Policy H3c (Town Centre Sites) and Policy H3e (Conversions from Commercial/Non-Residential Uses) also make reference to meeting the requirements of draft Policy EC2 in respect of new housing development in Crawley Town Centre, as well as the conversion of existing buildings from non-residential uses.</p> <p><b>Suggested Modifications:</b>  2.17 As per the comments previously noted, we consider that these inclusions would be detrimental to the future vitality and viability of Crawley Town Centre, which is in conflict with the NPPF, as well as other policies within the draft Plan. We therefore request that the relationship between policy EC2 and the other policies within the draft Plan identified above be reconsidered.</p>

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REP/033	Horsham District Council	H3d	We support this policy which encourages efficient use of land through building upwards. <b>Suggested Modifications:</b>
REP/056	Gatwick Airport Limited	H3d	52. We supported Policy H3d in the 2020 Reg19 DCLP, but suggested a minor revisions to criteria (i) of the policy (aerodrome safeguarding) in para 15.1 of our previous representations. We note that the policy and supporting text has been amended as suggested. We continue to support the policy. <b>Suggested Modifications:</b>
REP/066	Mid Sussex District Council	H3d	Response from January 2020 continues to apply. <b>Suggested Modifications:</b>
REP/106	Crawley Town Centre Bid Board	H3d	The CTCBID CP supports Policy H3c and H3d particularly as the more efficient use of town centre sites will aid sustainability and the aims of policy CL4 to drive up residential densities. <b>Suggested Modifications:</b>
REP/132	Quod on behalf of Aberdeen Standard Investments	H3e	2.16 Draft Policy H3c (Town Centre Sites) and Policy H3e (Conversions from Commercial/Non-Residential Uses) also make reference to meeting the requirements of draft Policy EC2 in respect of new housing development in Crawley Town Centre, as well as the conversion of existing buildings from non-residential uses. <b>Suggested Modifications:</b> 2.17 As per the comments previously noted, we consider that these inclusions would be detrimental to the future vitality and viability of Crawley Town Centre, which is in conflict with the NPPF, as well as other policies within the draft Plan. We therefore request that the relationship between policy EC2 and the other policies within the draft Plan identified above be reconsidered.
REP/033	Horsham District Council	H3f	We support this policy which strikes an appropriate balance between protecting and enhancing valued open spaced whist taking a pragmatic approach to allowing some housing development in certain circumstances. <b>Suggested Modifications:</b>



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REP/023	Savills on behalf of St Catherine's Hospice	H4	<p>Strategic Policy H4: Future Housing Mix</p> <p>3.47. Strategic Policy H4 sets out the required housing mix for development sites in Crawley. Whilst the policy acknowledges the need for the types of housing to reflect the size and characteristics of the site and viability of the scheme; it then goes on to stipulate that new developments are required to provide a housing mix test in accordance with the recommendations cited at paragraph 13.14.</p> <p>3.48. To ensure that future developments in Crawley can respond to local needs and the market, Policy H4 should be made more flexible to increase the efficiency of sustainable sites and ensure the deliverability and viability of these new dwellings.</p> <p>3.49. Notably, the new policy wording of the emerging Plan goes significantly beyond that used in Policy H3: Future Housing Mix in the adopted Plan (set out below). As such, it is considered that the previous policy wording should be retained in the emerging Plan, making reference to recent evidence.</p> <p><b>Suggested Modifications:</b></p> <p>3.50. It is therefore suggested the more prescriptive text is removed and the emerging Plan retains the previous policy wording.</p> <p><b>Recommended Changes</b></p> <p>“[All housing development should provide a mix of dwelling types and sizes to address the nature of local housing needs and market demand. The appropriate mix of house types and sizes for each site will depend upon the size and characteristics of the site and the viability of the scheme. However, consideration should be given to the evidence established in the Strategic Housing Market Assessment and its updates for market housing needs and demand in Crawley.</p> <p><b>Affordable Housing</b></p> <p>In delivering the affordable housing element of residential schemes, in line with Policy H5, the need for one, two and three bedroom affordable dwellings in Crawley, as identified in the council's Strategic Housing Market Assessment and its updates, should be addressed in meeting the housing needs of those considered to be in greatest need.]”</p>
REP/123	Barton Willmore on behalf of The Sogno Family Trust	H4	<p><b>Policy H4: Housing Mix</b></p> <p>4.3 Policy H4 states in the first paragraph that the appropriate mix of house types and sizes for each site will depend on size, characteristics and viability of a scheme, taking account of the Strategic Housing Market Assessment (SHMA). This approach is considered to be sound as it provides flexibility to deliver a range of homes to meet up to date needs at the time of any application.</p> <p>4.4 However, whilst the first paragraphs of the policy allow for flexibility, the third paragraph states that:  <u>The expected starting point for the market housing mix, both for schemes of owner occupation and private market rent, and the affordable housing mix is set out in the table below. Applications should explain how they have sought to meet this mix (or an subsequent delivery-adjusted update published with the council's Authority Monitoring Report) and</u></p>

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			<p><i>provide strong justification for schemes which fail to provide a reasonable balance of property types and sizes, to promote mixed communities.</i></p> <p>4.5 The policy goes onto include a “Housing Mix Test” which seeks to ensure no mix is excessively distorted</p> <p>4.6 Whilst we recognise that the policy states strong justification is needed only where schemes fail to provide a reasonable balance of property types and sizes, it is not clear at what point Officers will consider the balance to be unreasonable. Therefore, the policy should be amended to be positively worded (as per paragraph 35 of the NPPF 2019), to allow for deviation where it is justified through evidence.</p> <p>4.7. Given the limited land availability in the Borough and the need to optimise development sites, this is important to ensure the policy does not frustrate the delay and delivery of much needed homes.</p> <p><b>Suggested Modifications:</b></p>
REP/ 131	SMB Town Planning Limited	13.14	<p>We are concerned however that the table under paragraph 13.14 indicates the provision of 30% of the market housing element on town centre sites should be Family Homes (3+ Bedrooms). In addition to this the table indicates that the affordable rental element to be provided should be 30% to 40% as Family Homes. This seems to be excessive especially for a flatted town centre development and may have the adverse effect of reducing the viability of town centre schemes and consequently may well materially alter the affordable housing provision.</p> <p><b>Suggested Modifications:</b></p>
REP/ 130	Home Builders Federation	H5	<p><b>H5: Affordable housing</b></p> <p>4. The HBF agrees with the proposed amendment to reduce the level of affordable housing contributions within the town centres on the basis of the latest viability study. However, we do have some concerns that the assessment has not included the cost of providing electric vehicle charging points, a requirement of policy ST2, in the viability assessment. Given the sensitivity of development viability in Crawley it is important that all costs are considered fully in order to ensure that further amendments to other policies are not necessary to support the affordable housing requirement set out in H5.</p> <p>5. The Council will need to consider whether it would be appropriate to include the requirement that 25% of affordable homes are delivered as First Homes in this policy.</p> <p><b>Suggested Modifications:</b></p> <p>Whilst the Written Ministerial Statement and PPG set out the transitional arrangements that do not require the Council to include the 25% First Home requirement in their affordable housing policy Planning Practice Guidance (PPG) does state at paragraph 70-019 that Inspectors may wish to consider at the examination of a local plan whether an early update of the plan would be appropriate to take account of this change to national policy. Rather than include a requirement for an immediate review of the local plan to amend policy H3 we would suggest that the requirement is included prior to the plan being submitted for examination.</p>

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REP/ 131	SMB Town Planning Limited	H5	<p>Our main concern however is with Policy H5, which as drafted, expects town centre sites requiring 25% affordable housing to be split 60% social rent and / or affordable rent and up to 40% as intermediate tenure. At a site specific level however, Policy H5 identifies the circumstances under which this target may not be met and provides for a financial payment for off-site provision.</p> <p><b>Suggested Modifications:</b></p>
REP/ 133	The Planning Bureau Ltd	H5	<p>The Crawley Borough Local Plan is one of an alarmingly limited number that have set a differential affordable housing rate for Crawley town centre (25%) and the rest of the Borough (40%) housing. This is, of itself, commendable and suggests a greater focus on viability at the Plan making stage.</p> <p>The wording of Policy H5 and its justification makes it clear that a non-policy compliant level of affordable housing will only be allowed in exceptional circumstances and where sites are clearly subject to abnormal costs. It also states in the 'Exceptions' sub-section of the Policy that:</p> <p><i>"The council will only consider relaxing this affordable housing requirement, in part or in full, in exceptional circumstances, where a scheme is clearly subject to abnormal costs, not including land costs, and not otherwise envisaged by the Local Plan Viability Assessment. This must be evidenced by robustly assessed viability appraising various permutations of affordable housing provisions to best address local affordable housing needs which will be independently assessed. Should concessions be agreed by the council then claw-back mechanisms will be expected to be put in place and independently monitored. The scheme must also evidence that it addresses a demonstrative and immediate housing need"</i></p> <p>It is clear from the wording of the policy and its justification that the Local Authority is cognisant of the increased emphasis on Local Plan viability testing in Paragraph 54 of the NPPF. Given the Council's stance towards developer contributions and affordable housing, we find aspects of the evidence base underpinning these policies to be concerning.</p> <p>The affordable housing targets set out in Policy H5 are informed by the <i>Crawley Local Plan Review: Whole Plan Policies &amp; Community Infrastructure Levy Viability Assessment (LPVA)</i> undertaken by the Dixon Searle Partnership. We note that the LPVA has assessed the viability of older persons' housing typologies, which is welcomed.</p> <p>In reviewing the methodology for assessing specialist older persons' housing, we note that many of the inputs align with the methodology detailed in the Briefing Note on Viability Prepared for the Retirement Housing Group (hereafter referred to as the RHG Briefing Note) by Three Dragons, although a number do not. A copy of the RHG Briefing Note has been provided as part of this submission, which could result in an unrealistic planning obligations burden in the next Local Plan. Our concerns are that the Viability Assessment has overplayed the viability of older persons' housing.</p> <p>Mindful of the guidance in the PPG that is the responsibility of site owners and developers to engage in the Plan making process – McCarthy Stone and Churchill Retirement Living have provided a separate document with viability appraisals</p>

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			<p>for sheltered and extra care older persons' housing typologies. <b>It concludes that these forms of development are not able to provide an affordable housing contribution or CIL in the Authority.</b></p> <p>The PPG makes it clear that 'Different requirements may be set for different types or location of site or types of development' (Paragraph: 001 Reference ID: 10-001-20190509). <b>We are strongly of the view that it would be more appropriate to set a lower, potentially nil, affordable housing target and CIL rate for sheltered and extra care accommodation in the Borough.</b></p> <p>The need for specialist older persons' housing detailed in the Housing Chapter of the Local Plan (paragraphs 12.24 to 12.32). The Local Plan makes it clear that viable sites bringing these forms over development forward will be required over the Plan period. In burdening these forms of development with an unrealistic planning obligations regime, the Local Plan is considered unsound as these obligations are not justified, effective and the Plan is not positively prepared correspondingly.</p> <p><i>*See representations on Viability Assessment: Crawley Viability Assessment H5*</i></p> <p><b>Suggested Modifications:</b>  The Crawley Borough Local Plan is one of an alarmingly limited number that have set a differential affordable housing rates.</p> <p>The evidence we have provided in our viability appraisals for Sheltered Housing and Extra Care Housing typologies, concludes that these forms of development should be exempt from affordable housing provision and CIL across the Borough.</p> <p>As a suggestion we would recommend a supplemental sub-clause to Policy H5 which read as follows:</p> <p>i. Specialist older persons' housing including sheltered and extra care accommodation will not be required to provide an affordable housing contribution.</p>
REP/ 122	Inspired Villages	H5	<p>The allocations set out at Policy H2 also discuss the Use Classes C2 and C3. We would also request that the Council fully understands that a retirement community falls within the C2 Use Class. A retirement community is clearly different from C3 dwelling houses as evidenced in Paragraphs 2.21 to 2.25 of the attached document. For example, Inspired Villages is responsible for the long term operation, management and ownership of the site, and maintenance of significant communal facilities. The typical quantum of such communal facilities in a typical Inspired Villages retirement community comprise approximately 25% of its floorspace as non-saleable space. This includes the communal and care facilities available to its residents. Furthermore, a retirement community is a single planning unit – the communal and care facilities and units are integrally linked, one cannot exist without the other. Legal &amp; General retain the freehold ownership of the land and Inspired Villages is the operator. This means there is a long term interest in the operation of the village. It is not possible to subdivide a village to provide on-site affordable housing given the single planning unit and residents' obligations to pay service charge to contribute towards the provision of the facilities, staffing, etc. Again, we would direct you to understand the key ways in which specialist housing for older people differs in a number of ways</p>

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			that affect its viability as set out in the attached representation document. We would encourage the Council to take a proportionate approach to the requirement of affordable housing contributions from specialist operators such as Inspired Villages. Where retirement housing / age restricted housing is proposed, and which falls within the C3 use class (i.e. it provides housing with little, if any, facilities) then it is understood affordable housing may be sought – however, this is not the case with a retirement community as proposed by Inspired Villages.
			<b>Suggested Modifications:</b>
REP/ 123	Barton Willmore on behalf of The Sogno Family Trust	H7	<p><b>Policy H7: Self and custom build</b></p> <p>4.8 Policy H7 requires that all Use Class C3 residential developments of 50+ units provide 6% of the total area occupied by residential plots for self/custom housebuilding.</p> <p>4.9 The supporting text states that as of 1 April 2019 there were 71 individuals on the self-build register. Therefore, the policy is based on a requirement for self-build housing that is over 2 years old at the time of this consultation closing.</p> <p>4.10 In order to be underpinned by relevant and up to date evidence, as necessary under paragraph 31 of the NPPF 2019, it is recommended that the council update the evidence and policy to reflect more recent self-build requirements.</p> <p>4.11 Furthermore, given the 16 year plan period, in order to be “justified” the policy should be clear that it is only relevant to provide self-build housing where there remains a demonstrable demand for self and custom build housing on the self-build register at the time of any application, in order not to delay the delivery of otherwise much needed homes.</p> <p><b>Suggested Modifications:</b></p> <p>4.12 To be found sound, it is recommended the policy is updated as follows:</p> <p><i>“Subject to the exceptions listed below, where there is evidenced demand on the self-build register at the time of an application, a residential (Use Class C3) development including 50 or more units will be required to provide up to 6% of the total area occupied by residential plots in the form of serviced plots for self-build and custom housebuilding.”</i></p>
REP/ 124	Gladman Developments	H7	<p>4.3.2. Gladman highlight that any policy requirement for Self-Build and Custom-Build plots must be justified with robust evidence on demand and need for this type of housing. It may not be appropriate to apply a blanket requirement for the provision of self-build plots on major development sites as this does not respond to the differing needs across the region. Notwithstanding this, Gladman welcome the flexibility provides in exception criteria i) to iv), which accounts for Crawley’s urban setting.</p> <p>4.3.3. Policy H7 seeks to require all developments of 50 residential or more to provide up to 6% of the total plots as self-build. Gladman propose that this requirement is currently not justified through the evidence base.</p> <p>4.3.4. Topic Paper 3 highlights that there are 102 individuals registered on the Council’s Self-build and Custom Housebuilding Register, while only 80 individuals were recorded within Part 1 of the register, of which highlights demand in the local authority area (Planning Practice Guidance Paragraph: 018 Reference ID: 57-018-20210208 Revision date: 08 02 2021). Other than a more detailed note highlights information on the register noted in Northern West Sussex</p>

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			<p>Strategic Market Housing Assessment there is no further assessment of future need in relation to secondary sources or historic delivery of self-build homes in the district (Northern West Sussex Strategic Housing Market Assessment Final Report. Icen Projects Limited. (November 2019)), (Planning Practice Guidance Paragraph: 011 Reference ID: 57-011-20210208). It should be noted that Gladman do not oppose to such a policy but highlight that further evidence should be made available within the evidence base to justify the proposed approach in Policy H7.</p> <p>4.3.5. Furthermore, the Viability Assessment, published March 2021, does not provide evidential justification nor demonstrates that such a policy requirement is deliverable. The document states:  “From DSP's experience of this type of development, we consider the provision of plots (serviced and ready for development) for custom-build has the potential to be sufficiently profitable so as not to provide a significant drag on viability.” (Page 50 - Crawley Borough Council – Local Plan Review and CIL Viability Assessment (March 2021))</p> <p>4.3.6. Indeed, the information and testing results set out in Appendices I to IV do not appear to have taken into account Self and Custom Build plots within the tested scenarios.</p> <p>4.3.7. It should be noted that Gladman do not oppose to such a policy but highlight that further evidence should be made available within the evidence base to justify the proposed approach in Policy H7.</p> <p>4.3.8. Notwithstanding the above, Gladman welcome flexibility within H7 whereby once a plot has been marketed for 12 months but failed to be sold for self-build, it will be considered by the Council to be built out as conventional market housing.</p> <p><b>Suggested Modifications:</b></p>
REP/056	Gatwick Airport Limited	H8	<p>53. We objected to this policy in the 2020 Reg19 DCLP. However, in view of the fact that the 2021 Reg19 DCLP reinstates a policy (Policy GAT2) to safeguard land for a second runway, we no longer object to this policy.</p> <p><b>Suggested Modifications:</b></p>

Strategic Housing Land Availability Assessment			
Ref. No.	Respondent	Policy/ Para	Comments
REP/ 103	Carter Jonas LLP on behalf of SGN	SHLAA	<p>SHLAA – North East Sector, Gas Holder Site The Strategic Housing Land Availability Assessment (SHLAA) forms part of the evidence base for the Local Plan Review. The latest iteration was published in September 2020.</p> <p>The Site is assessed in part under the name 'North East Sector, Gas Holder site' (Site Ref: 73). SGN's land ownership forms the middle portion of the assessed area and does not include the adjacent land to the north and south.</p> <p>The Council conclude that Site 73 is considered unsuitable for housing development due to significant flood risks and a high likelihood of contaminated land.</p> <p>We challenge this assessment for the reasons set out below and consider it could be one of many sites that the Council have overlooked that have resulted in its failure to exercise all land options within its own boundary. Accordingly, there is potential that the amount of land required to meet the Council's objectively assessed need elsewhere within the HMA could be reduced.</p> <p>In justifying their methodology, the Council state at Paragraph 2.2 of the September 2020 SHLAA: 'Sites which have been refused permission for 10 or more dwellings and where residential development is considered unacceptable in principle have been identified as being unsuitable' (our emphasis).'</p> <p>We consider that flood risk and contamination presence are not sufficient reasons to render the principle of residential development as unsuitable. In the context of a constrained borough such as Crawley, the Council – in their own words – state that more can be done to overcome the constraints to deliver development. We agree with this statement.</p> <p><b>Suggested Modifications:</b></p> <p><b>Conclusions</b></p> <p>In summary, we consider the Local Plan Review as it is currently drafted and evidenced is unsound.</p> <p>The Council can only demonstrate enough housing land supply to deliver just 44% of its objectively assessed housing need. Not enough has been done to demonstrate that every possible land opportunity within its own boundaries has been exhausted; nor can they provide certainty that the unmet need can be provided elsewhere within the HMA.</p> <p>We have reviewed the SHLAA to determine the Council's conclusions regarding the Site and wider assessed area ('North East Sector, Gas Holder site' - Site 73) and note that the area has been precluded for reasons concerning flood risk and land contamination. These are matters that can be addressed through further investigatory work (the application of the Sequential and Exceptions Test), appropriate design and remediation.</p> <p>As a result, we would urge the Council to work positively and proactively to overcome constraints in the pursuit of delivering their objectively assessed need.</p> <p>In addition, whilst we welcome the Site's recognition as forming part of the proposed Forge Wood Neighbourhood allocation, we recommend that the brownfield land within it is defined and classified as residual land in which the</p>

<b>Strategic Housing Land Availability Assessment</b>			
<b>Ref. No.</b>	<b>Respondent</b>	<b>Policy/ Para</b>	<b>Comments</b>
			<p>principle of development is supported. This would at least demonstrate the Council's commitment to utilising all available land within the last full neighbourhood which can be built within.</p> <p>We trust that the information enclosed clearly sets out the work that is required to ensure the Local Plan Review can be found sound. We ask the Council to undertake further assessment of the Site and wider area forming Site 73 to determine its development potential and make the appropriate changes to Draft Policy H2 prior to submitting it to the Secretary of State for examination. We also ask to be notified about future EIP hearing sessions.</p>



# Crawley

Local Plan

## Environmental Sustainability

Regulation 19 January 2021 Representations

Local Plan Chapters 14 – 17 & Noise Annex

Chapter 14. Green Infrastructure & Biodiversity			
Ref. No.	Respondent	Policy/ Para	Comments
REP/ 041	IVCAAC	GI1	<p>We certainly support this but wonder how easy it will be to retain sufficient connected green infrastructure with the demand for housing.</p> <p><b>Suggested Modifications:</b> Is it possible to increase the area of green space with an increasing population?</p>
REP/ 055	Savills on behalf of Wilky Group	GI1	<p><b>1.0 Introduction</b></p> <p>1.1 This representation is submitted on behalf of The Wilky Group (TWG), which has a longstanding interest in the promotion of strategic employment land within the Crawley Borough Council (CBC) area. This representation relates to Policy GI1 Green Infrastructure in the draft Crawley Borough Local Plan, 2021 (DCBLP).</p> <p>1.2 TWG owns about 48 ha (119 acres) of land east of Gatwick Airport. The land has been promoted by TWG as a strategic employment opportunity known as Gatwick Green (the Site). The Site is proposed for allocation as a Strategic Employment Location (SEL) of 47 ha (116 acres) in the DCBLP under Strategic Policy EC4 as a comprehensive industrial-led development of predominantly storage and distribution uses under use class B8.</p> <p>1.3 This representation notes that Policy GI1 is broadly in accordance with the advice in the National Planning Policy Framework (NPPF, 2019) and the Planning Practice Guidance (PPG). It also confirms that Gatwick Green can be masterplanned and designed so as to be in accordance with the key objectives contained in Policy GI1.</p> <p><b>2.0 Policy GI1 – intent of policy and compliance</b></p> <p><b>Intention of the policy</b></p> <p>2.1 The purpose of Policy GI1 is to conserve and enhance the multi-functional green infrastructure network in Crawley so as to mitigate stress on the natural environment.</p> <p>2.2 Development within the Borough should protect and enhance the existing green infrastructure and take a positive approach to design and integration of new green infrastructure networks. Large-scale development is required to provide new links and incorporate blue infrastructure into the development design.</p> <p><b>National planning policy and guidance</b></p> <p>2.3 The NPPF sets out the objectives of the planning system with regard to contributing to enhancing the natural and local environment (para 170).</p> <p>2.4 The NPPF policy is supplemented by more detailed guidance in Planning Practice Guidance (PPG) on Green Infrastructure (<a href="https://www.gov.uk/guidance/natural-environment">https://www.gov.uk/guidance/natural-environment</a>). PPG sets out what planning goals green infrastructure can achieve, including building a strong and competitive economy, achieving well-deigned places, promoting healthy and safe communities, mitigating climate change, flooding and coastal change and conserving and enhancing the natural environment.</p> <p>2.5 It is considered that Policy GI1 provides appropriate and proportionate protection for green infrastructure in the Borough, consistent with national planning policy and guidance. Policy GI1 has been designed to ensure that these</p>

Chapter 14. Green Infrastructure & Biodiversity			
Ref. No.	Respondent	Policy/ Para	Comments
			<p>matters are addressed in the planning process – in relation to Gatwick Green, this will include the preparation of the masterplan, and an outline planning application supported by an assessment of green infrastructure in accordance with the requirements in Strategic Policy EC4.</p> <p><b>3.0 Implications for Gatwick Green</b></p> <p>3.1 Most of the Gatwick Green allocation forms part of the Gatwick Woods Biodiversity Opportunity Area (BOA) to which Policy GI1 applies. The overall masterplanning of the Site under Strategic Policy EC4 will need to have regard to the BOA and any other green infrastructure considerations that arise from more detailed work. These consideration are reflected in the Development Framework Plan (DFP – Appendix 8 to TWG’s representation on Strategic Policy EC4) and will be taken into account in the design and operation of the proposals for the Site. These will include:</p> <ul style="list-style-type: none"> <li>• The inclusion of landscape buffers and public open space to address separation of Gatwick Green from Gatwick Airport, Horley and the wider countryside.</li> <li>• The integration of trees, hedgerows and biodiversity into the layout and design and enhance blue/green infrastructure in the context of the Gatwick Woods Biodiversity Opportunity Area.</li> <li>• The integration of ‘important’ hedgerows and retaining a green buffer along Balcombe Road.</li> </ul> <p>3.2 The Appendices to TWG’s representation on Policy EC1 of the DCBLP (2020) (2020 Appendices) form part of the Council’s evidence base (Consultation appendix 4b: Wilky Group appendices combined). The environmental considerations relating to green infrastructure are addressed in the 2020 Appendices and subject to Addenda contained at Appendices 3 – 7 of TWG’s representation on Strategic Policy EC4. These Addenda confirm that the original recommendations remain valid in the context of the proposed allocation of Gatwick Green under Strategic Policies EC1 and EC4 and any other changes in circumstances.</p> <p>3.3 The Addenda to the Landscape Character and Visual Appraisal, the Updated Preliminary Ecological Appraisal and the Hedgerows Assessment confirm that the Site can be developed whilst respecting the green infrastructure in and around it, and include recommendations on appropriate avoidance and mitigation measures. These matters will be addressed at the planning application stage and set out in reports on biodiversity and ecology and landscape matters and a Design and Access Statement.</p> <p><b>Suggested Modifications:</b></p> <p><b>4.0 Conclusions</b></p> <p>4.1 TWG acknowledges the need for the Gatwick Green proposals to address the green infrastructure considerations relating to the Site and referenced in Policy GI1. All feasibility investigations to date indicate that the 24.1ha minimum requirement can be delivered in accordance with these requirements. The masterplan proposals for the Site required under Strategic Policy EC4 will have regard to these considerations in achieving a sustainable and well-designed scheme for the Site.</p>


<b>Chapter 14. Green Infrastructure &amp; Biodiversity</b>			
<b>Ref. No.</b>	<b>Respondent</b>	<b>Policy/ Para</b>	<b>Comments</b>
			4.2 It is considered that Policy GI1 provides appropriate and proportionate requirements for the provision of green and blue infrastructure, consistent with national policy. Development at Gatwick Green as allocated in Strategic Policy EC4 will be designed to incorporate green infrastructure which interlinks with the existing network and will incorporate innovative drainage solutions appropriate for the Site's location in proximity to an airport.
REP/087	Woodland Trust	GI1	<p>We welcome this policy, in particular the requirement in section x. that where possible, Natural England's Accessible Natural Green Space Standard recommendations and the Woodland Trust's Woodland Access Standard should be used to assess a development proposal's location in relation to existing accessible natural green space and woodland. We welcome the requirement in vii. that large development proposals will be required to provide new and/or create links to green infrastructure as well as take into consideration the use of SuDS in line with Policy EP1.</p> <p><b>Suggested Modifications:</b> N/A</p>
REP/113	Natural England	GI1	<p>We welcome the inclusion of this policy.</p> <p><b>Suggested Modifications:</b> N/A</p>
REP/041	IVCAAC	GI2	<p>SNCI (Sites of Nature Conservation Interest) are not mentioned in the list. Is there a reason for this? The meadows in Ifield have SNCI status.</p> <p><b>Suggested Modifications:</b></p>
REP/055	Savills on behalf of Wilky Group	GI2	<p><b>1.0 Introduction</b></p> <p>1.1 This representation is submitted on behalf of The Wilky Group (TWG), which has a long-standing interest in the promotion of strategic employment land within the Crawley Borough Council (CBC) area. This representation relates to Policy GI2 Biodiversity Sites in the draft Crawley Borough Local Plan, 2021 (DCBLP).</p> <p>1.2 TWG owns about 48 ha (119 acres) of land east of Gatwick Airport. The land has been promoted by TWG as a strategic employment opportunity known as Gatwick Green (the Site). The Site is proposed for allocation as a Strategic Employment Location (SEL) of 47 ha (116 acres) in the DCBLP under Strategic Policy EC4 as a comprehensive industrial-led development of predominantly storage and distribution uses under use class B8.</p> <p>1.3 This representation notes that Policy GI2 is broadly in accordance with the advice in the National Planning Policy Framework (NPPF, 2019) and the Planning Practice Guidance (PPG). It also confirms that Gatwick Green can be masterplanned and designed so as to be in accordance with the key objectives contained in Policy GI2.</p> <p><b>2.0 Policy GI2 – intent of policy and compliance</b></p> <p><b>Intention of the policy</b></p> <p>2.1 The purpose of Policy GI2 is to identify the hierarchy of biodiversity sites; establish a sequential approach to addressing impacts on these with reference to the hierarchy of sites, and require planning applications to address these through surveys and assessments.</p>

Chapter 14. Green Infrastructure & Biodiversity			
Ref. No.	Respondent	Policy/ Para	Comments
			<p>2.2 In the hierarchy of biodiversity sites, SSSIs are afforded the highest level of protection, followed by Ancient Woodland and aged or veteran trees, and finally a number of locally designated sites including Biodiversity Opportunity Areas. Biodiversity Opportunity Areas have been identified throughout the south and east and are identified areas for the restoration and creation of Biodiversity Action Plan (BAP) habitats.</p> <p><b>National planning policy and guidance</b></p> <p>2.3 Paragraph 170 requires planning policies and decisions to enhance the local and natural environment, including through net gains in biodiversity. The NPPF also requires plans to distinguish between the hierarchy of international, national and locally designated sites.</p> <p>2.4 The NPPF policy is supplemented by more detailed guidance in Planning Practice Guidance (PPG) on biodiversity (<a href="https://www.gov.uk/guidance/natural-environment">https://www.gov.uk/guidance/natural-environment</a>). PPG sets out guidance on the natural environment, the statutory basis for conserving and enhancing the natural environment and the approach to planning policies to achieve these objectives.</p> <p>2.5 It is considered that Policy GI2 provides appropriate and proportionate protection for biodiversity sites in the Borough, consistent with national planning policy and guidance. Policy GI2 has been designed to ensure that these matters are appropriately addressed in the planning process – in relation to Gatwick Green, this will include the preparation of the masterplan, and an outline planning application supported by ecological assessments in accordance with the requirements in Strategic Policy EC4.</p> <p><b>3.0 Implications for Gatwick Green</b></p> <p>3.1 Most of the Gatwick Green allocation forms part of the Gatwick Woods Biodiversity Opportunity Area (BOA) to which Policy GI2 applies. The overall master planning of the Site under Strategic Policy EC4 will need to have regard to the BOA and any other biodiversity and ecology considerations that arise from more detailed work. These consideration are reflected in the Development Framework Plan (DFP – Appendix 8 to TWG’s representation on Strategic Policy EC4) and will be taken into account in the design and operation of the proposals for the Site. These will include:</p> <ul style="list-style-type: none"> <li>• The integration of trees, hedgerows and biodiversity into the layout and design and enhance blue/green infrastructure in the context of the Gatwick Woods Biodiversity Opportunity Area.</li> <li>• The integration of ‘important’ hedgerows and retaining a green buffer along Balcombe Road.</li> </ul> <p>3.2 The Appendices to TWG’s representation on Policy EC1 of the DCBLP (2020) (2020 Appendices) form part of the Council’s evidence base (Consultation appendix 4b: Wilky Group appendices combined). The environmental considerations relating to biodiversity are addressed in the 2020 Appendices and subject to Addenda contained at Appendices 3 – 7 of TWG’s representation on Strategic Policy EC4. These Addenda confirm that the original recommendations remain valid in the context of the proposed allocation of Gatwick Green under Strategic Policies EC1 and EC4 and any other changes in circumstances.</p>

Chapter 14. Green Infrastructure & Biodiversity			
Ref. No.	Respondent	Policy/ Para	Comments
			<p>3.3 The Addendum to the Updated Preliminary Ecological Appraisal confirms that the Site can be developed whilst respecting the biodiversity in and around it, and includes recommendations on appropriate avoidance and mitigation measures. These will be designed in accordance with the sequential approach to addressing harm contained in Policy GI2. These matters will be addressed at the planning application stage and set out in a report on biodiversity and ecology and a Design and Access Statement.</p> <p><b>Suggested Modifications:</b>  <b>4.0 Conclusions</b>  4.1 TWG acknowledges the need for the Gatwick Green proposals to address the biodiversity considerations relating to the Site and referenced in Policy GI2. All feasibility investigations to date indicate that the 24.1ha minimum requirement can be delivered in accordance with these requirements. The masterplan proposals for the Site required under Strategic Policy EC4 will have regard to these considerations in achieving a sustainable and well-designed scheme for the Site.</p> <p>4.2 It is considered that Policy GI2 provides appropriate and proportionate requirements for addressing biodiversity, consistent with national policy. Development at Gatwick Green as allocated in Strategic Policy EC4 will be designed to incorporate biodiversity, which interlinks with that on adjoining land, where appropriate.</p>
REP/ 068	Sussex Wildlife Trust	GI2	<p>GI2 has now changed to Biodiversity Sites. SWT's previous comments relating to this policy are captured under policy amendments GI3, in our March 2020 consultation response.</p> <p><b>Suggested Modifications:</b>  Having looked at the Jan 2021 submission plan, we can see that amendments have been made to this policy in line with our comments. However, we wish to highlight again that SWT would ask CBC to consider an amendment to the policy that removes the final part of the sentence relating to past ecological surveys. This is because it may be the case that the site has not been previously surveyed, but it has features that are recognised as valuable for wildlife, for example veteran trees and species rich grassland.</p> <p>We therefore recommend the following amendment to the first paragraph of the policy;  <i>Up-to-date habitat and species surveys and associated reports will be required to accompany planning applications which may affect the areas listed below or sites showing likely ecological value, based on past ecological surveys</i></p>
REP/ 087	Woodland Trust	GI2	<p>In general we support this policy, but would like to see it strengthened with regard to the buffering of ancient woodland in order to be sound.</p> <p>We strongly welcome the policy that development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists.</p> <p>We welcome the policy that if significant harm to biodiversity resulting from development cannot be avoided, adequately mitigated or as last resort compensated then planning permission should be refused.</p>

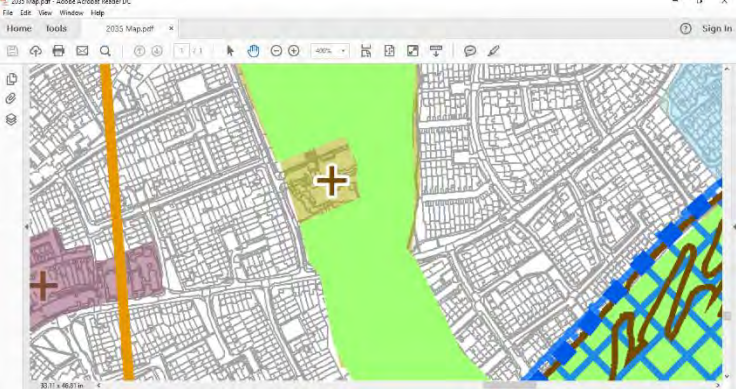
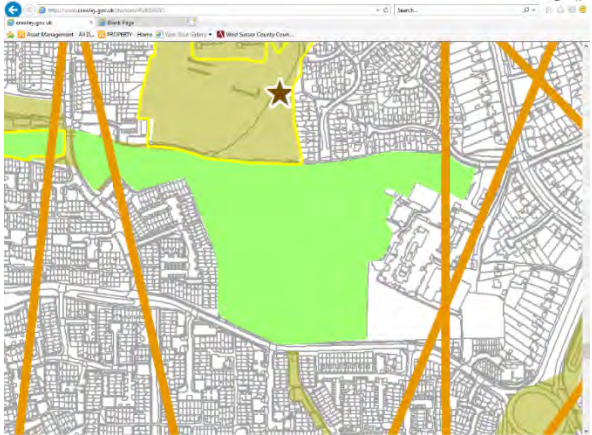
Chapter 14. Green Infrastructure & Biodiversity			
Ref. No.	Respondent	Policy/ Para	Comments
			<p>We welcome the recognition of the unique value of ancient woodland in 14.26 and guidance that a larger buffer may be required for particularly significant engineering operations, or for after-uses that generate significant disturbance.</p> <p>We strongly welcome the guidance in 14.27 that ancient wood pasture and historic parkland should receive the same consideration as other forms of ancient woodland.</p> <p>We strongly welcome the guidance in 14.28 that where it is deemed that there is going to be unavoidable residual damage or loss to ancient woodland, the measures taken to compensate for this must be of a scale and quality commensurate with the loss of this irreplaceable habitat, and that where ancient woodland is to be replaced by new woodland, this should aim to create 30 hectares of new woodland for every hectare lost.</p> <p>We note the policy that a buffer zone between development and ancient woodland will be required in line with Natural England Standing Advice. However, we do not believe this is sufficient.</p> <p><b>Suggested Modifications:</b>  We would urge amending this policy to require, as a precautionary principle, that a minimum 50 metre buffer should be maintained between a development and the ancient woodland, including through the construction phase, unless the applicant can demonstrate very clearly how a smaller buffer would suffice.</p> <p>Further information is available in the Trust's Planners' Manual for ancient woodland (2019) <a href="https://www.woodlandtrust.org.uk/publications/2019/06/planners-manual-for-ancient-woodland/">https://www.woodlandtrust.org.uk/publications/2019/06/planners-manual-for-ancient-woodland/</a></p>
REP/ 113	Natural England	GI2	<p>We welcome the inclusion of this policy. However, although it is acknowledged that the plan area does not include any internationally designated sites, there are some in its vicinity. Therefore, potential detrimental impact on these sites needs to be considered in relation to potential development and should, therefore, be referred to in this policy, to comply with the NPPF:</p> <p><b>"174. To protect and enhance biodiversity and geodiversity, plans should:</b>  <b>a) ...safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity:..."</b></p> <p>This is of particular relevance as the Plan will need to demonstrate that impacts to Arun Valley Special Protection Area (SPA) Special Area of Conservation (SAC) and Ramsar Site will be avoided/mitigated as explained below.</p> <p><i>*See representations on Habitat Regulations Assessment*</i></p> <p><b>Suggested Modifications:</b>  (Our suggested modifications are incorporated in the above advice).</p>
REP/ 006	WSCC Property and Assets Management	GI3	<p>The land at Cheals Roundabout is held for strategic infrastructure purposes, and to ensure that the road remains safe and can be well maintained. This representation was raised in our earlier response of 22 August 2019 in response to the Local Plan Review, and we would request reassurance that our objection has been considered and is reflected in this latest version in order to demonstrate that the plan is Positively Prepared.</p>

**Chapter 14. Green Infrastructure & Biodiversity**

Ref. No.	Respondent	Policy/ Para	Comments
			<p>A copy of the Local Plan Map with areas affected is attached below.</p>  <p>As a consequence we would request:</p> <ul style="list-style-type: none"> <li>• Removal of the designations of 'Structural landscaping' to the areas to the north and east of the roundabout shaded olive green, and also</li> <li>• Removal of the designation as 'Biodiversity Opportunity Areas' of the area to the south of the roundabout shaded bright green.</li> </ul> <p><b>Suggested Modifications:</b>            In order to demonstrate that the Plan is positively prepared and is informed by agreement with WSCC we would request:</p> <ul style="list-style-type: none"> <li>• Removal of the designations of 'Structural landscaping' to the areas to the north and east of the roundabout shaded olive green, and also</li> <li>• Removal of the designation as 'Biodiversity Opportunity Areas' of the area to the south of the roundabout shaded bright green.</li> </ul>
REP/006	WSCC Property and Assets	GI3	<p><b>The Oaks Primary School</b> is proposed to be designated as a 'Biodiversity Opportunity Area' (bright green) and an area of 'Structural landscaping' (olive green). An extract of the Local Plan Map with areas affected is attached below. These designations may serve to compromise or constrain (see para 3.4) the statutory obligation placed upon the Council to meet any future need to create additional spaces at the school, particularly in view of the proposed new housing allocations in Tilgate.</p>



**Chapter 14. Green Infrastructure & Biodiversity**

Ref. No.	Respondent	Policy/ Para	Comments
			 <p>We therefore wish to object to the proposed designations for the reasons set out above and in order to demonstrate that the Plan is positively prepared and is informed by agreement with WSCC, namely that the areas are already protected due to their status, and that there may be a future requirement to increase the capacity of the schools to accommodate additional children</p> <p><b>Suggested Modifications:</b> To remove the school fields and buildings at The Oaks Primary School from the list of proposed designated areas of 'Biodiversity Opportunity Area' (bright green) and an area of 'Structural landscaping' (olive green) within the proposed Local Plan in order to demonstrate that the Plan is positively prepared and is informed by agreement with WSCC.</p>
REP/006	WSCC Property and Assets	GI3	<p><b>Holy Trinity CE School</b> is proposed to be designated as a 'Biodiversity Opportunity Area' (bright green). An extract of the Local Plan Map with areas affected is attached below. This designation may serve to compromise or constrain (see para 3.4) the statutory obligation placed upon the Council to meet any future need to create additional spaces at the school.</p> <p>We therefore wish to object to the proposed designations for the reasons set out above, and in order to demonstrate that the Plan is positively prepared and is informed by agreement with WSCC namely that the areas are already protected due to their status, and that there may be a future requirement to increase the capacity of the schools to accommodate additional children.</p> 

<b>Chapter 14. Green Infrastructure &amp; Biodiversity</b>			
<b>Ref. No.</b>	<b>Respondent</b>	<b>Policy/ Para</b>	<b>Comments</b>
			<p><b>Suggested Modifications:</b> To remove the school fields at Holy Trinity CE School from the list of proposed designated areas of Biodiversity Opportunity Areas within the proposed Local Plan in order to demonstrate that the Plan is positively prepared and is informed by agreement with WSCC.</p>
REP/022	Sussex Ornithological Society	GI3	<p><b><u>RESPONSE TO CRAWLEY LOCAL PLAN S.19 SUBMISSION DRAFT</u></b> We have examined the Regulation 19 Submission Draft of the Crawley Local Plan, and in broad terms we would wish to maintain our position on the comments we made in March 2020 in response to the previous draft. It is understood that these will be forwarded to the Planning Inspector, and unless stated otherwise should still stand.</p> <p>It remains a matter of concern to the Society that the Council proposes to offload more than 50% of its housing allocation to other authorities, and that this proportion has in fact increased from 53% to 56% since the Regulation 19 Consultation Draft. We feel that, in the light of shifts in Central Government thinking regarding changes to the planning system, and in view of the effects that will follow the current health crisis (particularly the possible long-term brake on aviation growth and the rise in home working and on-line retail making office and retail sites potentially available for housing), Crawley should be more robust in stating that, if the Council is certain that more of these houses cannot be built within Crawley, it is not acceptable to ask neighbouring Local Authorities to build the huge numbers remaining.</p> <p>It remains a particular concern that there needs to be firmer protection relating to the High Weald AONB, which has not really been addressed in this draft, and regarding which we refer back to our observations in response to the Consultation Draft.</p> <p>We would like to make the following specific comments in relation to this Submission Draft of the Plan –</p> <p><b>Suggested Modifications:</b> <b>Strategic Policy GI3 – Biodiversity and net gain</b> This was Policy GI2 in the Consultation Draft. We would still like to see the wording at 23(a) of our submission included. It looks as though our comment at 23(b) is redundant as the provisions regarding financial contributions appear to have been deleted.</p>
REP/041	IVCAAC	GI3	<p>Is there a requirement for ecological studies of proposed development sites to be made public? Should it be a requirement that knowledge of ecology be sought from the local community who know an area well?</p> <p><b>Suggested Modifications:</b></p>
REP/055	Savills on behalf of Wilky Group	GI3	<p><b>1.0 Introduction</b> 1.1 This representation is submitted on behalf of The Wilky Group (TWG), which has a longstanding interest in the promotion of strategic employment land within the Crawley Borough Council (CBC) area. This representation relates to Policy GI3 Biodiversity and Net Gain in the draft Crawley Borough Local Plan, 2021 (DCBLP). 1.2 TWG owns about 48 ha (119 acres) of land east of Gatwick Airport. The land has been promoted by TWG as a strategic employment opportunity known as Gatwick Green (the Site). The Site is proposed for allocation as a Strategic</p>

Chapter 14. Green Infrastructure & Biodiversity			
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			<p>Employment Location (SEL) of 47 ha (116 acres) in the DCBLP under Strategic Policy EC4 as a comprehensive industrial-led development of predominantly storage and distribution uses under use class B8.</p> <p>1.3 This representation notes that Policy GI3 is broadly in accordance with the advice in the National Planning Policy Framework (NPPF, 2019) and the Planning Practice Guidance (PPG). It also confirms that Gatwick Green can be masterplanned and designed so as to be in accordance with the key objectives contained in Policy GI3.</p> <p><b>2.0 Policy GI3 – intent of policy and compliance</b></p> <p><b>Intention of the policy</b></p> <p>2.1 The purpose of Policy GI3 is to ensure a net gain in biodiversity, with development proposals expected to incorporate features to encourage biodiversity and enhance existing features of nature conservation value. In line with Government expectation in the Environment Bill (Defra, 2019), the policy also requires development proposals to make provision for a 10% net gain in biodiversity.</p> <p>2.2 Policy GI3 contains some more detailed guidance with regard to provision for pollination, green roofs / walls, landscape proposals and tree planting.</p> <p>2.3 Larger development proposals, such as Gatwick Green, must also provide an Ecological Management Plan/Biodiversity Offset Management Plan. Trees and soft landscaping would normally be expected within the development site, although off-site mitigation may be acceptable.</p> <p><b>National planning policy and guidance</b></p> <p>2.3 Paragraph 170 requires planning policies and decisions to enhance the local and natural environment, including through net gains in biodiversity. The NPPF also requires plans to distinguish between the hierarchy of international, national and locally designated sites.</p> <p>2.4 The NPPF policy is supplemented by more detailed guidance in Planning Practice Guidance (PPG) on biodiversity (<a href="https://www.gov.uk/guidance/natural-environment">https://www.gov.uk/guidance/natural-environment</a>). PPG sets out guidance on the natural environment, the statutory basis for conserving and enhancing the natural environment and the approach to planning policies to achieve these objectives.</p> <p>2.5 It is considered that Policy GI3 provides appropriate and proportionate guidance on the conservation and enhancement of biodiversity and the provision of net gain on sites in the Borough, consistent with national planning policy and guidance. Policy GI3 has been designed to ensure that these matters are appropriately addressed in the planning process – in relation to Gatwick Green, this will include the preparation of the masterplan, and an outline planning application supported by ecological assessments in accordance with the requirements in Strategic Policy EC4.</p> <p><b>3.0 Implications for Gatwick Green</b></p> <p>3.1 Most of the Gatwick Green allocation forms part of the Gatwick Woods Biodiversity Opportunity Area (BOA) to which Policy GI2 applies. The overall masterplanning of the Site under Strategic Policy EC4 will need to have regard to the</p>

Chapter 14. Green Infrastructure & Biodiversity			
Ref. No.	Respondent	Policy/ Para	Comments
			<p>BOA and any other biodiversity and ecology considerations that arise from more detailed work. There will be a range of biodiversity considerations taken into account in the design and operation of the proposals for the Site. These will include:</p> <ul style="list-style-type: none"> <li>• The integration of trees, hedgerows and biodiversity into the layout and design and enhance blue/green infrastructure in the context of the Gatwick Woods Biodiversity Opportunity Area.</li> <li>• The integration of ‘important’ hedgerows and retaining a green buffer along Balcombe Road.</li> </ul> <p>3.2 The Appendices to TWG’s representation on Policy EC1 of the DCBLP (2020) (2020 Appendices) form part of the Council’s evidence base (Consultation appendix 4b: Wilky Group appendices combined). The environmental considerations relating to biodiversity are addressed in the 2020 Appendices and subject to Addenda contained at Appendices 3 – 7 of TWG’s representation on Strategic Policy EC4. These Addenda confirm that the original recommendations remain valid in the context of the proposed allocation of Gatwick Green under Strategic Policies EC1 and EC4 and any other changes in circumstances.</p> <p>3.3 The Addendum to the Updated Preliminary Ecological Appraisal confirms that the Site can be developed whilst respecting the biodiversity in and around it, and includes recommendations on appropriate avoidance and mitigation measures. These will be designed in accordance with the sequential approach to addressing harm contained in Policy GI2. The proposals will also address the need to deliver a 10% net gain in biodiversity under Policy GI3. These matters will be addressed at the planning application stage and set out in a report on biodiversity and ecology and a Design and Access Statement.</p> <p><b>4.0 Conclusions</b></p> <p>4.1 TWG acknowledges the need for the Gatwick Green proposals to address the biodiversity considerations relating to the Site referenced in Policy GI3, including a 10% net gain in biodiversity. The masterplan proposals for the Site required under Strategic Policy EC4 will comply with these provisions so as to achieve a sustainable and well-designed scheme for the Site.</p> <p>4.2 It is considered that Policy GI3 provides appropriate and proportionate requirements for addressing biodiversity and net gain, consistent with national policy. Development at Gatwick Green as allocated in Strategic Policy EC4 will be designed to incorporate biodiversity which interlinks with that on adjoining land, where appropriate. A 10% net gain in biodiversity will also be delivered in line with national policy and Policy GI3.</p> <p><b>Suggested Modifications:</b></p>
REP/068	Sussex Wildlife Trust	GI3	<p>SWT previously submitted comments relating to this policy which was referenced as GI2 in the March 2020 consultation. We note that the local authority has made amendments to the policy in relation to information calculating net gain. However, SWT feels that this policy fails to adequately address what is required where Biodiversity Net Gain cannot be secured on site.</p>

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			<p>As stated in our previous consultation responses SWT would suggest that CBC ensure that they have a strategic plan in place for the delivery of Biodiversity Net Gain (BNG) that is required off site. SWT acknowledge that the Nature Recovery Network and BNG is still emerging through policy and legislation, however the plan will need to address the matter over its lifetime. A strategic approach is advised to ensure that where it is necessary to deliver biodiversity net gain, the gains are maximised and strategic in nature, in order to provide the best opportunities for biodiversity and the multiple benefits it can bring. SWT is aware of other local authorities within Sussex that have failed to take a strategic approach to biodiversity delivery, in terms of compensation for development, without the added need for net gain. This has result in developments that are unable to currently deliver the conditions of the approval. We therefore make this suggestion in order to ensure the plan is in line with section 174(b) of the NPPF 2019 and effective in delivery.</p> <p><b>Suggested Modifications:</b></p>
REP/ 113	Natural England	GI3	<p>We welcome the inclusion of this policy and in particular, the requirement for development proposals to demonstrate the securing of a net gain in biodiversity. However, we recommend the addition of 'measurable' to this wording to strengthen the policy; as per the NPPF:  <i>"174...plans should...b)... identify and pursue opportunities for securing measurable net gains for biodiversity."</i></p> <p>We advise that the following should be included in the policy:</p> <ul style="list-style-type: none"> <li>• We advise that this policy should include reference to the production of an SPD to provide details of how net gain will be effectively delivered and measured in practice with links to GI and Nature Recovery Strategies.</li> <li>• We advise that Net gain should be incentivised for on-site delivery first demonstrating that the design and location of development has followed the mitigation hierarchy (as referred to in GI3:i) &amp; ii)) but also demonstrating the securing of management for net gain in perpetuity for the lifetime of the development. Any residual impacts should be locally offsite, in line with Local Plan priorities/ Nature Recovery Strategy GI strategy. Funding for offsite delivery must demonstrating net gain with and be secured for at least 30 years via condition/agreement.</li> </ul> <p><b>Strategic delivery of Net Gain</b>  Key opportunities exit where net gain cannot be delivered on site to contribute towards strategic networks. This should be identified and cemented in Local Plans through GI Strategies. We advise partnership working for example with neighbouring LPA, wildlife trusts and Local Nature Partnerships will be key to establish strategic schemes.</p> <p><b>Nature Recovery Networks</b>  We note and welcome, the recognition of the value of green infrastructure as part of a Nature Recovery Network (section 14.9). Biodiversity net gain can also be a key contributor to Nature Recovery Networks. Nature Recovery Networks (NRNs) are about delivering the Lawton principles of – bigger, better, more joined up network. They are local spatial frameworks to recover nature; aiming for a natural environment where the biodiversity, functioning and resilience of ecosystems are re-established in an expanding network of both urban and rural spaces for nature that are sustainable into the future. NRNs are spatial planning frameworks with the principal focus on biodiversity and nature aiming to deliver nature recovery and restoration outcomes. We encourage your authority to realise the potential of the</p>

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			<p>Crawley Local Plan to contribute to NRN through partnership working. Local Plans provide the tools and framework to establish strategic, landscape scale networks.</p> <p><b>Suggested Modifications:</b> (Our suggested modifications are incorporated in the above advice).</p>
REP/ 123	Barton Willmore on behalf of The Sogno Family Trust	GI3	<p><b>Policy G13: Biodiversity and Net Gain</b></p> <p>4.13 The Trust are supportive of the delivery of Biodiversity Net Gain, in accordance with the Environmental Bill which is expected to be passed into law in late 2021. However, the policy as currently worded does not make provision for circumstances where Biodiversity Net Gain cannot be achieved (in part or full) on site. This circumstance is however referenced within paragraph 14.39 of the supporting text:</p> <p><i>“off-site financial provision, or alternative, will be delivered via an identified strategic mechanism for net gain, anticipated to be set out in national guidance”.</i></p> <p>4.14 To be clear and unambiguous for this event, it is recommended this provision is included within policy.</p> <p>4.15 The policy as currently worded also repeats the replacement tree planting policy DD4, referring to a commuted sum “per tree”. In the context of biodiversity, and biodiversity net gain, tree planting may not be the only or appropriate solution to achieve biodiversity net gain. The policy goes on to require, “for landscaping purposes” the planting of one new tree per dwelling which similarly does not appear to relate to the purpose of biodiversity net gain.</p> <p>4.16 As currently drafted, the policy is repetitive of other policies contained within the draft Local Plan and does not appear to directly relate to its intended purpose of Biodiversity Net Gain. Therefore, we recommend that the wording relating to tree replacement and landscaping is removed to avoid duplication.</p> <p><b>Suggested Modifications:</b></p>
REP/ 130	Home Builders Federation	GI3	<p>Policy is not consistent with national policy.</p> <p><b>Suggested Modifications:</b></p>
REP/ 133	The Planning Bureau Ltd	GI3	<p>The Council’s commitment towards new development achieving a minimum of 10% net gain for biodiversity in the Authority is commendable. We have no objection to the aims or objectives of this policy.</p> <p>This policy advises new development should seek a contribution of 1 tree per new dwelling, or a commensurate off-site financial contribution. This requires clarity. Either the Planning Authority will seek the new tree planting requirement / financial contribution on new planning applications, or it will not. If it is the former, then there should be an appropriate cost allowed for in the LPVA accordingly.</p> <p>A significant on-site replanting requirement can therefore be generated, and particularly when taken in conjunction with the tree replacement standards (based on trunk diameter) detailed in Strategic Policy DD4: Tree Replacement Standards.</p>

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			<p>There is a clear ambition to increase in tree cover in the Borough however we are concerned that this may be an impediment to building at higher densities, particularly on previously developed sites in urban areas. The policies in the Local Plan try and deliver a wide-ranging number of objectives and in combination it does not appear feasible that new development, particularly on constrained urban sites, can meet them all. Is it credible to expect development with a minimum density of 200 dph (as detailed in Policy CL4) to increase the level of tree cover on site?</p> <p>We note that the <i>Crawley Local Plan Review: Whole Plan Policies &amp; Community Infrastructure Levy Viability Assessment</i> (LPVA) incorporates the cost of achieving 10% biodiversity net gain into the 5% contingency for sustainable design &amp; construction costs. We would suggest that this contingency is stretched quite thin as it covers replacement tree planting and a reduction in CO<sub>2</sub> emissions.</p> <p>We also note that there is a requirement for an Ecological Management Plan / Biodiversity Off-set Management Plan which will be a further element of professional reporting required in new applications. The level of professional reports detailed in Local Plan policies is extensive and exceeds that required by other Councils. There should be a commensurate uplift in the allowance made for professional fees in the LPVA accordingly</p> <p><b>Suggested Modifications:</b></p> <ol style="list-style-type: none"> <li>1. Reduce the requirement for additional tree planting in urban locations.</li> <li>2. To include a separate cost for tree planting in the <i>Crawley Local Plan Review: Whole Plan Policies &amp; Community Infrastructure Levy Viability Assessment</i> (LPVA).</li> </ol>
REP/041	IVCAAC	GI4	<p>We strongly support the designation of Ifield Brook Meadows and Rusper Playing Fields as a Local Green space. They are a valuable and important local feature much valued by the community.</p> <p><b>Suggested Modifications:</b></p>
REP/114	Resident 46	GI4	<p>I think the Ifield Brook and Ifield Golf Club is the wrong place to build the monstrosity of Flats and Houses. Ruining natural areas of Crawley, pushing out nature and wildlife animals, foxes, rabbits, birds, deer etc.</p> <p>Protect green spaces, historic trees and natural bluebells, from the housing development. This area could potentially flood has done in the past. People need areas to exercise, walk dogs, golfing, for peoples mental health the area should be protected. We should produce food in Britain. The roads aren't fit for purpose and congested roads and block up our area at work times with 20k+ people living in these houses would create.</p> <p>Burden on Crawley and clog up this area, burden on Crawley amenities such as hospitals are over stretched, Schools over-subscribed, doctors are at breaking point, some people are struggling to get a dentist. These people will be a burden Crawley town. Not all developments have had their houses sold like Kilnwood and Forge Wood. Crawley will end up like concrete Rome, terrible with coronavirus people living on top of each other we need a few green spaces. Half the time developments promise thing's but don't deliver.</p> <p><b>Suggested Modifications:</b></p> <p>Please re-exam the Housing development.</p>

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			We already have Kilnwood Vale's development close by building on Ifield's side. I think Horsham Council should build elsewhere!
REP/134	Rusper Parish Council		<p>Rusper Parish Council would like to comment on your Local Plan Review.</p> <p>Councillors and many Rusper residents are concerned about the Land West of Ifield development site that has been proposed under a duty to cooperate with Horsham District Council. They feel this would impact negatively on the proposed Crawley Local Plan as follows:-</p> <ul style="list-style-type: none"> <li>• The need for open space and access to local facilities which support healthy lifestyles would be reduced.</li> <li>• Landmarks, views, vistas and woodland would be destroyed.</li> <li>• The proposal does not take into account the existing character of the area.</li> <li>• Individual specimens or groups of trees that make a positive contribution to visual and biodiversity amenity wouldn't be retained.</li> <li>• There is a need to retain an area of special local character (Ifield golf club) which has social and communal value. It also has heritage significance and is a local landmark.</li> <li>• The loss of farmland would adversely affect the rural economy; the NPPF supports rural businesses.</li> <li>• Valued landscapes and biodiversity would be destroyed.</li> <li>• There would be light pollution on intrinsically dark landscapes and nature conservation.</li> <li>• Ifield Brook Meadows is included as an area of enjoyment, visual amenity, tranquillity and wild life. The western link road would have an adverse effect on this as the proposals seem to have cycle ways through parts of this conservation area.</li> <li>• Flash flooding would increase.</li> <li>• The site would suffer from noise from Gatwick Airport.</li> </ul> <p><b>Suggested Modifications:</b></p>



<b>Chapter 15. Sustainable Design &amp; Construction</b>			
<b>Ref. No.</b>	<b>Respondent</b>	<b>Policy/ Para</b>	<b>Comments</b>
REP/035	Vail Williams on behalf of Admore Ltd. June 2021	SDC1	<p>Promotion Statement (June 2021) Green Credentials &amp; Sustainability</p> <p>14.1 It is important that our Jersey Farm Masterplan provides fit for purpose employment space that responds to market demands now and in the future. The units must also consider future technological changes, green innovation and green opportunities. We believe that our proposals can align with and contribute to CBC's commitment to being carbon neutral by 2050. Crawley and its surrounds have been identified as an area of significant change and growth. Manor Royal is currently responsible for 28% of the town's carbon emissions, our proposals provide an opportunity to expand the Manor Royal Business District in the most sustainable location whilst minimising carbon emissions through good planning and design.</p> <p>14.2 It is recognised that the layout and scale of new development strongly influences reduced energy consumption. We have set out in previous sections the integration of land uses, transport networks and broad connectivity. Opportunities for increased levels of sustainable transport modal share are maximised, walking and cycling is prioritised. Through internal and external links with existing and proposed improvements in association with Manor Royal and the Growth programme improvements, we believe our proposals meet Policy CL3: Movement Patterns, Layout and Sustainable Urban Design.</p> <p>14.3 The Emerging Local Plan sets out actions to reduce emissions from energy use in buildings and the following hierarchy should be adopted by all development in the borough: Be Lean – use less energy Be Clean – improve efficiency of energy supply Be Green – use renewable and low carbon energy sources</p> <p>14.4 The following policies can be met in full as set out below.</p> <p>Strategic Policy SDC1: Sustainable Design and Construction:</p> <ul style="list-style-type: none"> <li>• Building Regulations compliance should achieve the relevant Building Emission Rate (BER) through fabric and energy efficiency measures alone. When preparing the detailed design we will adopt a fabric first design approach.</li> <li>• A Sustainability Statement will be prepared that details measures proposed to minimise the amount of carbon emitted throughout the implementation and construction process and to retain any existing embedded carbon on site. Renewable and low carbon energy technologies will be used including solar PV. This has been explored and agreed with CBC under Building A and further assessment will be undertaken to maximise opportunities across the site.</li> <li>• BREEAM Excellent will be achieved within the Energy and Water categories in line with Adopted and Emerging policies and SPDs.</li> <li>• Measures to cope with temperature extremes/ heatwaves will follow the stated cooling hierarchy.</li> </ul> <p><b>Suggested Modifications:</b></p>

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REP/133	The Planning Bureau Ltd	SDC1	<p>The Council's commitment to meeting both its and the UK Government's target of net zero carbon emissions by 2050 is commendable and detailed at length in the justification to Policy SDC1.</p> <p>The policy climate change mitigation hierarchy advising that the Target Emission Rate (TER) in Building Regulations Part L should be achieved using building fabric and energy efficiencies measure alone (The 'Be Lean' policy component).</p> <p>The 'Be Clean' policy requirement is a requirement to consider and respond to de-centralised energy generation opportunities, as detailed in policy SDC2.</p> <p>Following this there would be a further 19% reduction in the TER below Part L through on-site renewable energy generation via the renewable or low carbon energy technologies (The 'Be Green' policy component).</p> <p>While the benefits of both the 'fabric first' and 'on-site renewables' are detailed in the supporting text to this policy, the rationale behind the requisite target percentages for each method are not. How the reduction in the TER would appear to be of little relevance and it would surely be better for a developer to utilize the method that is best suited to a particular site rather than adhere to a seemingly arbitrary ratio.</p> <p>We note than an allowance of 5% contingency of build costs has been allowed for sustainable design &amp; construction cost in the Crawley Local Plan Review: Whole Plan Policies &amp; Community Infrastructure Levy Viability Assessment (LPVA). This contingency is stretched thin as it is also intended to cover the cost of; achieving 10% biodiversity net gain (GI3); the tree planting requirements (DD4 &amp;g GI3); and, connection to a District Energy Network, or the provision of a site-wide communal energy system (SDC2).</p> <p><b>Suggested Modifications:</b> That the 19% reduction below the Building Regulations 'Part L' Target Emission Rate is achieved by a method the developer deems most appropriate.</p>
REP/035	Vail Williams on behalf of Admore Ltd. June 2021	SDC2	<p>Promotion Statement (June 2021) Policy SDC2: District Energy Networks:</p> <ul style="list-style-type: none"> <li>• It will be demonstrated that the development will be "network ready" i.e. optimally designed to connect to a District Energy Network on construction or at some point after construction. Work to align with the emerging Greening Manor Royal will also be undertaken as the designs evolve towards formal planning applications.</li> </ul> <p><b>Suggested Modifications:</b></p>
REP/035	Vail Williams on behalf of Admore Ltd. June 2021	SDC3	<p>Promotion Statement (June 2021) Policy SDC3: Tacking Water Stress:</p> <ul style="list-style-type: none"> <li>• BREEAM Excellent will be achieved within the Water category recognising that Crawley is in an area of water stress. This will look at low use across the site and reduce and recycle opportunities.</li> </ul>

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			<p>14.5 It should be noted that the above measures are incorporated into the design of Unit A. For this approved and implemented development we have also exceeded cycle and electrical vehicle charging provision, incorporated green walls and sustainable drainage systems (SuDS). The buildings identified in the Illustrative Masterplan proposals can therefore accommodate technological advances and are future proofed.</p> <p>14.6 The new masterplan also enables us to closely work with Manor Royal Business District and its partners, in regard to enhancing and improving opportunities linked to REenergise Manor Royal projects and the Towns Fund projects to enhance the environment of the area.</p> <p>14.7 Full regard will also be had to Emerging and Adopted Supplementary Planning Documents and other local and national requirements including those on Greening the Environment, Climate Change mitigation and adaptation, and biodiversity.</p> <p><b>Suggested Modifications:</b> No modifications required</p>
REP/ 113	Natural England	SDC3	<p>We note that we have previously provided your authority with advice regarding this policy and subsequently, as part of advice in relation to the Habitats Regulations Assessment (HRA) in relation to your Local Plan, including detailed hydrological impacts advice. We are disappointed to see that your previous policy has been weakened by the removal of the following wording: “...A tighter target of 80 litres/person/day should be met for significant, strategic scale developments.”</p> <p><b>Development Sites</b></p> <p>We note that an updated SHELAA will be published as part of the Local Plan submission and will be happy to comment regarding environmental constraints in relation to new allocations within it.</p> <p>The following comments relate to the areas identified as development sites (identified as deliverable and without existing planning permission) on the ‘Crawley Local Plan Map’ and within ‘Policy H2: Key Housing Sites’, where relevant environmental constraints have not been addressed within the constraints outlined in the current SHELAA.</p> <p><u>Forge Wood – Proposed Housing</u></p> <p>It is noted that the majority of the overall neighbourhood of Forge Wood site is already subject to outline planning permission. Constraints in relation to this area as shown on the above map, include a number of public rights of way and areas of deciduous woodland priority habitat, some of which is also ancient woodland.</p> <p><u>Heathy Farm</u> – from the map shown in the latest available SHELAA document, this entire site consists of deciduous woodland priority habitat, about which the National Planning Policy Framework states:  “Habitats and biodiversity  174. To protect and enhance biodiversity and geodiversity, <b>plans should:</b>....</p>

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			<p>b) <b>promote the conservation, restoration and enhancement of priority habitats</b>, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity.”</p> <p>Priority habitat, is that identified on a list, (required by section 41 of the Natural Environment and Rural Communities Act 2006) of habitat type (and living organisms) that are in the Secretary of State’s opinion, of principal importance for the purpose of conserving biodiversity. In addition, these habitat types are identified as being the most threatened and requiring conservation action under the UK Biodiversity Action Plan. We are, therefore, disappointed to see this site being allocated for development.</p> <p><u>Town Centre Housing Sites</u></p> <ul style="list-style-type: none"> <li>• Crawley Station and Car Parks (deliverable) – Public right of way through site.</li> <li>• Cross Keys (developable) – Public right of way along southern boundary.</li> </ul> <p><u>Housing and Open Space Sites</u></p> <ul style="list-style-type: none"> <li>• Henty Close, Bewbush 24 dwellings – This site lies outside of the existing built up area and is in close proximity to the High Weald Area of Outstanding Natural Beauty (AONB). The proposed use of the site for the development of 24 dwellings would need to address any potential impact on the nearby AONB and would need to be in accordance with the requirements of the High Weald AONB’s Management Plan. In addition, there is a public right of way along the site’s western boundary.</li> </ul> <p><u>Housing, Biodiversity and Heritage Site</u></p> <ul style="list-style-type: none"> <li>• Land east of Balcombe Road/Street Hill, Pound Hill (deliverable) 15 dwellings - This site also lies outside of the existing built up area and is in close proximity to the High Weald Area of Outstanding Natural Beauty (AONB). The proposed use of the site for the development of 15 dwellings would need to address any potential impact on the nearby AONB and would need to be in accordance with the requirements of the High Weald AONB’s Management Plan. The site also contains several areas of deciduous woodland priority habitat, for which as outlined above, the NPPF requires that plans provide their conservation, restoration and enhancement. The constraints section in the SHELAA refers to the site also forming part of a Site of Nature Conservation Importance (SNCI). Although Natural England does not hold records of such sites, we advise that the NPPA requires that such sites should be safeguarded: “171. Plans should: ... allocate land with the least environmental or amenity value,...” and “174. To protect and enhance biodiversity and geodiversity, plans should: <p>a) Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity;...”</p> <p><b>Suggested Modifications:</b> (Our suggested modifications are incorporated in the above advice).</p> </li></ul>

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REP/ 055	Savills on behalf of Wilky Group	EP1	<p><b>1.0 Introduction</b></p> <p>1.1 This representation is submitted on behalf of The Wilky Group (TWG), which has a longstanding interest in the promotion of strategic employment land within the Crawley Borough Council (CBC) area. This representation relates to Policy EP1 Development and Flood Risk in the draft Crawley Borough Local Plan, 2021 (DCBLP).</p> <p>1.2 TWG owns about 48 ha (119 acres) of land east of Gatwick Airport. The land has been promoted by TWG as a strategic employment opportunity known as Gatwick Green (the Site). The Site is proposed for allocation as a Strategic Employment Location (SEL) of 47 ha (116 acres) in the DCBLP under Strategic Policy EC4 as a comprehensive industrial-led development of predominantly storage and distribution uses under use class B8.</p> <p>1.3 This representation notes that Policy EP1 is broadly in accordance with the advice in the National Planning Policy Framework (NPPF, 2019) and the Planning Practice Guidance (PPG). It also confirms that Gatwick Green can be masterplanned and designed so as to be in accordance with the key objectives contained in Policy EP1.</p> <p><b>2.0 Policy EP1 – intent of policy and compliance</b></p> <p><b>Intention of the policy</b></p> <p>2.1 The purpose of Policy EP1 is to ensure that development avoids areas that are exposed to flood risk and that could increase the risk of flooding elsewhere.</p> <p>2.2 Development within the Borough must be directed to areas of lowest flood risk, where necessary demonstrated by satisfying the sequential and exceptions tests; ensuring the risks of flooding are mitigated, taking account of climate change, including major development in Flood Zone 1; incorporating SuDS into surface water drainage to manage surface water runoff; avoiding impacts on watercourses, and providing certification of drainage works.</p> <p><b>National planning policy and guidance</b></p> <p>2.3 The NPPF sets out the objectives of the planning system with regard to meeting the challenges of climate change, flooding and coastal change (para 148).</p> <p>2.4 The NPPF is supplemented by more detailed guidance in Planning Practice Guidance (PPG) on flood risk and coastal change (<a href="https://www.gov.uk/guidance/flood-risk-and-coastal-change">https://www.gov.uk/guidance/flood-risk-and-coastal-change</a>). PPG provides more detail on the policy tests to be applied in determining if development is acceptable in flood risk terms. These cover more specific guidance on taking flood risk into account in local planning policy; assessing and avoiding flood risk; managing and mitigating flood risk; the application of the sequential and exceptions tests; the scope of flood risk assessments, and making development safe from flood risk.</p> <p>2.5 It is considered that Policy EP1 provides an appropriate level of local policy control, including the key tests to be met in order to avoid or mitigate flood risk consistent with national planning policy and guidance. The policy has been designed to ensure that these matters are addressed in the planning process – in relation to Gatwick Green, this will include flood and land drainage investigations to inform the preparation of a masterplan and a Flood Risk Assessment</p>

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			<p>and drainage strategy to address provisions ii, iii and iv of the policy. These reports and other design material will support an outline planning application in accordance with the requirements in Strategic Policy EC4.</p> <p><b>3.0 Implications for Gatwick Green</b></p> <p>3.1 The Gatwick Green allocation falls within Flood Zone 1, which means that the risk of fluvial flooding at the Site is less than a 1 in 1,000 year probability and where employment development is considered to be acceptable. In terms of surface water flooding, most of the Site is at very low risk affecting parcels on the west and north parts of the Site – typically in topographically low areas and along the routes of existing minor ditches and drains. These surface water flooding zones do not represent a constraints to the development of the site for at least 24.1 ha or more of employment land, but will require some mitigation measures.</p> <p>3.2 The overall master planning of the Site under Strategic Policy EC4 will need to have regard to the surface water flood zones and any other surface water drainage considerations that arise from more detailed work. These consideration will be taken into account in the design and operation of the proposals for the Site. These will include:</p> <ul style="list-style-type: none"> <li>• Re-profiling and extending the existing ditch system - there will be a requirement to get approvals for any changes to the existing ditches, which will require Land Drainage Consents (LDC).</li> <li>• Based upon micro-drainage quick storage estimates (QSE) and incorporating flood studies report rainfall data, the storage requirement for the whole Site will be around 27,200m<sup>3</sup>.</li> <li>• Drainage infrastructure, including SuDS, would comprise: <ul style="list-style-type: none"> <li>• Tanked permeable pavements.</li> <li>• Dry swales.</li> <li>• Dry basins.</li> <li>• Cellular tanks.</li> <li>• Oversized pipework/culverts.</li> </ul> </li> </ul> <p>3.3 The Appendices to TWG's representation on Policy EC1 of the DCBLP (2020) (2020 Appendices) form part of the Council's evidence base (Consultation appendix 4b: Wilky Group appendices combined). The environmental considerations relating to flood risk and drainage are addressed in the 2020 Appendices and subject to Addenda contained at Appendices 3 – 7 of TWG's representation on Strategic Policy EC4. These Addenda confirm that the original recommendations remain valid in the context of the proposed allocation of Gatwick Green under Strategic Policies EC1 and EC4 and any other changes in circumstances. The Addendum to the original Environmental and Utilities Preliminary Assessment Report (Appendix 3 to representation on Strategic Policy EC4), contains an outline assessment of flood risks and a policy-level drainage strategy, building on the work undertaken in the original report.</p> <p>3.4 The Addendum to the Environmental and Utilities Preliminary Assessment Report confirms that the Site can be developed whilst avoiding flood risk on and off-site, and includes recommendations on appropriate avoidance and</p>

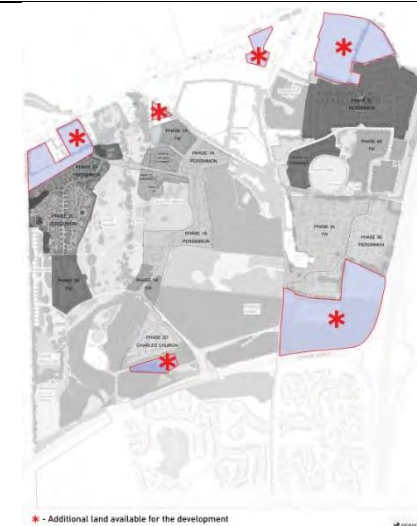
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			<p>mitigation measures. These matters will be addressed at the planning application stage and set out in the Flood Risk Assessment, drainage reports and a Design and Access Statement.</p> <p><b>Suggested Modifications:</b></p> <p><b>4.0 Conclusions</b></p> <p>4.1 TWG acknowledges the need for the Gatwick Green proposals to address flood risk and surface water drainage considerations relating to the Site and referenced in Policy EP1. All feasibility investigations to date indicate that the 24.1ha minimum requirement can be delivered in accordance with these requirements. The masterplan proposals for the Site required under Strategic Policy EC4 will have regard to these considerations in achieving a sustainable and well-designed scheme for the Site.</p> <p>4.2 It is considered that Policy EP1 provides appropriate and proportionate requirements for addressing floor risk and surface water drainage considerations, consistent with national policy. Development at Gatwick Green as allocated in Strategic Policy EC4 will be designed to incorporate appropriate flood risk mitigation measures and will incorporate innovative drainage solutions appropriate for the Site's location in proximity to an airport.</p>
REP/103	Carter Jones LLP on behalf of SGN	EP3	<p><b>Flood Risk</b></p> <p>In reaching a conclusion that Site 73 is unsuitable for housing development, the SHLAA states that the site 'falls within a functional floodplain (Zones 2 and 3) and is likely to be significantly constrained in terms of flooding'.</p> <p>It is acknowledged that this assessment was likely undertaken using the Environment Agency's adopted flood maps for the area, which indicate that Site 73 is predominantly covered by Flood Zone 2, with areas around the banks of Gatwick Stream covered by Flood Zone 3. We note this consultation also publishes the Crawley Borough and Upper Mole Catchment Level 1 Strategic Flood Risk Assessment (SFRA) (September 2020). The SFRA reflects new modelling that has been completed for the Upper Mole Catchment. At Appendix C, Site 73 is deemed to be predominantly within Flood Zone 3a, with areas around the Gatwick Stream contained within Flood Zone 3b. We reserve comment on this information, pending consultation with the Environment Agency.</p> <p>Nevertheless, in both scenarios, it is incorrect to consider the entirety of Site 73 as falling within functional floodplain, when in fact (on the latest modelling) only a small proportion adjacent to the banks of the Gatwick Stream appear to be so. The area is predominantly covered by Flood Zone 3a which is not sufficient grounds to render the principle of residential development unsuitable.</p> <p>A lack of further consideration for Site 73 undermines the Local Plan Review's own sequential approach to site allocation on sites with potential flood risk, as set out in Figure 3-2 of the SFRA below.</p> <p>Through appropriate design we consider that Site 73 could enable the delivery of residential development entirely located within Flood Zone 3a. At Table 2 of PPG on 'Flood Risk and Coastal Change' (Paragraph: 066, Reference ID: 7-066-20140306), residential development is considered a 'more vulnerable' use and can therefore be considered acceptable subject to the completion of a Sequential and Exception Test.</p>

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			<p>As per the requirements of NPPF Paragraph 158, local planning authorities (LPAs) should perform the Sequential Test to steer development to areas with the lowest risk of flooding. Development should not be allocated if there are reasonably available sites appropriate for the proposed development in areas with lower risk of flooding. The Council have highlighted the need to direct development to areas with the lowest flood risk (see Objective 2 of the draft Sustainability Appraisal), but we consider this should be balanced against a significant unmet need of over 6,500 dwellings.</p> <p>In recognition of limited space left for development, and the uncertainty associated with delivering unmet need outside of the Borough's boundary, the location of Site 73 within Flood Zone 3a should not preclude its inclusion as part of the Sequential Test.</p> <p>Given that an allocation would concern residential development (a 'more vulnerable' use), the application of the Exception Test would be required as per the requirements of NPPF Paragraphs 159 &amp; 160. For it to be passed, it should be demonstrated that development would provide wider sustainability benefits to the community that outweigh the flood risk; and the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall. We consider redevelopment would provide wider sustainability benefits to the community through the remediation of contaminated land, reuse of a brownfield land, and the delivery of much needed housing in one of the last remaining areas in the Borough deemed suitable for such development (the Forge Wood neighbourhood). We acknowledge that further strategic investigatory work by the Council and its flood risk consultants would be required to determine whether the second part of the Exceptions Test could be passed.</p> <p>We have made clear above that the Site and wider area forming Site 73 could be designed to avoid development on Flood Zone 3b. Its redevelopment could also present an opportunity to reduce flood risk overall, subject to further investigation. The Council also reserve the right to include conditions as part of a site allocation to ensure constraints are addressed through the development management process.</p> <p><u>Land Contamination</u> The SHLAA site assessment also deems Site 73 unsuitable due to the high likelihood of contaminated land. However, we consider that this should not be a reason to render a site unsuitable in any case.</p> <p>A significant proportion of development found in urban areas is the result of the redevelopment of previously developed land, often industrial in nature. As a landowner of many such sites, this matter is something that SGN are both well equipped to address and have sufficient experience of success delivering. Former gasholders are a reliable source of vacant brownfield land and there are many examples across the country that have been allocated and/or redeveloped for residential development following successful remediation. Redevelopment also presents the added benefit of sites being cleaned up.</p>



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			<p>Nevertheless, Draft Policy EP3 requires development that has the potential to cause land contamination to demonstrate that:</p> <p>a) Adequate measures will be put in place to protect land quality and any receiving water; [and]</p> <p>b) There will be no adverse impacts to occupiers of neighbouring land or the wider environment as a result of the development.</p> <p>Therefore, if the Site and wider assessed area were allocated for residential development, a proposal would still be required to demonstrate that such processes had been completed before planning permission could be granted. This requirement could also be included as a condition of any site allocation to provide further reassurance to the Council.</p> <p><b>Suggested Modifications:</b>  <b>Summary</b>  Despite the Site and wider area assessed (Site 73) in the SHLAA offering a deliverable option to increase housing land supply, the Council have precluded it for reasons that could be mitigated and improved as a result of redevelopment through both the plan-making and development management processes. The Council have also failed to acknowledge their own commentary in the Local Plan Review at paragraph 12.37 which states, “Forge Wood [...] is the last remaining large area of relatively unconstrained land in the borough”.</p> <p>Instead, the Council continue to move forward with a Local Plan Review with a significant unmet housing need and not knowing the full extent of their ability to meet its need elsewhere within the HMA. In this sense, we consider that the Local Plan Review fails to meet all soundness criteria under NPPF Paragraph 35.</p> <p>It is not considered to:</p> <ul style="list-style-type: none"> <li>- provide a strategy which seeks to meet the Council’s objectively assessed need;</li> <li>- take account of reasonable alternatives (e.g. SHLAA sites);</li> <li>- be based on effective joint working on cross-boundary strategic matters than have been adequately dealt with (instead the Statement of Common Ground states, “authorities agree to continue to work positively together to seek to address the future housing needs of the HMA as far as possible); or</li> <li>- enable the delivery of sustainable development in accordance with the policies in the NPPF (e.g. flood mitigation).</li> </ul>
REP/056	Gatwick Airport Limited	EP4	<p>46. We broadly supported Policy EP4 in 2020 Reg19 DCLP. We considered that the policy is correct in its approach of:</p> <p>a) Avoiding noise sensitive development which would be exposed to “unacceptable” levels of noise</p> <p>b) Requiring mitigation measures where noise sensitive development would be exposed to noise levels above the Lowest Observed Adverse Effect Level.</p> <p>47. We are pleased that minor amendments we suggested to the policy have been adopted.</p> <p>48. However, in relation to aviation transport sources we consider the ‘unacceptable level’, defined in part A of the policy specifically for New Sensitive Development as 60dB LAeq (and reflected in Table 1 of the Noise Annex), is not appropriate for reasons stated in paras 9.4 to 9.8 of our previous representations.</p>

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			<p>49. Topic Paper 7 offers a justification of the LAeq 60dB level with reference to a single appeal decision for residential development, located very close to the extended centre line of Manchester Airport's second runway. Given, however, the variety of developments that may be proposed in the Crawley area and their relative position to the runway infrastructure at Gatwick GAL does not consider that it should automatically follow that the LAeq 60dB level be adopted as 'unacceptable' for new noise sensitive development across the borough of Crawley.</p> <p>50. In the 2015 Local Plan the unacceptable level for new housing was set at 66dB LAeq, reflecting planning guidance at that time and decisions on planning applications such as Forge Wood in 2011. With more recent studies showing sensitivity to noise having increased, we consider 63dB LAeq should be taken as the Significant Adverse Effect Level and this should be reflected in Table 1 of the Noise Annex instead of Leq 60dB.</p> <p>51. We support the changes made to correct the Lowest Observed Adverse Effect Level (LOAEL) for aircraft noise is 51dB LAeq, 16 hour and 45dBLAeq, 8 hour night (Consultation Response on UK Aviation Policy: A framework for balanced decisions on the design and use of airspace, October 2017, Section 2 Paragraph 2.72) and the requirement in EP4 to incorporate noise mitigation into new noise sensitive development in areas where noise levels are above this. That mitigation should be developed in line with the Pro-PG Planning and Noise; New Residential Development, as referred to in the Noise Annex.</p> <p><b>Suggested Modifications:</b></p>
REP/063	Pegasus Group	EP4	<p><b>5. DEVELOPMENT AND NOISE</b></p> <p>5.1 Strategic Policy EP4: Development and Noise states that people's quality of life will be protected from unacceptable noise impacts by managing the relationship between noise sensitive development and noise sources.</p> <p>5.2 The four land parcels to the north of Forge Wood have the potential to be affected by existing and possible future noise arising from Gatwick Airport. Nevertheless, we would hope that the Council would be prepared to work towards securing a suitable solution and maximise the potential of Forge Wood neighbourhood area by unlocking other potential land.</p> <p>5.3 Our client is particularly concerned that Policy EP4 states that for aviation transport sources the Unacceptable Adverse Effect is considered to occur where noise exposure is above <u>60dB LAeq, 16hr</u>. (57dB LAeq, 8hr at night). This is a stricter threshold than adopted Policy ENV11 which states that for transport sources, the Unacceptable Adverse Effect is considered to occur where noise exposure is above <u>66dB LAeq, 16hr</u> (57dB LAeq, 8hr at night).</p> <p>5.4 The effect of the change is to suggest that large parts of Forge Wood are not suitable for housing and it puts an even greater constraint on development in Crawley generally.</p>



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			<p>5.5 In light of the unmet housing need Persimmon would urge the LPA to look for more innovative solutions to the (potential future) noise issue to enable more housing to be delivered in and around Forge Wood.</p> <p>5.6 Persimmon are also open to bringing that land forward for employment or other less noise sensitive uses. Pegasus Group would therefore like to highlight the appended parcels of land are suitable and available for a development.</p> <p><b>Suggested Modifications:</b></p>
REP/ 116	Neame Sutton Limited on behalf of Danescroft (RLP Crawley) LLP	EP4 Noise Annex	<p><b>Site-Specific Representations in Relation to Land at Steers Lane, Crawley</b>  <b>Policy EP4, Noise Annex – OBJECT: Unsound</b></p> <p>4.1 At the point of the Regulation 18 consultation stage in September 2019 the Council included Danescroft’s promotion site within the Plan as an allocation for a minimum of 75 no. dwellings.</p> <p>4.2 In the context of the first Regulation 19 consultation the Council had inexplicably removed the site as an allocation albeit that the land remained within the defined urban area on the draft Plan Proposals Map. The only evidence produced by the Council to support its removal if the site as a housing allocation at that time was contained in Strategic Housing Land Availability Assessment (“SHLAA”) (January 2020) wherein the Council concludes the site was not suitable due to the presence of a noise constraint relating to the potential second runway at Gatwick Airport (Page 146 of SHLAA January 2020).</p> <p>4.3 The justification set out in the SHLAA for the removal of the site was based on a revision to the Council’s Noise Annex contained at Page 270 of the draft Plan, which lowered the previously accepted predicted noise level for the proposed second runway from 66 dB down to 60dB. No evidence was presented by the Council to support the change in the noise level that it considered as the threshold for residential development.</p> <p>4.4 The change was particularly odd given that the Council remained of the opinion (as set out in the draft Noise Annex at that time) that 66dB was the appropriate noise level in relation to surface transport. In other words, it was acceptable for a residential proposal to come forward in an area affected by road transport noise up to 66 dB, but not if aviation noise is at 60 dB. This cannot be right.</p> <p>4.5 Since that time Area A of the promotion site has received Outline Consent for up to 185 no. dwellings allowed on Appeal in February 2020 based on 66 dB for aviation noise being the appropriate level to consider. The Council now acknowledges the developability of Area A in this latest Regulation 19 consultation version of the Plan and proposes the allocation of Area A for 185 no. dwellings in draft Policy H2.</p> <p>4.6 All of the above points relate to Area A of the promotion site, which equates to just over half of the area.</p> <p>4.7 The remainder of the land (Area B on the plan attached at Appendix 1) has the capability to deliver up to a further 100 no. dwellings. The only constraint on this land relates to the potential second runway at Gatwick Airport and the consequent impact in terms of noise contours.</p>

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			<p>4.8 Danescroft's acoustic specialists Bickerdike Allen Partners ("BAP") has undertaken a sensitivity check of the Gatwick Airport noise contours having regard to the changes in national aviation policy and in particular the change in appropriate for the future of Gatwick Airport as set out by Gatwick Airport Limited ("GAL") (see Appendix 2).</p> <p>4.9 The sensitivity check prepared by BAP confirmed that the whole of Area B is actually situated outside of the key 66dB contour based on the most likely foreseeable future contour for land use planning i.e. 2028 using the main and standby runways. It is therefore clear that Area B is unconstrained by aviation noise and with no other impediments to development should be released as an allocation for housing in the Local Plan.</p> <p>4.10 Danescroft's acoustic specialists Bickerdike Allen Partners ("BAP") has also undertaken an Acoustic Review with specific reference to draft Policy EP4, which is attached at Appendix 2.</p> <p>4.11 It is clear that, as drafted, Policy EP4 is unsound and requires modification. BAP has set out in detail why the unacceptable daytime noise level proposed by the Council of 60dB is not appropriate and does not reflect the evidence base. 4.12 BAP has set out a recommended modification to the draft Policy to provide a simplified approach to daytime noise levels set at a common threshold of 66 dB and night time levels set at 63 dB<sup>14</sup>.</p> <p>4.13 Without these changes Policy EP4 is unsound because it does not reflect the evidence nor government policy on the matter of aviation noise.</p> <p>4.14 As a consequence of the Council's overly restrictive and flawed approach to aviation noise levels it has failed to properly assess the suitability of Area B for residential development. The opportunity to deliver a further 100 no. dwellings on Area B comprising a mix of open market and affordable homes has therefore been missed by the Council.</p> <p><sup>14</sup> See Table 5 on Page 31 of BAP Acoustic Review in Appendix 2</p> <p>4.15 Area B should therefore be included as land suitable for residential development, particularly in the light of the recent report by the Government's Climate advisors (Climate Change Committee) regarding the future of air travel in the context of the accelerated climate change agenda<sup>15</sup> i.e. no net increase in airport capacity in the UK.</p> <p>4.16 The inclusion of Area B as a housing allocation would enable the Council to deliver up to another 100 no. dwellings (40 no. of which would be affordable) making a valuable contribution to the significant housing needs in the Borough.</p> <p>4.17 Danescroft would welcome the opportunity to work with the Council in relation to the allocation of Area B for housing as part of the emerging Local Plan.</p>

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			<p><b>DRAFT CRAWLEY BOROUGH LOCAL PLAN 2021-2037 POLICY EP4 ACOUSTIC REVIEW</b></p> <p><b>2.0 INTRODUCTION</b></p> <p>2.1.1 Acoustic consultants Bickerdike Allen Partners LLP (BAP) have been appointed by Danescroft Land Limited to carry out a technical review with respect to policy EP4: Development and Noise as set out in the Draft Crawley Borough Local Plan 2021 – 2037 (issued Jan 2021).</p> <p>2.1.2 The review has been prepared by Mr David Trew CEng BEng MIOA. Mr Trew is a Partner at BAP with a BEng (Hons) degree in Engineering Acoustics and Vibration from the Institute of Sound and Vibration Research (ISVR) at the University of Southampton. Mr Trew graduated in 1999 and has worked in acoustic consultancy at BAP for the last 21 years.</p> <p>2.1.3 Danescroft Land Limited (DLL) would welcome a dialogue with Crawley Borough Council (CBC) in order to achieve an appropriate amendment to Draft Policy EP4 in order that it can be made sound.</p> <p><b>3.0 BACKGROUND</b></p> <p>3.1.1 To inform the context of this review DLL is the owner of land between Steers Lane and Balcombe Road in Crawley. BAP were previously involved in a planning application for development on part of this site. The local authority reference was CR/2018/0894/OUT for up to 185 dwellings. The applicant appealed a non-determination from the local authority. The planning inspectorate appeal reference was APP/Q3820/W/19/3236721.</p> <p>3.1.2 This 2018 outline planning application was assessed against the 2015 Crawley Brough Council Local Plan policy ENV11. The planning application was granted consent on appeal. The development complied with the policy on aircraft noise. This adopted a standard of 66 dB LAeq,16h as an upper limit based on a noise contour for Gatwick airport with an additional wide spaced southerly runway.</p> <p>3.1.3 The Draft Local Plan seeks to update and significantly change the local policy with regards to residential development around Gatwick airport by reducing this daytime level to 60 dB LAeq,16h.</p> <p><b>4.0 EXISTING (2015) LOCAL PLAN POLICY ENV11</b></p> <p>4.1.1 The relevant section of the policy is reproduced below.</p> <p>4.1.2 <i>“People’s quality of life will be protected from unacceptable noise impacts by managing the relationship between noise sensitive development and noise sources. To achieve this, Policy ENV11 should be read in conjunction with the Local Plan Noise Annex.</i></p> <p>4.1.3 <i>A. Noise Sensitive Development</i></p> <p>4.1.4 <i>Residential and other noise sensitive development will be permitted where it can be demonstrated that users of the development will not be exposed to unacceptable noise disturbance from existing or future uses.</i></p>

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			<p>4.1.5 <i>Noise sensitive uses proposed in areas that are exposed to significant noise from existing or future industrial, commercial or transport (air, road, rail and mixed) sources will be permitted where it can be demonstrated that appropriate mitigation, through careful planning, layout and design, will be undertaken to ensure that the noise impact for future users will be made acceptable. Proposals that would expose future users of the development to unacceptable noise levels will not be permitted. <b><u>For transport sources, the Unacceptable Adverse Effect is considered to occur where noise exposure is above 66dB LAeq,16hr (57dB LAeq,8hr at night).</u></b></i></p> <p>4.1.6 Noise contours are produced in relation to aircraft noise from the nearby Gatwick Airport. The size of these contours depends on which scenario is being considered. The 2015 local plan noise annex stated the following with regards to noise contours.</p> <p>4.1.7 <i>"All the above levels would include the predicted noise from any proposed or required changes in transportation noise including the potential 2nd wide spaced runway at Gatwick Airport as set out in the 2003 White Paper and any forthcoming replacement policy document. Details of the predicted noise contours associated with a possible wide-spaced second runway at Gatwick Airport are set out in Figure 1 of this Noise Annex, which draws upon the noise contours published by the Civil Aviation Authority (CAA) in their report: ERCD report 0308. Figure 1 of the Noise Annex will be updated should these contours be superseded by subsequent noise contours published by the CAA."</i></p> <p>4.1.8 For application CR/2018/0894/OUT the development was tested against the ERCD 0308 2nd wide spaced runway future contours. These contours were produced by the CAA in 2003 in relation to Central Government Policy work on the Future of Air Transport in a 2003 White Paper for an assessment year of 2030 with 486,000 PATMS (annual passenger air traffic movement). These contours are somewhat dated now with regards to the assumptions used and more recent contours are available consider both a scenario with an additional southern wide spaced second runway as well as Gatwick Airport's preferred option of dual runway operations using the existing "northern" runway as a second runway.</p> <p><b>5.0 DRAFT LOCAL PLAN POLICY EP4</b></p> <p>5.1.1 The January 2021 draft local plan includes the emerging new policy on residential development near to Gatwick airport. This is discussed in detail in January 2021 Topic Paper 7; Development and Noise Technical Appendix. The 2021 draft local plan sets a very different performance standard compared with the existing 2015 local plan both in terms of the contour used and the noise policy adopted. The 2021 draft local policy is broadly consistent with the existing 2015 policy with regards to road and rail noise. However, a significant change is proposed for aircraft noise.</p> <p>5.1.2 Crawley Borough Council's draft planning policy EP4 relates to residential development near to sources of transportation noise. The policy states:</p> <p>5.1.3 <i>"A. Noise Sensitive Development</i></p>

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			<p>5.1.4 Residential and other noise sensitive development will be permitted where it can be demonstrated that users of the development will not be exposed to unacceptable noise impact from existing, temporary or future uses.</p> <p>5.1.5 Noise sensitive uses proposed in areas that are exposed to noise above the Lowest Observed Adverse Effect Level (LOAEL) or at the Significant Observed Adverse Effect Level (SOAEL) from existing or future industrial, commercial or transport (air, road, rail and mixed) sources will be permitted where it can be demonstrated good acoustic design has been considered early in the planning process, and that all appropriate mitigation, through careful planning, layout and design, will be undertaken to ensure that the noise impact for future users will be made acceptable. Noise sensitive uses proposed in areas that are exposed to noise at the Unacceptable Adverse Effect level will not be permitted.</p> <p>5.1.6 For surface transport noise sources, the Unacceptable Adverse Effect Level is considered to occur where noise exposure is above 66dB LAeq,16hr (57dB LAeq,8hr at night).</p> <p>5.1.7 For aviation transport sources the Unacceptable Adverse Effect is considered to occur where noise exposure is above 60dB LAeq,16hr. (57dB LAeq,8hr at night)."</p> <p>5.1.8 The draft Annex states the following with regards to noise contours:</p> <p>5.1.9 "All the above levels would include the predicted noise from any proposed or required changes in transportation noise including the potential additional southern wide spaced runway at Gatwick Airport, for which land is required to be safeguarded in the 2013 Aviation Policy Framework. Details of the predicted noise contours associated with a possible wide-spaced southern runway at Gatwick Airport are set out in Figure 1 of this Noise Annex, which shows the noise contours identified in Plan 31 of the Gatwick Airport Master Plan 2019 (Air Noise Map – Additional Runway – Summer Day - 2040). Planning applications for noise sensitive development will be considered on the basis of these noise contours. Figure 1 of the Noise Annex will be updated by the council should these contours be superseded by subsequent noise contours published by Gatwick Airport and approved by the CAA."</p> <p>5.1.10 The 2013 Aviation Policy Framework has since been updated by the Airports National Policy Statement: new runway capacity and infrastructure at airports in the South East of England, 2018. This National Policy Statement from Central Government found that an additional runway was needed in the south east by 2030. This additional runway should be at Heathrow, not Gatwick.</p> <p>5.1.11 This noise policy is inconsistent with current national planning policy and technical guidance on aviation and noise. This is discussed in more detail below.</p> <p>5.1.12 The draft local plan now refers to a more recent contour (published in 2014 and again in 2019). This is still for the worst-case scenario of Gatwick operating with a additional southern wide spaced runway. However, this contour has</p>

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			<p>been produced with more recent assumptions regarding aircraft type/fleet mix and is more representative than the old 2003 ERCD 0308 contours.</p> <p>5.1.13 The use of a future noise contour assuming a second southerly wide spaced new runway at Gatwick airport is very much a precautionary approach to the assessment of potential noise effects on the health and wellbeing of future residents. Current central Government policy on aviation supports a new additional runway at Heathrow, not Gatwick. Gatwick airport is currently pursuing a planning application to use their existing northern standby runway as a permanent 2nd dual runway.</p> <p><b>6.0 TEST OF SOUNDNESS</b></p> <p>6.1.1 The National Planning Policy Framework (NPPF) (2019) establishes the meaning of “soundness” in relation to Local Plans at paragraph 35:</p> <p>6.1.2 <i>“Local plans and spatial development strategies are examined to assess whether they have been prepared in accordance with legal and procedural requirements, and whether they are sound. Plans are ‘sound’ if they are: Positively prepared – providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs (Where this relates to housing, such needs should be assessed using a clear and justified method, as set out in paragraph 60 of this Framework); and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development; Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence; Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework.”</i></p> <p>6.1.3 The following assessment considers Draft Policy EP4 within the context of NPPF paragraph 35. BAP do not consider draft policy EP4 (and the supporting noise annex) to be sound in its present form, although we believe that with appropriate minor modification it can be made so.</p> <p><b>7.0 RELEVANT NATIONAL POLICY</b></p> <p><u>7.1 National Planning Policy Framework 2019 (NPPF)</u></p> <p>7.1.1 The National Planning Policy Framework (NPPF) sets out the Government’s planning policies for England and how these are expected to be applied. With regards to environmental noise assessment the NPPF states that</p> <p>7.1.2 <i>‘170. Planning policies and decisions should contribute to and enhance the natural and local environment by: ...</i></p>



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			<p>7.1.3 e) <i>preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans; ...</i></p> <p>7.1.4 180. <i>Planning policies and decisions should also ensure that new development is appropriate for its location taking to account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development. In doing so they should:</i></p> <p>7.1.5 <i>Mitigate and reduce to a minimum potential adverse impacts resulting from noise from new development – and avoid noise giving rise to significant adverse impacts on health and the quality of life (Explanatory Note to the Noise Policy Statement for England, Department for Environment, Food &amp; Rural Affairs, 2010.);</i></p> <p>7.1.6 <i>Identify and protect tranquil areas which have remained relatively undisturbed by noise and are prized for their recreational and amenity value for this reason; and</i></p> <p>7.1.7 <i>Limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation....</i></p> <p>7.1.8 ...182 <i>Planning policies and decisions should ensure that new development can be integrated effectively with existing businesses and community facilities (such as places of worship, pubs, music venues and sports clubs). Existing businesses and facilities should not have unreasonable restrictions placed on them as a result of development permitted after they were established. Where the operation of an existing business or community facility could have a significant adverse effect on new development (including changes of use) in its vicinity, the applicant (or ‘agent of change’) should be required to provide suitable mitigation before the development has been completed.”</i></p> <p>7.1.9 In paragraph 170, the NPPF guards against “unacceptable risk” and “unacceptable levels” of noise pollution. This is considered later in the context of the national planning practice guidance.</p> <p>7.1.10 Paragraph 180 refers to two situations in which there are impacts arising from noise, those that are potentially “adverse”, where the advice is to “mitigate and reduce to a minimum”, and those that may give rise to significant adverse impacts on health and the quality of life, where the advice is to “avoid”. Given the footnote reference (and the dates of the documents, both of which are extant), it must be taken that the Government intends the NPPF to be read together with the Noise Policy Statement for England, as well as the associated national planning practice guidance.</p> <p>7.1.11 With regards to the use of planning conditions Para 54 states</p>

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			<p>7.1.12 <i>“Local planning authorities should consider whether otherwise unacceptable development could be made acceptable through the use of conditions or planning obligations. Planning obligations should only be used where it is not possible to address unacceptable impacts through a planning condition.”</i></p> <p><u>7.2 Noise Policy Statement for England (NPSE)</u></p> <p>7.2.1 The Noise Policy Statement for England (NPSE) provides the framework for noise management decisions to be made that ensure noise levels do not place an unacceptable burden on society.</p> <p>7.2.2 The stated aims of the NPSE are to:</p> <p>7.2.3 <i>‘Avoid significant adverse impacts on health and quality of life from environmental, neighbour and neighbourhood noise within the context of Government policy on sustainable development;</i></p> <p>7.2.4 <i>Mitigate and minimise adverse impacts on health and quality of life from environmental, neighbour and neighbourhood noise within the context of Government policy on sustainable development; and</i></p> <p>7.2.5 <i>Where possible, contribute to the improvement of health and quality of life through the effective management and control of environmental, neighbour and neighbourhood noise within the context of Government policy on sustainable development.’</i></p> <p>7.2.6 In the explanatory note, various important concepts are introduced (paragraph 2.20):</p> <p>7.2.7 NOEL – no observed effect level <i>“This is the level below which no effect can be detected. In simple terms, below this level there is no detectable effect on health and quality of life due to the noise”.</i></p> <p>7.2.8 LOAEL – lowest observed adverse effect level (referred to below as “LOAEL”) <i>“This is the level above which adverse effects on health and quality of life can be detected.”</i></p> <p>7.2.9 SOAEL – significant observed adverse effect level (referred to below as “SOAEL”) <i>“This is the level above which significant adverse effects on health and quality of life occur.”</i></p> <p>7.2.10 The category levels are tied in with the NPSE’s aims as follows:</p> <p>7.2.11 <i>“2.23 The first aim of the NPSE states that significant adverse effects on health and quality of life should be avoided while also taking into account the guiding principles of sustainable development (paragraph 1.8).“</i></p> <p>7.2.12 <i>“2.24 The second aim of the NPSE refers to the situation where the impact lies somewhere between LOAEL and SOAEL. It requires that all reasonable steps should be taken to mitigate and minimise adverse effects on health and quality of life while also taking into account the guiding principles of sustainable development (paragraph 1.8). This does not mean that such adverse effects cannot occur.”</i></p>

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			<p>7.2.13 "2.25 This [third] aim seeks, where possible, positively to improve health and quality of life through the pro-active management of noise while also taking into account the guiding principles of sustainable development (paragraph 1.8), recognising that there will be opportunities for such measures to be taken and that they will deliver potential benefits to society. The protection of quiet places and quiet times as well as the enhancement of the acoustic environment will assist with delivering this aim."</p> <p>7.2.14 The NPSE does not identify specific noise based measures which define each category, saying that there is "no single objective noise-based measure that defines SOAEL that is applicable to all sources in all situations" (see NPSE paragraph 2.22). The Government acknowledges that there is emerging evidence as to the long term direct health effects of noise and explains its intention to keep research on the health effects of long term exposure to noise under review (NPSE paragraph 2.14)</p> <p><u>7.3 Planning Practice Guidance Noise PPG(N) 2019</u></p> <p>7.3.1 On 6 March 2014, the Department for Communities and Local Government (DCLG) launched a web-based resource providing planning practice guidance to assist local authorities in local planning matters. Guidance on noise is provided in a separate guidance note reference ID30. The advice was last updated on 22nd July 2019.</p> <p>7.3.2 PPG(N) provides guidance on how to determine the noise impact, advising that local planning authorities should take account of the acoustic environment and in so doing consider: • whether or not a significant adverse effect is occurring or likely to occur; • whether or not an adverse effect is occurring or likely to occur; and • whether or not a good standard of amenity can be achieved.</p> <p>7.3.3 It states that in line with the Explanatory Note of the Noise Policy Statement for England, this would include identifying whether the overall effect of the noise exposure is, or would be, above or below the "significant observed adverse effect level" and the "lowest observed adverse effect level for a given situation. These boundary levels are described in the guidance as follows:-</p> <ul style="list-style-type: none"> <li>• Significant observed adverse effect level: This is the level of noise exposure above which significant adverse effects on health and quality of life occur.</li> <li>• Lowest observed adverse effect level: this is the level of noise exposure above which adverse effects on health and quality of life can be detected.</li> <li>• No observed effect level: this is the level of noise exposure below which no effect at all on health or quality of life can be detected.</li> </ul> <p>7.3.4 Guidance was provided on how to recognise when noise could be a concern. It explains that when noise is not noticeable, there is by definition no effect. As the noise exposure increases, it can slightly affect the acoustic character of an area but not to the extent there is a perceived change in quality of life. At this noise exposure level, no specific noise mitigation measures are required. As the exposure increases further, the lowest observed adverse effect level boundary is crossed. The noise starts to have an adverse effect and consideration needs to be given to mitigating and</p>

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			<p>minimising those effects (taking account of the economic and social benefits being derived from the activity causing the noise).</p> <p>7.3.5 The guidance advises that above the significant observed adverse effect level boundary, the planning process should be used to avoid this effect occurring, by use of appropriate mitigation such as by altering the design and layout. Such decisions must be made taking account of the economic and social benefit of the activity causing the noise, but it is undesirable for such exposure to be caused.</p> <p>7.3.6 At the highest extreme, noise exposure would cause extensive and sustained changes in behaviour without an ability to mitigate the effect of noise. The impacts on health and quality of life are such that regardless of the benefits of the activity causing the noise, this situation should be prevented from occurring.</p> <p>7.3.7 Guidance on an interpretation of these boundaries is given below, based on the likely average response.</p>

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			Perception	Examples of Outcome	Increasing Effect Level	Action
			Not present	No effect	No Observed Effect	No specific measures required
			Present and not intrusive	Noise can be heard, but does not cause any change in behaviour, attitude or other physiological response. Can slightly affect the acoustic character of the area but not such that there is a change in the quality of life.	No Observed Adverse Effect	No specific measures required
					Lowest Observed Adverse Effect Level	
			Present and intrusive	Noise can be heard and causes small changes in behaviour and/or attitude, e.g. turning up volume of television; speaking more loudly; where there is no alternative ventilation, having to close windows for some of the time because of the noise. Potential for some reported sleep disturbance. Affects the acoustic character of the area such that there is a perceived change in the quality of life.	Observed Adverse Effect	Mitigate and reduce to a minimum
					Significant Observed Adverse Effect Level	
			Present and disruptive	The noise causes a material change in behaviour, attitude or other physiological response, e.g. avoiding certain activities during periods of intrusion; where there is no alternative ventilation, having to keep windows closed most of the time because of the noise. Potential for sleep disturbance resulting in difficulty in getting to sleep, premature awakening and difficulty in getting back to sleep. Quality of life diminished due to change in acoustic character of the area.	Significant Observed Adverse Effect	Avoid
			Present and very disruptive	Extensive and regular changes in behaviour, attitude or other physiological response, and/or an inability to mitigate effect of noise leading to psychological stress or physiological effects, e.g. regular sleep deprivation/awakening; loss of appetite, significant, medically definable harm, e.g. auditory and non-auditory	Unacceptable Adverse Effect	Prevent

**Table 1 -2019 Planning Policy Guidance on noise**

7.3.8 PPGN also advises “The following documents published by other organisations may be of assistance:

- BS 8233:2014– Guidance on sound insulation and noise reduction for buildings (British Standards Institute 2014);
- Guidelines for Environmental Noise Impact Assessment (Institute of Environmental Management and Assessment, 2014);

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			<ul style="list-style-type: none"> <li>• <i>ProPG: Planning &amp; Noise – Professional Practice Guidance on Planning &amp; Noise- New Residential Development (Association of Noise Consultants, Institute of Acoustics and Chartered Institute of Environmental Health, May 2017).</i></li> </ul> <p>7.3.9 <i>Some of these documents contain numerical criteria. These values are not to be regarded as fixed thresholds and as outcomes that have to be achieved in every circumstance.”</i></p> <p><u>7.4 2017 CAP 1506</u></p> <p>7.4.1 The Civil Aviation Authority regularly publish technical guidance on the assessment of aviation noise. One recent document was CAP 1506 published by the Policy Programmes Team Survey of noise attitudes 2014: Aircraft.</p> <p>7.4.2 Historically the 57 dB LAeq,16 value associated with the onset of significant community annoyance was based on the 1985 UK Aircraft Noise Index Study (ANIS). The 57dB LAeq,16h contour was chosen as the threshold of community annoyance because it ‘indicated a marked increase in some reported measures of disturbance’, with 63 and 69dB LAeq,16h representing medium and high annoyance and subsequently incorporated into planning policy guidance. The 69 dB LAeq,16h high annoyance value is considered by many to represent the Unacceptable Adverse Noise Level.</p> <p>7.4.3 In the UK there were two more recent studies. The first was the Attitudes to Noise from Aviation Sources in England (ANASE) study in 2001. The second was the Survey of Noise Attitudes (SoNA) 2014. Both the ANASE study and the SoNA study suggested that people were more annoyed for the same “dose” of noise compared with the 1985 ANIS study. This can be seen in the table below.</p> <table border="1"> <thead> <tr> <th rowspan="2">Average summer day noise exposure, LAeq,16h (dB)</th> <th rowspan="2">Annoyance descriptors (ATWP)</th> <th colspan="2">% highly annoyed</th> </tr> <tr> <th>ANIS 1982</th> <th>SoNA 2014</th> </tr> </thead> <tbody> <tr> <td>51</td> <td></td> <td>3%</td> <td>7%</td> </tr> <tr> <td>54</td> <td></td> <td>5%</td> <td>9%</td> </tr> <tr> <td>57</td> <td>Onset of significant community annoyance</td> <td>9%</td> <td>13%</td> </tr> <tr> <td>60</td> <td></td> <td>14%</td> <td>17%</td> </tr> <tr> <td>63</td> <td>Medium annoyance</td> <td>23%</td> <td>23%</td> </tr> <tr> <td>66</td> <td></td> <td>34%</td> <td>31%</td> </tr> <tr> <td>69</td> <td>High annoyance</td> <td>48%</td> <td>39%</td> </tr> </tbody> </table> <p><small>Table 2 - Percentage highly annoyed as a function average summer day noise exposure, LAeq,16h</small></p> <p>7.4.4 One key point from the above comparison is that if 9% of the population high annoyed is considered to be the “onset” of community annoyance this value should now be 54 dB LAeq,16h rather than 57 dB LAeq,16h.</p>	Average summer day noise exposure, LAeq,16h (dB)	Annoyance descriptors (ATWP)	% highly annoyed		ANIS 1982	SoNA 2014	51		3%	7%	54		5%	9%	57	Onset of significant community annoyance	9%	13%	60		14%	17%	63	Medium annoyance	23%	23%	66		34%	31%	69	High annoyance	48%	39%
Average summer day noise exposure, LAeq,16h (dB)	Annoyance descriptors (ATWP)	% highly annoyed																																			
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69	High annoyance	48%	39%																																		

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			<p>7.4.5 Another key point is that those exposed to 63 dB LAeq,16h “medium” levels of aircraft noise are no more sensitive in 2014 than in 1982. T 7.4.6 those exposed to “high” levels of noise this population would appear significantly less annoyed compared to 1982. This may be due to the benefits of sound insulation schemes offered by airports to treat existing residential properties exposed to higher levels of aircraft noise.</p> <p><u>7.5 ProPG 2017</u></p> <p>7.5.1 Professional Practice Guidance on Planning &amp; Noise (ProPG) is an industry guidance document referenced by central government policy guidance on noise. It was overseen by a Working Group consisting of representatives of the Association of Noise Consultants (ANC), Institute of Acoustics (IOA) and Chartered Institute of Environmental Health (CIEH), together with practitioners from a planning and local authority background. The project was jointly supported by the ANC, IOA and CIEH. The document provides guidance on how to assess the management of noise within the planning system.</p> <p>7.5.2 The document advocates the use of a two stage system to assess sites. The first is a simple “initial assessment”. The second stage is a more detailed assessment including;</p> <ul style="list-style-type: none"> <li>• Good acoustic design</li> <li>• Internal noise level guidelines, i.e. recommended noise standards inside dwellings.</li> <li>• External amenity area assessment, i.e. assessment of noise impact in gardens and communal amenity area.</li> <li>• Consideration of “other relevant issues”</li> </ul> <p>7.5.3 The guidance for the initial assessment is provided in Figure 1.</p>

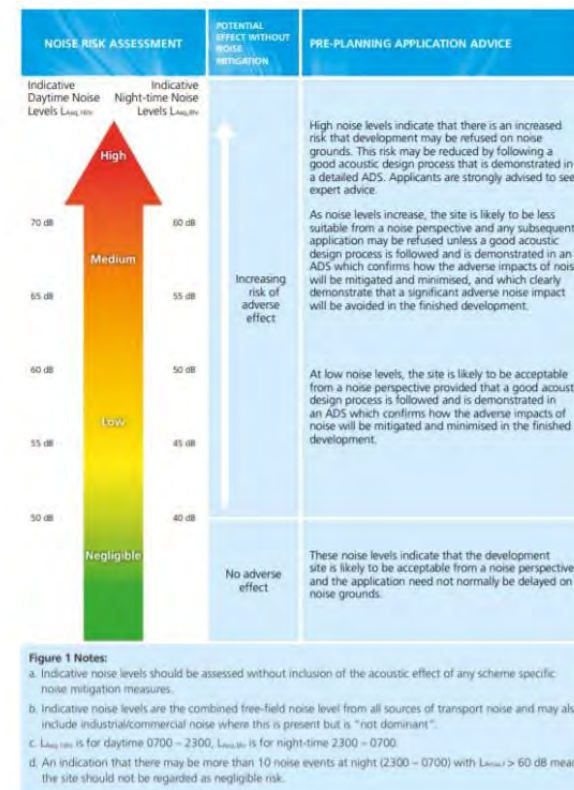


Figure 1 - Stage 1 - Initial Site Noise Risk Assessment

Figure 1 - Extract from ProPG

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ACTIVITY	LOCATION	07:00 – 23:00 HRS	23:00 – 07:00 HRS
Resting	Living room	35 dB $L_{Aeq,16hr}$	-
Dining	Dining room/area	40 dB $L_{Aeq,16hr}$	-
Sleeping (daytime resting)	Bedroom	35 dB $L_{Aeq,16hr}$	30 dB $L_{Aeq,8hr}$ 45 dB $L_{Amax}$ (Note 4)

*NOTE 1 The Table provides recommended internal  $L_{Aeq}$  target levels for overall noise in the design of a building. These are the sum total of structure-borne and airborne noise sources. Ground-borne noise is assessed separately and is not included as part of these targets, as human response to ground-borne noise varies with many factors such as level, character, timing, occupant expectation and sensitivity.*

*NOTE 2 The internal  $L_{Aeq}$  target levels shown in the Table are based on the existing guidelines issued by the WHO and assume normal diurnal fluctuations in external noise. In cases where local conditions do not follow a typical diurnal pattern, for example on a road serving a port with high levels of traffic at certain times of the night, an appropriate alternative period, e.g. 1 hour, may be used, but the level should be selected to ensure consistency with the internal  $L_{Aeq}$  target levels recommended in the Table.*

*NOTE 3 These internal  $L_{Aeq}$  target levels are based on annual average data and do not have to be achieved in all circumstances. For example, it is normal to exclude occasional events, such as fireworks night or New Year's Eve.*

*NOTE 4 Regular individual noise events (for example, scheduled aircraft or passing trains) can cause sleep disturbance. A guideline value may be set in terms of SEL or  $L_{Amax,5s}$  depending on the character and number of events per night. Sporadic noise events could require separate values. In most circumstances in noise-sensitive rooms at night (e.g. bedrooms) good acoustic design can be used so that individual noise events do not normally exceed 45dB  $L_{Amax,5s}$  more than 10 times a night. However, where it is not reasonably practicable to achieve this guideline then the judgement of acceptability will depend not only on the maximum noise levels but also on factors such as the source, number, distribution, predictability and regularity of noise events (see Appendix A).*

*NOTE 5 Designing the site layout and the dwellings so that the internal target levels can be achieved with open windows in as many properties as possible demonstrates good acoustic design. Where it is not possible to meet internal target levels with windows open, internal noise levels can be assessed with windows closed, however any façade openings used to provide whole dwelling ventilation (e.g. trickle ventilators) should be assessed in the "open" position and, in this scenario, the internal  $L_{Aeq}$  target levels should not normally be exceeded, subject to the further advice in Note 7.*

*NOTE 6 Attention is drawn to the requirements of the Building Regulations.*

*NOTE 7 Where development is considered necessary or desirable, despite external noise levels above WHO guidelines, the internal  $L_{Aeq}$  target levels may be relaxed by up to 5 dB and reasonable internal conditions still achieved. The more often internal  $L_{Aeq}$  levels start to exceed the internal  $L_{Aeq}$  target levels by more than 5 dB, the more that most people are likely to regard them as "unreasonable". Where such exceedances are predicted, applicants should be required to show how the relevant number of rooms affected has been kept to a minimum. Once internal  $L_{Aeq}$  levels exceed the target levels by more than 10 dB, they are highly likely to be regarded as "unacceptable" by most people, particularly if such levels occur more than occasionally. Every effort should be made to avoid relevant rooms experiencing "unacceptable" noise levels at all and where such levels are likely to occur frequently, the development should be prevented in its proposed form (see Section 3.D).*

Figure 2. ProPG Internal Noise Level Guidelines (additions to BS8233:2014 shown in blue)

**Figure 2 - Extract from ProPG internal noise levels**

7.5.4 A second Stage assessment requires an assessment of internal noise levels. These are almost verbatim the same guidelines within industry standard BS 8233:2014. The only difference being that a guideline for individual noise events or noise maxima is included.

7.5.5 The ProPG provided guideline internal noise levels at which noise is considered "unacceptable". These levels are 10 dB LAeq,16h higher than the BS8233:2014 "desirable" internal noise levels.

7.5.6 Guidance on external noise levels in amenity spaces is provided in the ProPG. This is reproduced below.

"Element 3 – External Amenity Area Noise Assessment  
3(i) "If external amenity spaces are an intrinsic part of the overall design, the acoustic environment of those spaces should be considered so that they can be enjoyed as intended".

3(ii) "The acoustic environment of external amenity areas that are an intrinsic part of the overall design should always be assessed and noise levels should ideally not be above the range 50 – 55 dB LAeq,16hr."

3(iii) "These guideline values may not be achievable in all circumstances where development might be desirable. In such a situation, development should be designed to achieve the lowest practicable noise levels in these external amenity spaces."



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			<p>3(iv) Whether or not external amenity spaces are an intrinsic part of the overall design, consideration of the need to provide access to a quiet or relatively quiet external amenity space forms part of a good acoustic design process.</p> <p>3(v) Where, despite following a good acoustic design process, significant adverse noise impacts remain on any private external amenity space (e.g. garden or balcony) then that impact may be partially off-set if the residents are provided, through the design of the development or the planning process, with access to</p> <ul style="list-style-type: none"> <li>• a relatively quiet facade (containing openable windows to habitable rooms) or a relatively quiet externally ventilated space (i.e. an enclosed balcony) as part of their dwelling; and/or</li> <li>• a relatively quiet alternative or additional external amenity space for sole use by a household, (e.g. a garden, roof garden or large open balcony in a different, protected, location); and/or</li> <li>• a relatively quiet, protected, nearby, external amenity space for sole use by a limited group of residents as part of the amenity of their dwellings; and/or</li> <li>• a relatively quiet, protected, publicly accessible, external amenity space (e.g. a public park or a local green space designated because of its tranquillity) that is nearby (e.g. within a 5 minutes walking distance). The local planning authority could link such provision to the definition and management of Quiet Areas under the Environmental Noise Regulations.”</li> </ul> <p>The 4th element of a “Stage 2” assessment needs to include:  “2: Element 4 – Assessment of Other Relevant Issues  4(i) compliance with relevant national and local policy  4(ii) magnitude and extent of compliance with ProPG  4(iii) likely occupants of the development  4(iv) acoustic design v unintended adverse consequences  4(v) acoustic design v wider planning objectives”</p> <p>7.5.7 Further commentary and examples can be found within the ProPG document of these scenarios.</p> <p><u>7.6 2013 Aviation Policy Framework</u>  7.6.1 Central government policy on aviation noise was published in 2013 and is reproduced below.</p> <p>7.6.2 “Policy objective 3.12</p> <p>7.6.3 The Government’s overall policy on aviation noise is to limit and, where possible, reduce the number of people in the UK significantly affected by aircraft noise, as part of a policy of sharing benefits of noise reduction with industry.</p> <p>7.6.4 3.13 This is consistent with the Government’s Noise Policy, as set out in the Noise Policy Statement for England (NPSE)93 which aims to avoid significant adverse impacts on health and quality of life.</p>

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			<p>7.6.5 3.14 <i>Although there is some evidence that people’s sensitivity to aircraft noise appears to have increased in recent years, there are still large uncertainties around the precise change in relationship between annoyance and the exposure to aircraft noise. There is evidence that there are people who consider themselves annoyed by aircraft noise who live some distance from an airport in locations where aircraft are at relatively high altitudes. Conversely, some people living closer to an airport seem to be tolerant of such noise</i></p> <p>7.6.6 3.15 <i>To provide historic continuity, the Government will continue to ensure that noise exposure maps are produced for the noise-designated airports on an annual basis providing results down to a level of 57dB LAeq 16 hour.<sup>94</sup> To improve monitoring of the specific impact of night noise, we will also ensure that separate night noise contours for the eight-hour night period (11pm–7am) are produced for the designated airports.</i></p> <p>7.6.7 3.16 <i>This does not preclude airports from producing results to a lower level or using other indicators to describe the noise impact of their operations, as appropriate (see paragraph 3.19 below). Some airports already map noise exposure to lower levels every five years under European legislation and we encourage those that routinely produce such contours on a voluntary basis to continue to do so, as a means of facilitating improved monitoring, transparency and communication of the impact of aircraft noise. Other airports which have significant night operations may also wish to produce separate night noise contours on a regular basis.</i></p> <p>7.6.8 3.17 <i>We will continue to treat the 57dB LAeq 16 hour contour as the average level of daytime aircraft noise marking the approximate onset of significant community annoyance. However, this does not mean that all people within this contour will experience significant adverse effects from aircraft noise. Nor does it mean that no-one outside of this contour will consider themselves annoyed by aircraft noise.</i></p> <p>7.6.9 3.18 <i>The Airports Commission has also recognised that there is no firm consensus on the way to measure the noise impacts of aviation and has stated that this is an issue on which it will carry out further detailed work and public engagement. We will keep our policy under review in the light of any new emerging evidence.</i></p> <p>7.6.10 3.19 <i>Average noise exposure contours are a well-established measure of annoyance and are important to show historic trends in total noise around airports. However, the Government recognises that people do not experience noise in an averaged manner and that the value of the LAeq indicator does not necessarily reflect all aspects of the perception of aircraft noise. For this reason we recommend that average noise contours should not be the only measure used when airports seek to explain how locations under flight paths are affected by aircraft noise. Instead the Government encourages airport operators to use alternative measures which better reflect how aircraft noise is experienced in different localities, developing these measures in consultation with their consultative committee and local communities. The objective should be to ensure a better understanding of noise impacts and to inform the development of targeted noise mitigation measures.”</i></p>

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			<p>7.6.11 This 57 dB level does not differentiate between sound levels inside a home or noise levels within amenity spaces such as gardens, balconies or terraces.</p> <p>7.6.12 Also addition policy on Land-use planning and management is reproduced below.</p> <p>7.6.13 3.20 <i>Chapter 5 explains the status of the Aviation Policy Framework and its interaction with existing planning guidance and policies. Land-use planning and management is one of the elements of the ICAO balanced approach which should be explored when tackling noise problems at an airport. In line with the Government's noise policy, the Government's National Planning Policy Framework (NPPF) says that planning policies and decisions should aim to avoid a situation where noise gives rise to significant adverse impacts on health and quality of life as a result of new development, and to mitigate and reduce to a minimum other adverse impacts on health and quality of life arising from noise from new development, including through the use of conditions.</i></p> <p>7.6.14 3.21 <i>The NPPF expects local planning policies and decisions to ensure that new development is appropriate for its location and the effects of pollution – including noise – on health, the natural environment or general amenity are taken into account. This does not rule out noise-sensitive development in locations that experience aircraft noise. In the same way that some people consider themselves annoyed by aircraft noise even though they live some distance from an airport in locations where aircraft are at relatively high altitudes, other people living closer to an airport seem to be tolerant of aircraft noise and may choose to live closer to the airport to be near to employment or to benefit from the travel opportunities.</i></p> <p>7.6.15 3.22 <i>There can also be other good economic or social reasons for noises sensitive developments to be located in such areas. However, reflecting Government noise policy, the NPPF is quite clear that the planning system should prevent new development being put at unacceptable risk from, or being adversely affected by, unacceptable levels of noise pollution. Local planning authorities therefore have a responsibility to ensure that the land use element of the balanced approach is implemented in the context of their local plan policies, including any on noise. People considering moving to an area which may be affected by existing aircraft noise also have a responsibility to inform themselves of the likely impacts before moving to the area, and airport operators should ensure that all necessary information to inform such decisions is easily accessible.</i></p> <p>7.6.16 3.23 <i>Results from the 2011 Census show a general increase in population density. Consequently, within some noise contours around airports, the number of people has increased regardless of any change in noise. The Government will therefore take into account the trends in populations within the contours when monitoring the effectiveness of its overall policy on aviation noise."</i></p> <p><u>7.7 Aviation 2050 (2018)</u></p> <p>7.7.1 The publication of the Aviation 2050 document in December 2018, represents the third (and final) stage in the consultation process underpinning the publication of the Government's new national aviation strategy. As far as noise compensation/insulation matters are concerned, there is a current proposal to extend the noise insulation policy</p>

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threshold to beyond the current 63 dB LAeq,16hour contour to 60 dB LAeq,16 hour. This does not mean that 60 dB LAeq 16 hours would be SOAEL, but rather it indicates that such a reduction would be in line with the policy requirement to mitigate and minimise. It is not known whether that proposal will remain in the final version of the strategy.

7.8 BS 8233: 2014

7.8.1 The British Standard BS 8233: 2014 “Sound insulation and noise reduction for buildings – Code of practice” provides guidance on the control of external noise and is a revision of its 1987 (and later 1999) predecessor. The standard presents a number of design ranges for indoor noise levels in spaces when they are unoccupied. These are presented in Table 3.

Activity	Location	07:00 to 23:00	23:00 to 07:00
Resting	Living room	35 dB LAeq,16hour	-
Dining	Dining room/area	40 dB LAeq,16hour	-
Sleeping (daytime)	Bedroom	35 dB LAeq,16hour	30 dB LAeq,8hour

Table 3 – Indoor ambient noise levels for dwellings

**NOTE**

Regular individual noise events (for example, scheduled aircraft or passing trains) can cause sleep disturbance. A guideline value may be set in terms of SEL or LAFmax , depending on the character and number of events per night. Sporadic noise events could require separate values.

7.8.2 The withdrawn 1999 version of BS 8233 included a guideline for noise maxima at night. “For a reasonable standard in bedrooms at night, individual noise events (measured with F timeweighting) should not normally exceed 45 dB LA,max”. This was consistent with the 1999 World Health Organisation Publication Guidelines for Community Noise. The current 2014 document does not provide a guideline value. In our experience the 45 dB LAF,max criterion is still a desirable level not to be exceeded for “regular” events. The definition of regular is subjective with different professionals taking different approaches. The World Health Organisation Guidelines referred to 10-15 events per night and this is frequently taken as a test for “regular” events.

7.8.3 With regards to gardens and external amenity spaces the current standard advises that:

7.8.4 *“For traditional external areas that are used for amenity space, such as gardens and patios, it is desirable that the external noise level does not exceed 50 dB LAeq,T, with an upper guideline value of 55 dB LAeq,T which would be acceptable in noisier environments. However, it is also recognized that these guideline values are not achievable in all circumstances where development might be desirable. In higher noise areas, such as city centres or urban areas adjoining the strategic transport network, a compromise between elevated noise levels and other factors, such as the convenience of living in these locations or making efficient use of land resources to ensure development needs can be*

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			<p><i>met, might be warranted. In such a situation, development should be designed to achieve the lowest practicable levels in these external amenity spaces, but should not be prohibited.</i></p> <p><i>7.8.5 Other locations, such as balconies, roof gardens and terraces, are also important in residential buildings where normal external amenity space might be limited or not available, i.e. in flats, apartment blocks, etc. In these locations, specification of noise limits is not necessarily appropriate. Small balconies may be included for uses such as drying washing or growing pot plants, and noise limits should not be necessary for these uses. However, the general guidance on noise in amenity space is still appropriate for larger balconies, roof gardens and terraces, which might be intended to be used for relaxation. In high-noise areas, consideration should be given to protecting these areas by screening or building design to achieve the lowest practicable levels. Achieving levels of 55 dB LAeq,T or less might not be possible at the outer edge of these areas, but should be achievable in some areas of the space.”</i></p> <p><i>7.8.6 The British Standard advises that “If relying on closed windows to meet the guide values, there needs to be an appropriate alternative ventilation that does not compromise the façade insulation or the resulting noise level. If applicable, any room should have adequate ventilation (e.g. trickle ventilators should be open) during assessment.”</i></p> <p><i>7.8.7 Also “Where development is considered necessary or desirable, despite external noise levels above WHO guidelines, the internal target levels may be relaxed by up to 5 dB and reasonable internal conditions still achieved.”</i></p> <p><b>8.0 COMMENTARY ON DRAFT POLICY EP4</b></p> <p><i>8.1.1 Against the background of the policy and guidance framework set out above, and BAP’s expert views as to its application in this case, Danescroft’s more specific representations on draft Policy EP4 are now set out. For the reasons given below, the policy incorrectly sets the level of UAEL. As it is currently worded, it is not consistent with Government policy or guidance, nor is it justified by evidence. Accordingly, it cannot be regarded as sound.</i></p> <p><u>8.2 Draft Policy EP4: Development and noise</u></p> <p><i>8.2.1 “A. Noise sensitive development</i>  <i>Residential and other noise sensitive development will be permitted where it can be demonstrated that users of the development will not be exposed to unacceptable noise impact from existing, temporary or future uses. Noise sensitive uses proposed in areas that are exposed to noise above the Lowest Observed Adverse Effect Level (LOAEL) or at the Significant Observed Adverse Effect Level (SOAEL) from existing or future industrial, commercial or transport (air, road, rail and mixed) sources will be permitted where it can be demonstrated good acoustic design has been considered early in the planning process, and that all appropriate mitigation, through careful planning, layout and design, will be undertaken to ensure that the noise impact for future users will be made acceptable. Noise sensitive uses proposed in areas that are exposed to noise at the Unacceptable Adverse Effect level will not be permitted. For surface transport noise sources, the Unacceptable Adverse Effect Level is considered to occur where noise exposure is above 66dB LAeq,16hr (57dB LAeq,8hr at night). For aviation transport sources the Unacceptable Adverse Effect is considered to occur where noise exposure is above 60dB LAeq,16hr. (57dB LAeq,8hr at night).”</i></p>

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			<p>8.2.2 A summary of all noise exposure hierarchy categories as given in the Crawley Local Plan Noise Annex is provided below in Table 4.</p> <table border="1"> <thead> <tr> <th>Descriptor</th> <th>Daytime (07:00-23:00) threshold</th> <th>Night time (23:00-07:00) threshold</th> </tr> </thead> <tbody> <tr> <td>NOAEL</td> <td>&lt;51dB L<sub>Aeq,16hr</sub> &lt;65dB L<sub>AFmax</sub></td> <td>&lt;45dB L<sub>Aeq,8hr</sub> &lt;60dB L<sub>AFmax</sub></td> </tr> <tr> <td>LOAEL</td> <td>51dB L<sub>Aeq,16hr</sub> 65dB L<sub>AFmax</sub></td> <td>45dB L<sub>Aeq,8hr</sub> 60dB L<sub>AFmax</sub></td> </tr> <tr> <td>SOAEL</td> <td>For surface transport sources, between 55dB and 66dB L<sub>Aeq,16hr</sub> (54dB to 60dB L<sub>Aeq,16hr</sub> for aviation transport sources)  65dB to 82dB L<sub>AFmax</sub></td> <td>Between 48dB and 57dB L<sub>Aeq,8hr</sub>  60dB to 82dB L<sub>AFmax</sub></td> </tr> <tr> <td>UAEL</td> <td>For surface transport sources 66dB L<sub>Aeq,16hr</sub> For aviation transport sources 60dB L<sub>Aeq,16hr</sub></td> <td>57dB L<sub>Aeq,8hr</sub></td> </tr> </tbody> </table> <p><b>Table 4: Summary of noise exposure hierarchy (Local Plan Noise Annex)</b></p> <p>8.2.3 BAP agree with the almost all of the above policy. The principals of the policy follow current central government policy set out within NPPF, NPSE and PPG(N). The policy above also refers to “good acoustic design”. This design principle is described in the industry guidance document ProPG : Planning &amp; Noise – New Residential Development.</p> <p>8.2.4 The policy defines thresholds and guidelines to the various noise descriptors from PPG(N). This approach is reasonable although, consistent with central government guidance, these should be considered as guidelines rather than hard limits that that have to be achieved in every circumstance.</p> <p>8.2.5 The area where BAP consider that the above policy is not consistent with national policy is the definition of the Unacceptable Adverse Effect Level for aviation noise as 60 dB LAeq,16h daytime and 57 dB LAeq,8h at night.</p> <p>8.2.6 Central government planning guidance defines the unacceptable level as present and very disruptive and provides examples of outcomes as “Extensive and regular changes in behaviour, attitude or other physiological response and/or</p>	Descriptor	Daytime (07:00-23:00) threshold	Night time (23:00-07:00) threshold	NOAEL	<51dB L <sub>Aeq,16hr</sub> <65dB L <sub>AFmax</sub>	<45dB L <sub>Aeq,8hr</sub> <60dB L <sub>AFmax</sub>	LOAEL	51dB L <sub>Aeq,16hr</sub> 65dB L <sub>AFmax</sub>	45dB L <sub>Aeq,8hr</sub> 60dB L <sub>AFmax</sub>	SOAEL	For surface transport sources, between 55dB and 66dB L <sub>Aeq,16hr</sub> (54dB to 60dB L <sub>Aeq,16hr</sub> for aviation transport sources)  65dB to 82dB L <sub>AFmax</sub>	Between 48dB and 57dB L <sub>Aeq,8hr</sub>  60dB to 82dB L <sub>AFmax</sub>	UAEL	For surface transport sources 66dB L <sub>Aeq,16hr</sub> For aviation transport sources 60dB L <sub>Aeq,16hr</sub>	57dB L <sub>Aeq,8hr</sub>
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			<p>an inability to mitigate effect of noise leading to psychological stress, e.g. regular sleep deprivation/awakening; loss of appetite, significant, medically definable harm, e.g. auditory and non-auditory.”</p> <p>8.2.7 One objective method of defining this unacceptable level is to define where there is an inability to mitigate the adverse effects of noise. For the Heathrow Airport third runway DCO application preliminary environmental information report (PEIR) the daytime unacceptable level was set at a level of 71 dB LAeq,16h. This was based on local (London Borough of Richmond SPD guidance and the ProPG) which provided a benchmark for unacceptable internal conditions as 10 dB LAeq,T above recommended BS 8233: 2014 indoor ambient noise levels.</p> <p>8.2.8 The ethos here was that BS 8233: 2014 recommends a “desirable” internal noise level of 35 dB LAeq,16h, this would become unacceptable at 45 dB LAeq,16h. Allowing a nominal 26 dB level difference for a standard dwelling with no additional noise mitigation this would correspond to an external aircraft noise level of 71 dB LAeq,16h. This approach is suitable when Heathrow’s consultants are assessing the impact of aviation noise on existing residential properties. The same procedure is used for the night time UAEL to provide a threshold of 66 dB LAeq,8h. This, in our opinion, it is not suitable for Crawley where we are looking at the impact on new residential development near to the airport. Indeed the Richmond SPD (London Borough of Richmond - Development Control for Noise Generating and Noise Sensitive Development, 2018) provides a guideline (not a limit) that “high” noise levels occur at around &gt;69 dB LAeq,16h during the day which “indicate that there is an increased risk that development may be refused on noise grounds”. The Richmond night time “high” level is &gt;60 dB LAeq,8h.</p> <p>8.2.9 Another method to define the unacceptable adverse effect level is to consider other airport infrastructure planning applications where airport operators have assessed noise effects on existing residential communities and this assessment has been tested at local planning application, DCO application or appeal.</p> <p>8.2.10 Bickerdike Allen are regularly involved in assessing aviation noise impacts both for airport operators and for developers who are looking to develop sites affected by aviation noise. Historically we have adopted an unacceptable guideline of &gt;69 dB LAeq,16h. This is based on the Aviation Policy Framework policy for where the Government expects airport operators to offer households assistance with the costs of moving.</p> <p>8.2.11 A night time UAEL 63 dB LAeq,8h is consistently used across many recent airport infrastructure development applications (Stansted/Bristol/Luton). Some recent airport applications did not adopt a night-time unacceptable level (London City/Manston).</p> <p>8.2.12 The above guidelines do not consider the mitigation options available to developers of new dwellings. An existing dwelling near Gatwick airport built many years ago with standard double glazed windows and conventional slot or trickle ventilators will provide a reduction in aircraft noise of approximately 25 dB. A new build dwelling built near the airport can be designed with suitable high performance glazing and ventilation to ensure adequate internal noise conditions and provide a simple reduction in external noise of 35 dB or more.</p>

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			<p>8.2.13 As a result the daytime level at which there is an “inability to mitigate effect of noise” is around &gt;70 dB LAeq,16h during the daytime and &gt;65 dB LAeq,8h at night. These levels are broadly consistent with currently used and accepted UAEL guidelines used around airports.</p> <p>8.2.14 Usefully, Crawley have provided a policy paper to explain their preferred standard of 60 dB LAeq,16h (Crawley Borough Local Plan Topic Paper 7: Development and Noise Technical Appendix (Jan 2021)) to defined UAEL. The document references recent airport infrastructure projects (London City Airport 69 dB LAeq,16h UAEL, Cranford Agreement Secretary of State’s Decision, February 201 UAEL 69 dB LAeq,16h). But the topic paper relies on a 2015 planning application and subsequent planning appeal for a residential development in a small village in Cheshire East near Manchester Airport PP/R0660/W/15/3027388. This decision was based on the fact that external noise levels in gardens would exceed desirable guidelines. The following quote is provided.</p> <p>8.2.15 “The external noise environment would not be positive but would have a significant adverse impact on the quality of life of future residents. Whilst noting that an acceptable internal acoustic environment would technically be achievable, the sealed box solution would further detract from future residents’ quality of life and is an additional factor weighing against permission.”</p> <p>8.2.16 This decision was unusual. Dwellings do not need to be designed as a “sealed box” to mitigate against external noise. There are many parts of Crawley exposed to external noise form the M23 motorway, A roads such as the A2011 &amp; A220, railway lines and aircraft noise. Dwellings in these locations can and have been designed to meet suitable internal noise levels but do not require anything to be sealed closed. In fact both the existing and proposed new noise policy annex require that dwellings should not be sealed to mitigate the effects of transportation noise.</p> <p>8.2.17 The decision was also unusual by implying that residential development should be refused on the basis of external noise levels in gardens. This conflicts with current guidance (BS 8233: 2014 and ProPG)</p> <p>8.2.18 “For traditional external areas that are used for amenity space, such as gardens and patios, it is desirable that the external noise level does not exceed 50 dB LAeq,T, with an upper guideline value of 55 dB LAeq,T which would be acceptable in noisier environments. However, it is also recognized that these guideline values are not achievable in all circumstances where development might be desirable. In higher noise areas, such as city centres or urban areas adjoining the strategic transport network, a compromise between elevated noise levels and other factors, such as the convenience of living in these locations or making efficient use of land resources to ensure development needs can be met, might be warranted. In such a situation, development should be designed to achieve the lowest practicable levels in these external amenity spaces, but should not be prohibited.”</p> <p>8.2.19 There were many other residential developments near Manchester airport exposed to noise levels greater than 60 dB LAeq,16h. Unfortunately details of all of these applications were not available to the planning inspector at the inquiry. 8.2.20 The above planning application was determined by Cheshire East Council (CEC). This council has recently closed a consultation on their own development policies including a detailed objective policy on aircraft noise</p>



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			<p>ENV13. This policy defines a SOAEL as 63 dB LAeq,16h and but does not define what level becomes unacceptable. Residential development is permissible up to 63 dB LAeq,16h with a policy recommendation that noise levels in gardens should be designed to achieve the lowest practicable levels.</p> <p><b>9.0 SUMMARY</b></p> <p>9.1.1 The principles of the draft noise policy and associated noise annex generally follow central government policy, planning policy guidance and technical guidance relevant to environmental noise assessment. However the identification of 60 dB LAeq is an unacceptable daytime noise level for aircraft is not consistent.</p> <p>9.1.2 BAP have presented some minor modifications to the proposed policy. BAP would be pleased to work with the council if there are any queries regarding the suggested minor modifications.</p> <p><b>Suggested Modifications:</b></p> <p><b>5.0 Areas Where Changes are Required for Plan to be Legally Compliant and Sound</b></p> <p>5.1 As set out in Section 2 of these representations the Plan is currently not legally compliant.</p> <p>5.2 The Council therefore needs to rectify the significant deficiencies in the Plan's evidence base, particularly in relation to DtC, and then restart the Regulation 19 consultation stage for a third time. This is essential to ensure that the Plan does not fail at the Examination stage.</p> <p>5.3 As part of addressing the significant deficiencies in the Plan's evidence base the following key changes are required to the Plan for it to be made Sound:</p> <ul style="list-style-type: none"> <li>• Revise draft Policy EP4 to reflect the recommendations in the BAP Report attached at Appendix 2 of these Representations;</li> </ul> <p><b>8.3 Recommended Policy EP4: Development and noise</b></p> <p>8.3.1 BAP recommend the following modifications to policy EP4 to make it sound and consistent with current policy. Suggested changes are in blue underline. BAP consider that the Unacceptable Adverse Effect level for aircraft noise should be 69 dB LAeq,16h during the daytime. However, this conflicts with the current local plan policy and would provide a different guideline to that for road and rail. BAP there consider that having a simpler noise exposure hierarchy as suggested below would address this issue. BAP have also added some minor modifications as noise standards in local plans should not be applied as rigid thresholds, as specific circumstances may justify some variation being allowed (PPG(N) Paragraph: 007 Reference ID: 30-007-20190722).</p> <p>8.3.2 "A. <i>Noise sensitive development</i>  <i>Residential and other noise sensitive development will be permitted where it can be demonstrated that users of the development will not normally be exposed to unacceptable noise impact from existing, temporary or future uses. Noise sensitive uses proposed in areas that are exposed to noise above the Lowest Observed Adverse Effect Level (LOAEL) or at the Significant Observed Adverse Effect Level (SOAEL) from existing or future industrial, commercial or transport (air, road, rail and mixed) sources will be permitted where it can be demonstrated good acoustic design has been</i></p>

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			<p><i>considered early in the planning process, and that all appropriate mitigation, through careful planning, layout and design, will be undertaken to ensure that the noise impact for future users will be made acceptable. Noise sensitive uses proposed in areas that are exposed to noise at the Unacceptable Adverse Effect level will not normally be permitted. For surface transport noise sources, the Unacceptable Adverse Effect Level is considered to occur where noise exposure is above 66dB LAeq,16hr (63dB LAeq,8hr at night). For aviation transport sources the Unacceptable Adverse Effect is considered to occur where noise exposure is above 66dB LAeq,16hr. (63dB LAeq,8hr at night)."</i></p> <p>8.3.3 A summary of all noise exposure hierarchy categories as given in the Crawley Local Plan Noise Annex is provided below in Table 4.</p> <table border="1" data-bbox="622 568 1317 874"> <thead> <tr> <th data-bbox="622 568 857 632">Descriptor</th> <th data-bbox="857 568 1104 632">Daytime (07:00-23:00) threshold</th> <th data-bbox="1104 568 1317 632">Night time (23:00-07:00) threshold</th> </tr> </thead> <tbody> <tr> <td data-bbox="622 632 857 695">NOAEL</td> <td data-bbox="857 632 1104 695">&lt;51dB LAeq,16hr &lt;65dB LAfmax</td> <td data-bbox="1104 632 1317 695">&lt;45dB LAeq,8hr &lt;60dB LAfmax</td> </tr> <tr> <td data-bbox="622 695 857 759">LOAEL</td> <td data-bbox="857 695 1104 759">51dB LAeq,16hr 65dB LAfmax</td> <td data-bbox="1104 695 1317 759">45dB LAeq,8hr 60dB LAfmax</td> </tr> <tr> <td data-bbox="622 759 857 839">SOAEL</td> <td data-bbox="857 759 1104 839">51dB to 66dB LAeq,16hr 65dB to 82dB LAfmax</td> <td data-bbox="1104 759 1317 839">45dB to 63dB LAeq,8hr<sup>1</sup> 60dB to 82dB LAfmax</td> </tr> <tr> <td data-bbox="622 839 857 874">UAEL</td> <td data-bbox="857 839 1104 874">≥66dB LAeq,16hr</td> <td data-bbox="1104 839 1317 874">≥63dB LAeq,8hr</td> </tr> </tbody> </table> <p><small>Table 5: Summary of noise exposure hierarchy (Local Plan Noise Annex)</small></p> <p><small><sup>1</sup>Where noise maxima regularly exceed 60 dB LAf,max suitable mitigation will be required to meet internal noise standards as defined within the Noise Annex.</small></p>	Descriptor	Daytime (07:00-23:00) threshold	Night time (23:00-07:00) threshold	NOAEL	<51dB LAeq,16hr <65dB LAfmax	<45dB LAeq,8hr <60dB LAfmax	LOAEL	51dB LAeq,16hr 65dB LAfmax	45dB LAeq,8hr 60dB LAfmax	SOAEL	51dB to 66dB LAeq,16hr 65dB to 82dB LAfmax	45dB to 63dB LAeq,8hr <sup>1</sup> 60dB to 82dB LAfmax	UAEL	≥66dB LAeq,16hr	≥63dB LAeq,8hr
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REP/ 123	Barton Willmore on behalf of The Sogno Family Trust	EP4	<p><b>Policy EP4: Development and Noise</b></p> <p>4.17 Policy EP4 states that noise sensitive uses in areas that are exposed to Unacceptable Adverse Effect Levels (as defined in the Noise Annex) will not be supported. However, for lower levels of noise, mitigation can be applied to make development acceptable.</p> <p>4.18 The above policy relies upon the PPG24 (Planning and Noise), which has been revoked, to define acceptable locations for development, prior to any consideration of mitigation. Given the shortfall in housing accommodated within the borough, it is not justified for the policy to define the noise levels (pre-mitigation) where development will be supported.</p> <p>4.19 Indeed, the supporting text provides more flexibility than the policy, which undermines the strict approach to this policy. Rather, the acceptability of a location for development in relation to neighbouring noise generating uses should be determined at application stage, based on evidence of mitigation which can be achieved to maintain amenity for residents.</p>															

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			<p>4.20 Therefore, in order for the policy to be found sound, flexible to accommodate progress in technology across the plan period, and not unduly restrictive, we recommend removal of reference to acceptable noise levels for development, and reference instead to the requirement for a Noise Impact Assessment to demonstrate how a development would be acceptable, taking account of existing surrounding noise sources (i.e. the agent of change).</p> <p><b>Suggested Modifications:</b></p>
REP/068	Sussex Wildlife Trust	EP6	<p>SWT is concerned that this policy does not reflect the need to consider the impact of light pollution on Biodiversity as required by section 180 of the NPPF. It is possible that bullet point 2 of the policy indeed has the potential to cause negative impacts for wildlife or causes uncertainty. This is because it states:</p> <p>2) The means of lighting would be unobtrusively sited or well screened by landscaping or other site features;</p> <p>It could be that the landscape features are actually being utilised by light sensitive species including bats and as such using the features could impact on their role in terms of connectivity and function for biodiversity.</p> <p>Considering the policy does not address impacts to biodiversity from light pollution we suggest that it does not comply with 180 of the NPPF.</p> <p><b>Suggested Modifications:</b></p> <p>We proposed an amended or additional bullet point to address this within the policy and make it sound. CBC could include:</p> <ul style="list-style-type: none"> <li>• ensure outdoor lighting is well designed; low impact; efficient; the minimum necessary with an appropriate balance between intensity, fittings, height and structures; and, not cause unacceptable detriment to public and highway safety, biodiversity, in particular priority habitat and species.</li> </ul>

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REP/035 (Jun 21)	Vail Williams on behalf of Ardmore/ Windsor Land Consortium	Chpt 17	<p><b><i>Additional Comments to Chapter Seventeen: Sustainable Transport Modal shift, and mobility strategy themes</i></b></p> <p>A vital element of the Jersey Farm development will be its Mobility Strategy, which will be an overarching strategy for the whole development. The Strategy will focus on all transport users and travel modes, and will be developed in conjunction with the highway and planning authorities, as well as a number of other stakeholders including the Manor Royal Business Improvement District and Metrobus.</p> <p>We have already engaged with West Sussex County Council Highways, Manor Royal BID, and Metrobus, and will continue to do so through the next steps of the planning process. The Project team are closely working with WSCC on other local schemes and have experience of bus viability studies, Statements of Common Ground, and mobility strategies to support their partnership working approach with key stakeholders, which in this location would be the CBC Sustainability Manager, MRBG and WSCC.</p> <p>The Jersey Farm site has direct access to the existing network of pedestrian footways and road crossings within the County Oak and Manor Royal areas, and therefore has ready-made pedestrian connections between the site and the surrounding areas, including residential areas and other employment / retail land uses.</p> <p>It is within a 2KM walking commute of the residential areas of Langley Green, Ifield, and West Green, comprising a resident population of approximately 17,000 within walking distance. It is also within 2km of the whole of the Manor Royal area and Northgate.</p> <p>The 5km cycling catchment for Jersey Farm includes the majority of Crawley to the south and southeast, all of Gatwick Airport, and the southern portion of Horley, to the north. This comprises a total resident population of approximately 120,000 within cycling distance.</p> <p>With direct access to the existing network of pedestrian and cycle routes and infrastructure within Manor Royal and wider Crawley, there are real opportunities for future employees and visitors to travel by active modes.</p> <p>The closest bus stops to the Jersey Farm site are adjacent to the site's eastern boundary and are served by regular and frequent buses on Routes 4 and 5, and the 100 Fastway service. These provide a total of seven buses per hour during the peak periods.</p> <p>The Crawley Growth Programme includes a number of schemes in Manor Royal close to the Jersey Farm site, to provide improvements to the pedestrian infrastructure and environment, which aim to promote sustainable travel.</p> <p>Additionally, Crawley has been successful in its bid for £21.1m from the Towns Deal, which will be invested in improvements to the public realm and improvements in active travel, particularly in the Manor Royal area, over the period to 2022-2026. This will help to make walking, cycling, and bus travel more attractive and popular, which will facilitate the aim of reducing reliance on car travel to/from Jersey Farm.</p>

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			<p><b>Vehicle Access Strategy</b></p> <p>Our illustrative Masterplan indicates that the development can initially be accessed via County Oak Way. The quantum of this development will be dictated by the available capacity of the junction of County Oak Way and the A23 London Road, which will be determined from traffic modelling in conjunction with CBC's transport consultants and WSCC, which is ongoing at the time of writing, and will form further representations, hence the holding representation. This is due to the short time afforded to undertake additional modelling using the Strategic Modelling Data which we have only recently received.</p> <p>The remainder of the development will be accessed from the east via a proposed new road and junction with the A23 London Road, north of the A23 Fleming Way Roundabout.</p> <p><b>Pre app with WSCC</b></p> <p>We are engaged in pre-application consultation with WSCC Highways, and their advice will be incorporated into the Jersey Farm proposals as they develop; further traffic and transport assessment work will be undertaken to refine the proposed access arrangements as those discussions progress.</p> <p><b>Suggested Modifications:</b></p>
REP/011	Highways England	ST1	<p>Thank you for your consultation on the Draft Crawley Local Plan Regulation 19 Consultation seeking Highways England's comments by 30<sup>th</sup> June.</p> <p>Highways England has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the strategic road network (SRN). The SRN is a critical national asset and as such Highways England works to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity. Highways England will be concerned with plans and/or proposals that have the potential to impact on the safe and efficient operation of the SRN. In the case of the Crawley Local Plan our focus will be on any potential impact to the M23 and A23 Trunk Roads.</p> <p>Highways England is continuing to work with officers from Crawley Borough Council, their consultants Stantec and West Sussex County Council to agree the Transport Study supporting the Local Plan. Whilst good progress has been made there is still further work to be undertaken before Highways England can agree that the plan is sound in relation to its potential impacts on the safe and efficient operation of the M23 and A23 Trunk Roads. This was set out in our attached email of 17<sup>th</sup> June 2021.</p> <p>We will also continue to work with Crawley Borough Council to develop a Statement of Common Ground on highways matters between ourselves, the council and West Sussex County Council prior to submission of the Local Plan Examination. The Statement can be amended as more matters are agreed between us.</p> <p>I trust that the above comments are of assistance.</p> <p><b>Suggested Modifications:</b></p>

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REP/055	Savills on behalf of Wilky Group	ST1	<p><b>1.0 Introduction</b></p> <p><b>Background</b></p> <p>1.1 This representation is submitted on behalf of the Wilky Group (TWG), which has a longstanding interest in the promotion of strategic employment land within the Crawley Borough Council (CBC) area. This representation relates to Strategic Policy ST1 Development and Requirements for Sustainable Transport in the draft Crawley Borough Local Plan, 2021 (DCBLP).</p> <p>1.2 TWG owns about 48 ha (119 acres) of land east of Gatwick Airport as shown the plan at <b>Appendix 1</b>. The land has been promoted by TWG as a strategic employment opportunity known as Gatwick Green (the Site). The Site is proposed for allocation as a Strategic Employment Location (SEL) of 47 ha (116 acres) in the DCBLP under Strategic Policy EC4 as a comprehensive industrial-led development of predominantly storage and distribution uses under use class B8. The extent of the SEL allocation is identified on the plan at <b>Appendix 1</b>.</p> <p><b>Scope of representation</b></p> <p>1.3 This representation sets out the evidence in support of the Crawley Transport Strategy (New Directions for Crawley, Transport and access for the 21st century, Crawley Borough Council, January 2020 and paras 2.52-2.54 of DCBLP) and Strategic Policy ST1 with reference to:</p> <ul style="list-style-type: none"> <li>• National and Regional planning and transport policy.</li> <li>• Local transport strategies - Highway and Planning Authorities.</li> <li>• How Strategic Policy ST1 supports sustainable development within Crawley.</li> <li>• How Gatwick Green is aligned with the principles behind the Council's strategy and policies on transport, including Strategic Policy ST1.</li> </ul> <p><b>2.0 Direction of National / Regional Transport Policy</b></p> <p>2.1 The National Planning Policy Framework, (NPPF) confirms the purpose of the planning system is to contribute to the achievement of sustainable development.</p> <p>2.2 Paragraph 102 of Section 9 of the NPPF sets out that transport issues should be considered from the earliest stages of plan-making and development proposals, so that:</p> <ol style="list-style-type: none"> <li>1. The potential impacts of development on transport networks can be addressed.</li> <li>2. Opportunities from existing or proposed transport infrastructure, and changing transport technology and usage, are realised – for example in relation to the scale, location or density of development that can be accommodated.</li> <li>3. Opportunities to promote walking, cycling and public transport use are identified and pursued.</li> <li>4. The environmental impacts of traffic and transport infrastructure can be identified, assessed and taken into account – including appropriate opportunities for avoiding and mitigating any adverse effects, and for net environmental gains.</li> <li>5. Patterns of movement, streets, parking and other transport considerations are integral to the design of schemes and contribute to making high quality places.</li> </ol>

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			<p>2.3 Paragraph 103 confirms this approach, stating that:  <i>“The planning system should actively manage patterns of growth in support of these objectives. Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions and improve air quality and public health. However, opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and this should be taken into account in both planmaking and decision-making.”</i></p> <p>2.4 The report titled Gear Change – A bold vision for walking and cycling (DfT – July 2020), sets out the Government’s ambition for a future where half of all journeys in towns and cities are cycled or walked. With 58% of car journeys in 2018 being under 5 miles, and in urban areas, more than 40% of journeys being under 2 miles in 2017–18, many people would be able to walk or cycle to their destination.</p> <p>2.5 The report provides nine key pledges to increase the level of walking and cycling, including:</p> <ul style="list-style-type: none"> <li>• The delivery of thousands of miles of safe, continuous, direct routes for cycling in towns and cities, physically separated from pedestrians and volume motor traffic, serving the places that people want to go.</li> <li>• Creating cycle, bus and walking corridors, closing a limited number of main roads to through traffic except for buses and access.</li> <li>• Reducing rat-runs and delivering “school streets” which protect children.</li> <li>• Improve the National Cycle Network, with higher design standards and creating more “Mini-Hollands”.</li> </ul> <p>2.6 Transport for South East, (TfSE) comment in the introduction to their Transport Strategy published in 2020 that such strategies were typically devised on a “predict and provide” basis, with planners making forecasts about future transport demand based on past trends and investment focused on expanding capacity on road and rail networks.</p> <p>2.7 The TfSE approach, (Transport Strategy, June 2020) going forward is to decide on the future people want for the region and plan a transport system that helps make it happen, putting people and places first, rather than vehicles. The vision stated in the TfSE strategy is that:</p> <ul style="list-style-type: none"> <li>• By 2050, the South East of England will be a leading global region for net-zero carbon, sustainable economic growth where integrated transport, digital and energy networks have delivered a step change in connectivity and environmental quality; and</li> <li>• A high-quality, reliable, safe and accessible transport network will offer seamless door-to-door journeys enabling our businesses to compete and trade more effectively in the global marketplace and giving our residents and visitors the highest quality of life.</li> </ul> <p><b>3.0 Crawley’s Transport Strategy</b></p> <p>3.2 The Vision that Crawley Borough Council is proposing for transport and travel was clearly stated in the publication of a draft policy document in January 2020 entitled ‘New Directions for Crawley’. The introductory section states that</p>

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			<p>“Crawley Borough Council aims to join those in the forefront of new thinking on transport and access to find sustainable solutions for Crawley”</p> <p>3.3 The means by which CBC will deliver its vision is set out on page 11 of New Directions, (January 2020), as follows: <i>“In the light of the climate emergency, health needs, developing technology, new policies and approaches for Crawley and the south-east as well as studies and experience across Europe, CBC aims to work in partnership with WSCC to meet the following aims:</i></p> <ol style="list-style-type: none"> <li>1. <i>Improved sustainable travel infrastructure – prioritise walking and cycling network improvements and facilities, improving public transport access and services.</i></li> <li>2. <i>Smarter highway network management – managing demand, directions, speeds and inefficient road space allocation to address congestion and improve access and health of neighbourhoods and business districts.</i></li> <li>3. <i>Integrated transport and land use planning – ensure housing and business development centres on public transport links and walking and cycling networks as ‘Transit Oriented Development’ for improved access.</i></li> <li>4. <i>Effective travel planning – working with business and other organisations to improve commuter, visitor, shopping and leisure choices and reduce single-occupancy car use.</i></li> <li>5. <i>Shared mobility – develop facilities such as car clubs and shared bikes, with electric vehicle charging to broaden choices beyond conventional private car use”.</i></li> </ol> <p>3.4 It is recognised that the strategy and policies enshrined in the Draft Crawley Borough Local Plan (DCBLP) 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. The Plan states at paragraph 2.52: <i>“The emerging Crawley Transport Strategy seeks to identify opportunities for Crawley for developing a more attractive and practical transport infrastructure that works for everyone, whether or not they drive and whether or not they are able-bodied, and will look at developing access to work, education, shopping and leisure that is easier, more affordable and healthier.”</i></p> <p>3.5 Crawley has a record of delivering genuine improvements in public transport through Fastway, which has helped achieve a shift from car to bus travel. It is also clear that recent sustainable transport measures proposed and under development as part of the Coast to Capital Growth Fund are an extension of a local commitment to innovation in transport. This includes significant investment in hydrogen powered buses with zero emissions. The DCBLP (para 2.39 to 2.41) sets out that:</p> <ul style="list-style-type: none"> <li>• Crawley has excellent communications, lying adjacent to the M23, close to the M25 and is on the main railway line linking London to the south coast. Gatwick Airport is located within the borough.</li> <li>• The town itself is served by a rapid guided bus service: Fastway, which provides attractive and effective public transport services, which are essential to facilitate and encourage a shift to sustainable modes of transport.</li> <li>• There is a network of green corridors, providing attractive pedestrian and cycle routes through the neighbourhoods and into the town centre and out into the countryside.</li> </ul>



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			<ul style="list-style-type: none"> <li>The identification and delivery of improved public transport needs to be focused on optimal routes and connecting the higher density neighbourhoods to Crawley's three primary economic centres and its two regional transport nodes: Three Bridges station and Gatwick Airport and its station. This will help to provide a viable, dependable and sustainable transport alternative.</li> <li>Together with promoting active travel, cycling and walking, modal shift will lead to reduced carbon emissions, improved air quality, and a reduction in traffic volumes and the borough's over-dependence and reliance on private vehicles for getting around.</li> <li>All new developments should be planned to maximise links in the transport network and opportunities for all forms of sustainable transport. A key priority area for the Plan period will be to build upon and improve the dependability, frequency, capacity and speed of the Fastway service in key areas of the borough, to encourage a viable and attractive alternative to car use, both for commuters, residents and visitors.</li> </ul> <p>3.6 Paragraph 2.54 of the DCBLP refers to the Government's Cycle and Walking Investment Strategy, published in 2017. This forms a basis for the draft Crawley Local Cycle and Walking Infrastructure Plan, (LCWIP) which informs an approach to the sustainable transport in Strategic Policy ST1.</p> <p><b>4.0 Crawley's policy response: Strategic Policy ST1</b></p> <p>4.1 Strategic Policy ST1 sets out the requirements for development in relation to sustainable transport. The key aims of the policy are:</p> <ul style="list-style-type: none"> <li>That development should be located and designed to prioritise and encourage travel via the walking and cycling network and public transport routes, while reducing dependency on travel by private motor vehicle.</li> <li>That development should be phased so that walking and cycling infrastructure which forms part of the development is delivered at the earliest opportunity.</li> <li>Development should contribute to improved sustainable transport infrastructure off-site, including, where appropriate, bus priority measures, enhanced passenger information, and routes identified in the council's Local Cycling and Walking Infrastructure Plan.</li> <li>Development should provide an appropriate amount and type of parking in accordance with Policy.</li> <li>Developments should not cause an unacceptable impact in terms of increased traffic congestion or highway safety.</li> <li>Development will be considered acceptable in highways terms unless there would be an unacceptable impact on highway safety, or the cumulative impact on the transport network is severe and cannot be satisfactorily mitigated.</li> </ul> <p>4.2 TWG consider that Strategic Policy ST1 is entirely consistent with and advances the aims and principles embodied in current and emerging national, and regional transport strategies and plans. The Crawley Transport Strategy (defined in Para 2.52 of the DCBLP) is also framed within the context of the West Sussex Local Transport Plan which states its objectives as;</p> <ul style="list-style-type: none"> <li>Promoting Economic Growth</li> <li>Tackling Climate Change</li> </ul>

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			<ul style="list-style-type: none"> <li>• Providing access to services, employment and housing</li> <li>• Improving safety, security and health</li> </ul> <p>4.3 TWG therefore support the Council’s strategy and policy response under Strategic Policy ST1 and understands that the implementation of schemes to deliver the policy are underway in many parts of the borough. The need to afford priority to cyclists, pedestrians and public transport users is enshrined in Strategic Policy ST1 and is in line with central and regional policy to improve connectivity for those travelling within and to destinations outside the Borough. TWG support this approach and briefly describe in the following section the way in which the proposed development at Gatwick Green will meet the aspirations for Sustainable Transport defined in Strategic Policy ST1.</p> <p>4.4 A more detailed description of the transport measures is contained in Appendix 2 of EC4 submitted on behalf of TWG in response to consultation on the DCLP.</p> <p><b>5.0 Approach for Gatwick Green</b></p> <p>5.1 TWG has adopted the WSCC Local Transport Plan objectives along with the policy commitments contained within Strategic Policy ST1 of the DCBLP, forming principles to guide its approach to sustainable transport as follows:</p> <ul style="list-style-type: none"> <li>• Provide employment opportunities that widen and deepen the skill base of residents in Crawley and its immediate neighbours. This will reduce levels of “outcommuting” and therefore the length of trips. Shorter journeys are made more easily by active modes, walking and cycling and potentially, personal electric transport.</li> <li>• Link new and existing residential development with employment opportunities at Gatwick Green through supporting infrastructure and transport services that cater for carbon neutral modes of travel, potentially reducing reliance on the private car and in line with the concept of Mobility as a Service, (MAAS).</li> <li>• Ensure a consistent approach to the delivery of new transport services and infrastructure across borough/county boundaries and to work in partnership with relevant agencies such as the Coast to Capital LEP and Transport for the SouthEast (TfSE).</li> <li>• Achieve a high level of integration between carbon-neutral modes by providing strategically located and high quality interchange facilities (the concept of superhubs is already established in Crawley).</li> <li>• Establish a multi-modal, comprehensive and flexible Sustainable Transport Strategy which is phased in line with the development.</li> <li>• Following completion of the Crawley Transport Model, consideration will be given to modest improvements to road junctions in line with the CBC policy of attracting a greater mode share for cyclists, pedestrians and bus users.</li> </ul> <p>5.2 The overarching transport strategy for Gatwick Green is therefore 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. At the heart of the development philosophy will be a transport strategy which recognises the need to address climate change and the pledge by Crawley Borough Council to</p>

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			<p>reduce carbon emissions generated by CBC activities by at least 45% by 2030, in line with the InterGovernmental Panel on Climate Change.</p> <p>5.3 The following sets out how development at Gatwick Green is consistent with and meets the requirements of Strategic Policy ST1:</p> <p><b>Public Transport</b></p> <ul style="list-style-type: none"> <li>• The ability to introduce several accesses onto Balcombe Road provides an opportunity to divert existing fastway/bus services to penetrate the site. This will incidentally benefit existing residents and businesses and other new development along the Balcombe Road Corridor.</li> <li>• Public transport provision for the site will, in collaboration with CBC and Metrobus, be integrated into the Fastway Development Programme.</li> <li>• Mobility transport hubs will be introduced within the site. These are already proposed for Manor Royal and will allow for seamless interchange between ride sharing, public transport and non-motorised modes of travel in line with existing initiative identified within the Crawley Growth Programme and Crawley New Directions.</li> </ul> <p><b>Walking and cycling</b></p> <ul style="list-style-type: none"> <li>• Alongside the public transport provision, the access strategy and internal layout will prioritise high quality, safe walking and cycling routes in line with latest guidance.</li> <li>• In conjunction with CBC, improvements will be made to existing pedestrian and cycle routes, plugging gaps and connecting to the enhanced network specified in the Crawley Local Cycling and Walking Infrastructure Plan (CLCWIP).</li> </ul> <p><b>Parking</b></p> <ul style="list-style-type: none"> <li>• The development will deliver an appropriate amount of parking for both cars, light vehicles and heavy goods vehicles in line with parking standards and typical demand, to ensure that there is no adverse impact on the local highway network or neighbouring areas.</li> <li>• Parking infrastructure will meet the standards and requirement at the time of any application(s) and would include meeting anticipated demand for Electric Vehicle (EV) Charging Infrastructure. The scale and type of parking will meet Local Plan Policy and West Sussex County Council's 2019 Guidance on Parking in New Developments, along with emerging EV Strategy and any appropriate guidance in respect to the development of Hydrogen recharging network.</li> </ul> <p><b>Suggested Modifications:</b></p> <p><b>6.0 Conclusions</b></p> <p>6.1 The Strategic Policy ST1 is consistent with the NPPF and associated policy and guidance and as such is sound against the tests set out in paragraph 35 of the NPPF.</p> <p>6.2 The Gatwick Green development satisfies the policy through explicitly meeting the following requirements:</p>

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			<ul style="list-style-type: none"> <li>i. The development is designed to prioritise the needs of pedestrians, cyclists and public transport users over ease of access by the motorist.</li> <li>ii. Appropriate amount and type of parking is provided in accordance with Strategic Policy ST1 and Policy ST2.</li> <li>iii. The development will be phased to ensure infrastructure for pedestrians and cyclists is available from first occupation.</li> <li>iv. Contributions will be made to bus priority and LCWIP schemes, where appropriate.</li> </ul> <p>6.3 A Transport Assessment will be produced for Gatwick Green which includes a Mobility Strategy or Travel Plan to meet the requirements of Strategic Policy ST1. Crawley Borough Council is at the forefront of the emerging national policy of Decide and Validate, recently adopted by Transport for South-East (TfSE). This will assist in meeting its aspiration to reduce carbon emissions and is consistent with West Sussex County Council objectives, defined in the Local Transport Plan.</p>
REP/056	Gatwick Airport Limited	ST1	<p>54. We supported the policy in the 2020 Reg19 DCLP, but suggested a minor revision. We note that the policy has not been changed but we have no objections to the policy as worded.</p> <p><b>Suggested Modifications:</b></p>
REP/023	Savills on behalf of St Catherine's Hospice	ST2	<p><b>Section 17: Sustainable Transport</b>  <b>Strategic Policy ST2: Car and Cycle Parking Standards</b></p> <p>3.51. St Catherine's support the changes to Strategic Policy ST2.</p> <p>3.52. The introduction of Parking Behaviour Zones and corresponding parking standards is considered justified as it localises the parking policies, reflecting the circumstances of each individual neighbourhood. This is compliant with paragraph 105 of the NPPF and encourages the use of public and active transport in sustainable locations.</p> <p><b>Suggested Modifications:</b></p>
REP/130	Home Builders Federation	ST2	<p>The policy is unsound as it has not been justified.</p> <p><b>Suggested Modifications:</b></p> <p>7. No allowance has been made for the requirement to provide electric vehicle charging points (EVCP) as set out in policy ST2 Car and Cycle Parking Standard (and the relevant annex at page 277). The Government has estimated installation of such charging points add an additional cost of approximately £976 per car parking space for an average home. In addition, there is the concern that the introduction of EVCP in new buildings will impact on the electricity demand from these buildings especially for multi-dwelling buildings. A requirement for large numbers of EVCPs will require a larger connection to the development and will introduce a power supply requirement, which may otherwise not be needed. The level of upgrade needed is dependent on the capacity available in the local network resulting in additional costs in relation to charge point instalment. Any such additional infrastructure requirements would likely see average S106 infrastructure costs increased from the Council's current estimates. As the additional costs of EVCPs have not been included in the viability study we would suggest that this is addressed prior to submission.</p>

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			<p>8. Alongside the costs being tested we would also question whether this policy is necessary given that it is likely to be superseded by national policy. The HBF is supportive of encouragement for the use of electric and hybrid vehicles. However, we consider the most effective approach to delivering the transition to greater electric vehicle use is via a national standardised approach implemented through the Building Regulations to ensure a consistent approach to future proofing the housing stock.</p> <p>9. The Department for Transport held a consultation on Electric Vehicle Charging in Residential &amp; Non-Residential Buildings, this consultation set out the Government's preferred option to introduce a new functional requirement under Schedule 1 to the Building Regulations 2010. The inclusion of EVCP requirements within the Building Regulations will introduce a standardised consistent approach to EVCP in new buildings across the country. Given that such requirements are likely to be included in Building Regulations, and that there has been no viability testing at this stage the HBF would recommend that this policy is deleted as it will be unnecessary and repetitious.</p> <p><b>Conclusion</b></p> <p>10. At present we do not consider the plan to be sound, as measured against the tests of soundness set out in paragraph 35 of the NPPF. As such I can confirm that I wish to participate in the relevant hearing sessions in order to full represent our concerns which reflect the views of discussions with our membership who account of 80% of the market housing built in England and Wales.</p>
REP/133	The Planning Bureau Ltd	ST2	<p><b><u>Vehicle Parking</u></b></p> <p>McCarthy Stone and Churchill Retirement Living have unrivalled experience in developing retirement housing for the elderly, having implemented well over 1000 Category II sheltered housing developments throughout England, Scotland and Wales.</p> <p>Retirement Living (Category II sheltered housing) has been defined as “grouped flatlets to meet the needs of the less active elderly people”. The key wording here is “less active elderly people”, although residents are not normally so frail as to be wholly inactive. Based on survey work it was found that the average age was over 76 years.</p> <p>It has been found that, of those residents who have given up car ownership, as the majority eventually will, a very significant proportion, of about 18%, do so at, or close to, the time that they enter this form of housing.</p> <p>This reduction in car ownership is more pronounced for residents of ‘Extra Care accommodation’ which is specialist older persons’ accommodation that is aimed at the ‘frail’ elderly. The average age of a resident in a McCarthy Stone ‘Retirement Living Plus’ (Extra development) is currently 83 years old.</p> <p>It is noted that the Parking Standards Annex provides bespoke standards for specialist older persons’ accommodation which is as follows:</p> <p>Sheltered Housing &amp; Flats for the elderly - 1 space per every 2 dwellings plus staff.</p>

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			<p>We also note that the standards do incorporate an element of flexibility with the notes advising that ‘These standards are indicative and are intended to reflect likely demand. Provision below these standards may be acceptable if it can be demonstrated how the total access needs of the development can be met.’</p> <p>In light of the considered nature of the standards and the intended flexibility in their application, the respondents support this aspect of the standards.</p> <p><b>Electric Vehicles</b></p> <p>In respect of the standards for charging points for electric vehicles, we note that the Local Plan refers to minimum standards in the Council’s Guidance Note for applicants. As electric vehicle charging technology is progressing rapidly we feel that the provision of a quota of charging points runs a significant risk of obsolescence. The provision of cabling to car parking spaces to enable future installation of charging point in line with the wishes of residents is a more practical measure.</p> <p><b>Cycle Parking</b></p> <p>As referenced earlier, sheltered housing and in particular Extra Care accommodation, is used by older people who tend to be frail and are likely to have mobility difficulties. Were an older person likely to cycle on regular basis it would be unlikely they would require extra care accommodation.</p> <p>A survey of 242 McCarthy and Stone Retirement Living units showed only 7 bicycles owned by residents in these apartments. This is an ownership rate of 0.0289 cycles per apartment or 1 cycle per 35 apartments.</p> <p>Whilst we can understand the rationale behind encouraging cycling in the general population, we consider that a requirement for cycle spaces in specialist older persons’ housing to be inappropriate and unnecessary. Both companies provide an internal mobility scooter store for use by residents which is a far more relevant requirement and in the handful of instances that a resident has used a bicycle it can be stored in this area.</p> <p><b>Suggested Modifications:</b></p> <p>1 To require the provision of cabling to all unallocated car parking spaces to enable future installation of electric vehicle charging points in line with demand from residents.</p> <p>2 For cycle parking in Extra Care &amp; Sheltered housing developments to be limited to provision for staff and visitors.</p>
REP/056	Gatwick Airport Limited	ST3	<p>55. We objected to the policy in the 2020 Reg19 DCLP. We note that the policy has been amended broadly in line with suggested changes we proposed. We therefore no longer object to the policy.</p> <p><b>Suggested Modifications:</b></p>
REP/106	Crawley Town Centre Bid Board	ST3	<p>The CTCBID TCP supports Policy ST3. Enhanced pedestrian/cycling accessibility and public transport provision along with better integration with the main shopping area will enhance the attractiveness of the Town Centre and is welcomed</p> <p><b>Suggested Modifications:</b></p>
REP/016	Resident 7	ST4	<p>If Gatwick airport build a second runway they are proposing to replace the sports pitches at Willoughby Field and have shown a new facility west of Ifield on their plan. This falls within the area of Homes England West of Ifield proposed</p>

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			<p>housing and link road development. As the sports pitches at Willoughby Field fall under Crawley's jurisdiction new provision should be made in this local plan to reflect this and a new site proposed.</p> <p><a href="http://www.gatwickairport.com/globalassets/publicationfiles/business_and_community/all_public_publications/second_runway/airports_commission_july15/13---gatwick-airport-ltd-development-of-an-indicative-habitat-and-landscape-plan---ac-submission.pdf">www.gatwickairport.com/globalassets/publicationfiles/business_and_community/all_public_publications/second_runway/airports_commission_july15/13---gatwick-airport-ltd-development-of-an-indicative-habitat-and-landscape-plan---ac-submission.pdf</a></p> <p><b>Suggested Modifications:</b> As the sports pitches at Willoughby Field fall under Crawley's jurisdiction new provision should be made in this local plan to reflect this and a new site proposed.</p>
REP/022	Sussex Ornithological Society	ST4	<p><b>Strategic Policy ST4 – Search corridor for Crawley Western Relief Road</b> We note that little progress has been made regarding this since the Consultation Draft, and the comments we made in our March 2020 response still stand.</p> <p><b>Suggested Modifications:</b></p>
REP/032	West Sussex County Council	ST4	<p>Policy GAT2: Safeguarded Land for the potential future additional wide spaced runway as per the Gatwick Airport Master Plan is in conflict with Policy ST4: Safeguarding of a Search Corridor for a Crawley Western Link Road as substantial sections of the ST4 area lies within the GAT2 safeguarded area. Failing to address this issue may compromise the ability for Gatwick Airport to expand in the future and/or delivery of a western link road to support future growth.</p> <p>The Draft Local Plan therefore does not fully comply with the following sections of The National Planning Policy Framework due to the conflict:</p> <ul style="list-style-type: none"> <li>• 104 (c) – identify and protect, where there is robust evidence, sites and routes which could be critical in developing infrastructure to widen transport choice and realise opportunities for large scale development;</li> <li>• 104 (f) – recognise the importance of maintaining a national network of general aviation airfields, and their need to adapt and change over time – taking into account their economic value in serving business, leisure, training and emergency</li> <li>• 104 (f) – recognise the importance of maintaining a national network of general aviation airfields, and their need to adapt and change over time – taking into account their economic value in serving business, leisure, training and emergency service needs, and the Government's General Aviation Strategy.</li> </ul> <p>West Sussex County Council is aware that further technical analysis is currently underway to resolve the conflict. The objective of the analysis is to refine the alignment of the Link Road so that it does not conflict with the GAT2 boundary, or to come to an agreeable solution with all parties with regards to amended boundaries.</p> <p>Justification 17.25 – It should be noted that developments could be refused on highway grounds based on the potential severe cumulative impacts on the transport network, if the scheme is not implemented.</p>

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			<p>Policy ST4 &amp; Justification 17.28 - As indicated in paragraph 17.28, there is potential that land may need to be compulsorily purchased in order to deliver the Western Relief Road.</p> <p>However, Policy ST4 does not include reference to the potential need for land to be compulsorily purchased in its reference to its impact on residential and commercial properties. This is not sound because the scheme is likely to be dependent upon a successful future application for a Compulsory Purchase Order which may need to be considered at a Public Inquiry. Therefore, Policy ST4 should be amended to specifically state that there is a potential need for land to be compulsorily purchased in order to deliver the scheme. Failing to amend Policy ST4 to reflect the potential need for land to be compulsorily purchased may compromise the future delivery of this section of the Western Relief Road or mean that the scheme is unable to achieve its strategic objectives.</p> <p><b>Suggested Modifications:</b> Refinement of the alignment of the Link Road so it does not conflict with the GAT2 boundary or to come to an agreeable solution with all parties with regards to the amended boundaries.</p>
REP/033	Horsham District Council	ST4	<p>We support this policy subject to the following comment:</p> <p><b>Suggested Modifications:</b> The corridor for any future relief road will need to be agreed jointly with HDC as most of the route would be within the administrative area of Horsham. Any area of safeguarding should not prejudice this. It is noted that this is recognised in the supporting text. We are also pleased to be given opportunity to work collaboratively with CBC on further consultancy-led work to better understand options for a safeguarded corridor in light of constraints and potential impacts.</p> <p>I do hope these comments are helpful. I would like to emphasise that they are made in anticipation of further constructive dialogue between our authorities, and with an expectation that areas of disagreement can be readily addressed, and quite possibly eliminated.</p>
Rep 35 (Mar 21)	Vail Williams	ST4	<p><b>ST4 safeguarding of a search corridor for a Crawley western link road</b></p> <p>Policy ST4 identifies the search corridor for the CWRR, linking the A284 with the A23. This states that this corridor will be safeguarded from development that would be incompatible with the future delivery of the link road. It also states that the design and route of the western link road must take account of its impact and bus priority measures.</p> <p>As explained in regard to our response to policy CL8, we currently have a planning application that is able to be implemented. This development is shown within the area identified for the Indicative Search Corridor for the CWRR. We therefore still seek reassurance that our permitted application would be a material consideration under this policy and policy ST4 should any future any minor alterations be required.</p> <p>However, as with our Regulation 19(1) representations, we are concerned that the extent of the search corridor is so significant and that this in effect safeguards the land at Jersey farm with no clear indication of when or how a proposed western relief road would be provided.</p>



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			<p>In order to ascertain how development of the western relief road may impact on the masterplan, we have undertaken 2 masterplan options to demonstrate how the land could provide significant economic floor space on the 24 hectare site whilst still enabling the principles and objectives of the western link road in relieving congestion on the existing internal roads in Crawley. We appreciate that in paragraph 17.21 modelling has been undertaken in association with Horsham District Council in regard to their Local Plan Review process, but as we are aware this has currently been delayed. It also states that in 17.22 the corridor will be led and identified by HDC.</p> <p>We would therefore seek clarity on how the Crawley's Local Plan can allocate such a significant search corridor without clarity as to the precise location of any road and therefore any alternative revisions in regard to the built up area boundary in Crawley.</p> <p>Whilst we are aware that further major development is being promoted to the West of Crawley through the Horsham District Council Local Plan Review and we appreciate that cumulative impacts of all of the developments in the area will exacerbate existing capacity issues on roads within Crawley, it is still not yet clear whether it is indeed appropriate at this time to safeguard the whole of the potential corridor of land within Crawley for a full western relief road and at this time it is not possible to identify the route corridor within Horsham District to the West.</p> <p>The latest draft Local Plan therefore further blights land that could be released for development in the latter period of the Plan should an alignment route be agreed.</p> <p>We welcome paragraph 17.28 that confirms that the current search corridor is located at the southern edge of land safeguarded for potential runway at Gatwick and that the Council is seeking to engage with Gatwick Airport about the detailed alignment of the route.</p> <p>However further certainty is required as this is land owned by the consortium, and we would have expected confirmation of Gatwick's land take requirements and detailed alignment of the corridor to been provided before such a significant search corridor and Gatwick safeguarding (or both) is adopted within any Local Plan.</p> <p>We therefore reiterate our concerns that this safeguarding will significantly affect our client's land as it is shown as part of the current arbitrary corridor to deliver any western relief road, without what appears to be any further justification to the current timeline for delivery, need, route, or scale for this major highway's development.</p> <p>Given CBC's own transport modelling is also not yet finalised we would suggest that this allocation and safeguarding is premature.</p> <p>We therefore continue to raise objections to both the policy ST4 in its current form and the Proposals Map allocation as well as the principle of safeguarding land for a relief road, and we consider this policy and extent of the Indicative Search Corridor to be premature.</p> <p><b>Suggested Modifications:</b></p>

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Rep 35 (Jun 21)	Vail Williams on behalf of Ardmore/ Windsor Land Consortium	ST4	<p><b>Additional comments to Policy ST4: Safeguarding of a search corridor for a CWRR/Link Road</b></p> <p>The identification of the indicative search corridor for the relief road, as shown on page 214 and on the Proposals Map, indicate that there is an area that will be safeguarded against all development throughout the plan period.</p> <p>Given the policy position, land within the Jersey Farm site will be safeguarded to accommodate the delivery of the CWRR; allowing it to be connected to the Jersey Farm access road from the west, allowing the access road to be widened to accommodate bus lanes and pedestrian/cycleways, and allowing the Jersey Farm / A23 junction to be upgraded.</p> <p>We are in dialogue with both Homes England and Aberdeen Standard with regard to their respective development masterplans and the synergies in terms of the CWRR.</p> <p>We understand that CBC has commissioned SYSTRA to undertake an additional study into the potential route and alignment of the CWRR. Given the location of the Jersey Farm site on the Policy ST4 search corridor, we have already supplied a draft copy of the indicative site masterplan, showing our proposed CWRR safeguard corridor, to CBC's consultant to assist them with their assessment.</p> <p><b>Suggested Modifications:</b></p>
REP/ 041	Ifield Village Conservation Area Advisory Committee (IVCAAC)	ST4	<p>The reservations that we have about the link road are given above in the section on Urban extensions.</p> <p>The arguments set out in the plan for the road are sound from the point of view of both reducing traffic round the many roundabouts in Crawley and giving drivers a simpler drive from the south to Manor Royal. We note 'Connectivity by non-vehicular modes of transport between Crawley's urban neighbourhood and the wider Sussex countryside should be maintained and enhanced'. There is also acknowledgement of the importance of not taking any routes across Ifield Brook Meadows and into Rusper Road.</p> <p>However, the negative effects of the road through the countryside have not been outlined (see our comments above re the urban extensions above). There is also no mention of the disadvantage of it going through land which floods easily, nor the known fact that opening up new roads frequently increases traffic in an area overall.</p> <p><b>Suggested Modifications:</b></p>
REP/ 056	Gatwick Airport Limited	ST4	<p>56. We objected to this policy in the in the 2020 Reg19 DCLP because the search corridor encroached into land safeguarded for future development of a second runway.</p> <p>57. We note that despite the 2021 Reg19 DCLP reinstating a policy safeguarding land for a second runway (Policy GAT2), and furthermore accepting that the land to the south of Gatwick would be required to accommodate development associated with a southern runway (para 9.53), the search corridor has not been altered, but continues to be situated more or less wholly within the safeguarded land boundary. Our objection therefore still stands and is now strengthened by the inherent inconsistency between Policies GAT2 and ST4.</p>

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			<p>58. The boundary of the safeguarded land on the proposals map has rightly been taken from the boundary in GAL's 2019 Gatwick Airport Master Plan. That in turn reflected detailed master planning work undertaken by GAL during the period 2012 – 2015 as parts of its submissions to the Airports Commission, when the 2nd runway option was shortlisted for detailed studies. This included detailed consideration of the spacing required between the existing runway and new southern runway to enable fully independent runway operations, together with the land needed for a third passenger terminal and its associated piers / satellites, aprons and stands; connecting taxiways; and operational roads, all designed in accordance with established safety standards and clearances to provide for safe and efficient operations. The southern alignment of the 2nd runway masterplan boundary also reflected well considered plans for:</p> <ul style="list-style-type: none"> <li>a. the diversion of the A23 to the east and south of the existing airport, and connecting into the existing roundabout at County Oak (including compliant footpaths and cycleways alongside it);</li> <li>b. the provision of a varying width corridor to accommodate the required diversion channels for the Crawters Brook and River Mole and to meet requirements of the Water Framework Directive and floodplain;</li> <li>c. a noise mitigation bund.</li> </ul> <p>59. With a possible need to have to compulsory purchase land, the master plan, and therefore the extended airport boundary, has been carefully considered to minimise land take. There may be some scope for minor changes to the southern boundary, such as minor adjustments to the width of the river corridor in places, but the scope is likely to be minimal.</p> <p>60. We also note that Homes England (HE) have prepared three options for alignment of the Western Relief Road. These have been prepared having regard to the need to safeguard land for R2. HE's northernmost alignment option extends marginally into parts of the R2 river diversion corridor. HE's southernmost option is aligned well to the south of the safeguarded search corridor shown on the Local Plan Map.</p> <p>61. Given a second runway and associated / related facilities could not be delivered without the land included within the Western Relief Road search corridor, the search corridor is illogical and incompatible with safeguarding for R2. It would seem logical for the width of the corridor to be broadly based on the alignments of the southernmost and northernmost extents of the alignment options prepared by Homes England. In any event the boundaries of the search corridor should be revised so that any encroachment into safeguarded land for the second runway is minor given the limited opportunities to for the R2 boundary to be retracted.</p> <p>62. It would also be logical for the eastern end of the search corridor to relate to the detailed R2 space and master planning undertaken by GAL, including how the relief road might connect into the diverted route for the A23 at County Oak.</p> <p>63. At the present time, however, the proposed search corridor as shown on the Local Plan Proposals Map is not sound or justified.</p> <p><b>Suggested Modifications:</b></p>

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REP/068	Sussex Wildlife Trust	ST4	<p><b>Strategic Policy ST4: Safeguarding of a search corridor for Crawley Western Relief Road.</b></p> <p>SWT is very concerned about the inclusion of this policy with very little explanation of the level of need, potential impacts or understanding of alternative options. The broad area appears to cover areas of known biodiversity value including a Local Wildlife Site and ancient woodland. We note that there have been a considerable number of updated evidence bases submitted alongside this plan, so if the council can point us towards the evidence related to this that we might have missed it would be appreciated.</p> <p>We note further consultation has resulted in the availability of the Crawley Transport Study Report. We have looked at information relating to the Crawley Western Link Road Sensitivity Test in section 9 on the report. Whilst we are not familiar with all the technical detail used to assess these models as presented in this report, section 9.5.4 states : A more detailed study is necessary to consider how the CWLR and its junctions may be designed in order to elicit the best attributes of the CWLR while minimising or eliminating any potential adverse impacts.</p> <p>Adverse impacts could very well occur for the biodiversity in the area given the sensitives of the habitats in the safeguarded area, for example irreplaceable habitat such as Ancient Wood and Local Wildlife Sites. SWT are concerned that the current policy wording simply states that: The design and route of the Western Link Road must take account of:</p> <p>a. its impact on (but not limited to):</p> <ul style="list-style-type: none"> <li>• residential and commercial properties close to the route;</li> <li>• the flood plain;</li> <li>• the rural landscape;</li> <li>• local biodiversity;</li> <li>• sports pitch provision and recreation facilities; and</li> <li>• heritage and heritage landscape assets and visual intrusion.</li> </ul> <p>We do not feel the current policy wording reflects the clear need with the NPPF section 175 to follow the mitigation hierarchy and avoid impacts in the first instance. SWT remain unclear about the true need for this Crawley Western Relief Road given the uncertainties presented in section 9 of the Crawley Transport Study Report.</p> <p><b>Suggested Modifications:</b></p> <p>We would suggest that if the policy does proceed that amendments must be made to better reflect the requirements of the NPPF in relation to section 175. We do not believe in its current form that the policy wording is sound and therefore propose the following amendment to policy ST4 to better reflect this requirement:</p> <p>The design and route of the Western Link Road must <b>identify and avoid</b> <del>take account of</del>:</p> <p>a. its impacts on (but not limited to):</p> <ul style="list-style-type: none"> <li>• residential and commercial properties close to the route;</li> <li>• the flood plain;</li> </ul>

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			<ul style="list-style-type: none"> <li>the rural landscape;</li> <li>local biodiversity;</li> <li>sports pitch provision and recreation facilities; and</li> <li>heritage and heritage landscape assets and visual intrusion.</li> </ul> <p>We hope our recommendations are adopted to ensure that the policies within the Crawley Local Plan are as robust and effective as possible. SWT would be happy to discuss any of the above points with CBC.</p> <p>We do wish to attend the Examination in Public to ensure our views are given due consideration.</p>
REP/087	Woodland Trust	ST4	<p>We welcome the confirmation in 17.25 that new highways crossing the Ifield Brook Meadows and Rusper Road Playing Fields Local Greenspace would be wholly unacceptable, given the impact this would have on ancient woodland. However, we are concerned that the search area for the proposed link road still includes ancient woodland at Rowley Wood ASNW (grid reference: TQ2791939226).</p> <p><b>Suggested Modifications:</b></p> <p>We propose modifying the policy to expand the criterion “local biodiversity” under ST4 a) adding the words “and protected biodiversity sites” so that the policy reads: "The design and route of the Western Link Road must take account of a. its impact on (but not limited to): .... local biodiversity and protected biodiversity sites..." This would better reflect local plan Policy GI2.</p>
REP/091	Brunel Planning on behalf of COIF Nominees LTD c/o CCLA	ST4	<p>March 2021:</p> <p><b>Indicative Search Corridor for a Western Link Road designation</b></p> <p><b>Reserve the right to comment – ‘Indicative Search Corridor for a Western Link Road’ – Proposals Map 2021</b></p> <p>3.29 Part of the site falls within the designated ‘Indicative Search Corridor for a Western Link Road’ as shown on Figure 1 (ii) above.</p> <p>3.30 We understand that Crawley Borough Council is currently preparing the Transport Modelling studies and these are not available at this stage (February 2021) for review.</p> <p>3.31 COIF Nominees Limited reserves the right to submit further representations when the Transport Modelling studies have been released and any impact on The Atrium site has been considered.</p> <p>4.20 COIF Nominees Ltd wish to reserve the right to comment on the site location within the ‘Indicative Search Corridor for a Western Link Road.’ We understand that Crawley Borough Council is currently preparing the Transport Modelling studies and these are not available at this stage (February 2021) for review.</p> <p><b>Suggested Modifications:</b></p>
REP/091	Brunel Planning on	ST4	<p>June 2021:</p> <p>Part of the site falls within the designated ‘Indicative Search Corridor for a Western Link Road’</p>

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	behalf of COIF Nominees LTD c/o CCLA		<p>We have reviewed draft Policy ST4 – Safeguarding of a Search Corridor for a Crawley Western Link Road and the ‘Crawley Transport Study – Transport Study of Strategic Development Options and Sustainable Transport Measures – Draft Crawley Local Plan 2021 – 2037.’</p> <p>Policy ST4 states that: ‘The design and route of the Western Link Road must take account of (a) its impact on (but not limited to): ... commercial properties close to the route’</p> <p>COIF Nominees Limited welcomes this reference within the policy to protecting future commercial development. There is no reason to object to the site’s partial location within the designated ‘Indicative Search Corridor for a Western Link Road’ as long as there will be no adverse impact on the future development and employment generating potential of The Atrium site and its location within Manor Royal.</p> <p>4.20 COIF Nominees Ltd has no reason to object to Policy ST4 as long as the Western Link Road does not prejudice The Atrium site’s future development and employment generating potential and its location within Manor Royal.</p> <p><b>Suggested Modifications:</b> N/A</p>
REP/ 134	Rusper Parish Council		<p>Rusper Parish Council would like to comment on your Local Plan Review.</p> <p>Councillors and many Rusper residents are concerned about the Land West of Ifield development site that has been proposed under a duty to cooperate with Horsham District Council. They feel this would impact negatively on the proposed Crawley Local Plan as follows:-</p> <ul style="list-style-type: none"> <li>• The need for open space and access to local facilities which support healthy lifestyles would be reduced.</li> <li>• Landmarks, views, vistas and woodland would be destroyed.</li> <li>• The proposal does not take into account the existing character of the area.</li> <li>• Individual specimens or groups of trees that make a positive contribution to visual and biodiversity amenity wouldn't be retained.</li> <li>• There is a need to retain an area of special local character (Ifield golf club) which has social and communal value. It also has heritage significance and is a local landmark.</li> <li>• The loss of farmland would adversely affect the rural economy; the NPPF supports rural businesses.</li> <li>• Valued landscapes and biodiversity would be destroyed.</li> <li>• There would be light pollution on intrinsically dark landscapes and nature conservation.</li> <li>• Ifield Brook Meadows is included as an area of enjoyment, visual amenity, tranquillity and wild life. The western link road would have an adverse effect on this as the proposals seem to have cycle ways through parts of this conservation area.</li> <li>• Flash flooding would increase.</li> <li>• The site would suffer from noise from Gatwick Airport.</li> </ul> <p><b>Suggested Modifications:</b></p>

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REP/016	Resident 7	page 228 17.21 page 229 17.22	<p>If Gatwick airport build a second runway they are proposing to replace the sports pitches at Willoughby Field and have shown a new facility west of Ifield on their plan. This falls within the area of Homes England West of Ifield proposed housing and link road development. As the sports pitches at Willoughby Field fall under Crawley's jurisdiction new provision should be made in this local plan to reflect this and a new site proposed.</p> <p><a href="http://www.gatwickairport.com/globalassets/publicationfiles/business_and_community/all_public_publications/second_runway/airports_commission_july15/13---gatwick-airport-ltd-development-of-an-indicative-habitat-and-landscape-plan---ac-submission.pdf">www.gatwickairport.com/globalassets/publicationfiles/business_and_community/all_public_publications/second_runway/airports_commission_july15/13---gatwick-airport-ltd-development-of-an-indicative-habitat-and-landscape-plan---ac-submission.pdf</a></p> <p><b>Suggested Modifications:</b> As the sports pitches at Willoughby Field fall under Crawley's jurisdiction new provision should be made in this local plan to reflect this and a new site proposed.</p>

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Ref. No.	Respondent	Policy/ Para	Comments
REP/030	Resident 11	Map on page 294	<p>Gatwick airport noise contour map is not clear enough. Very hard to see colour of lines over proposed development west of Ifield noise levels.</p> <p><b>Suggested Modifications:</b> Reprint map to make it clearer.</p>
REP/116	Neame Sutton Limited on behalf of Danescroft (RLP Crawley) LLP	EP4 Noise Annex	<p><b>Site-Specific Representations in Relation to Land at Steers Lane, Crawley</b> <b>Policy EP4, Noise Annex – OBJECT: Unsound</b></p> <p>4.1 At the point of the Regulation 18 consultation stage in September 2019 the Council included Danescroft’s promotion site within the Plan as an allocation for a minimum of 75 no. dwellings.</p> <p>4.2 In the context of the first Regulation 19 consultation the Council had inexplicably removed the site as an allocation albeit that the land remained within the defined urban area on the draft Plan Proposals Map. The only evidence produced by the Council to support its removal if the site as a housing allocation at that time was contained in Strategic Housing Land Availability Assessment (“SHLAA”) (January 2020) wherein the Council concludes the site was not suitable due to the presence of a noise constraint relating to the potential second runway at Gatwick Airport (Page 146 of SHLAA January 2020).</p> <p>4.3 The justification set out in the SHLAA for the removal of the site was based on a revision to the Council’s Noise Annex contained at Page 270 of the draft Plan, which lowered the previously accepted predicted noise level for the proposed second runway from 66 dB down to 60dB. No evidence was presented by the Council to support the change in the noise level that it considered as the threshold for residential development.</p> <p>4.4 The change was particularly odd given that the Council remained of the opinion (as set out in the draft Noise Annex at that time) that 66dB was the appropriate noise level in relation to surface transport. In other words, it was acceptable for a residential proposal to come forward in an area affected by road transport noise up to 66 dB, but not if aviation noise is at 60 dB. This cannot be right.</p> <p>4.5 Since that time Area A of the promotion site has received Outline Consent for up to 185 no. dwellings allowed on Appeal in February 2020 based on 66 dB for aviation noise being the appropriate level to consider. The Council now acknowledges the developability of Area A in this latest Regulation 19 consultation version of the Plan and proposes the allocation of Area A for 185 no. dwellings in draft Policy H2.</p> <p>4.6 All of the above points relate to Area A of the promotion site, which equates to just over half of the area.</p> <p>4.7 The remainder of the land (Area B on the plan attached at Appendix 1) has the capability to deliver up to a further 100 no. dwellings. The only constraint on this land relates to the potential second runway at Gatwick Airport and the consequent impact in terms of noise contours.</p>



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			<p>4.8 Danescroft's acoustic specialists Bickerdike Allen Partners ("BAP") has undertaken a sensitivity check of the Gatwick Airport noise contours having regard to the changes in national aviation policy and in particular the change in appropriate for the future of Gatwick Airport as set out by Gatwick Airport Limited ("GAL") (see Appendix 2).</p> <p>4.9 The sensitivity check prepared by BAP confirmed that the whole of Area B is actually situated outside of the key 66dB contour based on the most likely foreseeable future contour for land use planning i.e. 2028 using the main and standby runways. It is therefore clear that Area B is unconstrained by aviation noise and with no other impediments to development should be released as an allocation for housing in the Local Plan.</p> <p>4.10 Danescroft's acoustic specialists Bickerdike Allen Partners ("BAP") has also undertaken an Acoustic Review with specific reference to draft Policy EP4, which is attached at Appendix 2.</p> <p>4.11 It is clear that, as drafted, Policy EP4 is unsound and requires modification. BAP has set out in detail why the unacceptable daytime noise level proposed by the Council of 60dB is not appropriate and does not reflect the evidence base. 4.12 BAP has set out a recommended modification to the draft Policy to provide a simplified approach to daytime noise levels set at a common threshold of 66 dB and night time levels set at 63 dB<sup>14</sup>.</p> <p>4.13 Without these changes Policy EP4 is unsound because it does not reflect the evidence nor government policy on the matter of aviation noise.</p> <p>4.14 As a consequence of the Council's overly restrictive and flawed approach to aviation noise levels it has failed to properly assess the suitability of Area B for residential development. The opportunity to deliver a further 100 no. dwellings on Area B comprising a mix of open market and affordable homes has therefore been missed by the Council.</p> <p><sup>14</sup> See Table 5 on Page 31 of BAP Acoustic Review in Appendix 2</p> <p>4.15 Area B should therefore be included as land suitable for residential development, particularly in the light of the recent report by the Government's Climate advisors (Climate Change Committee) regarding the future of air travel in the context of the accelerated climate change agenda<sup>15</sup> i.e. no net increase in airport capacity in the UK.</p> <p>4.16 The inclusion of Area B as a housing allocation would enable the Council to deliver up to another 100 no. dwellings (40 no. of which would be affordable) making a valuable contribution to the significant housing needs in the Borough.</p> <p>4.17 Danescroft would welcome the opportunity to work with the Council in relation to the allocation of Area B for housing as part of the emerging Local Plan.</p> <p><b>Gatwick Contour Sensitivity Check</b>  <b>1.0 INTRODUCTION</b>  Bickerdike Allen Partners LLP (BAP) have been appointed to provide acoustic consultancy services in relation to a development site at Steers Lane in Crawley. This site is close to Gatwick airport.</p>

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Ref. No.	Respondent	Policy/ Para	Comments
			<p>BAP were previously involved in a planning application for development on part of this site. The local authority reference was CR/2018/0894/OUT for up to 185 dwellings. The applicant appealed a non-determination from the local authority. The planning inspectorate appeal reference was APP/Q3820/W/19/3236721.</p> <p>This 2018 outline planning application was assessed against the 2015 Crawley Brough Council Local Plan (CBLP) policy ENV11. The planning application was granted consent on appeal. The development complied with the policy on aircraft noise. This adopted a standard of 66 dB LAeq,16h as an upper limit based on a noise contour for Gatwick airport with an additional wide spaced Southerly runway. This noise contour was prepared in 2003. This report reviews updates in noise contours, airport expansion plans and aviation policy.</p> <p><b>2.0 EXISTING (2015) LOCAL PLAN POLICY ENV11</b> The relevant section of the policy is reproduced below.</p> <p><i>“People’s quality of life will be protected from unacceptable noise impacts by managing the relationship between noise sensitive development and noise sources. <b><u>To achieve this, Policy ENV11 should be read in conjunction with the Local Plan Noise Annex.</u></b></i></p> <p><i>A. Noise Sensitive Development</i></p> <p><i>Residential and other noise sensitive development will be permitted where it can be demonstrated that users of the development will not be exposed to unacceptable noise disturbance from existing or future uses.</i></p> <p><i>Noise sensitive uses proposed in areas that are exposed to significant noise from existing or future industrial, commercial or transport (air, road, rail and mixed) sources will be permitted where it can be demonstrated that appropriate mitigation, through careful planning, layout and design, will be undertaken to ensure that the noise impact for future users will be made acceptable. Proposals that would expose future users of the development to unacceptable noise levels will not be permitted. <b><u>For transport sources, the Unacceptable Adverse Effect is considered to occur where noise exposure is above 66dB LAeq,16hr (57dB LAeq,8hr at night).</u></b>”</i></p> <p>Noise contours are produced in relation to aircraft noise from nearby Gatwick. The size of these contours depends on which scenario is being considered. The 2015 local plan noise annex stated the following with regards to noise contours.</p> <p><i>“All the above levels would include the predicted noise from any proposed or required changes in transportation noise <b><u>including the potential 2nd wide spaced runway at Gatwick Airport</u></b> as set out in the 2003 White Paper and any forthcoming replacement policy document. Details of the predicted noise contours associated with a possible wide-spaced second runway at Gatwick Airport are set out in Figure 1 of this Noise Annex, which <b><u>draws upon the noise contours published by the Civil Aviation Authority (CAA) in their report: ERCD report 0308. Figure 1 of the</u></b></i></p>

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Ref. No.	Respondent	Policy/ Para	Comments
			<p><b><u>Noise Annex will be updated should these contours be superseded by subsequent noise contours published by the CAA.</u></b></p> <p>For application CR/2018/0894/OUT the development was tested against the ERCD 0308 2nd wide spaced runway future contours. These contours were produced by the CAA in 2003 in relation to Central Government Policy work on the Future of Air Transport in a 2003 White Paper for an assessment year of 2030 with 486,000 PATMS (annual passenger air traffic movement). These contours are somewhat dated now with regards to the assumptions used. No night time contours were published for the same scenario.</p> <p><b>3.0 DRAFT LOCAL PLAN POLICY EP4</b></p> <p>The January 2021 draft local plan includes the emerging new policy on residential development near to Gatwick airport. This is discussed in detail in January 2021 Topic Paper 7; Development and Noise Technical Appendix. The 2021 draft local plan sets a very different performance standard compared with the existing 2015 local plan both in terms of the contour used and the noise policy adopted.</p> <p>Crawley Borough Council's draft planning policy EP4 relates to residential development near to sources of transportation noise. The policy states:</p> <p><i>"A. Noise Sensitive Development</i></p> <p><i>Residential and other noise sensitive development will be permitted where it can be demonstrated that users of the development will not be exposed to unacceptable noise impact from existing, temporary or future uses.</i></p> <p><i>Noise sensitive uses proposed in areas that are exposed to noise above the Lowest Observed Adverse Effect Level (LOAEL) or at the Significant Observed Adverse Effect Level (SOAEL) from existing or future industrial, commercial or transport (air, road, rail and mixed) sources will be permitted where it can be demonstrated good acoustic design has been considered early in the planning process, and that all appropriate mitigation, through careful planning, layout and design, will be undertaken to ensure that the noise impact for future users will be made acceptable. Noise sensitive uses proposed in areas that are exposed to noise at the Unacceptable Adverse Effect level will not be permitted.</i></p> <p><i>For surface transport noise sources, the Unacceptable Adverse Effect Level is considered to occur where noise exposure is above 66dB LAeq,16hr (57dB LAeq,8hr at night).</i></p> <p><b><u>For aviation transport sources the Unacceptable Adverse Effect is considered to occur where noise exposure is above 60dB LAeq,16hr. (57dB LAeq,8hr at night).</u></b></p> <p>The draft Annex states the following with regards to noise contours:</p> <p><i>"All the above levels would include the predicted noise from any proposed or required changes in transportation noise including the potential additional southern wide spaced runway at Gatwick Airport, for which land is required to be safeguarded in the 2013 Aviation Policy Framework. Details of the predicted noise contours associated with a possible</i></p>

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			<p><i>wide-spaced southern runway at Gatwick Airport are set out in <b>Figure 1 of this Noise Annex, which shows the noise contours identified in Plan 31 of the Gatwick Airport Master Plan 2019 (Air Noise Map – Additional Runway – Summer Day - 2040)</b>. Planning applications for noise sensitive development will be considered on the basis of these noise contours. Figure 1 of the Noise Annex will be updated by the council should these contours be superseded by subsequent noise contours published by Gatwick Airport and approved by the CAA."</i></p> <p>This noise policy is inconsistent with current national planning policy and technical guidance on noise. This is discussed in more detail in BAP report reference A11375_01_MO002_1.0. This note is limited to a discussion as to what is the most appropriate noise contour to use for landuse planning.</p> <p>The draft local plan now refers to a more recent contour (published in 2014 and 2019). This is still for the worst-case scenario of Gatwick operating with a additional southern wide spaced runway. However, this contour has been produced with more recent assumptions regarding aircraft type/fleet mix and is more representative than the old 2003 ERCD contour.</p> <p><b>4.0 2018/2019 MASTERPLAN CONTOURS</b></p> <p>Gatwick airport published a draft masterplan in 2018 including noise contour information for a number of different future development scenarios. In 2019 Gatwick published their final masterplan. A masterplan (and associated noise contours) is an indication of how the airport would like to develop in the short, medium and long term. It is common for information on masterplan aspirations to be followed by planning applications. A master plan is produced by the airport, not the government. Noise contours are produced by the CAA. However, these are produced based on flight paths, aircraft movement and fleet mix forecasts provided the airport. This can introduce a potential difference compared to noise contours produced by Government.</p> <p>Gatwick have stated a commercial preference for a second "standby" northern runway in the short to medium term. This is essentially to widen the existing northern taxiway to allow for higher capacity without substantial infrastructure required for an additional wide spaced second runway. The Gatwick master plan statement on a need for additional wide spaced runway is reproduced below.</p> <p><i>"Gatwick is no longer actively pursuing plans for an additional runway, but there nevertheless remains the possibility of building and operating one in the future. Should this, or a future, Government decide to support an additional runway at Gatwick, we would be ready to take this forward with a view to seeking development consent. Should such policy support materialise, then it would be feasible to open the additional runway towards the end of the 5 to 15 year period. It is for this reason that we have included the additional runway in this draft master plan."</i></p> <p>The master plan also states: <i>"Although the Government's Airports National Policy Statement supports a third runway at Heathrow, we believe an additional Gatwick runway, built to the south, should continue to be safeguarded. We believe it is in the national interest to preserve this opportunity to build a new runway in the south east to meet longer term demand growth. DfT's forecasts show that by 2025 the main London airports, with the exception of Stansted, are</i></p>

Noise Annex			
Ref. No.	Respondent	Policy/ Para	Comments
			<p><i>expected to be effectively full and that, even with a third runway at Heathrow, UK airport capacity constraints will be apparent by 2030 and in subsequent years.”</i></p> <p>On 03rd September 2019, Gatwick Airport Ltd submitted a scoping report to the Secretary of State for Transport in pursuance of its intention to obtain a Development Consent Order (DCO) with regard to a Nationally Significant Infrastructure Project for the amendment of Gatwick Airport to support dual runway operations through the routine use of the existing Northern runway and to accommodate up to 74 million passengers per annum. The development will include amendments to taxiways, terminals and ancillary facilities, highways and rivers; as well as temporary construction works, mitigation works and other associated development.</p> <p>BAP understand that there will be a second consultation on the DCO application for the northern runway in the summer of 2021 with an application via the DCO process in 2022.</p> <p>A wide spaced second runway at Gatwick is not a likely future scenario. Current government policy set out in the Airports National Policy Statement 2018 supports a third northern runway at Heathrow. Preliminary work on the Heathrow DCO planning application was carried out in 2018 and 2019. A legal appeal regarding the validity of the government’s policy was resolved in December 2020.</p> <p>Information on likely future contour impacts are presented below compared with the most recent current noise contour information for Gatwick (ERCD report 2002 published in 2020).</p>

Noise Annex																																																							
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			<table border="1"> <thead> <tr> <th>Plan<sup>1</sup></th> <th>Publication date</th> <th>Forecast Year</th> <th>Scenario</th> <th>No. of passenger air traffic movements (PATM) (000s)</th> <th>No. of passengers per year (mppa)</th> <th>Population within 57 dB (000s)</th> <th>Size of contour &gt;57 dB, km<sup>2</sup></th> </tr> </thead> <tbody> <tr> <td>ERCD 2002 FigureB15</td> <td>2020</td> <td>2019</td> <td>2019 Actual</td> <td>285</td> <td>46.6</td> <td>2.6</td> <td>38.7</td> </tr> <tr> <td>27</td> <td>2018</td> <td>2028</td> <td>Main and standby runway (day)</td> <td>360-365</td> <td>65-67</td> <td>3.9</td> <td>n/a</td> </tr> <tr> <td>28</td> <td>2018</td> <td>2028</td> <td>Main and standby runway (night)</td> <td>360-365</td> <td>65-67</td> <td>4.9<sup>1</sup></td> <td>n/a</td> </tr> <tr> <td>29</td> <td>2018</td> <td>2032</td> <td>Main and standby runway (day)</td> <td>375-390</td> <td>68-70</td> <td>4.1</td> <td>n/a</td> </tr> <tr> <td>30</td> <td>2018</td> <td>2032</td> <td>Main and standby runway (night)</td> <td>375-390</td> <td>68-70</td> <td>4.9<sup>1</sup></td> <td>n/a</td> </tr> </tbody> </table>	Plan <sup>1</sup>	Publication date	Forecast Year	Scenario	No. of passenger air traffic movements (PATM) (000s)	No. of passengers per year (mppa)	Population within 57 dB (000s)	Size of contour >57 dB, km <sup>2</sup>	ERCD 2002 FigureB15	2020	2019	2019 Actual	285	46.6	2.6	38.7	27	2018	2028	Main and standby runway (day)	360-365	65-67	3.9	n/a	28	2018	2028	Main and standby runway (night)	360-365	65-67	4.9 <sup>1</sup>	n/a	29	2018	2032	Main and standby runway (day)	375-390	68-70	4.1	n/a	30	2018	2032	Main and standby runway (night)	375-390	68-70	4.9 <sup>1</sup>	n/a				
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			<p><b>Table 1 - Comparison of Crawley preferred noise contour against recent CAA published contours</b></p> <p><sup>1</sup> Plan reference taken from ERCD report/2018 Gatwick Airport Draft Masterplan</p> <p><b>5.0 DAY TIME NOISE – ADDITIONAL WIDE SPACED SECOND RUNWAY</b></p> <p>The noise contours in the Gatwick master plan were prepared by Civil Aviation Authority (CAA) ERCD. BAP have reviewed the Air Noise Map – Additional Runway – Summer Day – 2040 contour referred to in the Local Plan Annex both in terms of location relative to the Steers Lane site and absolute size. This contour is compared with a baseline scenario of the ERCD 0308 daytime contour previously used by Crawley in Table 2.</p>																																																				

**Noise Annex**

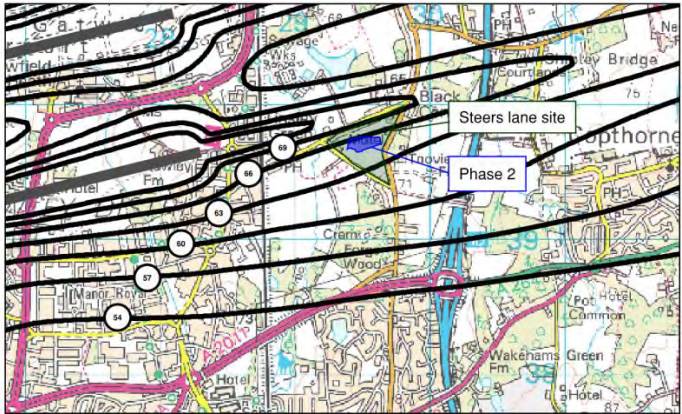
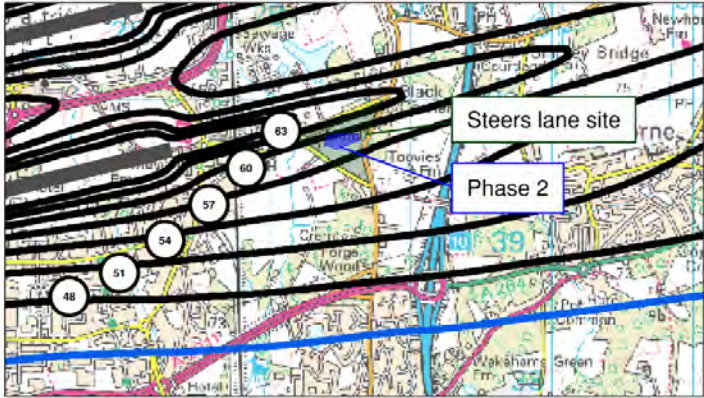
Ref. No.	Respondent	Policy/ Para	Comments
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Plan	Publication date	Forecast Year	Scenario	No. of passenger air traffic movements (PATM) (000s)	No. of passengers per year (mppa)	Population within 57 dB (000s)	Size of contour >57 dB, km <sup>2</sup>
ERCD 0308 Figure 3.4	2003	2030	One additional wide-spaced southern runway	486	76	13.2	84.0
Gatwick 2019 Masterplan Plan 31	2014 & 2019 <sup>1</sup>	2040	One additional wide-spaced southern runway. Same as 2014 airports commission submission <sup>1</sup>	560	95	15.4	66.5

**Table 2: Comparison of 2040 contour with 2030 contour**

<sup>1</sup> The Gatwick 2019 masterplan states that “For our work for the Airports Commission we submitted, in 2014, detailed information on the noise impacts of the proposed additional runway as forecast at that time. The 2040 summer day contours are shown in Figure 5.14.” The 2014 Airports Commission included multiple scenarios for 2014. BAP have assumed that the contour is the larger 95mppa option 3 “scenario”.

Table 2 demonstrates that the use of the more recent (2014 & 2019) future estimate of noise levels from Gatwick with an additional southern wide-spaced runway results in a lower contour area. This is likely to be due to more realistic assumptions regarding aircraft source sound levels and fleet mix than those available for the 2003 prediction. The site's position in relation to the 2040 Summer Day contour is shown below in Figure 1. A more detailed A3 is appended.


Noise Annex			
Ref. No.	Respondent	Policy/ Para	Comments
			 <p>Figure 1: Site location in relation to 2040 Summer Day contour</p> <p>The development site is wholly within the 63 dB contour, with the 66 dB contour crossing a small part of the Northern portion of the site.</p> <p><b>6.0 NIGHT TIME NOISE</b></p> <p>The 2040 Summer Night contour did NOT form part of the 2019 Gatwick masterplan but has previously been published by Gatwick for work by Airport's Commission in 2014. This is shown in Figure 2.</p>  <p>Figure 2: Site location in relation to 2040 Summer Night contour</p>



Noise Annex			
Ref. No.	Respondent	Policy/ Para	Comments
			<p>Phase 2 is wholly within the 57 dB contour, except a small portion to the North which is within the 60 dB contour.</p> <p><b>7.0 SUMMARY</b></p> <p><u>Daytime</u>  Ignoring safeguarding for a second runway, the most likely foreseeable future contour for land use planning would be the 2028 scenario using both the main and standby runways. This is the preferred development option for Gatwick airport.</p> <p>The 66 dB LAeq,16h daytime and 57 dB LAeq,8h night time contours do not encompass the Steers Lane site. It would need to be agreed with the local authority that this contour supersedes the 2014 wide spaced second runway contour.</p> <p>This would seem unlikely. Current central government policy is that a new runway is needed in the south-east of England and that this runway should be at Heathrow. However there is uncertainty that this new runway will be delivered. Crawley's policy position has consistently been to safeguard land on the precautionary principle that a wide spaced second runway at Gatwick could be built.</p> <p><u>Night time</u>  Unfortunately, while the more recent (2014 &amp; 2019) published daytime contours indicate there is more flexibility on noise sensitive development for the Steers Lane site the night time contours indicate a more stringent noise constraint to the daytime noise contours. The control of night noise from this designated airport is still in the remit of Central Government not Gatwick airport.</p> <p>The issue with the Gatwick masterplan contours discussed above is that these are not government policy documents. Post 2003 government policy contours are discussed below.</p> <p><b>8.0 AIRPORT'S COMMISSION 2014-2015</b>  The contours preferred by Crawley are the Gatwick Airport 2019 Masterplan contours taken from previous noise information submitted by the airport in 2014 to the Independent Airports Commission, also known as the Davies commission.</p> <p>The Independent Airports Commission followed up on the 2003 White Paper and investigated 3 options for expanding aviation capacity. Two options involved additional runway capacity at Heathrow. One option was for a new full length wide spaced runway at Gatwick.</p> <p>The report included a recommendation that the best solution was to expand Heathrow with a third runway to the north-west of the airport. The Commission did not agree with Gatwick Airport Limited's view that a second wide spaced runway was an appropriate solution.</p> <p>Noise contours were produced for a 2-runway airport and submitted by Gatwick airport.</p>

Noise Annex			
Ref. No.	Respondent	Policy/ Para	Comments
			<p>Independent noise contours for a 2-runway airport were also prepared by Jacobs on behalf of the Independent Commission. Various scenarios were assessed. These include both future development which is constrained by environmental (carbon) restrictions. Contours were also produced which allowed a high level of airport growth on the assumption that the negative environmental impact would be mitigated through carbon trading. Contours were produced for years 2030, 2040 and 2050.</p> <p>The night time contours potentially constrain development on the site.</p> <p>There is a risk that this could be raised during the planning application that the development does not comply with the local plan policy based on this worst-case night-time contour. This risk is low. The contours have been in the public domain since 2014 and we are not aware that the local authority has raised this risk.</p> <p>There is a reasonable planning argument that the night time noise impact can be adequately mitigated. The adverse night time effects of aircraft noise are limited to potential sleep disturbance and/or annoyance within bedrooms at night. This can be mitigated through the acoustic design of new dwellings to provide adequate sound insulation and ventilation to protect the health and wellbeing of future occupants.</p> <p><b>9.0 AIRPORTS NATIONAL POLICY STATEMENT, JUNE 2018</b>  The Airports Commission recommendation for a third runway at Heathrow was adopted and become policy in Airports National Policy Statement: <i>“New runway capacity and infrastructure at airports in the South East of England, DfT 2018”</i>.  The Policy stated that <i>“the Government believes that there is clear and strong evidence that there is a need to increase capacity in the South East of England by 2030 by constructing one new runway.”</i> A new runway at Gatwick was not supported by this policy.</p> <p>A debate on Airport Expansion (2nd March 2020) has confirmed that the 2018 Airports National Policy Statement is still the policy of the current administration.</p> <p><b>10.0 SUMMARY</b>  The Steers Lane site has previously been developed using the ERCD 2030 66 dB LAeq,16h contour as a constraint. This contour was published in 2003. In the Noise Annex to the Draft Local Plan (published January 2021) the Local Authority have stated that planning applications for noise sensitive developments will be assessed on the basis of Plan 31 of the Gatwick Airport Master Plan 2019 (Air Noise Map – Additional Runway – Summer Day - 2040).</p> <p>This is a worst-case precautionary approach assuming that Gatwick will operate in the future with a second wide spaced southerly runway. This is not current central government policy and Gatwick airport has stated the following in their 2019 Masterplan</p>

Noise Annex			
Ref. No.	Respondent	Policy/ Para	Comments
			<p><i>"3.3.8 Although we strenuously made the case for a new runway at Gatwick, we accept that it is current Government policy to instead supports the third runway at Heathrow and it is now for Heathrow's owners to seek development consent for that project within the terms set out by the NPS.</i></p> <p><i>3.3.9 In light of this policy position we are not actively pursuing a new additional runway. However, should this or a future Government decide to support a new additional runway at Gatwick, then we would be ready to re-examine this with a view to seeking development consent. In the meantime the land required for an additional runway should continue to be safeguarded from incompatible development, in line with current Government policy."</i></p> <p>The Noise Annex also includes scope for this contour to be superseded by <i>"subsequent noise contours published by Gatwick Airport and approved by the CAA"</i>.</p> <p>No night time contours for a wide space second runway at night have been reproduced in the Crawley local plan.</p> <p>BAP have reviewed the 2040 Summer Day contour and policy documents to see if these would change the noise constraints on this site.</p> <p>Night time noise contours for use in planning assessments were not specified in the January 2021 Noise Annex to the Crawley Local Plan. The 2019 Gatwick masterplan does not include a 2040 Summer Night contour. A 2040 Summer Night contour was published as part of previous work issued by Gatwick in 2014.</p> <p>The Government currently controls night noise at the designated airports (Heathrow, Gatwick, Stansted). Current policy is given in "Night flight restrictions at Heathrow, Gatwick and Stansted Decision Document" from 2017. The policy is to "Limit or reduce the number of people significantly affected by aircraft noise at night, including through encouraging the use of quieter aircraft, while maintaining the existing benefits of night flights". Therefore, any potential significant increase in night noise contours seems exceptionally unlikely as this would breach current aircraft night noise policy. The government are currently consulting on the night flight restrictions (2021) but no relaxation on night noise policy seems likely.</p>

Noise Annex															
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			 <p>This drawing contains Ordnance Survey data © Crown Copyright and database right 2021.</p> <p><b>LEGEND:</b></p> <ul style="list-style-type: none"> <li>Wide Spaced 2040 (Plan 31)</li> <li>63 dB <math>L_{Aeq,16h}</math> (Day)</li> <li>Wide Spaced 2040 (Plan 31)</li> <li>66 dB <math>L_{Aeq,16h}</math> (Day)</li> <li>57 dB <math>L_{Aeq,8h}</math> Standard (Night)</li> <li>57 dB <math>L_{Aeq,8h}</math> Carbon Traded (Night)</li> </ul> <table border="1"> <tr> <td>1</td> <td>Feb 2021</td> <td>-</td> <td>MP</td> </tr> <tr> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td></td> <td></td> <td></td> <td></td> </tr> </table> <p><b>REVISIONS</b></p> <p><b>Bickerdike Allen Partners</b>  Architecture  Acoustics  Technology</p> <p>01203 000000   01203 000000  www.bickerdikeallen.com</p> <p>Steers Lane, Crawley</p> <hr/> <p>DRAWN: MP      CHECKED: DT</p> <p>DATE: February 2021      SCALE: 1:5000</p> <p>FIGURE No:  A11375_01_DR001_1.0</p> <p><b>Suggested Modifications:</b>  <i>*see representations to Policy EP4*</i></p>	1	Feb 2021	-	MP								
1	Feb 2021	-	MP												



## Legal Compliance & Key Documents

Regulation 19 January 2021 Representations

Local Plan Map, Duty to Cooperate, Sustainability Appraisal/Strategic Environmental Assessment, Habitats Regulations Assessment, Local Development Scheme, Statement of Community Involvement

Local Plan Map			
Ref. No.	Respondent	Policy/ Para	Comments
REP/091	Brunel Planning on behalf of COIF Nominees LTD c/o CCLA	CL8: Local Plan Map	<p>The main front part of the site is located within the 'Built Up Area' as currently designated.</p> <p>The existing building on site falls within this area but the building's car park on the rear part of the site is currently shown as adjoining but outside the Built-Up Area boundary.</p> <p>The Draft Proposals Map 2021 proposes to maintain this split only proposing to show the front half of the site as being within the Build Up Area.</p> <p>COIF Nominees Limited objects to the site's proposed partial location within the defined Built Up Area.</p> <p>The Draft Local Plan 2021 defines the Built Up Area as: 'This is the boundary around the area defined in the Local Plan as being built up, distinguishing it from the countryside.'</p> <p>Clearly, the entire site and its location within Manor Royal and the Gatwick Diamond is an important employment generating site with capacity for further development and intensification for employment generating uses.</p> <p>This site therefore, should be fully located within the defined Built Up Area on the Draft Proposals Map 2021, as this site is not 'countryside' and is within an area that is 'built up.'</p> <p><b>Suggested Modifications:</b> COIF Nominees Ltd strongly objects to the proposed Built Up Area boundary, and requests that the proposed Built Up Area boundary currently set out on the Draft Proposals Map 2021 be extended to include the entire site.</p>
REP/035 (Jun 21)	Vail Williams on behalf of Ardmore/ Windsor Land Consortium	CL8: Local Plan Map	<p>As you are aware, we already have consent for Building A as shown on the attached Masterplan. This was approved in 2020 and the relevant conditions have been discharged in May 2020 in order to facilitate implementation (June 2020).</p> <p><b>Suggested Modifications:</b> We therefore repeat our comment that the BUAB should reflect this an amendment to the Proposals Map.</p>
REP/055	Savills on behalf of Wilky Group	EC4	<p>See submission for representation</p> <p><b>Suggested Modifications:</b> 5.3 In addition, the following amendments should be made to the allocation for Gatwick Green and the extent of Safeguarded Land on the Local Plan Map:</p> <ol style="list-style-type: none"> <li><b>Amend the allocation of the Strategic Employment Location (Gatwick Green) on the draft Local Plan Map</b> to include the three small parcels of land owned by TWG as shown on the plan at <b>Appendix 10</b>. As a consequence, these parcels of land would be removed from the area designated as Safeguarded Land on the Local Plan Map under Policy GAT2.</li> <li><b>Amend the Safeguarded Land on the draft Local Plan Map between Gatwick Green and the M23 spur road so as to accommodate the proposed spur roads from Junction 9 on the M23</b> to serve a future possible additional wide-spaced runway – the extent of the Safeguarded Land is as advised by GAL to TWG and shown on</li> </ol>

Local Plan Map			
Ref. No.	Respondent	Policy/ Para	Comments
			<p>the Plan at Appendix 11. As a consequence, some small parcels of land would be removed from the land allocated as a Strategic Employment Location (Gatwick Green) on the draft Local Plan Map under Strategic Policy EC4.</p> <p>5.4 The above proposed changes to the DCBLP have been applied to Strategic Policy EC4 and the supporting text of the Plan and are attached at <b>Appendix 12</b>.</p>
REP/093	T S LEISURE & PROPERTY		<p>Similar Policy E4 allocation to the Local Plan for the proposed residential development site at Burstow Hall fronting Antlands Lane.</p> <p>The proposed Horley Business Park at Gatwick Green is adjacent to Burstow Hall. The owner of East Wing is in favour of the development and is prepared to support the proposal provided the same planning privileges are extended to his own development site at Burstow Hall by allocation through E4 to the Local Plan. The planning application for five detached houses on part of the site at Burstow Hall fronting Antlands Lane was refused and all the same reasons apply to the Gatwick Green Business Site site:</p> <ol style="list-style-type: none"> <li>1. Safeguarded land.</li> <li>2. Location outside built up area.</li> <li>3. Unacceptable noise levels.</li> <li>4. Neighbouring commercial occupiers not safeguarded.</li> <li>5. No green infrastructure provisions in place.</li> </ol> <p>The inference is therefore that both sites should be treated equally as they are adjacent and are both subject to the same conditions therefore both sites should gain the planning privileges not just the Business Park site promoted by the Local Authority.</p> <p><b>Suggested Modifications:</b>  Allocation through E4 to the Local Plan of Land at East Wing Burstow Hall, Antlands Lane, Horley, RH6 9SR as shown on Drawing Number TSLP-16-36-02A - Site Block Plan as Proposed dated March 2017.  This modification would result in the fair treatment of the proposed allocations to the Local Plan of neighbouring land owners in a fair and proper manner thereby making the Plan equitably sustainable.</p>

Local Plan Map			
Ref. No.	Respondent	Policy/ Para	Comments
REP/032	West Sussex County Council	The Local Plan Map	<p>The Local Plan Map does not currently show the Minerals Safeguarding Area which is required by para. 005 of the Planning Practice Guidance. It is requested that this is included as a modification to the Plan.</p> <p><b>Suggested Modifications:</b>  The Local Plan Map does not currently show the Minerals Safeguarding Area which is required by para. 005 of the Planning Practice Guidance. It is requested that this is included as a modification to the Plan.</p>
REP/091	Brunel Planning on behalf of COIF Nominees LTD c/o CCLA	Local Plan Map: Manor Royal Boundary	<p>The main front part of the site is located within 'Manor Royal' as currently designated.</p> <p>The existing building on site falls within this area but the building's car park on the rear part of the site is currently shown as adjoining but outside the Manor Royal boundary.</p> <p>The Draft Proposals Map 2021 proposes to maintain this split only proposing to show the front half of the site as being within Manor Royal.</p> <p>COIF Nominees Limited objects to the site's proposed partial location within the defined Manor Royal boundary.</p> <p>The Draft Local Plan 2021 defines the Manor Royal as:  "...the principal business location for Crawley, and instrumental to the success of the wider Gatwick Diamond. Development that is compatible with the area's economic function and role in the wider sub-region will be permitted where it falls within the business sectors of office, research and development, light industry, general industrial and storage or distribution and would result in the reuse, intensification, or change of use of the land or buildings."</p>



Local Plan Map			
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			<p>Clearly, the entire site and its location within Manor Royal and the Gatwick Diamond is an important employment generating site with capacity for further development and intensification for employment generating uses.</p> <p>This site therefore should be shown as being fully located within the defined Manor Royal on the Draft Proposals Map 2021, as the whole of this site functions as part of the Manor Royal.</p> <p><b>Suggested Modifications:</b> COIF Nominees Ltd strongly objects to the proposed Manor Royal boundary, and requests that the proposed Manor Royal boundary set out on the Draft Proposals Map 2021 be extended to include the whole of The Atrium site and not just part of the site.</p>
REP/091	Brunel Planning on behalf of COIF Nominees LTD c/o CCLA	GAT2: Airport Safeguarded Land	<p><b>Object:</b> <b>Proposals Map 2021: Boundary of Gatwick Airport Safeguarded Land</b> <b>Policy GAT2 – Safeguarded Land Not Sound</b></p> <p>The Gatwick Airport Safeguarded Land boundary as set out on the draft Proposals Map 2021 has been expanded further to the south and is proposed to cover a much larger area, than its position on the adopted Proposals Map 2015.</p> <p>The Gatwick Airport Safeguarded Land area on the draft Proposals Map 2021 now partially includes a significant portion of The Atrium site as shown above in Figure 1 (ii).</p> <p><b>Brief Background</b> <b>Earlier Crawley Acceptance of Safeguarded Land</b> For many years Crawley Borough Council has accepted having a safeguarded area north of the Manor Royal Industrial Estate and south of the Southern Perimeter Road of Gatwick Airport.</p> <p>But the Council always recognized that that a Strategic Employment Location between Manor Royal and Gatwick Airport would be welcome because '...this area is sustainably located adjacent to Manor Royal...'. However, the Council states in the current Local Plan that '...this area is currently constrained by safeguarding for a possible new runway at Gatwick...' The Council stated that it would only assess opportunities in this area once the government has determined its approach towards additional runways.</p> <p>The area identified on the Local Plan Map was the area where it was considered that new development would be incompatible with the expansion of the airport to accommodate the construction of an additional wide spaced runway.</p> <p><b>2003 Aviation White Paper</b> The original requirement to safeguard land for a second runway at Gatwick was contained in the 2003 Aviation White Paper. The land originally shown as safeguarded for a second runway in the Local Plan Map reflected that shown in the 2012 Gatwick Airport Masterplan.</p>

Local Plan Map			
Ref. No.	Respondent	Policy/ Para	Comments
			<p><b>Airports Commission's Final Report</b></p> <p>The Airports Commission Final Report considered the three shortlisted schemes, one of which was Gatwick Airport Ltd.'s Gatwick Second Runway Scheme (LGW-2R) proposal for a new full length runway to the south of and parallel to the existing runway at Gatwick.</p> <p>The Airports Commission concluded that the best answer was to expand Heathrow's runway capacity, which would deliver the most '...substantial economic and strategic benefits...' than the other options, and would best boost the productivity of the UK economy.</p> <p>Crawley Council fully recognized that the Airports Commission's Final Report came down on the side of recommending to the Government that a further runway should be provided by the expansion of Heathrow Airport.</p> <p>However, the Council noted that this was a recommendation and stated at the time of the current Local Plan the area would continue to be safeguarded until a decision had been made by the Government, and depending on the Government's response the Local Plan may need to be reviewed.</p> <p>The Council recognized that the review may need to include the future use of the currently Safeguarded Land '... if it is concluded at a national level that there is no requirement to safeguard it for additional runways...'</p> <p><b>Government Agreement to Heathrow Expansion</b></p> <p>The Government confirmed that it agreed with and accepted the Airports Commission recommendation to build a new runway at Heathrow, as the best way to deliver new runway capacity in the South East.</p> <p>Crawley Council now have the opportunity to take advantage of the opportunity to remove their previously identified constraint and '...assess the opportunities in this area..' as the Government has clearly determined its approach towards an additional runway.</p> <p><b>Gatwick Airport Master Plan 2019</b></p> <p>Gatwick Airport Ltd (GAL) appeared to have accepted the Government's decision and reconsidered its approach to the provision of future runway capacity.</p> <p>GAL presented three growth scenarios for the airport's longer-term future. These were:  Scenario 1: where Gatwick remains a single runway operation using the existing main runway;  Scenario 2: where the existing standby runway is routinely used together with the main runway;  Scenario 3: where GAL continue to safeguard Land for an additional runway to the south.</p> <p>GAL has decided to pursue Scenario 2 which they stated would make best use of the existing runways, and provide additional operational resilience, whilst offering capacity benefits whilst minimising development outside the existing airport boundary.</p>

Local Plan Map			
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			<p>They stated that this scenario would have the potential for an increase in passenger numbers of greater than 10 million passengers per annum, and would assist in delivering ‘...unmet Department for Transport forecasted aviation demand to 2050.’ That forecasted aviation demand was before the impact of the Covid pandemic.</p> <p>GAL state in the latest Master Plan that they will apply for a Development Consent Order following the nationally Significant Infrastructure Project (NSIP) route under the Planning Act 2008, to gain planning permission for the Scenario 2 development of a second full runway.</p> <p>However, GAL has also made the inconsistent statement that they ‘...would continue to safeguard land...’ for another runway to the south of the airport.</p> <p>Notwithstanding the Airports Commission’s work and recommendations, and the subsequent decision by the Government, GAL is in effect proposing to make Gatwick a three-runway airport.</p> <p>Rather than dramatically reducing or removing the previous Safeguarded Land for a potential second runway, as one might expect, GAL is suggesting this should remain in place, in effect to allow a potential third runway, and indeed that it should be expanded further cutting further into existing commercial development within Manor Royal.</p> <p>This is clearly a perverse planning response in the light of the Government decisions.</p> <p>It is of course open to GAL as a commercial operator to attempt to bring about their preferred commercial approach, it would clearly be irrational for Crawley Borough, as the Local Planning Authority, to also adopt such an approach.</p> <p>In the Gatwick Master Plan 2019 GAL ask Crawley Council to accept their approach, stating that they ‘recommend’ to the Local Planning Authorities that they accept that their previous Safeguarded Land area is expanded, which would allow them to accommodate their third runway.</p> <p>The rational response from Crawley Council as the Local Planning Authority would be to not accept this recommendation from the airport operator. There is now no need to safeguard land to the north of Manor Royal.</p> <p><b>The Objection</b>  <b>Object:</b>  <b>Proposals Map 2021: Boundary of Gatwick Airport Safeguarded Land</b>  <b>Policy GAT2 – Safeguarded Land Not Sound</b></p> <p>Draft Policy GAT2 – Safeguarded Land states that ‘the Local Plan Map identifies land that is safeguarded from development which would be incompatible with expansion of the airport to accommodate the construction of an additional wide spaced runway together with a commensurate increase in facilities that contribute to the safe and efficient operation of the expanded airport...’</p>

Local Plan Map			
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			<p>COIF Nominees Ltd strongly objects to draft Policy GAT2 and the Gatwick Airport Safeguarded Land boundary as set out on the Draft Proposals Map 2021 (extract above, Figure 1 (ii)).</p> <p>The Atrium site and its location within Manor Royal is recognised throughout the Draft Local Plan 2021 as a principal business location and this area has been identified as being critical to the function of Crawley and that of the wider sub-region.</p> <p>In addition, the Draft Local Plan 2021 recognises that ‘positive planning’ and the Local Plan have a ‘key role’ to play in supporting the business led economic role of Manor Royal and must set ‘a framework in place for wider improvements so that Manor Royal can go from strength to strength.’</p> <p>The approach Crawley Borough Council has taken in setting out the Gatwick Airport Safeguarded Land boundary on the draft Proposals Map 2021 is irrational and is not sound and goes against the positive planning strategy for employment land set out in Section 9 – Economic Growth of the Draft Local Plan 2021.</p> <p>As set out above, The Gatwick Master Plan 2019 confirms that Gatwick is no longer actively pursuing plans for an additional runway and that they will look to utilise the existing standby runway to the North for additional flights. There is therefore no need for safeguarded land to the south of Gatwick Airport.</p> <p>It cannot be that GAL in deciding to use the existing standby runway as their second full runway, can reasonably propose to further increase the ‘Safeguarded Land’ boundary and not instead remove it, or dramatically reduce it from the adopted Local Plan position, so that they can pursue a third runway in the future.</p> <p>This approach will blight the strategic employment land and good employment growth prospects in critical areas of Crawley including Manor Royal.</p> <p>COIF Nominees Ltd have future plans to develop the Atrium site further for increased employment use. This accords with a key aim of both the Development Plan and the Draft Local Plan 2021.</p> <p>The expanded Safeguarded Land approach set out on the draft Proposals Map 2021 is not sound for the reasons set out above and conflicts with other key parts of the Draft Local Plan 2021.</p> <p><b>Suggested Modifications:</b> COIF Nominees Ltd therefore wish to see the Safeguarded Land boundary along the northern edge of Manor Royal, removed in light of the findings set out within the Gatwick Masterplan 2019 so that crucial employment land does not remain under this unnecessary constraint.</p>

<b>Duty to Cooperate</b>			
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REP/025	Resident 10		<p>5.1 I'm not a lawyer.</p> <p>5.2 It does not appear sound in respect of the failed duty to cooperate (please see attachment)</p> <p>5.3 It cannot comply because the duty to cooperate does not work. It doesn't 'do what it says on the tin'. The final sentence in italics of the section 7 heading below is tantamount to an admission of its failure. It merely gives licence to the controlling LPA as more of a 'duty to operate in spite of whatever might be best for the impacted authority, and in anticipation of this, seeks to absolve the planning process of any further responsibility to exercise any degree of constraint.</p> <p>The resulting denial of control affecting growth beyond its current built boundary impinges on all aspects of the local plan consultation.</p> <p>(please see my email of 13.03.2021)</p> <p><b>Suggested Modifications:</b>  The final sentence of the above heading is a denial of justice, in any sense of the word, in the context of a town whose very existence and growth has derived from its own good planning, being denied any continued leadership in determining its own future shape and direction.</p> <p>Under these rules any modification seeking to remedy the injustice supported by duty to cooperate would be deemed to be outside the remit of the consultation process.</p> <p>A Local Plan approved under these circumstances, given insufficient control of land beyond its built-up edges, and without Government concession on this fundamental point will be bad for Crawley and in some important respects, little better or worse than no plan.</p> <p>(Please see 13.03.20121 email).</p>
REP/058	Reigate and Banstead		<p><b>Statement of Common Ground</b>  In our last response to the Regulation 19 Local Plan Review (2020) we noted our concern that we had not been approached to produce a Statement of Common Ground ("SoCG") as advised by the National Planning Practice Guidance ("PPG"). However, both CBC and RBBC have since agreed to a SoCG, which was signed by both parties in February 2021. We fully appreciate CBC's initiative in preparing a SoCG with us.</p> <p><b>Suggested Modifications:</b></p>
REP/116	Neame Sutton Limited on behalf of Danescroft		<p><b>2.0 Legal Compliance</b>  <b>Duty to Cooperate:</b>  2.1 There are a number of Legal Compliance matters that the Council must address if it intends to proceed with the submission of a Local Plan for Examination. The Regulation 19 consultation stage is intended to comprise the version of the Plan that the Council considers to be Sound and in compliance with the various legal requirements.</p>

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	(RLP Crawley) LLP		<p>2.2 Unlike matters of Soundness that can be addressed through modifications to the Plan any issues relating to Legal Compliance of the Plan cannot be addressed retrospectively.</p> <p>2.3 It is therefore of vital importance to the Council that the Plan meets the Legal Compliance requirements before it proceeds.</p> <p>2.4 Of particular importance in the case of Crawley is the Duty to Cooperate (“DtC”). Section 110 of the Localism Act 2011 introduces a new Section 33a into the Planning and Compulsory Purchase Act 2004, which requires the Local Planning Authority to cooperate with its neighbouring authorities and other bodies.</p> <p>2.5 Sub-section (2) goes onto set out how the engagement should be undertaken by stating: ‘In particular, the duty imposed on a person by subsection (1) requires the person— (a). to engage constructively, actively and on an ongoing basis in any process by means of which activities within subsection (3) are undertaken, and (b). to have regard to activities of a person within subsection (9) so far as they are relevant to activities within subsection (3).’</p> <p>2.6 Government policy also confirms that: ‘In order to demonstrate effective and on-going joint working, strategic policy-making authorities should prepare and maintain one or more statements of common ground, documenting the cross-boundary matters being addressed and progress in cooperating to address these. These should be produced using the approach set out in national planning guidance, and be made publicly available throughout the plan-making process to provide transparency.’ Paragraph 27 of National Planning Policy Framework (February 2019).</p> <p>2.7 It is therefore a vital legal requirement of the Plan making process that the Council engages with its neighbours on a constructive, active and, ongoing basis. The engagement should be documented throughout the process to demonstrate compliance with the legal requirements.</p> <p>2.8 In our Representations to the first Regulation 19 draft of the Plan in February 2020 we highlighted the fact that, at that time, no evidence at all of engagement with neighbouring authorities, the County Council or other bodies, either as part of that consultation nor in relation to any earlier stage in the preparation of the Plan had been provided by the Council.</p> <p>2.9 As part of this second Regulation 19 consultation the Council has published the following documents:</p> <ul style="list-style-type: none"> <li>• Draft Duty to Cooperate Statement – March 2021 <ul style="list-style-type: none"> <li>○ North West Sussex Statement of Common Ground – May 2020</li> <li>○ West Sussex Statement of Common Ground – April 2020</li> <li>○ SoCG between Crawley and Reigate and Banstead – February 2021</li> <li>○ SoCG between Crawley and Mole Valley – January 2021</li> <li>○ SoCG between Tandridge and Crawley – December 2018</li> <li>○ Ashdown Forest Statement of Common Ground – April 2018</li> </ul> </li> </ul>

<b>Duty to Cooperate</b>			
<b>Ref. No.</b>	<b>Respondent</b>	<b>Policy/ Para</b>	<b>Comments</b>
			<p>2.10 The above SoCGs are appended to the Draft Duty to Cooperate Statement (“DtC”). The Draft DtC Statement also references a SoCG between Crawley and Horsham and states that is ‘outstanding’. Even by the Council’s own standard the DtC evidence base is therefore incomplete. Given that Horsham is one of only two primary candidates for accommodating any unmet need arising in Crawley the absence of a SoCG is arguably a significant gap in the evidence base.</p> <p>2.11 Furthermore it is important to note that the SoCGs with Reigate and Banstead and Mole Valley were both produced after the commencement of the current Regulation 19 consultation and therefore the draft Plan cannot possibly be reflective of those DtC discussions.</p> <p>2.12 Secondly, the SoCGs prepared in relation to Tandridge and Ashdown Forest are now 2½ and 3 years old respectively, which is not evidence of continuous and ongoing engagement.</p> <p>2.13 Finally, the North West Sussex SoCG is predicated on a lower level of unmet need than the Council is currently expecting in this Regulation 19 version of the Plan, which therefore renders that document out of date.</p> <p>2.14 Turning now to consider some of the detail in the DtC evidence presented by the Council.</p> <p><b>North West Sussex Statement of Common Ground – May 2020:</b></p> <p>2.15 This SoCG was prepared and signed during May and June 2020 i.e. 7-8 months prior to the publication of the current Regulation 19 version of the Plan in January 2021.</p> <p>2.16 Whilst the document identifies the strategic matters to be considered in relation to housing need it merely quantifies the level of unmet need, which at that time was identified as 5,995 dwellings, and does no more than that.</p> <p>2.17 Since that time the level of unmet need that the Council envisages will arise from its current draft Regulation 19 version of the Plan has increased to 6,680 dwellings (Paragraph 3.1.5 on Page 11 of the Unmet Needs and Duty to Cooperate Topic Paper – January 2021).</p> <p>2.18 The content of the SoCG is therefore out-of-date and there does not appear to have been any update to either to reflect the increased unmet need arising from Crawley nor to move forward the important debate about how it is to be addressed. This does not represent active and ongoing engagement.</p> <p><b>West Sussex Statement of Common Ground – April 2020:</b></p> <p>2.19 This SoCG does not deal with housing need and delivery and in this respect no further comment is provided at this stage.</p> <p><b>SoCG between Crawley and Reigate and Banstead (“RBBC”) – February 2021:</b></p>

<b>Duty to Cooperate</b>			
<b>Ref. No.</b>	<b>Respondent</b>	<b>Policy/ Para</b>	<b>Comments</b>
			<p>2.20 This SoCG, having been produced after the publication of the current Regulation 19 draft Plan, identifies the up-to-date level of unmet need of 6,680 dwellings, which again reinforces the fact that the North West Sussex SoCG is out-of-date.</p> <p>2.21 Point 9 of the SoCG simply concludes that RBBC is not in a position to meet any unmet need arising from Crawley. No review programme is in place and there does not appear to be any expectation set out by either party for further discussion on the matter.</p> <p>2.22 This cannot meet the duty for active and ongoing engagement.</p> <p><b>SoCG between Crawley and Mole Valley – January 2021:</b></p> <p>2.23 This SoCG concludes at Point 7 that due to the need to undertake site-specific exceptional circumstances testing to determine whether it is appropriate for individual sites to be released from the Green Belt, it is not currently considered possible to meet any of Crawley’s housing needs within Mole Valley.</p> <p>2.24 Mole Valley has not closed the door on the concept of meeting some of Crawley’s unmet need, yet the SoCG does not set out any review programme and there does not appear to be any intention by either party to revisit the position.</p> <p>2.25 This cannot meet the duty for active and ongoing engagement.</p> <p><b>SoCG between Crawley and Tandridge:</b></p> <p>2.26 This document is now over 2 years old and no update has been provided in the evidence base.</p> <p>2.27 In simple terms the document cannot meet the duty for active and ongoing engagement because nothing has been produced by either party to update the key actions identified under heading 2.1 – Housing i.e. TDC and CBC will engage through a wider duty to cooperate forum with others to find opportunities for meeting unmet need.</p> <p>2.28 The failings identified above in relation to the Duty to Cooperate are matters that a number of other Local Planning Authorities have recently got into difficulties with including Sevenoaks and Wealden both of which have had to abandon their Examinations.</p> <p>2.29 It is particularly important in relation to Crawley, which is heavily dependent upon its neighbours in order to meet the full Local Housing Need (“LHN”) calculated via the Government’s Standard Method.</p> <p><b>Suggested Modifications:</b></p>
REP/120	Squires Planning on behalf of J. Ewing & V. Lovell		<p><b>(iv) Duty to Cooperate</b></p> <p>2.32. This requires that councils preparing development plan documents ‘engage constructively’ and ‘on an ongoing basis’ with each other. The Duty to Cooperate is not just a procedural hurdle. In Central Beds Vs SOS Justice Patterson stated; “To come to a planning judgment on a duty to co-operate involves not a mechanistic acceptance of all documents submitted by the plan-making authority but a rigorous examination of those documents and the evidence</p>



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			<p>received so as to enable an Inspector to reach a planning judgment on whether there has been an active and ongoing process of co-operation”.</p> <p>2.33. Three Statements of Common Ground (SCG) were published in January 2021 as part of the Crawley Submission Draft Local Plan Consultation. These are with Mole Valley, Reigate and Banstead and North West Sussex (Horsham, Mid Sussex and West Sussex). Further SCGs were published as part of the 15th April update within the Draft Duty to Cooperate Statement. These are with West Sussex (April 2020), Tandridge December 2018) and Ashdown Forest (April 2018). It is noted that in preparation of the adopted Local Plan 2015-2030 there were 10 statements of common ground/memorandum of 11 understanding documents submitted which also included details of constructive and ongoing dialogue between the LEP and Gatwick Diamond LPAs.</p> <p>2.34. We comment on the published SCG’s below:</p> <ul style="list-style-type: none"> <li>(i) With regard to the Mole Valley SCG, the two authorities agree that they are in separate functional economic market areas (FEMA) and therefore there are no influential economic connections between Crawley and Mole Valley. “Mole Valley is, therefore, not able to physically or effectively accommodate any unmet business land needs from Crawley, should these arise.” (p13).</li> <li>(ii) With regard to the Reigate and Banstead SCG there is agreement that the Crawley Submission Draft Local Plan seeks to meet the most recently identified office and industrial (storage and distribution) needs in their borough.</li> <li>(iii) The North West Sussex SCG highlights employment and economic development as a strategic matter and commits the authorities to work together on employment issues and meet regularly. There is agreement that ‘...the approaches to employment development in currently adopted Local Plans support the economic growth of the Functional Economic Area’ (p4). There is no updated agreement on the current approach although the recently published North West Sussex EGA is evidence of jointly commissioned work, the results of which have been accepted by each council.</li> <li>(iv) The West Sussex SCG is signed by all the Local Authorities within West Sussex. It states in paragraph 2.4 of Appendix J to the Draft Duty to Cooperate document that ‘each LPA will prepare a SCG that addresses strategic matters relevant to the preparation of local plans, neighbourhood plans, and infrastructure delivery plans (IDPs) in their plan areas. As necessary, they will address joint working and cooperation with WSCC in relation to the strategic matters identified in this SCG’. It does not appear that such SCGs have been completed. Further to this paragraph 6.2 states that a template be completed throughout plan preparation for submission, setting out where an agreement has been reached and where there are any outstanding matters that need to be resolved. It does not appear this tool of ongoing and constructive engagement has taken place. Paragraph 6.4 states that ‘WSCC will identify what, where, and when new or improved infrastructure provided by WSCC (on a statutory basis or as a service provider) is needed to mitigate the impact of planned development’. It does not appear that WSCC have confirmed whether such new or improved infrastructure is needed to service the ‘Gatwick Green’ allocation. There is concern that WSCC have not been properly engaged in the plan making process which has led to uncertainty over the impacts of the ‘Gatwick Green’ allocation and what mitigation is appropriate. This concern is highlighted under</li> </ul>

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			<p>Table 3.3 of the Draft Duty to Cooperate Statement which states the outstanding action with regard to employment: Outstanding Issues &amp; Ongoing Cooperation: Ongoing discussions in relation to strategic employment locations, particularly related to transport 12 implications with West Sussex County Council, Reigate and Banstead Borough Council and Surrey County Council.</p> <p>(v) The Tandridge SCG and Ashdown Forest SCG do not cover employment matters.</p> <p>2.35. There are no statements of common ground with Horsham, Croydon Borough Council, East Sussex or Coastal West Sussex authorities which are part of the Gatwick Diamond and Coast to Capital Local Enterprise Partnership.</p> <p>2.36. The Gatwick Diamond Strategic Statement 2016 (published June 2017) aims to help fulfil the Duty to Cooperate (para 1.3). It provides a broad consensus on the relevant challenges and issues affecting the economic area alongside a strategic direction for joint working and cooperation for delivering the approach laid out in the statement (para 1.11). The Gatwick Diamond comprises Surrey County Council and West Sussex County Council, and the local authorities of Crawley Borough, Epsom and Ewell Borough, Horsham District, Mid Sussex District, Mole Valley District, Reigate and Banstead Borough, together with Tandridge District. The broad area is shown on the diagram below:</p> <p>2.37. The Statement covers broad themes and aims. The short-term priority for the Gatwick Diamond is to co-ordinate employment land policies to secure and support the retention of employment land necessary to provide a mix and choice of high-quality sites (p42) and the longer-term priority is agreeing the delivery of a Science and Technology Park (p50). There is no spatial element to the statement in terms of employment land supply and there appears to be no timetable or mechanism for achieving the goals. The Statement was published almost 4 years ago in 2017. It is not apparent what has happened since that time regarding engagement between the Gatwick Diamond Authorities and so this statement does not satisfy the duty to cooperate as it is not an active and ongoing process of seeking to meeting employment needs.</p> <p>2.38. Gatwick 360 - The Coast to Capital Strategic Economic Plan 2018-2030, covers a large area between Brighton and Croydon as the name suggests. The plan highlights the importance of Gatwick Airport and encourages maximising its economic potential (p16). The Strategy largely focuses on promoting the 'knowledge economy' – high tech manufacturing, education, digital and communications businesses. There is no mention of providing warehouse and distribution services and there is no spatial direction or agreement on provision of employment land. This does not</p>



Figure 1 - The Gatwick Diamond

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			<p>satisfy the duty to cooperate as there is no evidence of constructive engagement between its members in an active and ongoing process of seeking to meet employment needs.</p> <p>2.39. Paragraph 27 of the revised NPPF states that “strategic policy-making authorities should prepare and maintain one or more statements of common ground, documenting the crossboundary matters being addressed and progress in cooperating to address these”. It advises that “these should be produced using the approach set out in national planning practice guidance and be made publicly available throughout the plan-making process to provide transparency”.</p> <p>2.40. It is noted that the previous Regulation 19 consultation in early 2020 included no SCGs. Reigate and Banstead, in their response to that consultation stated that they had not yet been approached to produce one. An SCG has now been produced late in the plan preparation agreeing that the Submission Draft Plan seeks to meet the most recently identified office and industrial (storage and distribution) needs in Crawley Borough.</p> <p>2.41. The very recently proposed allocation of ‘Gatwick Green’ within the borough provides a solution for the plan to meet employment needs without needing to properly engage through the Duty to Cooperate. Indeed, without the proposed allocation the emphasis on the duty to cooperate to meet the unmet needs would be in focus and the available evidence, or lack of, demonstrate that there has been little effort to meet employment needs in other LPAs. It appears that this cross-boundary issue should have been dealt with through effective joint working rather than through a last minute and unjustified attempt to meet employment needs within the borough by removing a large part of the safeguarded area. The plan is in danger of failing the test of soundness which states that plans should be ‘positively prepared’.</p> <p>2.42. It is considered that, whilst Crawley’s attempt to meet employment needs within its own boundary is short sighted and could result in far greater economic damage than benefits (see safeguarding section). This could potentially have been avoided if there had been effective joint working on cross-boundary strategic matters with LPAs with influential economic linkages including Reigate and Banstead, Mole Valley, Tandridge, coastal West Sussex and East Sussex as well as the North West Sussex Area.</p> <p>2.43. Employment land delivery is a sub-regional/regional issue affecting a wide area and Crawley should therefore be engaging constructively and on an ongoing basis with the Gatwick Diamond and LEP. Crawley falls short of this requirement with a lack of constructive and ongoing dialogue with these areas. There has been a failure to engage adequately on addressing their unmet employment needs in neighbouring LPAs which has resulted in an attempt to address the issue by allocating land which is safeguarded for nationally important infrastructure. The last-minute proposal is highlighted by the fact there is no evidence to suggest it is not needed for a second runway and there does not appear to have been any engagement with Gatwick Airport Ltd (GAL) regarding the proposal. GAL, having gone through an extensive process to establish plans for a second runway for the Airport Commission is best placed to understand the land take for an additional runway.</p>

<b>Duty to Cooperate</b>			
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			<p>2.44. The plan currently fails the legal ‘duty to cooperate test’ as set out in Localism Act 2011 and should progress no further in its current state. Only once constructive engagement with the wider Gatwick Diamond and LEP areas with regard to meeting the unmet need for employment land should the plan proceed. Substantive, early engagement takes lots of time, resources and mutual political will but is crucial in achieving the best outcome. We believe that this, alongside maximising the use and intensifying existing employment sites within Crawley is the appropriate way forward in line with national policy, which protects land that may be required for airport development in the future (Aviation Framework 2013).</p>
			<p><b>Suggested Modifications:</b></p>
REP/ 124	Gladman Developments Ltd.		<p><b>a. Legal compliance</b>  <b>2.1. Duty to Cooperate</b>  2.1.1. The Duty to Cooperate is a legal requirement established through Section 33(A) of the Planning and Compulsory Purchase Act 2004, as amended by Section 110 of the Localism Act. It requires local authorities to engage constructively, actively and on an ongoing basis with neighbouring authorities on cross-boundary strategic issues throughout the process of Plan preparation. As demonstrated through the outcome of the 2020 Sevenoaks District Council Local Plan examination and subsequent Judicial Review, if a Council fails to satisfactorily discharge its Duty to Cooperate, this cannot be rectified through modifications and an Inspector must recommend non-adoption of the Plan.  2.1.2. Whilst Gladman recognise that the Duty to Cooperate is a process of ongoing engagement and collaboration, as set out in the Planning Practice Guidance (PPG) it is clear that it is intended to produce effective policies on cross-boundary strategic matters.  2.1.3. The revised Framework (2019) has introduced a number of significant changes to how local planning authorities are expected to cooperate including the preparation of Statement(s) of Common Ground (SoCG) which are required to demonstrate that a plan is based on effective cooperation and has been based on agreements made by neighbouring authorities where cross boundary strategic issues are likely to exist. The revised Framework (2019) sets out that local planning authorities should produce, maintain, and update one or more Statement(s) of Common Ground (SoCG), throughout the plan making process (PPG Reference ID: 61-001-20180913). The PPG sets out further guidance of the information that a SoCG should contain, including that the distribution of needs in the area as agreed through the plan-making process, or the process of agreeing the distribution of need (including unmet need) across the area (Planning Practice Guidance Paragraph: 011 Reference ID: 61-011-20190315). In this regard, Gladman believe it would be prudent for the Council to outline how the proposed number of unmet dwellings will be addressed across the Northern West Sussex (NWS) authorities. This would provide greater certainty regarding the delivery of the unmet housing needs across the HMA ahead of the submission of the Local Plan, which can then later be confirmed during the examination process.</p>
			<p><b>Suggested Modifications:</b></p>

<b>Duty to Cooperate</b>			
<b>Ref. No.</b>	<b>Respondent</b>	<b>Policy/ Para</b>	<b>Comments</b>
REP/123	Barton Willmore on behalf of The Sogno Family Trust		<p><b>Duty to Cooperate</b></p> <p>2.24 Statements of Common Ground have been signed with Reigate and Banstead, Mole Valley and the Northern West Sussex authorities (Horsham, Mid Sussex and West Sussex). An updated Duty to Cooperate Statement was published in April 2021 which has been considered below.</p> <p>2.25 Whilst Reigate and Banstead Borough and Mole Valley District are within separate HMAs according to the Statements of Common Ground, it is appropriate for the authorities to consider whether they can accommodate unmet needs of Crawley given their close relationship. Both authorities have stated they are unable to accommodate any unmet needs due to Green Belt constraints. As per paragraph 137 of the NPPF, it is agreed that prior to concluding exceptional circumstances to remove land from the Green Belt, all other reasonable options for meeting the identified need should be examined fully, such as other locations or authorities who are not constrained as such.</p> <p>2.26 The Northern West Sussex Statement of Common Ground (May 2020) identifies that Horsham and Mid Sussex will seek to accommodate unmet needs arising from Crawley in their emerging Local Plans. However, at the time of these representations, the amount of need that can be accommodated within Horsham and Mid Sussex is unknown.</p> <p>2.27 In order for the draft Local Plan to be found effective, in accordance with paragraph 35 of the NPPF, that “cross-boundary strategic matters have been dealt with, not deferred”, it is necessary for the council to have confidence that their unmet housing need can be accommodated by the Horsham and Mid Sussex District Councils. Otherwise, in the absence of other reasonable options, further engagement with Mole Valley and Reigate and Banstead will be necessary to understand whether there are any sites which do not contribute to the purpose of the Green Belt, and are suitable for release to meet Crawley’s unmet needs. In providing this additional supporting evidence, the plan can be found effective.</p> <p>2.28 On this basis, it is recommended that an updated Statement of Common Ground be agreed which confirms the extent of unmet needs that can be accommodated by the neighbouring authorities, in order for the plan to be found effective and positively prepared, and therefore sound.</p> <p><b>Suggested Modifications:</b></p>

Sustainability Appraisal/Strategic Environmental Assessment			
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REP/022	Sussex Ornithological Society	ST4	<p>We have no further points to raise in regard to the Sustainability Appraisal/Strategic Environmental Assessment, and would like the comments we made in our March submission to go forward.</p> <p><b>Suggested Modifications:</b></p>
REP/055	Savills on behalf of Wilky Group Agent	EC1	<p><b>1.0 Introduction</b></p> <p>1.1 This representation is submitted on behalf of The Wilky Group (TWG), which has a longstanding interest in the promotion of strategic employment land within the Crawley Borough Council (CBC) area. This representation relates to the draft Sustainability Appraisal / Strategic Environmental Assessment (SA/SEA) (Crawley Borough Council Local Plan Review   Sustainability Appraisal / Strategic Environmental Assessment, Draft Report, For the Submission Local Plan, January 2021) that supports the draft Crawley Borough Local Plan, 2021 (DCBLP).</p> <p>1.2 TWG owns about 48 ha (119 acres) of land east of Gatwick Airport. The land has been promoted by TWG as a strategic employment opportunity known as Gatwick Green (the Site). The Site is proposed for allocation as a Strategic Employment Location (SEL) of 47 ha (116 acres) in the DCBLP under Strategic Policy EC4 as a comprehensive industrial-led development of predominantly storage and distribution uses under use class B8.</p> <p>1.3 This representation notes that the SA/SEA has been prepared in accordance with the advice in the Planning Practice Guidance (PPG), and that specifically its assessment in relation to Strategic Policies EC1 and EC4 and Policy GAT2 is sound.</p> <p><b>2.0 Strategic Policy EC1</b></p> <p>2.1 The Council has assessed the alternative options in relation to addressing the unmet economic and employment land needs of the Borough in its Sustainability Appraisal (SA/SEA). This evaluated three options: (1) rely on the NPPF to direct economic growth to the most appropriate locations, (2) adopt an employment land requirement based on Crawley's housing land supply and accommodate economic growth in existing employment areas and in neighbouring council areas, and (3) plan positively for growth in line with the role of Crawley and accommodate economic growth at the main employment areas and the allocation of Gatwick Green to meet industrial and warehouse requirements.</p> <p>2.2 Option 3 was selected as the most sustainable option as it recognised Crawley as a key employment destination with a <b>minimum</b> land requirement of 38.7 ha to be met through development in the main employment areas, small extensions to Manor Royal and the allocation of Gatwick Green. This approach enabled (page 176):</p> <p><i>"...Crawley to respond to market signals, planning for the specific sectors where growth is identified, and support economic recovery from the current economic challenges posed by Covid-19. In identifying new business land, the approach will help to retain and attract business and investment, both to Crawley and the wider functional economic market area. In doing so, the approach responds to NPPF requirements to plan positively for economic growth, and reinforcing and strengthening Crawley's economic role, and that of the wider area."</i></p> <p>2.3 This analysis was reflected in Topic Paper 5 (Employment Needs and Land Supply). Importantly, the assessment was predicated on the need to plan for a minimum of 38.7 ha of new employment land and a minimum of 77,800 sqm</p>

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			<p>of employment floorspace – this underlines the positive policy response to planning for the future economic needs of the Borough, allowing for flexibility so as to future-proof the economy.</p> <p>2.4 Applying the employment requirements as minima was a key part of the Council's SA/SEA, demonstrating that this approach was the most sound of the options considered. More detailed evidence contained in Savills' representation on behalf of TWG in relation to Strategic Policy EC1 demonstrates that the Council's analysis is correct such that there is a sound case in support of Strategic Policy EC1, subject to some minor adjustments as referred to in the representation.</p> <p><b>Suggested Modifications:</b></p>
		EC4	<p><b>3.0 Strategic Policy EC4</b></p> <p>3.1 The Council has assessed the alternative options for providing for an Strategic Employment Location (SEL) in its Sustainability Appraisal (SA/SEA). This evaluated three options: (1) allocate a SEL only through Strategic Policy EC1, (2) allocate a SEL through a dedicated local plan policy, and (3) explore the scope to allocate an industrialised SEL through an Area Action Plan.</p> <p>3.2 Option 2 was selected as it allowed for detailed matters relating to the amount and type of business floorspace, transport and access, design and amenity and environmental considerations to be addressed in policy and provide a framework to achieve a sustainable development through a masterplan and planning application. The Council's approach is supported in that it has allowed for the Gatwick Green SEL to be identified as part of the overall economic strategy for the Borough articulated in Strategic Policy EC1, with the detailed matters relating to site / development requirements to be addressed separately in a site-specific policy (EC4).</p> <p>3.3 More detailed evidence contained in Savills' representation on behalf of TWG in relation to Strategic Policy EC4 demonstrates that the Council's analysis is correct such that there is a sound case in support of Strategic Policy EC4, subject to some minor adjustments as referred to in the representation.</p> <p><b>Suggested Modifications:</b></p>
		GAT2	<p><b>4.0 Policy GAT2</b></p> <p>4.1 The Council has assessed the alternative options in relation to Safeguarded Land in its Sustainability Appraisal (SA/SEA). This evaluated three options: (1) safeguarding land as shown in the GAMP, (2) do not safeguard any land, and (3) safeguard land with an amended boundary to allow for strategic employment provision. Option 3 was selected as the most sustainable option as it responded to national policy to retain safeguarding, but with an amended boundary to accommodate Crawley's unmet employment land needs in the form of a SEL at Gatwick Green. This approach enabled land south of the airport required to accommodate the physical land take of a possible wide-spaced runway and its operations to be retained. The approach was based on the following analysis:  <i>"The council does not consider parking to represent an efficient use of the site, particularly given the significant employment needs of Crawley borough, and is of the view that the airport could accommodate parking more efficiently</i></p>

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			<p><i>through decked and robotic parking and other efficiency measures, should it be demonstrated that additional on-airport parking is required having regard to the airport's surface access obligations stated in the S106 legal agreement."</i></p> <p>4.2 This analysis was reflected in Topic Paper 2 on Gatwick Airport. More detailed evidence contained in Savills' representation on behalf of TWG in relation to Policy GAT2 demonstrates that the Council's analysis is correct such that there is an overwhelming and sound case in support of Policy GAT2, subject to some minor adjustments as referred to in the representation.</p>
			<b>Suggested Modifications:</b>
		ST1 IN1	<p><b>5.0 Other policies</b></p> <p>5.1 The SA/SEA also contains comparative evaluations of the options with regard to sustainable transport and infrastructure provision (Strategic Policies ST1 and IN1). In relation to these evaluations, the SA/SEA concluded in favour of locally-specific policies on sustainable transport and infrastructure over relying on the NPPF (the 'do nothing' option). Both evaluations demonstrated significantly more benefits for a detailed locally specific policy over the 'do nothing' option. More detailed evidence contained in Savills' representation on behalf of TWG in relation to Strategic Policy ST1 and IN1 demonstrates that the Council's analysis is correct such that there is an overwhelming and sound case in support of these policies.</p>
			<b>Suggested Modifications:</b>
			<p><b>6.0 Conclusions</b></p> <p>6.1 Overall, TWG supports the Council's SA/SEA and specifically with regard to its evaluations and conclusions in relation to Strategic Policies EC1, EC4, ST1 and IN1, and Policy GAT2. TWG's representations on these policies put forward some minor changes to the policies in order to achieve greater consistency and clarification, and achieve some more sustainable outcomes. TWG's consultants have considered the proposed changes and have concluded that they would not materially affect the conclusions set out in the SA/SEA.</p>
			<b>Suggested Modifications:</b>
REP/058	Reigate and Banstead Borough Council	p29	<p>The SA/SEA (page 29) the assessment of the sustainability of the proposed allocation site of Gatwick Green is less than neutral, with only one SA objectives being positive "green". Whilst we accept the Council's statement that this is the only "reasonable option" to accommodate the identified B8 logistics floorspace need identified, as all other sites promoted as currently in the airport safeguarding land for a second (southern) runway and A23 re-alignment (whereas this site is also safeguarded land for the airport's expansion, but for surface car parking), we do not see that the Council has assessed the sustainability of the option of not allocating a land to meet this identified B8 need. This is considered a failure of the SA/SEA to consider all reasonable options. This is an issue of legal compliance with regards to this proposed site allocation.</p> <p><b>Conclusion</b></p> <p>We hope that you find these comments helpful. Should you have any queries, please do not hesitate to contact us. We note that there are still outstanding results from some of the assessments in the HRA, so we wish to be notified when</p>



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			such results are published. We will be happy to discuss this, and any other comments made in the representation above in more detail.
			<b>Suggested Modifications:</b>
REP/044	Tim North & Associates Ltd on behalf of Hx Properties Ltd	GAT3	<p>See attached correspondence dated 18 February 2021*</p> <p><b>Draft Crawley Borough Local Plan Review 2021-2037 – Regulation 19 Consultation</b></p> <p>My clients, HX Properties Ltd, object to the assessment carried out in the Sustainability Appraisal/Strategic Environmental Assessment (hereinafter referred to as SA/SEA) dated January 2021 accompanying the latest Regulation 19 Version of the Draft Crawley Borough Local Plan 2021-2037 (hereinafter referred to as the DCBLP 2021-2037), where it relates to Policy GAT3. It is contended that the SA/SEA is deficient, inadequate and unsound where the appraisal concerns Policy GAT3.</p> <p>There is a duty to carry out a legally adequate SA/SEA in order to comply with the EU Strategic Environmental Assessment Directive 2001/42. The SA/SEA must consider Policy GAT3 and “<i>reasonable alternatives</i>” to it, with the provisions of Article 5 of the Directive having been transposed into UK law through the Environmental (Assessment of Plans and Programmes) Regulations 2004. Regulation 12 is particularly relevant, being concerned with the preparation of an environmental report.</p> <p>It is contended that the assessment of the amended “<i>reasonable alternatives</i>” to Policy GAT3 is defective, representing a fundamental flaw which extends to the soundness of the process. There is no obligation, as far as the law is concerned, to choose the most sustainable option, or the most sustainable of two policy options, since the requirements of the appraisal are entirely procedural [<i>R (on the application of Friends of the Earth) v The Welsh Ministers (2015) EWHC 776 (Admin)</i>] {12} and {75}. Sound reasons must, however, be given for the rejection of “<i>reasonable alternatives</i>” so that consultees are able to know what those reasons are. (<i>Save Historic Newmarket Community v Forest Heath District Council (2011) EHC 606</i>).</p> <p>It is appreciated that the SA/SEA is an iterative process, and therefore it is relevant to consider how your Authority has arrived at the two “<i>reasonable alternatives</i>” relating to the latest version of the SA/SEA concerning the subject of “<i>Gatwick Airport Related Car Parking</i>”.</p> <p>In the case of the earlier Regulation 19 version of the DCBLP 20210-2035, two alternative policy scenarios were considered: Option 1 being to provide additional car parking within the airport boundary; and Option 2 to allow car parking in other areas. These were precisely the same two policy options that were considered in the SA/SEA dated December 2015, relating to equivalent Policy GAT3 in the statutorily adopted Crawley Borough Local Plan 2015-2030.</p> <p>The SA/SEA as part of the statutorily adopted Crawley Borough Local Plan 2015-2030 considered both policy options against ten Sustainability Objectives. Sustainability Objectives 1 to 8 inclusive set out in the SA/SEA dated December 2015 are precisely the same as the Sustainability Objectives against which Policy GAT2 of the earlier Regulation 19 version of the DCBLP 2020-2035 were assessed. Sustainability Objectives 9 and 10 where they relate to the SA/SEA</p>

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			<p>dated December 2015 concerning the adopted Local Plan were amalgamated to produce one Sustainability Objective 9 in the SA/SEA Regulation 19 version of the DCBLP 2020-2035.</p> <p>In effect, what were previously Sustainability Objectives 9 and 10 namely “<i>To promote active cohesive and socially sustainable communities</i>” and “<i>To ensure everyone has the opportunity to participate in sport and to encourage active, healthy and independent lifestyles</i>” respectively, were amalgamated into a single Sustainability Objective 9 where it formed part of the SA/SEA Regulation 19 version of the DCBLP 2020-2035, viz: “<i>To ensure healthy, active, cohesive and socially sustainable communities. To ensure all benefit from a good quality of life., To ensure everyone has the opportunity to participate in sport and to encourage active lifestyles.</i>”</p> <p>It follows that the SA/SEA methodology had not materially changed between that relied upon in the adopted Crawley Borough Local Plan 2015-2030 where it relates to Policy GAT3, and that which forms the basis to the earlier Regulation 19 version of the DCBLP 2020-3035 concerning equivalent Policy GAT2. This being the case, and given that the two policy options in the two earlier SA/SEAs were virtually identical; no reasoned justification was advanced as to why the scores in respect of the two SA/SEAs relating to Policies GAT3 and GAT2 respectively had changed.</p> <p>The two “<i>reasonable alternatives</i>” in the SA/SEA dated January 2021 relating to Policy GAT3 “<i>Gatwick Airport Related Car Parking</i>” comprising part of the latest Regulation 19 version of the DCBLP 2021-2037 are fundamentally different from the earlier SA/SEA January 2020 where it related to the same policy. Option 1 is now concerned with the provision of additional or replacement airport-related car parking which is only to be permitted where it is (i) located within the airport boundary; (ii) it is justified by a demonstrable need in the context of proposals for achieving a sustainable approach to surface transport access to the airport within the airport boundary. Option 2 provides for additional or replacement airport related car parking within the airport boundary and at locations outside the airport boundary provided it is justified by a demonstrable need.</p> <p>The scores against the 9 Sustainability Objectives are very similar, with Option 2 scoring double minuses in respect of minimising climate change; adapting to climate change and promoting sustainable journeys, compared with Option 1 where a single minus is scored. It is therefore necessary to consider how these different scores have been derived in the evaluation process.</p> <p>It is necessary at the outset to record that both “<i>reasonable alternatives</i>” seek to provide airport related car parking within the boundary of Gatwick Airport, with Option 2 also allowing for locations outside the airport boundary. Crucially, both options irrespective of their location, are only considered acceptable where they are justified by a demonstrable need.</p> <p>My clients do not object to the fact that long term off-airport car parking proposals are required to show a demonstrable need, in the same way as on-airport car parking proposals, although for reasons stated in the</p>

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			<p>representations to GAT3 as set out in DCBLP 2021-2037, there is no justification why GAL should have to provide a demonstrable need, having regard to “<i>permitted development rights</i>” available to the airport owner.</p> <p>The alteration in the two options in the SA/SEA January 2021 version compared with the earlier SA/SEA of January 2020, are now expressed in a similar way to what was previously Policy GAT8 set out in the formerly adopted Crawley Borough Local Plan 2000, where the limitation was expressed in the following terms:-  <i>“The Borough Council will only permit proposals for airport-related car parking on off-airport sites where they do not conflict with countryside policies and can be justified by a demonstrable need in the context of proposals for achieving a more sustainable approach to surface transport access to the airport.”</i></p> <p>With both “<i>reasonable alternatives</i>” now required to show a demonstrable need, means that in terms of a long term off-airport car parking proposal, an applicant is required to show that existing and future demand for, and capacity (supply) of, on-airport related car parking is not or will not be met. A demonstrable need for a long term off-airport car parking proposal will not be proven in a situation where the provision of available car parking spaces on-airport seen in the context of future on-airport related car parking capacity can be achieved. In effect, if these two factors are “<i>in balance</i>” adopting the term applied by GAL, planning permission will not be granted for a long term off-airport car parking use.</p> <p>The commentary to Option 2 in the SA/SEA January 2021 provides the underlying justification for the difference in the scoring concerning Sustainability Objectives, 1, 2 and 7 between the two “<i>reasonable alternatives</i>”. It is said “<i>An approach that allows airport-related parking in off-airport locations is likely to encourage users to access Gatwick Airport by car and will increase the number of trips and distance travelled by the vehicle and passenger travelling between the car park and the terminals.</i>”</p> <p>In a situation where planning permission is granted for a long term off-airport parking proposal based on a demonstrable need having been proven, means that the decision reached would not have been based on a choice between on- and off-airport car parking locations; but between managing long-term off-airport car parking in a location close to Gatwick Airport, where the only other realistic alternative is unmanaged, unauthorised airport related car parking occurring, more likely than not, at a distance further from Gatwick Airport than the site for which planning permission is being granted for the long term car parking use.</p> <p>This must be the case as this scenario arises because the demand for, and capacity of, on-airport related car parking, is not “<i>in balance</i>”, i.e. planning permission would have been forthcoming for the long term off airport use based on a demonstrable need, as on-airport car parking demand either does not or will not will not meet anticipated on-airport supply at Gatwick Airport.</p> <p>For similar reasons, the commentary relating to Option 2 is flawed where it states “... <i>the approach would also undermine the ability of the airport operator to meet obligations set out in the S106 legal agreement, including the requirement to provide ‘sufficient but no more on-airport car parking spaces than necessary to achieve a</i></p>

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			<p><i>combined on and off-airport supply that is proportionate to 48% of non-transfer passengers choosing to use public transport for their journeys to and from the airport by 2022’.</i></p> <p>Aside from the fact that 48% is not a challenging target, the Council’s approach in this regard may have been considered appropriate in circumstances where Option 2 was based on the same <i>“reasonable alternative”</i> as set out in the earlier SA/SEA January 2020 comprising part of the DCBLP 2020-2035, concerning Policy GAT2, namely <i>“to allow car parking in other areas”</i>.</p> <p>The fundamental difference between the Option 2 where it formed part of the DCBLP 2020-2035 and that comprising part of the DCBLP 2021-2037 is the requirement to show a demonstrable need. The fact that a demonstrable need is necessary means that the comment raised in this paragraph has no validity, if only because in this scenario, GAL’s on airport car parking demand either does not or will not meet on-airport car parking supply.</p> <p>This justification is further flawed because there is no reason why in circumstances where a long term off-airport car parking site is granted planning permission based on demonstrable need being shown to exist, that a contribution in terms of a public transport levy should not be applied to meet the obligations in the Section 106 Legal Agreement.</p> <p>Similarly, there is no evidence to justify the assertion that <i>“the provision of airport-related parking in off-airport locations can detract from biodiversity and landscaping, frequently requiring hardstanding and lighting and places pressure on land which could be more beneficially used for other purposes.”</i> The opportunity to provide effective landscaping and contributing to net gains in biodiversity are equally if not more likely to be achieved in a long term off-airport car parking location where the land is less constrained in terms of available space than it is on Gatwick Airport. Both on- and off-airport parking provision require hardstanding and lighting, whilst the proposition that the land could be more beneficially used for other purposes is equally applicable to circumstances on-airport given the variety of activities associated with an international airport, than it is to a site where the aim is to provide for a long term off-airport use.</p> <p>It follows that the underlying reasoning provided by the LPA why they consider Option 2 to be less sustainable than the approach in Option 1 is unsound and hence unlawful. It has failed to appreciate that Option 2 is not simply <i>“to allow car parking in other areas”</i> as was the case with the previous iteration of the SA/SEA, but in this case it is <i>“to provide additional or replacement airport related car parking within the airport boundary and at locations outside the airport boundary provided it is justified by demonstrable need.”</i></p> <p>The commentary to Option 2 concerning Policy GAT3 in the DCBLP 2021-2037 also refers to the High Court challenge in which my clients sought to quash Policy GAT3 set out in the Crawley Borough Local Plan 2015-2030. This is prayed-in-aid to justify the comments for discounting Option 2 as a <i>“reasonable alternative”</i> in the</p>

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			<p>DCBLP 2021-2037, even though Holiday Extras Limited did not seek to raise any representations to the SA/SEA where it was directed to Policy GAT3 found in the earlier Crawley Borough Local Plan 2015-2030.</p> <p>The SA/SEA accompanying the adopted Crawley Borough Local Plan 2015-2030 contained no “<i>reasonable alternative</i>” commensurate with that now set out in Option 2 of the DCBLP 2021-2037. To this end, Option 2 found in the SA/SEA accompanying the adopted Crawley Borough Local Plan 2015-2030 is materially different from Option 2 set out in the DCBLP 2021-2037, despite the fact that the Local Plan Inspector did not preclude the possibility of planning permission being granted for long term off-airport car parking if it could be shown that material considerations justified going against the provisions of the same Plan. In effect, the requirement to show a demonstrable need is akin to a material consideration dictating circumstances where a long term off-airport car parking proposal would be acceptable.</p> <p>The current iteration of Option 2 in the SA/SEA provides an opportunity to prioritise those forms of long term off-airport car parking facilities which are the most sustainable seen from a transport perspective. Clear differences arise between the “<i>meet and greet</i>” model and the “<i>park and ride</i>” form of long term off-airport car parking, with the latter offering distinct benefits in terms of reduced numbers of trips by passengers accessing the airport; congestion on the road network leading to Gatwick Airport, and the accumulation of CO<sub>2</sub> emissions on-airport. These are factors which have not been explored as part of any assessment of “<i>reasonable alternatives</i>” in the SA/SEA relating to Policy GAT3.</p> <p><b>Suggested Modifications:</b></p> <p>The SA/SEA where it concerns Policy GAT3 is defective and has not properly assessed "reasonable alternatives". Both "reasonable alternatives" seek to provide airport related car parking within the boundary of Gatwick Airport, with Option 2 allowing for locations outside the airport boundary. Both options critically are only considered exceptional where they are justified by demonstrable need, There is no justification why GAL should have to provide a demonstrable need, having regard to "permitted development rights" available to the Airport Owner.</p> <p>In a situation where planning permission is sought for a long term off-airport car parking proposal, it can only be based on a demonstrable need being proven. This means that in terms of the long term off-airport car parking proposal an applicant is required to show that existing and future demand for, and capacity (supply) of, on-airport related car parking is not, or will not be met. The choice in these circumstances between on- and off-airport parking provision is between managing long term car parking in a location close to Gatwick Airport, or allowing for unmanaged, unauthorised airport related car parking to occur, more likely than not at a distance further from Gatwick Airport than the site for which planning permission is being sought for a long term off-airport car parking use.</p> <p>The commentary relating to Option 2 is completely flawed given the fact that a long term off-airport car parking use would have to show a demonstrable need. There has been a fundamental change between the two options in the submission Version of the DCBLP 2021-2037 and the earlier Regulation 19 version of the DCBLP 2020-2035,</p>

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			<p>although this does not appear to have been appreciated in drafting the commentary to Option 2 in the latest SA/SEA, which reflects that of the earlier Regulation 19 version of the Plan.</p> <p>The underlying reason why the LPA consider Option 2 to be less sustainable than Option 1 in the latest iteration of the SA/SEA is unsound and unlawful. It has failed to appreciate that Option 2 is not simply based on "to allow car parking in other areas", but is now based on "to provide additional or replacement airport related car parking within the airport boundary and at locations outside the airport boundary provided it is justified by demonstrable need."</p> <p>For these reasons there is a need to re-appraise the two options in the SA/SEA.</p> <p><b>Attached correspondence dated 18 February 2021:</b></p> <p><b>Draft Crawley Borough Local Plan 2021-2037 January 2021 Regulation 19 Consultation</b></p> <p>This company raised an objection on behalf of my clients, HX Properties Ltd, to Policy GAT2 of the Regulation 19 version of the Draft Crawley Borough Local Plan 2020-2035, along with paragraphs 10.16 to 10.19 inclusive, providing the reasoned justification behind the same policy.</p> <p>Policy GAT3 concerned with " <i>Gatwick Airport Related Parking</i>" found in the latest Regulation 19 version of the Draft Crawley Borough Local Plan 2021-2037 (hereinafter referred to as DCBLP 2021-2037) reflects the previous version of the same policy, but with less force as the word "must" has been omitted before the phrase "be justified demonstrable need in the context of proposals for achieving a sustainable approach to surface transport access to the airport". The two limbs comprising Policy GAT3 have now been separated, where previously they formed a single paragraph.</p> <p>My clients object to Policy GAT3 along with paragraphs 10.24 to 10.27 forming part of the reasoned justification behind the same policy, on the grounds that they have not been positively prepared, neither are they justified, nor are they consistent with national policy.</p> <p>The reasoned justification behind Policy GAT3 is fundamentally flawed, in that it takes no account of and is inconsistent with, the provisions of Schedule 2 Part 8 Class F of the Town &amp; Country Planning (General Permitted Development) (England) Order 2015 (As Amended). The Airport Owner on "Operational Land" can construct surface car parking or build multi-storey car parks in accordance with the above mentioned "permitted development rights", for which no express planning permission is required, and more importantly, without having to justify "... a demonstrable need in the context of proposals for achieving a sustainable approach to surface transport access to the airport". This situation applies, irrespective of whether the word "must" is to be inserted before the phrase "be justified".</p> <p>There is no disputing these facts. What it means is that Policy GAT3 as set out in the DCBLP 2021-2037 is completely unnecessary and serves no valid purpose, nullifying the reasoned justification set out in paragraphs 10.24 to 10.27 inclusive of the same version of the emerging Local Plan. There is no requirement for GAL to justify any form of airport-related car parking on operational land within its boundary, and equally no requirement to provide a</p>

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			<p>demonstrable need in the context of achieving a sustainable approach to surface transport access to the airport. Put simply, <i>“permitted development rights”</i> do not require a demonstrable need to be met.</p> <p>The fact that the Airport Operator is under no obligation to produce an assessment of demonstrable need to justify any on-airport surface or multi-storey car park on land forming part of its operational area, in accordance with the second limb of Policy GAT3, becomes immediately apparent from the decision taken by your Council to raise no objection to Application No. CR/2017/0523/CON.</p> <p>It is a well-known fact that Crawley Borough Council rely on GAL to support the central issue of <i>“demonstrable need”</i> on applications refused by your authority for long term off-airport car parking in its administrative area. The involvement of GAL means that, by association, it occupies a central position in the decision-making process, particularly in cases where an applicant proceeds to appeal against the Local Planning Authority’s refusal or non-determination of a long term off-airport car parking proposal. However, that is not a justifiable reason for incorporating a policy into the emerging Local Plan concerning a form of development in which your Authority have no control.</p> <p>GAL as a private company, enjoys a dominant position in surface access facilities provided at Gatwick Airport, being present in the upstream market (i.e. facilities at an airport, such as bus stations or car parks), as well as the downstream market (i.e. allowing providers to access the facilities at an airport), where they relate to surface access provision. GAL’s presence as an important integral part in the decision-making process, means that land use planning decisions governing airport related car parking proposals cannot be considered to be transparent. That is, they cannot be divorced from, and understandably are influenced by, private sector decisions promoted through GAL’s own Capital Investment Programmes.</p> <p>The insertion of Policy GAT3 into the Regulation 19 version of the DCBLP 2021-2037, where it is not necessary to do so for the reasons stated above, leads on to the question of whether its provisions unnecessarily restrict competition in respect of certain forms of long term off-airport car parking, in particular the <i>“park and ride”</i> model, which dependent on the selected location, is equally well placed to achieve a sustainable approach to surface transport access to the airport.</p> <p>Paragraph 14 of the NPPF 2019 states that for plan-making - <i>“plans should positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to change”</i> (my emphasis). Policy GAT3 fails to achieve the sufficient flexibility sought by national policy, despite the fact that the location of Gatwick Airport is not included in one of the selected areas which provide a strong reason for restricting development in Footnote 2 of the same paragraph of current national policy.</p> <p>It follows from these representations that if Policy GAT3 is to be retained in the Regulation 19 version of the DCBLP 2021-2037, then consideration should be given to removing <i>“permitted development rights”</i> through an Article 4 Direction, where it relates to on-airport car parking provision on <i>“Operational Land”</i> within Gatwick Airport. The Article</p>

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			<p>4 Direction process will then provide the purpose behind the same policy and its reasoned justification, allowing for more transparent decision-making, if only for reasons of having to justify a demonstrable need.</p> <p>This is not considered to be an unreasonable request in that GAL in its own representations to the earlier Regulation 19 version of the DCGLP 2020-2035, when considering the use of existing employment sites in the Borough which it states could be used more efficiently by means of intensification, redevelopment and design improvements, add:-</p> <p><i>“It is crucial that the Council uses Article 4 Directions to prevent the further loss of employment sites to residential development via Permitted Development Rights. The Council has continued to lose valuable employment sites due to the conversion of office buildings to residential accommodation via the prior approval process, and the draft Plan should proactively seek means to restrict such loss of its existing employment land stock.”</i></p> <p>A methodology should be agreed in which to assess long term demand and capacity issues concerning both on and off airport-related car parking provision, involving your Authority, GAL and representatives of those involved in lawful long term off-airport car parking facilities. This will reduce issues of dispute, or at least highlight those specific areas where agreement cannot be reached, surrounding existing and future demand for and capacity (supply) of airport related car parking, according to the concept that the same two factors are “<i>in balance</i>” as argued by GAL. To this end, through collaboration, a sound base for deciding applications will be provided, not dissimilar to the way in which the NPPF requests Local Planning Authorities to use the standard methodology in order to establish a minimum local housing needs figure (LHN) in their administrative areas.</p> <p>The contents of supporting paragraph 10.24 to Policy GAT3 refer to the 2019 Section 106 Planning Obligation entered into between Crawley Borough Council, West Sussex County Council and GAL, which sets out an obligation for the Airport Operator to achieve a target of 48% of passengers travelling to the airport by public transport by 2022. The figure of 48% is used as a metric to show that the amount of airport related car parking that needs to be provided for airport passenger throughput, in accordance with the Airport Operators Interim Car Parking Strategy April 2017, is in some way commensurate with public transport modal share. The 48% figure is not considered to be a challenging target, in that in the fourth quarter of 2017, (October to December), CAA’s O &amp; D data reveals that a public transport modal share figure of 48.3% was reached, being in excess of the 48% target figure set down for 2022 (See the evidence of Mr Tom Nutt, Crawley BC to the Former Gasholder Station Car Park Appeal, the inquiry of which took place on 15-17 May 2017).</p> <p>No evidence has been produced to demonstrate that long term off-airport car parking has prevented the modal share in favour of public transport from being reached, as set out in the various iterations of the Gatwick Airport Surface Access Strategy (hereinafter referred to as GASAS) and associated Section 106 Planning Obligations. The target figure of 48% is in all probability likely to be met, even in the event that the figure were to be increased, when it is realised that visitors to the UK are always more likely to use public transport than those living and working in the UK.</p>



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			<p>The contents of paragraph 10.25 providing part of the reasoned justification to Policy GAT3 refer to a number of lawful long term off-airport car parking businesses, serving the needs of passengers using Gatwick Airport. The figure for long term off-airport car parking spaces set out at paragraph 2.3.30 of the Gatwick Airport Masterplan 2019, namely 21,196 authorised spaces is strongly disputed. There has been a consistent and marked reduction in the supply of long term off-airport car parking provision serving the airport, since the Gatwick Airport Interim Master Plan was published in 2006.</p> <p>Long term off airport car parking provides an important contribution to airport related car parking, meaning that it has a role to play in the supply of the same product, meeting not only a quantitative, but also a qualitative requirement. A number of long term off airport car parks have been found to occupy “<i>sustainable locations</i>” whilst at the same time offering “<i>customer choice</i>” (See appeal decisions at Acacia Grove, Copthorne (PINS Ref 2153589); City Place, Crawley (PINS Ref 2171971 &amp; 2071972; and the Case Officer’s report at Southways Business Park (Crawley BC Ref. No. CR/2033/0094/FUL); Site E2 Crawley Business Quarter (Crawley BC Ref. No. CR/2014/0080/FUL and the Former BOC Edwards Site (CR/2014/0615/FUL)). This becomes evident from Inspectors’ appeal decisions in your Council’s administrative area, as well as the contents of Case Officers’ reports granting planning permission for the same use.</p> <p>A more flexible approach is required in the consideration of airport related car parking provision, given that issues of sustainability, when taken to an extreme as is the case with Policy GAT3, results in locations being defined solely by reference to whether a site lies within or outside the boundary of Gatwick Airport. That approach produces an anomalous situation, in that were your Council to accept an alteration to the boundaries of Gatwick Airport, so that it is commensurate with that indicated on Plan 20 in the Gatwick Masterplan 2019, (i.e. leading to an extension to the east beyond the London to Brighton Railway Line towards the M23 Motorway); what is at present considered to be an unsustainable location, would automatically become sustainable.</p> <p>In devising a policy devoted to “<i>Gatwick Airport Related Parking</i>”, requires sustainability issues to extend beyond consideration of whether a site is situated within or outside the boundaries of Gatwick Airport. A restrictive policy of the kind set out in GAT3 has adverse implications, with associated disadvantages for airport related car parking, with inadequate account taken of other related issues surrounding airport car parking provision, significant amongst which is unauthorised provision found in adjoining Authorities’ administrative areas, some distance from the airport.</p> <p>Indeed, Policy GAT3 takes no account of i) access arrangements from the particular car park whether on or off airport to the terminal buildings; or ii) the advantages of transporting a number of passengers to the Airport’s terminals utilising low emissions/eco-friendly buses. These benefits associated with a traditional park and ride off-airport parking facility have the ability to lead to a reduction in traffic movements, thereby alleviating congestion at strategically located junctions situated in close proximity to Gatwick Airport, at the same time having the propensity to reduce carbon emissions on-airport.</p>

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			<p>It is said in GAL's representations to the July 2019 version of the DCBLP that the aim is to offer an attractive on airport car parking product as a means of discouraging use of less sustainable car parking options, which double the amount of car trips, whilst generating extra surface access journeys, which it is argued, add to congestion and CO<sub>2</sub> emissions compared with "<i>park and fly</i>". These comments are wholly predicated on the "<i>kiss and fly</i>" and "<i>meet and greet</i>" car parking modes serving Gatwick Airport, which are the least sustainable. They take no account of traditional long term park and ride facilities, which are infinitely more sustainable than encouraging passengers to park on-airport. To the extent that GAL refer to a "<i>residual and increasing demand for parking for those passengers who choose to use the car</i>" dictates that the long term off-airport "<i>park and ride</i>" model has the ability to be the most sustainable option after dependence on public transport. Their importance will no doubt increase as electric vehicles become increasingly popular.</p> <p>It is a known fact that unless additional resources are provided to the Authority, and a proactive approach is taken to enforcement proceedings in respect of unlawful off-airport car parking uses, the ability to ensure a sustainable approach to airport related car parking will never be realised. Your Authority are on record as stating that unauthorised long term airport related car parking will continue to be a source of capacity (supply) into the future. Given these circumstances, to pursue a strategy which perpetuates, at the same time places reliance on unauthorised long term off-airport car parking, in preference to a properly managed lawful long term off-airport car parking facility, is the very antithesis of "<i>managing</i>" airport related car parking provision into the future.</p> <p>Evidence reveals that adopting the tact outlined in the previous paragraph will encourage long term off-airport car parking facilities of all models, in least sustainable locations seen in terms of distance to the north and south terminals, and is required to be compared with what otherwise may arise from lawful long term off-airport park and ride facilities which from a locational perspective, are sited in close proximity to the same terminals. It is also infinitely more sustainable to have sites granted planning permission, than for long term off-airport car parking facilities to be made lawful through CLEUDs.</p> <p>To impose an embargo on lawful long term off-airport car parking uses based on the park and ride model, would simply play into the hands of those unauthorised long term off-airport car parking businesses operated by rogue traders, with all the ensuing bad publicity for airport related car parking. It simply hands the impetus to those seeking CLEUDs for long term off-airport car parking uses on sites distant from the airport, catering for the "<i>meet and greet</i>" mode, which is the least desirable from a transport sustainability perspective.</p> <p>Policy GAT3 pays no regard to the increasing provision of organisations such as JustPark, a technological platform matching drivers with car parking spaces through its website and app, representing what is referred to as the "<i>sharing economy</i>", having a profound impact on the ability to reduce the private car mode in favour of public transport, and appearing less sustainable than the provision of a traditional long-term off-airport car parking facility. To these</p>

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			<p>considerations can also be added the increasing focus placed on the use of on-street car parking, sometimes known as transit parking, in residential areas, before walking or taking a cab to the airport's terminals.</p> <p>In conclusion, Policy GAT3 represents an abrogation of the responsibilities concerning the topic of airport related car parking from the Local Planning Authority to a private company, namely the Owner/Operator of Gatwick Airport, who is then passed the remit of meeting the modal split target of passengers, through total reliance placed on on-airport related car parking, without assessing alternative forms of access by private car to the same international airport. There are forms of long term off-airport car parking use which are in a position to contribute to sustainable transport through the provision of a public transport levy, in the same way a GAL provides for those travellers who have no alternative but to rely on the private car to access Gatwick Airport.</p>
REP/116	Neame Sutton Limited on behalf of Danescroft (RLP Crawley) LLP	SA TOPIC AREA C	<p><b>Housing Need, Housing Requirement/Target and, Supply</b>  <b>Policy H1, SA (Topic Area C) and Table 5.1, Paragraphs 12.1 – 12.43 – OBJECT: Unsound</b></p> <p>3.17 The Council's approach is also not entirely supported by the conclusions of its own Sustainability Appraisal (January 2021)("SA"). The SA includes an option that meets both the full affordable housing requirement (generating a housing target of 1848 dpa) along with an option that meets the Standard Method calculation of 750 dpa. Both options score considerably better than the chosen option (Option 5) in terms of meeting housing needs (Pages 203-206 of the SA – January 2021). It is however unclear why some of the negative scores in relation to employment growth, health and infrastructure have been attributed to these higher housing growth options. The negative scores are attributed to 'anticipated impacts' rather than being based on any tangible evidence. It must be the case that the Council hasn't based the assessment on tangible evidence because it has already identified that significant portions of the evidence base in relation to matters such as Transport modelling are yet to be completed and published.</p> <p>3.18 In this respect the conclusions of the SA cannot be relied upon and a further SA should be undertaken once the evidence base is complete.</p> <p><b>Suggested Modifications:</b>  As part of addressing the significant deficiencies in the Plan's evidence base the following key changes are required to the Plan for it to be made Sound:  6. The SA needs to be undertaken again once the evidence base is complete to avoid unsubstantiated assumptions being applied to the assessment process;</p> <p><b>Site-Specific Representations in Relation to Land at Steers Lane, Crawley</b>  <b>Policy H2 SA – OBJECT: Unsound</b></p> <p>4.14 As a consequence of the Council's overly restrictive and flawed approach to aviation noise levels it has failed to properly assess the suitability of Area B for residential development. The opportunity to deliver a further 100 no. dwellings on Area B comprising a mix of open market and affordable homes has therefore been missed by the Council.</p>

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			<p>4.15 Area B should therefore be included as land suitable for residential development, particularly in the light of the recent report by the Government's Climate advisors (Climate Change Committee) regarding the future of air travel in the context of the accelerated climate change agenda i.e. no net increase in airport capacity in the UK.</p> <p>4.16 The inclusion of Area B as a housing allocation would enable the Council to deliver upto another 100 no. dwellings (40 no. of which would be affordable) making a valuable contribution to the significant housing needs in the Borough.</p> <p><b>Suggested Modifications:</b> As part of addressing the significant deficiencies in the Plan's evidence base the following key changes are required to the Plan for it to be made Sound: 6. The SA needs to be undertaken again once the evidence base is complete to avoid unsubstantiated assumptions being applied to the assessment process;</p>
REP/124	Gladman Developments	SA	<p><b>1.2. Sustainability Appraisal</b></p> <p>1.2.1. In accordance with Section 19 of the 2004 Planning and Compulsory Purchase Act, policies set out in Local Plans must be subject to Sustainability Appraisal (SA). Incorporating the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004, SA is a systematic process that should be undertaken at each stage of the Plan's preparation, assessing the effects of the Local Plan's proposals on sustainable development when judged against reasonable alternatives.</p> <p>1.2.2. Crawley Borough Council should ensure that the results of the SA process clearly justify its policy choices. In meeting the development needs of the area, it should be clear from the results of the assessment why some policy options have been progressed, and others have been rejected. Undertaking a comparative and equal assessment of each reasonable alternative, the Crawley Local Plan's decision-making and scoring should be robust, justified and transparent.</p> <p><b>Suggested Modifications:</b></p>
REP/120	Squires Planning		<p>(ii) Sustainability Appraisal and Habitat Regulations Assessment</p> <p>2.7. A Sustainability Appraisal (SA) / Strategic Environmental Assessment (SEA) Draft Report (January 2021) has been published alongside the Regulation 19 consultation.</p> <p>2.8. The document confirms that Local Planning Authorities are required to carry out a Sustainability Appraisal (SA) for all Development Plan Documents to ensure that the Plan is designed in a sustainable manner. It goes on to confirm that the process involves examining the likely effects of the Local Plan and considering how they contribute to the environmental, social and economic wellbeing of the town. Where problems are identified, mitigation measures should be proposed and put into place in the plan. It is noted that the report combines the SA, SEA, Health Impact Assessment (HIA) and Equalities Impact Assessment (EIA).</p> <p>2.9. Carrying out a sustainability appraisal of a local plan is an essential part of the plan-making process. The sustainability appraisal is not a one-off exercise; it needs to be integrated into the various stages of plan making. It</p>

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			<p>provides evidence, helps to test that evidence and helps with developing options. It cannot just be done as a 'looking back' exercise at the end and so it warrants consideration at the earliest stage of plan making. Failure to carry out the sustainability appraisal process properly will result in a local plan not being legally compliant.</p> <p>2.10. One of the requirements of the Strategic Environmental Assessment (SEA) Regulations is to include an assessment of any reasonable alternatives, taking into account the objectives and the geographical extent of the plan or programme. Reasons must, however, be given for the rejection of “reasonable alternatives” so that consultees are able to know what those reasons are. (Save Historic Newmarket Community v Forest Heath District Council (2011) EHCW 606).</p> <p>2.11. It should therefore be clear within the SA why some policy options have progressed, and others have been rejected. This must be undertaken through a comparative and equal assessment of each reasonable alternative, in the same level of detail for both chosen and rejected alternatives. The Council’s decision-making and scoring should be robust, justified and transparent.</p> <p>2.12. We provide detailed commentary below on the matters we have identified as being problematic in relation how EC4 has been considered and the final policy solution arrived at. It should be noted that we have not sought to review the whole document and there may therefore be other problematic areas within the document. The matters we wish to address are:</p> <ul style="list-style-type: none"> <li>• Insufficient evidence to prepare SA.</li> <li>• The spatial approach to meeting Crawley’s land use needs.</li> <li>• Prejudicing the delivery of a second runway, should it be required by national policy.</li> <li>• Assessment of Economic Growth Options</li> <li>• Assessment of Policy Option</li> </ul> <p><u>Insufficient evidence to prepare SA.</u></p> <p>2.13. Since the Draft Crawley Local Plan Regulation 19 consultation commenced a number of documents have been published including the Viability Study, Draft Duty to Cooperate Statement and Crawley Transport Study. The findings of these documents should be taken into consideration in an update to the SA/ SEA. However, the SA/SEA does not appear to have been updated since its publication in January 2021. We urge that this is rectified and that the latest evidence is incorporated into the SA/SEA. Without this happening, it is likely that the SA will fail to properly assess likely significant impacts of the policy approaches taken and as a result fail the legal compliance test. The spatial approach to meeting Crawley’s land use needs.</p> <p>2.14. Page 137 of the SA/SEA sets out three scenarios for the ‘Spatial Strategy and Vision’ of the Local Plan. 1. A sub region with a South East regional focus. This scenario would maximise development opportunities within the borough and continue to work with others to encourage allocations of land outside the borough boundary to accommodate all of Crawley’s emerging housing and employment needs, as well as potentially those of the wider area. 2. Scenario 2: A sub regional focus. The sub regional focus is an ‘At Crawley’ approach for the purposes of Duty to Cooperate. This is</p>

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			<p>reference to the 'At Crawley Study' (2009) which included areas of search immediately adjacent to the administrative boundary for meeting the land use needs of Crawley. 3. Scenario 3: Crawley Borough focus. This would maximise development opportunities within the borough boundary.</p> <p>2.15. The chosen option is a combination of a sub-regional focus and Crawley Borough focus which seeks to meet needs within the borough and adjacent to it through the Duty to Cooperate.</p> <p>2.16. In following this approach, Crawley, in the previous draft submission consultation proposed an Area Action Plan to allocate employment land within the 15-year plan period. This consultation has removed that approach, following advice from the planning inspectorate. Instead, this spatial approach has resulted in allocation of an employment site (Policy EC4) within the borough boundary to meet employment needs over the 15- year plan period. However, to do so involves the removal of a large area that is safeguarded for a second runway should it be required by national policy. As is explained further on in this response, the approach lacks the evidence to justify that it would not be incompatible with delivery of a second runway and is therefore contrary to national aviation policy.</p> <p>2.17. The Crawley Borough/sub regional "At Crawley" focus has led to the current decision to allocate the 'Gatwick Green' site contrary to national policy. This must be accepted by Crawley and a different approach undertaken to meet employment needs.</p> <p>2.18. SA/SEA is an iterative process and in the face of not being able to deliver employment land under scenario 2 and 3, a review of strategic approach regarding employment needs should have been undertaken and assessed within the SA/SEA. It is likely that this would have led to an in-combination approach with Scenario 1 as this wider geographical focus and joint working could have resulted in successfully meeting employment needs outside the borough. However, this was not pursued and as a result has led to the inappropriate allocation of employment land on an area that is safeguarded for a second runway. The approach to the Spatial Strategy and Vision, is therefore considered unreasonable as it fails to maximise sustainable development opportunities in line with national policy and against the objectives of the SA/SEA.</p> <p>2.19. Page 329-356 of the SA includes an assessment of the only accepted employment site 'Gatwick Green' and all the rejected sites, against the SA objectives. It is clear from reading the assessments that the overarching basis for the proposed allocation of 'Gatwick Green' and the rejection of most the other potential locations is that the 'Gatwick Green' site is considered by Crawley Borough Council to be in an area that is not needed for a second runway and the other locations are. Without this distinction other sites could be preferable such as Land at Rowley Farm or a combination of sites. Prejudicing the delivery of a second runway, should it be required by national policy.</p> <p>2.20. As covered elsewhere in this response, the 'Gatwick Green' area has not been proven to be surplus to requirements for the delivery of a second runway at Gatwick Airport. On this basis the site should also be rejected alongside the other potential employment sites listed. The ++ economic benefits identified are questioned as there is</p>

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			<p>no certainty that the allocation would not prejudice the delivery of a second runway leading to economic damage on a national scale. Assessment of Economic Growth Options</p> <p>2.21. What the assessment of sites highlight is that should safeguarding be lifted in the future, the 'Gatwick Green' site would likely not be the most sustainable location to meet employment needs. It appears short sighted to allocate this land when, in the next few years, safeguarding could be lifted, and all sites can at that time be assessed in an equal way, with the most sustainable option chosen. Whilst this is not the right time to compare sites within the safeguarded area, it is evident from the SA that a strategic employment site north of Manor Royal would be the most sustainable location should safeguarding be lifted.</p> <p>2.22. It is noted that under the assessment of the 'Gatwick Green' site the impact on Objective 3 - Protect and/or Enhance the Built Environment, is scored as a possible positive impact. This is contested as there are a number of Listed and Locally Listed Buildings within and 9 adjacent to the site. A major industrial employment site cannot possibly protect and/or enhance these historic buildings some of which are surrounded entirely by the proposed allocation area. The proposed industrial/warehouse use is fundamentally in conflict with the listed buildings and no amount of good design, landscaping and screening will protect and enhance these buildings as claimed on page 330 of the SA.</p> <p>2.23. Whilst the site is geographically close to Gatwick Airport and the M23 there is no obvious connection to the strategic road network which is crucial for the industrial/warehouse use proposed. The stated 'possible positive' impact for SA Objectives 7 and 9 are therefore disputed for the reasons set out in the Transport section of this consultation response. Assessment of Policy Options</p> <p>2.24. The policy options assessed for Policy EC4 (p181-183) compare the policy mechanisms for allocating a Strategic Employment Location. The removal of safeguarded land for the proposed 'Gatwick Green' allocation is contrary to national aviation policy (APF) and the NPPF (para 104). It cannot therefore be an appropriate strategy and is lacking in evidence to justify it in any event. There is no certainty that the removal of this large area of safeguarded land would not impact on the sustainability of development at Gatwick. Nor is there any evidence that the allocation would not damage the national and regional economy as well as the local economy through the loss of significant positive employment opportunities that would arise from a nationally significant infrastructure scheme. This is set out in detail in 'soundness' section of this response.</p> <p>2.25. Unfortunately, the assumption of CBC that a 47.3ha area of safeguarded land can be removed and allocated for employment use without prejudicing the delivery of a second runway is not supported by any evidence and the chosen policy option for GAT2 is therefore unjustified and contrary to national policy. This assumption undermines the entire sustainability appraisal as it does not recognise the likely significant impacts of removing a large area of safeguarded land or consider reasonable alternatives to meeting employment needs other than within the borough boundary or the narrowly defined sub region.</p>

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			<p>2.26. The result of the above assumption made by CBC is that the SA contains errors in the assessment of the 'Gatwick Green' site and GAT2 policy options which have resulted in the inclusion of 'Gatwick Green' as an allocated site rather than being correctly rejected. Its rejection should then lead to a review of scenarios for the 'Spatial Strategy and Vision' of the Local Plan by focusing Duty to Cooperate on a wider geographical area to meet employment needs.</p> <p>2.27. The SA does not properly assess the impacts of removing a large area of safeguarded land which results in chosen policy options that do not secure the objectives of the local plan, The SA therefore fails the legal compliance test.</p> <p><b>Suggested Modifications:</b></p>



Habitat Regulations Assessment			
Ref. No.	Respondent	Policy/ Para	Comments
REP/058	Reigate and Banstead Council	HRA	<p>We note that the draft Habitat Regulation Assessment (“HRA”) has been prepared. We appreciate that the HRA takes into account our previous representation made in March 2020 to the Regulation 19 Local Plan and we look forward to seeing the results of the “in-combination” air quality effects assessment. The results of which will have an effect on the Mole Gap to Reigate Escarpment Special Area of Conservation (“SAC”).</p> <p>As the Plan area is at least 9.6km from the SAC, the draft HRA considers that the Bechstein’s bat habitat will not be affected by the Local Plan and habitat loss and fragmentation will not be considered further in the HRA process. The Bat Conservation Trust (“BCT”) guidance on thresholds for Core Sustenance Zones (“CSZ”) is in line with the HRA findings and RBBC therefore do not dispute the decision.</p> <p>We note that the draft HRA states that the site will not be considered further in the HRA process in terms of public access and disturbance. Again, RBBC do not dispute this decision in light of the draft HRA’s findings but would recommend that strong consideration is taken for any large development sites.</p> <p>RBBC would also like to stress the importance of the HRA’s commitment to assessing the SAC site in further details in relation to air quality impacts (particularly NOx) and hydrological impacts. The findings of such impacts will be of great interest to us.</p> <p>Draft HRA Table 6.1: presents a summary of “screened in” policies shows that Policy EC4 Strategic Employment Provision Screening category I and L was “screened in”. In Appendix E, the conclusion for the site is RED, i.e. Screened in. The recommendation is for “further work” – “Detailed air quality modelling is currently underway to further define impacts associated with increased traffic movements. This will inform the HRA and Local Plan.”</p> <p>The draft HRA advises that “modal shift and behavioural changes could be encouraged – with consideration given to car free options, 20-minute neighbourhoods and developing strong links with LTP3. It is noted that the Local Plan contains good sustainable transport policies ST1, ST2 and ST3. Employment allocations to be selected to reduce reliance on the car.”</p> <p>This raises significant concern for us with regards to potential impacts from site development as it does not include freight traffic to / from the planned logistics site, which will be a much more significant part of the site traffic than employees’ cars. This is planned to access the site from the local road network with all the implications for air quality adjacent to an AQMA close by to the north of the site on the opposite side of the M23.</p> <p><b>Suggested Modification:</b></p>
REP/066	Mid Sussex District Council	HRA	<p>In response to the 2020 Plan the Council advised that for the Plan to be found sound, Crawley Borough Council should prepare the necessary evidence to conclude there are no adverse impacts on the Ashdown Forest SAC Habitat. We also indicated that it would be helpful to see more recent and relevant correspondence from Natural England setting out their view on the likely significant effect on the Ashdown Forest SAC.</p>

Habitat Regulations Assessment			
Ref. No.	Respondent	Policy/ Para	Comments
			<p>Mid Sussex District Council remains concerned about the HRA work undertaken to support the Crawley Local Plan as it appears that no detailed transport modelling, air quality modelling and ecological interpretation to assess any impact on the Ashdown Forest SAC has been undertaken. This additional work is referenced in the HRA (January 2021) in Chapter 7 and Chapter 9. Mid Sussex District Council considers that this modelling work and the next version of the HRA will need to be undertaken prior to submission of the Local Plan for examination.</p> <p><b>Conclusion</b> Mid Sussex is committed to continuous close co-operation and joint working with Crawley Borough Council. As part of the well-established joint working arrangements, it is anticipated that there will be ongoing dialogue between the Councils, to address the outstanding issues identified in this letter, ahead of the submission of the Plan.</p> <p><b>Suggested Modification:</b> <b>Change required:</b> Completion of the additional work referenced in the HRA (January 2021) and the opportunity for interested parties to respond. Without the completion of this evidence it is <b>not possible to conclude the Plan is justified or effective.</b></p>
REP/ 113	Natural England		<p><b>Water Resources-Arun Valley SPA, Ramsar Site and SAC.</b> As stated above, we have previously provided advice regarding hydrological impacts, in relation to your 'Report to Inform the HRA'. We also have the following related advice to offer, in relation to this current Local Plan consultation:</p> <p>We welcome the ongoing engagement with your Authority regarding the requirement for all development served by Southern Water's Sussex North Water Supply Area to demonstrate water neutrality.</p> <p>As you are aware Natural England has reviewed data regarding the abstraction license at Hardham with the EA and the Water Company. Our role is to provide advice on potential impacts of abstraction operations on statutory wildlife sites.</p> <p>In December 2019 Natural England wrote to Southern Water services to state that based on a recent evidence review of the Hardham groundwater abstraction, an adverse effect on the integrity of the Arun Valley SAC, SPA and Ramsar features could not be excluded with certainty. This abstraction is a significant contributor during certain supply conditions to Southern Water's Sussex North supply area. This area supplies Crawley and has clear implications for Plans and Projects in this area. Furthermore, the Gatwick Sub-Regional Water Cycle Study has concluded that water use within the district will need to demonstrate neutrality for enough water to be available to the district.</p> <p>The Environment Agency and Natural England are working with Southern Water to try to identify a long term more sustainable water supply. In the meantime, whilst the adverse effect remains or is uncertain, development in Crawley must be certain not to add to this adverse effect.</p> <p>This will need to be tested through Crawley Local Plan's HRA, and again we welcome ongoing involvement in this process and the work that Crawley has undertaken thus far to assess this impact through the HRA. Once this has been completed it will support the test of soundness for the Local Plan. Therefore, in the absence of the completed</p>

Habitat Regulations Assessment			
Ref. No.	Respondent	Policy/ Para	Comments
			HRA we cannot comment on soundness for this aspect of the Plan. As afore mentioned, we welcome the work you have commissioned thus far regarding water resources and look forward to continuing to work with you on this matter. We advise that this requirement should be an essential target in the Sustainability Appraisal. With clear links to the quantum of housing numbers coming forward.
			<b>Suggested Modification:</b>

<b>Local Development Scheme</b>			
<b>Ref. No.</b>	<b>Respondent</b>	<b>Policy/ Para</b>	<b>Comments</b>
REP/120	Squires Planning		<p><b>(i) Local Development Scheme</b></p> <p>2.4. The Council's Local Development Scheme has been the subject of numerous updates in recent years to take account of delays and changing circumstances. The latest update is dated December 2020. It is noted that some evidence base documents that were due to be published as part of the Regulation 19 consultation have yet to be included. It is our view that it would have been appropriate to wait until that evidence had been received before progressing to Regulation 19 consultation. It appears that evidence documents such as an up-to-date viability assessment and transport modelling have been left out in the drafting of the submission local plan. It is our view that this evidence informs local plan policies and had it of been received prior to consultation beginning may have resulted in changes to the local plan as published.</p> <p>2.5. We also note that the current timetable set out in this document is not feasible given submission is due to take place before the Regulation 19 consultation is scheduled to end.</p> <p>2.6. The overall result appears to be a Local Plan that is being rushed, lacking the necessary evidence that is needed to properly inform an appropriate strategy for meeting Crawley's needs. The lack of conformity with the current Local Development Scheme would result in the plan not being legally compliant which could not be addressed through retrospective changes.</p> <p><b>Suggested Modification:</b></p>

<b>Statement of Community Involvement</b>			
<b>Ref. No.</b>	<b>Respondent</b>	<b>Policy/ Para</b>	<b>Comments</b>
REP/120	Squires Planning		<p><b>(iii) Statement of Community Involvement</b></p> <p>2.28. To be legally compliant, consultation on the Local Plan should be carried out in accordance with the Council's Statement of Community Involvement.</p> <p>2.29. The Crawley Borough Council Statement of Community Involvement was updated in June 2020 and sets out a guide to participating in the planning system. Paragraph 4.6 states: 'when the council produces a local planning document, it will seek to involve people as early as possible and will invite feedback on draft documents'.</p> <p>2.30. It is considered that inclusion of a major employment site at the Regulation 19 stage of the plan preparation is too late in the process to allow sufficient appraisal of its acceptability and meaningful engagement with stakeholders and the local community. This issue is highlighted by the late inclusion of key pieces of evidence and statements of common ground. The process appears rushed, perhaps to ensure the Council does not have an out-of-date local plan. Whilst we sympathise with the 5-year life of a Local Plan, we believe it is in the interests of the community to carry out the proper plan process by allowing sufficient time for meaningful engagement and joint working with neighbouring authorities and GAL before consulting on a draft local plan for public consultation, in line with the Statement of Community Involvement.</p> <p>2.31. We believe that there has been insufficient consultation with stakeholders and preparation of the necessary evidence to support the proposed policies and therefore allow meaningful engagement with the public through this Regulation 19 consultation. This is not in the spirit of the Council's Statement of Community Involvement and may therefore fail the legal compliance test in this regard.</p> <p><b>Suggested Modification:</b></p>