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Topic Paper 4 Air Quality, Noise and Flood Risk

Crawley Borough Council adopted its Core Strategy back in November 2007, providing the spatial vision, objectives and development strategy for Crawley up to 2016. The Council has now begun preparing the successor to the Core Strategy – the Core Strategy Review – which will cover a much longer period up to 2026. Although there are aspects of the original Core Strategy that can be retained there are other areas where significant change has occurred in the intervening years and this will need to be reflected in the new document.

This consultation period is the first of the Review and further consultation stages are planned before the document is adopted in early 2012. This is your opportunity to shape the way the town develops over the next 20 years and the Council would appreciate and value any comments you have on this Topic Paper or any of the others that form part this consultation.

Summary of the Current Context

The Government's national planning guidance relating to air quality and noise is set out in Planning Policy Statement 23: Planning and Pollution Control (PPS 23) and Planning Policy Guidance Note 24: Planning and Noise (PPG 24). These documents outline that regard should be given to the location of development which may cause pollution and/or noise, such as industry, and should also ensure that new developments are not located in areas where they would be affected by major existing or future sources of pollution and/or noise.

Government guidance has also been produced in relation to flooding, Planning Policy Statement 25: Development and Flood Risk (PPS25). This guidance sets out that flood risk should be taken into account at all stages of the planning process in order to avoid inappropriate development in areas at risk of flooding. New development should not increase flood risk elsewhere.

Indication of the Key Issues Relating to Air Quality, Noise and Flood Risk

Crawley is unique when compared to other towns in the region. The Borough is mainly urban in character, and is situated adjacent to the M23, close to the M25, and contains a major international airport, Gatwick, within its boundaries. The town is also home to Manor Royal and County Oak, one of the largest employment areas in this part of the South East. These uses play a vital role in promoting a successful and vibrant economy in the Borough, creating jobs and attracting business, though it is also important to note that such uses can create noise and pollution impacts.

Air Quality

- The Council's Environmental Health team assess air quality within the Borough, and



poor air quality is not generally an issue in Crawley. If the Government's air quality objectives are exceeded, an Air Quality Management Area (AQMA) should be declared, and an Action Plan prepared.

- Though there are not currently any designated Air Quality Management Areas within Crawley, it is also important to consider that air pollution from Crawley-based sources, including Gatwick Airport and Manor Royal, can impact upon air quality in adjoining districts.

Noise

- Noise remains a key issue in the town, particularly in light of the Government identifying need for additional runway capacity in the South East.
- Although a third runway at Heathrow has been identified as the Government's preferred option, this remains far from certain, and the Council is required to safeguard land for possible development of a second runway at Gatwick Airport post 2019, should this be required (for further information see Topic Paper 9 – Gatwick).
- As such, the impact of existing noise, and possible impact of future noise remains a key issue to be considered as part of the Core Strategy Review.

Flood Risk

- The Borough also contains a number of waterways, and falls within the Upper River Mole Catchment Area. The Borough's water environment provides an important leisure and visual role in a predominantly urban area, but recent flood events have highlighted the need to manage flood risk.

Indication of the Options for Addressing the Key Issues Outlined Above

Noise and Air Quality

- The Council wants Crawley to be a place where people want to live, work and visit. To make this happen, there is a need to ensure that different kinds of development, such as housing and employment, are built in the most appropriate locations.
- Planning can play an important role in determining the correct location for development, for example, directing sensitive uses such as housing or schools away from areas of noise, poor air quality, and flood risk, and through directing new industrial development away from existing housing or schools.
- In relation to both noise and pollution, guidance has already been set out at the national level by PPS23 (relating to pollution and air quality) and PPG24 (relating to noise).
- This guidance sets out a clear rationale as to where sensitive development should be located in relation to existing noise/pollution sources, and also sets out guidance to where potentially polluting (including noise and air) development should be located.
- However, given Crawley's location adjacent to Gatwick Airport, and the possibility of a second runway at Gatwick, noise and air quality could potentially be considered to be locally specific to Crawley, allowing for a localised noise policy. As such, possible options are:
 - To rely upon existing Government guidance to direct sensitive development away from existing/potential sources of poor air quality and noise, and ensure that proposals likely to result in impact on noise and air quality are appropriately located.

- To produce a locally specific policy to manage development and noise/air quality within the Borough.

Flood Risk

- In relation to flooding, the national policy statement – PPS25 – sets out guidance requiring local authorities to steer vulnerable development (for example schools, housing and emergency services) away from areas of flood risk, though it acknowledges that water compatible and less vulnerable uses may be appropriate in these locations (for example, nature reserves and parks).
- To help avoid development in areas of flood risk, Government guidance requires local authorities to undertake a Strategic Flood Risk Assessment which identifies those areas at greatest risk.
- Crawley Borough Council recently undertook a Strategic Flood Risk Assessment in April 2007. The document sets out that flood risk is minimal across the majority of the Borough. It also makes recommendations as to the types of development likely to be appropriate in areas of greater flood risk, and the development types that should be avoided.
- The Council will be updating the Strategic Flood Risk Assessment as part of the Core Strategy Review, and will continue to update this assessment as required.
- The Environment Agency has been working to bring forward a River Mole Flood Attenuation Strategy, which proposes a series of works designed to address flood risk within and adjacent to the Borough. These include the addition of flood detention reservoirs at Ifield and Worth Farm, alongside a wider programme of works at Tilgate Lake, Clays Lake and Grattons Park River. A key aspect of the scheme focuses upon an area of land to the west of Ifield, which it is proposed should be employed for



Main Issues for Consultation

- Both air quality and noise are an issue for the Borough but are covered by national planning guidance. Is it necessary for the Core Strategy Review to include a locally specific policy to guide development likely to be affected by, or result in an increase in, issues of air quality and noise?
- Should a locally-specific flood risk policy refer to the findings of the current Strategic Flood Risk Assessment?
- How often should the Council update the Strategic Flood Risk Assessment?
- Could environmental constraints such as air quality, noise and flooding be dealt with under a single policy, or would these issues be best addressed separately?

flood attenuation. This would equate to the area not being available for development. The Environment Agency is currently working to identify a final format for the scheme, and once a preferred option has been identified it is anticipated that a period of public consultation will be held, with a formal planning application expected to be received during November 2009.

In light of the Government guidance, the main options relating to flooding are:

- To produce a locally specific policy requiring developers to accord with the findings of the current Strategic Flood Risk Assessment in order to avoid vulnerable development in areas of flood risk, avoid increasing the risk of flooding elsewhere, and where appropriate ensure appropriate flood mitigation measures are in place.
- To carry out an annual update of the Strategic Flood Risk Assessment, or review this document as and when required.

Indication of the Potential Direction at this Stage

- In light of the requirement that local authorities do not repeat national and regional guidance, the Council are currently proposing to rely upon existing Government guidance to manage applications relating to noise and air quality within the Borough.
- It is suggested that issues of flood risk are locally specific, and should be addressed as part of the Core Strategy Review. At this stage, the preferred approach would be for the Core Strategy Review to incorporate a specific flood risk policy underpinned by the findings of the Strategic Flood Risk Assessment. This policy would require development to comply with both the national guidance of PPS25, and also the local level recommendations of the Strategic Flood Risk Assessment. This approach would give the Strategic Flood Risk Assessment greater weight when considering planning applications, particularly in the context of setting out detailed Development Management

guidance for developers in terms of the types of development considered to be acceptable in areas at risk of flooding, and also the flood mitigation measures required to ensure that new development does not increase flood risk elsewhere.

- It is suggested that future updates of the Strategic Flood Risk Assessment are undertaken as and when required.

Current Context

Planning Policy Statement 23: Planning and Pollution Control

- Advises on situations where air quality should be a material consideration in planning decisions, particularly regarding potential impact upon health, the natural environment and general amenity. Attention is drawn to the need to consider existing, and likely future air quality in the area, including any Air Quality Management Areas.



Planning Policy Note Guidance 24: Planning and Noise

- Requires Local Authorities to consider whether proposals for new noise sensitive development would be compatible with existing activities.
- Development should not be permitted in areas which are, or are expected to become, subject to unacceptably high levels of noise in the foreseeable future.
- For new dwellings or noise sensitive development affected by aircraft noise contours, Annex 1 of PPG24 identifies a desirable upper limit of 60 Leq dB(A)¹, with a level of 57 Leq dB(A) considered to mark the onset of significant community annoyance.

Planning Policy Statement 25: Development and Flood Risk

- Sets out that flood risk must be taken into account at all stages of the planning process in order to avoid inappropriate development in areas at risk of flooding.
- Where development in a flood risk area is unavoidable, and justified via the exception test, appropriate flood mitigation measures should be undertaken.
- Development should not increase flood risk elsewhere.

South East Plan Proposed Modifications

- Policy NRM4: Sustainable Flood Risk Management
- Policy NRM9: Air Quality
- Policy NRM10: Noise

Crawley Borough Adopted Core Strategy

- Policy H3 outlines that residential development will be steered towards locations which are not subject to major physical or environmental constraints. Further guidance is provided under 'saved' Local Plan Policies GD16-23.

Evidence Base

Crawley Borough Local Air Quality Management Detailed Assessment of Air Quality (2007) and Crawley Borough Local Air Quality Management Progress Report (2008)

- The Council is required to assess air quality within Crawley, and where national air quality objectives are exceeded, an Area Quality Management Area should be declared.
- There are not currently any Air Quality Management Areas declared within the Borough.

Crawley Borough Strategic Flood Risk Assessment (2007)

- Classifies Crawley into areas of Low, Medium and High Flood Risk.
- Sets out that a relatively low proportion of the Borough is affected by flooding from the River Mole and its tributaries.
- Sets out recommendations as to the types of development likely to be acceptable in each of the flood risk areas.

¹ Decibels measured on a sound level meter incorporating a frequency weighting ('A' Weighting) which differentiates between sound of different frequency (pitch).