

# **CRAWLEY BOROUGH LOCAL PLAN EXAMINATION**

Crawley Borough Council Response to Inspector's  
Matters, Issues and Questions

Matter 2: Overall Spatial Development Strategy

February 2015



CBC/002 Matter 2 Overall Spatial Development Strategy February 2015

*Issue: Whether the strategy of urban consolidation represents a sustainable approach to growth which pays sufficient regard to the environmental and other constraints of the borough.*

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## **CBC/002 Matter 2: Overall Spatial Development Strategy**

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## **2.1 Is the spatial strategy of consolidating housing and employment within existing neighbourhoods and employment areas, whilst safeguarding local character and environmental assets, based on a sound assessment of the socio-economic and environmental characteristics of the borough?**

- 2.1.1 The Crawley Borough Local Plan (CBLP) is underpinned by a substantial, up-to-date and relevant evidence base<sup>1</sup>. The Local Plan preparation evolved from the previous work undertaken for the adopted 2000 Local Plan and the adopted 2008 Core Strategy, as well as work prepared for the West Sussex Structure Plan and the South East Regional Spatial Strategy, and the West of Bewbush Joint Area Action Plan (JAAP), prepared and adopted by both Crawley Borough Council (CBC) and Horsham District Council (HDC).
- 2.1.2 Clear understandings of need and demand arising from within the borough were essential, particularly being mindful of the nationally-changing political and economic context in which the Plan was prepared. These were gathered through assessments commissioned jointly across the wider housing market area for both housing and economic growth<sup>2</sup>; the summaries of the evidence are set out in Topic Papers 2: Housing Needs<sup>3</sup> and 4: Economic Growth<sup>4</sup>.
- 2.1.3 The legacy of the Crawley New Town masterplan offers both opportunities and constraints in relation to future development possibilities. As the neighbourhoods have each been planned around a core neighbourhood centre and are served by a good public transport system, they provide clear sustainable locations for development to take place. However, within the planned neighbourhoods, landscaping and open space provide important environmental character and residential amenity functions.
- 2.1.4 The administrative boundaries are, for much of the borough, tightly drawn around the urban area which was developed on a neighbourhood-by-neighbourhood basis over a relatively short period of time during the twentieth century according to established land use planning principles, resulting in limited potential for natural turn-over of brownfield land. Topic Paper 3: Housing Land Supply<sup>5</sup> explains the process undertaken to ascertain the full extent of developable land within the borough. This has included a wide ranging number of evidence base documents looking at the borough's environmental and infrastructure constraints as set out in Appendix A.

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<sup>1</sup> As set out in the Local Plan Library Reference List; and LP001: Submission Local Plan, Background Studies and Evidence Base Documents section, p.136 - 140 (September 2014) CBC

<sup>2</sup> LP065 and LP066: Employment Land Review (2009 and 2010) GL Hearn; LP062 and LP063: Economic Growth Assessment (2013 and 2014) NLP; LP082a-c: Strategic Housing Market Assessment (2009, 2012 and 2014) GVA & Chilmark; LP084: Locally Generated Housing Needs Assessment (2011) NLP

<sup>3</sup> LP011: Topic Paper 2: Housing Needs (November 2014) CBC

<sup>4</sup> LP013: Topic Paper 4: Economic Growth (November 2014) CBC

<sup>5</sup> LP012: Topic Paper 3: Housing Land Supply (November 2014) CBC

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2.1.5 The small physical size of the borough has meant that it has been possible to assess all areas of land for their development potential and/or environmental/amenity value. Specific sites for housing, economic or mixed use development, were identified through initial and updated Urban Capacity Studies<sup>6</sup> and a series of Calls for Sites; both processes fed into the final Strategic Housing Land Availability Assessment (SHLAA) for the borough<sup>7</sup>, the Employment Land Trajectory<sup>8</sup>, and CBLP site allocations and policy assumptions.

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<sup>6</sup> LP090: The Urban Capacity Study (2013) CBC; LP091: Crawley Borough Council Urban Housing Potential Study (2004) Baker Associates

<sup>7</sup> LP079: Crawley Strategic Land Availability Assessment (2014) CBC

<sup>8</sup> LP064 & LP064b: Crawley Employment Land Trajectory (2014 and update) CBC

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## **2.2 Does the strategy address cross-boundary issues effectively? Should the CBLP be more proactive in promoting development in neighbouring authorities to meet Crawley's unmet needs?**

2.2.1 The cross-boundary and strategic issues relating to the CBLP were identified early on in the process, having been already explored and addressed through the preparations and adoption of the Joint Area Action Plan (JAAP) with Horsham District Council (HDC). These are set out in paragraph 1.33 of the CBLP and are explored in detail in the Duty to Cooperate Statement prepared to accompany the Local Plan's submission and examination. In particular, the CBLP<sup>9</sup> clearly recognises the importance of Crawley Borough Council's (CBC) role in engaging with neighbouring authorities to ensure the delivery of Crawley's unmet needs within the housing market area, insofar as constitutes sustainable development and explicitly addresses the need to continue work on exploring possible further urban extensions to Crawley in the form of potential new neighbourhood scale developments. However, it is beyond the remit of the CBLP to allocate land outside Crawley's boundaries<sup>10</sup>, although mechanisms for the delivery and approval of further Joint Local Plan documents will be explored in relation to urban extensions<sup>11</sup>.

2.2.2 CBC has worked closely with its neighbouring authorities to understand the different options of how the unmet need arising from Crawley can be met. Spatially it is acknowledged that, within the borough, it is not possible to extend the urban area northwards due to the constraints of safeguarding and noise relating to the airport; nor southwards due to the Area of Outstanding Natural Beauty. Consideration of options to meet needs beyond the borough include:

- immediately adjacent to Crawley with urban extensions in the form of further new neighbourhood scale development to the east and/or west<sup>12</sup>;
- jointly funded studies to consider the provision of a new settlement within the housing market area<sup>13</sup>;
- using CBC land ownership proactively to help deliver housing land on Crawley's boundaries<sup>14</sup>;
- using CBC land to help facilitate delivery of the Kilnwood Vale buslink into the borough; and

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<sup>9</sup> LP001: Crawley Borough Submission Local Plan 2015 – 2030, paragraphs 1.33; 2.25-2.26; 5.22; and 6.40-6.41 (September 2014) CBC

<sup>10</sup> CBC/005: Council's Response to Inspector's Matter 3: Housing; Issue 3: Housing Delivery (2015) CBC

<sup>11</sup> LP006: Crawley Submission Duty to Cooperate Statement, p15, Paras 2.7 (2014) CBC

<sup>12</sup> LP087: At Crawley Study (2009) GL Hearn; LP088: West of Bewbush Joint Area Action Plan (2009) CBC and HDC; LP079: Crawley Strategic Land Availability Assessment, Appendix K (2014) CBC

<sup>13</sup> LP085: New Market Town Study (2010) GL Hearn; and LP086: West Sussex Bio City (2010) Bio City Development Company

<sup>14</sup> Planning Permission granted in Mid Sussex District: for 500 dwellings, employment land and open space, on land east of Cophorne

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- by dispersal across the existing main towns in the housing market area, particularly those with good public transport links to Crawley's main employment areas<sup>15</sup>.
- 2.2.3 Consultants commissioned by Mid Sussex District Council (MSDC) have undertaken a sustainability assessment of cross-boundary options for the Mid Sussex District Plan and, as part of this process, MSDC wrote on the 5th August 2014 to neighbouring local planning authorities, including CBC and HDC, to confirm formally whether they have unmet needs that they are seeking assistance with, and the detailed nature of any such needs.
- 2.2.4 The results of the sustainability assessment were shared with the neighbouring authorities, including CBC and HDC. MSDC has also shared the results of its updated work on housing need and supply. This evidence indicates an objectively assessed housing need of 627 homes per annum 2014-2031. A supply of 650 homes per annum is recommended in the proposed District Plan over the same period. The sustainability assessment advises that any supply in excess of local need is most likely to be absorbed by Crawley and Brighton & Hove, which have the strongest economic and functional links with Mid Sussex<sup>16</sup>.
- 2.2.5 The Unmet Needs Topic Paper<sup>17</sup> prepared to support the CBLP highlights the strategic development in close proximity to Crawley which could, in practice, contribute towards meeting the needs of some of Crawley's residents either unable to access housing within the borough or those wishing to move out of the town due to lifestyle choices, and the wider economic growth aspirations of the Gatwick Diamond<sup>18</sup>, and agreements have already been negotiated to achieve this in practice at Kilnwood Vale<sup>19</sup>. The 'At Crawley' study concluded that infrastructure capacity allowed for two new neighbourhood scale developments to come forward; these are currently under construction in the form of Kilnwood Vale and Forge Wood<sup>20</sup>. In order to update the information the conclusions of the 'At Crawley' study were based on, CBC wrote to the infrastructure providers for the town requesting an updated position in relation to bringing forward development of neighbourhood scale beyond that planned for within the CBLP. The responses to these are set out in Appendix B, and show a continuing constraint on sewage treatment works capacity, flooding and secondary school provision for which solutions would need to be resolved before further significant scale development 'at Crawley' is acceptable. In addition, the Transport Modelling study recommended that strategic development allocations in Crawley should be restricted to at, or below, the level of 300 dwellings

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<sup>15</sup> LP129: Northern West Sussex Position Statement (2014) CBC, HDC and MSDC; LP079: Crawley Strategic Land Availability Assessment, Appendix K (2014) CBC; and LP139: Sustainability Assessment of Cross-Boundary Options for the Mid Sussex District Plan (2014) LUC

<sup>16</sup> This is reflected in the Pre-Submission Draft Mid Sussex District Plan, para. 3.19 (March 2015)

<sup>17</sup> LP014: Topic Paper 5: Unmet Needs (November 2014) CBC

<sup>18</sup> LP014: Topic Paper 5: Unmet Needs, paras. 2.23 and 3.12 (November 2014) CBC

<sup>19</sup> CBC/005: Council's Response to Inspector's Matter 3: Housing; Issue 3: Housing Delivery, para 3.9.4 (2015) CBC

<sup>20</sup> LP087: Crawley Borough Council, Horsham District Council and Mid Sussex District Council At Crawley Study 2009, paras. 9.2 – 9.4 (2009) GL Hearn



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per annum<sup>21</sup>. Therefore, it is important that further work is undertaken to unlock otherwise potentially sustainable sites by increasing infrastructure capacity. This is acknowledged within the Northern West Sussex Position Statement which highlights the work being done with the Coast to Capital Local Enterprise Partnership (LEP) by the local authorities. Similarly, the Joint Northern West Sussex Strategic Sites Appendix to the Strategic Housing Land Availability Assessment<sup>22</sup> (SHLAA) reflects this work as it is carried out across the whole housing market area, jointly between the three authorities, to ensure any infrastructure improvements are directed to the most sustainable options and deliverable opportunities.

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<sup>21</sup> LP0119: Transport Modelling Stage 1, para.4.1.26, p33 (2012) Amey Consulting

<sup>22</sup> LP079: Crawley Strategic Housing Land Availability Assessment, Appendix K (2014) CBC

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### **2.3 By proposing a limited review of the CBLP following the Government's decision on a second runway at Gatwick airport, has the Plan been positively prepared? Is there a better approach to the current uncertainty surrounding Gatwick airport?**

2.3.1 The CBLP has been prepared positively to help address currently identified housing and economic growth needs. It is based on growth at Gatwick Airport to 45 million passengers per annum, within its current configuration of a single-runway, two-terminal airport. However, the Plan continues to 'safeguard' the land identified as necessary for a second wide-spaced runway, and imposes noise policies on new development which reflect the noise contours anticipated for a two-runway airport, to ensure that the potential for future additional runway capacity at the airport is not prejudiced by development decisions taken now within the borough, as required by national policy<sup>23</sup>.

2.3.2 A government decision to locate a second runway at Gatwick would obviously have a huge impact on the northern part of Crawley borough, with the expanded airport boundary and realigned roads virtually contiguous with the northern edge of the existing built-up area. It would also trigger significant change in the anticipated growth needs for housing and employment provision in the Gatwick Diamond area. However, a decision not to locate a new runway at Gatwick also has implications for the borough and the Local Plan as, particularly if safeguarding is removed, more of Crawley's development needs would be able to be accommodated within the borough. Therefore, the CBLP could not reasonably plan for all of these scenarios and it clearly sets out, in paragraphs 1.38 – 1.43 and 9.5 – 9.6<sup>24</sup>, the intended approach in relation to a government decision on the location of additional runway capacity. This has been based on a focused assessment of the potential scenarios in relation to the future runway capacity of Gatwick Airport and their impacts on the land available for development and objectively assessed development needs of the borough. The different scenarios are understood to have a varying degree of impact upon the Plan and would, therefore, trigger different levels of review of the Local Plan. This is explained in full in Topic Paper 1<sup>25</sup>. The Local Development Scheme<sup>26</sup> (LDS) identifies the government decision on Gatwick Airport as a critical trigger for reviewing the Local Plan.

2.3.3 This approach is reflected in the Airports Commission documents, who confirm that: "It is important to note that all existing spatial development plans and strategies make no allowance for the impacts and expansion of Heathrow or Gatwick and should not be expected to. Local plans must necessarily respond to anticipated local needs at the time they are drawn up. Airport expansion at Heathrow or Gatwick would have a significant impact on the nature of future local and regional needs and create new opportunities, changing the conditions for which decision-makers must

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<sup>23</sup> LP122: Aviation Policy Framework, para. 5.9, p74 (2013) DfT

<sup>24</sup> LP001: Crawley Borough Local Plan Submission Consultation Draft (September 2014) CBC

<sup>25</sup> LP010: Topic Paper 1: Future of Gatwick Airport & Local Plan Review (2014) CBC

<sup>26</sup> LP040: Crawley Borough Council's Local Plan Local Development Scheme 2013 – 2016 (2014) CBC

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plan. It should not be inferred that any current local plans are deficient if they do not take account of the impacts of airport expansion nor that in requiring change, airport expansion plans are necessarily misaligned with existing plans and strategies.”<sup>27</sup>

- 2.3.4 The Inspector’s Initial Findings into the Horsham District Planning Framework offers some further insight into how the future of Gatwick Airport is being considered at a strategic planning policy level:

“...As was acknowledged by virtually all participants at the hearings, any decision to expand Gatwick Airport by building a second runway would have major implications for the planning of the whole subregion and would almost certainly necessitate an urgent review of the HDPF (and quite probably the plans of all authorities in the Gatwick Diamond area). If that were to occur, the way in which future development needs should be met would undoubtedly be raised again...”<sup>28</sup>

- 2.3.5 The uncertainty not just of the outcome of the Airports Commission’s work, but also a final decision being made by central government, and, critically, the timing of this decision, means it would not be appropriate for the council to delay the preparation of the Local Plan leaving Crawley without an identified five-year housing supply, and without policies to promote economic growth and to protect important environmental and heritage assets, until an outcome is known. As expressed in paragraph 9.18 of the CBLP it is difficult to pre-empt what recommendations the Airports Commission will make. On this basis, it is considered preparing the Local Plan for the borough to reflect the latest available national policy position at the time of writing is the most appropriate approach to have taken.

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<sup>27</sup> Strategic Fit: Fit with Wider Spatial and Socio-Economic Development Strategies, para 1.5, p9 (November 2014) Airports Commission

<sup>28</sup> Horsham District Planning Framework (HDPF) examination Inspector’s Initial Findings, para 25 (19 December 2014) Inspector Geoff Salter

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## **2.4 Is the strategy based on sound testing of reasonable alternatives? If the strategy is considered unsound, what alternative strategy should be pursued, and why?**

- 2.4.1 CBC believes the CBLP (September 2014) to be the sound Local Plan for the borough. A limited number of modifications<sup>29</sup> have been proposed by the council, following the submission public consultation period<sup>30</sup> and prior to its submission to the Secretary of State for its independent Examination<sup>31</sup>; these are suggested to aid the clarification of policy intentions and address changing national requirements. In considering the Inspector's Matters, Issues and Questions<sup>32</sup>, the council proposes some additional modifications which are set out and explained in the relevant council written statements. A schedule of these further proposed modifications<sup>33</sup> has also been prepared which should be read alongside the schedules of modifications previously submitted with the CBLP.
- 2.4.2 The CBLP is based on sound testing of reasonable alternatives. These can be seen through the consultation materials during the early engagement stages of preparation<sup>34</sup>. The options considered for the strategy are set out in the Sustainability Report<sup>35</sup>. The first option of Crawley allocating sufficient land within the borough, and supporting development adjacent to the borough to meet all its needs without taking account of environmental issues in order to perform a wider subregional function would have met Crawley's needs but would have had a significant negative impact on Crawley's environmental assets and the amenity of local residents' quality of life. The third option, to focus development only within the borough would not sufficiently address Crawley's socio-economic development needs due to insufficient available land required to meet quantity of development anticipated without incurring substantial harm to a number of the Core Planning Principles set out in the NPPF<sup>36</sup>. Therefore, the chosen Strategy is to develop within the borough as far as possible without detrimental impact on its environment, and to explore appropriate opportunities for further growth, including the potential of new neighbourhood growth, outside the borough.

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<sup>29</sup> LP001a: Crawley Submission Modifications Draft Local Plan (November 2014) CBC; LP001b: Schedule of Proposed Main Modifications to the Draft Local Plan (November 2014) CBC; LP001c: Schedule of Proposed Minor Modifications to the Draft Local Plan (November 2014) CBC

<sup>30</sup> Regulation 19 Consultation carried out 1 September – 13 October 2014

<sup>31</sup> Submitted 26 November 2014

<sup>32</sup> Received 23 January 2015

<sup>33</sup> LP001d: Schedule of Further Proposed Modifications to the Submission Local Plan (February 2015) CBC

<sup>34</sup> LP033: Crawley Borough Council Shaping the future of Crawley – Core Strategy Review Topic Papers (2009) CBC; Crawley Borough Council Crawley 2029 Local Plan Issues and Option Topic Papers (2012) CBC; LP027: Local Plan (Crawley 2029) Consultation Report – Appendix 3: Questionnaires on 6 Themes (2012) CBC

<sup>35</sup> LP003: Crawley Borough Council Sustainability Appraisal/Strategic Environmental Assessment; Sustainability Report for the Submission Local Plan, Section 5.0, Appendix E, F and G (November 2014) CBC

<sup>36</sup> National Planning Policy Framework, p5-6, Para 17, bullet 2; bullet 4; bullet 5; bullet 6; bullet 7; bullet 8; bullet 9; bullet 10; bullet 12 (2012) DCLG

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2.4.3 In explaining the capacity to develop within the borough, a full range of policies, land allocations and designations were assessed. The preferred strategy document<sup>37</sup> offered the opportunity to test, through public consultation and with technical stakeholders, the council's approach for the overarching vision and spatial development strategy. Additional sites were considered as the evidence base evolved; these were subject to public consultation during June – July 2013<sup>38</sup> and were identified as:

- Sites for Allocation (Housing and Cemetery)
- Sites for Designation (Local Green Space and Historic Parks and Gardens)
- Sites for De-designation (Historic Parks and Gardens)
- Options for Allocation Sites (Gypsy and Traveller)
- Sites that Require Further Work (Housing)
- Rejected Sites (Housing)

In addition, consultees were invited to propose additional sites for consideration as part of the preparations for the CBLP, at that stage. The assessment of these sites fed into the evidence base and have led to the final strategy.

2.4.4 It is the most appropriate, sustainable and deliverable strategy for the borough over the Plan period 2015 – 2030.

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<sup>37</sup> LP028: The Crawley Borough Council Local Plan 2014 – 2029 Preferred Strategy Consultation Draft (2012) CBC

<sup>38</sup> LP025: Site Allocations Consultation Reports (2013) CBC

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## **2.5 Does the CBLP include sufficient flexibility and contingencies to take account of unexpected changes in circumstances?**

- 2.5.1 The Policies within the CBLP have been drafted to provide a positive and proactive planning framework for the borough over a 15-year Plan period. It is anticipated that during this period the borough will experience the full range of economic-cycles and national policy changes<sup>39</sup>.
- 2.5.2 During the preparation of the Plan, the national economic, legislative and policy context has experienced significant, unexpected changes in circumstances which have influenced the emerging strategy and expectations for future development within the borough. This has ensured sufficient flexibility and contingencies have been built in to the Plan to support its implementation over the whole Plan period, for example, the town centre allocations (Policy EC6) are deliberately flexible in supporting residential, or a range of town centre uses rather than specific allocations for just one use.
- 2.5.3 The Local Development Scheme<sup>40</sup> confirms that the Local Plan will be continually monitored and a report will be published annually to ensure the policy objectives are being implemented. In order to ensure the Plan's effectiveness is accurately reported, a number of monitoring indicators have been established: for the Local Plan Objectives these are set out in the Monitoring and Implementation Section of the CBLP<sup>41</sup>. More detail has been provided in the Monitoring and Implementation Framework<sup>42</sup> which identifies the outcomes and targets along with the delivery partners and means of implementation for each policy in the Local Plan. The council's response to the Inspector's questions on Matter 6 consider this in more detail<sup>43</sup>.
- 2.5.4 In line with section 2.4 above, a decision in relation to whether or not a second runway should be provided at Gatwick Airport would have such substantial implications for the development needs and land available, it would trigger a Local Plan Review.

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<sup>39</sup> LP001: Crawley Borough Submission Local Plan 2015 – 2030, para. 1.37 (September 2014) Crawley Borough Council

<sup>40</sup> LP040: Crawley Borough Council's Local Plan Local Development Scheme 2012 – 2016, p10–11 (November 2014) Crawley Borough Council

<sup>41</sup> LP001: Crawley Borough Local Plan, p121-128 (September 2014) CBC

<sup>42</sup> LP141: Crawley Local Plan Monitoring and Implementation Framework (2015) CBC

<sup>43</sup> CBC/013: Council's Response to Inspector's Matters, Issues and Questions Matter 6: Infrastructure Provision, Implementation and Monitoring, Questions 6.5 and 6.6 (2015) CBC

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## APPENDIX A: EVIDENCE BASE DOCUMENTS

**Table 2.1: Environmental Constraints Evidence Base**

<b>Library Ref:</b>	<b>Document</b>
LP052:	Crawley Extensive Urban Survey (2008)
LP053:	Crawley Baseline Character Assessment (2009) EDAW/AECOM
LP054:	Crawley ASEQs and Local Listed Buildings Heritage Assessment (2010) Alan Baxter Associates
LP055:	Historic Parks and Gardens Review (2013) Sussex Gardens Trust
LP056:	Crawley Built Up Area Boundary Review (2012) Crawley Borough Council
LP057:	Crawley Landscape Character Assessment (2012) Crawley Borough Council
LP103:	Crawley Borough Council Strategic Flood Risk Assessment (SFRA) (2014) Crawley Borough Council
LP111:	Green Infrastructure Discussion Document (2012) Crawley Borough Council
LP113:	Review of CBC's Sites of Nature Conservation Importance Management Plans (2010) Crawley Borough Council
LP115:	Crawley Open Space, Sport and Recreation Study (2013) JPC Strategic Planning and Leisure Limited
LP116:	A Playing Pitch Study for Crawley (2013) JPC Strategic Planning and Leisure Limited
LP117:	Crawley PPG17 Open Space, Sport and Recreation Assessment (2008) PMP

**Table 2.2: Infrastructure Constraints Evidence Base**

<b>Library Ref:</b>	<b>Document</b>
LP005:	Crawley Infrastructure Plan (2014) Crawley Borough Council
LP119:	Transport Modelling – Stage 1 (2012) Amey Consulting
LP120:	Transport Modelling – Stage 2 (2014) Amey Consulting
LP122:	Aviation Policy Framework (2013) DfT
LP125:	Gatwick Master Plan (2012) Gatwick Airport Limited

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## APPENDIX B: UPDATED POSITION ON INFRASTRUCTURE CAPACITY FOR 'AT CRAWLEY' SITES

Infrastructure Provider	Comment	Date of Response
Highways Agency	The HA position as set out previously (as sent in Nigel Walkden's email below) is essentially unchanged in that we look to your Council to demonstrate nil detriment for the potential or proposed additional development. We don't have any further comments on the 2009 study other than to highlight that any future study would require updating based upon current growth forecasts for Crawley and surrounding areas.	05/09/14
Southern Water	<p>In response to the 'At Crawley Sites Review', Southern Water has a statutory duty to serve new development, and is committed to providing the right infrastructure in the right place at the right time in collaboration with developers and with support from the planning system through planning policies and planning conditions. <u>Capacity above that which is currently available can be provided in parallel with development, providing there is good forward planning.</u> There is no overall limit, as far as water supply goes, on the total scale of development across the borough or at individual sites. However, it is likely that new infrastructure will be required.</p> <p>We have a dedicated team for Local Plan enquiries. The email address is <a href="mailto:planningpolicy@southernwater.co.uk">planningpolicy@southernwater.co.uk</a>. The postal address for Local Plans is Sarah Harrison, Regional Planning, Southern Water, Southern House, Yeoman Road, Worthing, West Sussex, BN13 3NX.</p> <p>This team responds to Local Plan consultations, and arranges for site by site capacity checks once site options have been refined and published in a draft development plan document. We require precise location information and number of dwellings to carry out these checks. These checks determine whether existing capacity is sufficient to serve each site, and will help to formulate planning policies to secure new or improve infrastructure in parallel with the development.</p> <p>If existing capacity is insufficient in the immediate vicinity of the site, this is not a constraint to development provided it connects to the local water supply system at the nearest point of adequate capacity. The precise location of the nearest point of capacity will need to be investigated when the development comes forward. Planning policies and conditions can be put in place to ensure the timing of development is co-ordinated with provision of necessary infrastructure.</p> <p>The adopted Borough Local Plan will inform Southern Water's investment planning. Adoption provides the planning certainty required to support investment proposals to Ofwat, the water industry's economic regulator. Southern Water is currently going through the price review process with Ofwat, this will decide the</p>	15/09/14



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Infrastructure Provider	Comment	Date of Response
	<p>investment programme in the period to 2020. There will be another price review in 2019, covering the investment period 2020 to 2025.</p> <p>Strategic infrastructure such as additional water resources can be planned and funded through the price review process, and co-ordinated with new development. However, local infrastructure, should be funded by the development if this is specifically required to service individual development sites. The mechanism by which the development can provide the infrastructure required to serve it is to connect to the water supply system at the nearest point of adequate capacity. This may require off-site infrastructure if the nearest point is not located within the immediate vicinity of the site.</p> <p>We look to the planning authority to ensure through planning policies and planning conditions that development is co-ordinated with provision of infrastructure and not permitted to proceed unless it connects to the water supply system at the nearest point of adequate capacity, to ensure levels of service are maintained to both new and existing customers.</p>	
Sussex Police	<p>Based on the development planned, and the anticipated population increase, it has been identified that the cost of policing this anticipated growth equates to a total Sussex Police infrastructure funding need of £1.8m over the Plan period, which will be utilised for the infrastructure identified in Appendix 1. It should be noted that these are indicative projects and costs at this stage, based on existing plans and priorities of Sussex Police over the next five years. These needs and types of infrastructure may change over the Plan period, depending on the crime, incidents and policing model at the time development comes forward. Sussex Police therefore seek inclusion of these general infrastructure needs (accommodation, equipment and facilities) in the updated Infrastructure Delivery Plan to give some flexibility on necessary infrastructure provision over the plan period.</p> <p>It should also be noted that these infrastructure needs relate to the number of dwellings coming forward over the Plan period, rather than the specific location of these dwellings. As such, the infrastructure needs remain the same as in Appendix 1, even if these dwellings come forward on the remaining 'At Crawley' sites identified. This is subject to these dwellings being included within the 4950 dwellings to be delivered, rather than in addition to.</p>	28/08/14
Network Rail	<p>Network Rail supports Crawley Borough Councils' Core Strategy Policy <i>T4: Improving Rail Stations</i> and would welcome a similar policy being included in the Local Plan. In partnership with other relevant bodies, Network Rail is committed to improving all four stations within the Borough, including the possible redevelopment of Three Bridges and Crawley stations.</p>	05/08/14

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Infrastructure Provider	Comment	Date of Response
	<p>Gatwick Airport station had concourse and access enhancements in 2012 and an additional platform being constructed in 2014. This has improved the performance of the station and introduced the dedicated use of Platforms 5 &amp; 6 for Gatwick Express services.</p> <p>Network Rail consider that developer contributions should be sought for railway station facilities/infrastructure that require improvements to accommodate any increases in rail patronage. This should also be included within the Planning Obligations and S106 Agreements SPD and the Community Infrastructure Levy (if the Council chooses to implement it).</p> <p>Any development that would significantly increase the use of the existing Faygate or Ifield stations must consider the need to extend the platforms. Both stations only have capacity for 5 coaches; an option to increase the platforms to cater for 12 coaches services should be made available if necessary. Significant improvements in relation to disabled access are also likely to be necessary.</p> <p>Were the development to increase the use of level crossings at Crawley High Street, Crawley Horsham Road, and Roffey Road (1 mile west of Faygate), there may be serious concerns regarding the safety and increase in traffic at these sites. If a transport assessment highlighted these issues, Network Rail would be seeking contributions to improve these crossings.</p>	
Environment Agency	<p><b><u>'At Crawley' Sites Review</u></b></p> <p><b><u>Flood Risk</u></b></p> <p><b><u>Option C – Crawley Down</u></b></p> <p>This site is located upstream of the Main River extent of the Burstow Stream/Copthorne Brook, with the western boundary of the site defined by a watercourse with an associated floodplain.</p> <p>Any development on this site would need to ensure flood risk was not increased elsewhere, we are aware that areas of Copthorne experienced flooding during winter 2013/14. Anecdotal evidence suggests that areas within this site suffered from flooding, though it is unclear whether the source was fluvial, surface water or poor drainage.</p> <p>Any development on this site should not result in a loss of flood storage capacity. In addition, the sloping topography of the site indicates a robust surface water management and drainage solution will be required for any proposed development, to ensure that both the proposed development site and adjacent areas are not placed at risk to inundation. It is likely that the use of SuDS, where conditions allow, will be an important component of any development strategy to achieve runoff no greater than the Greenfield rate, with the aim to reduce this further where possible.</p>	09/09/14

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Infrastructure Provider	Comment	Date of Response
	<p>Should a proposal for development on this site be furthered, a robust assessment of flood risk and impacts of proposed development would need to be undertaken. We would expect the developer to fund or make a significant contribution to any flood alleviation works required as part of their proposal.</p> <p><u>Option D – Crabbet Park</u>                      This site is located upstream of the Main River extent of the Burstow Stream, with the eastern boundary of the site defined by a watercourse with an associated floodplain.                      Any development on this site would need to ensure flood risk was not increased elsewhere, we are aware that areas of Copthorne experienced flooding during winter 2013/14.</p> <p>Any development on this site should not result in a loss of flood storage capacity. In addition, the sloping topography of the site indicates a robust surface water management and drainage solution will be required for any proposed development, to ensure that both the proposed development site and adjacent areas are not placed at risk to inundation. It is likely that the use of SuDS, where conditions allow, will be an important component of any development strategy to achieve runoff no greater than the Greenfield rate, with the aim to reduce this further where possible.</p> <p>Should a proposal for development on this site be furthered, a robust assessment of flood risk and impacts of proposed development would need to be undertaken. We would expect the developer to fund or make a significant contribution to any flood alleviation works required as part of their proposal.</p> <p>With Options C &amp; D being located close to 2 sites, A &amp; B, which are progressing through either permitted development or granted planning permission, should Options C &amp; D go ahead the overall impact on this area in terms of flood risk and surface water management should be considered. As well as considering impacts from individual Options, it would be prudent to consider the wider and more strategic impacts to the north-eastern area of Crawley.</p> <p><u>Option F – West of Ifield</u>                      This site contains sections of 3 Main Rivers and their associated floodplains. We would seek to actively protect Main River and its associated Byelaw Margin from any development. Any development on this site should not result in a loss of flood storage capacity or increase the risk of flooding elsewhere.</p> <p>This area has been known to flood on a number of occasions in the past, including during 2000, 2008 and 2013. It should be noted that this includes the internal inundation to a number of properties, making flooding a sensitive issue for adjacent communities.</p>	

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Infrastructure Provider	Comment	Date of Response
	<p>This area was identified as a possible location for part of the Upper Mole Flood Alleviation Scheme, though currently the proposal to construct a flood attenuation dam within this area is on hold.</p> <p>However, we are keen to explore a more local option to offer flood attenuation to the Ifield Green area with investigations currently ongoing to allow this to be realised. One of the objectives of the project is to ensure that localised flood alleviation option(s) would not compromise the ability to bring forward a larger scheme in the future should it become financially viable. This has been agreed in a Memorandum of Understanding between Crawley BC, West Sussex CC and the Environment Agency.</p> <p>Currently, work is ongoing to produce an updated flood risk model for the Upper Mole. This may identify that large scale storage in this area is not viable, though it would be prudent to wait for the results of this study before making a final decision on this point. It should be noted that the updated modelling may also alter the extent of the floodplain and it is possible the flood risks areas could increase based upon updated information and the collation and inclusion of historic data.</p> <p>Should a proposal for development on this site be furthered, a robust assessment of flood risk and impacts of proposed development would need to be undertaken. We would expect the developer to fund or make a significant contribution to any flood alleviation works required as part of their proposal.</p> <p>A robust surface water management and drainage solution will be required for any proposed development, to ensure that both the proposed development site and adjacent areas are not placed at risk to inundation. It is likely that the use of SuDS, where conditions allow, will be an important component of any development strategy to achieve runoff no greater than the Greenfield rate, with the aim to reduce this further where possible.</p> <p><u>Option G – West of Ifield/Langlely Green</u></p> <p>This site contains sections of 2 Main Rivers and their associated floodplains. We would seek to actively protect Main River and its associated Byelaw Margin from any development. Any development on this site should not result in a loss of flood storage capacity or increase the risk of flooding elsewhere.</p> <p>This area has been known to flood on a number of occasions in the past, including during 2000, 2008 and 2013. It should be noted that this includes the internal inundation to a number of properties, making flooding a sensitive issue for adjacent communities.</p> <p>This area was identified as a possible location for part of the Upper Mole Flood Alleviation Scheme, though currently the proposal to construct a flood attenuation dam within this area is on hold.</p>	

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	<p>However, we are keen to explore a more local option to offer flood attenuation to the Ifield Green area with investigations currently ongoing to allow this to be realised. One of the objectives of the project is to ensure that localised flood alleviation option(s) would not compromise the ability to bring forward a larger scheme in the future should it become financially viable.</p> <p>Currently, work is ongoing to produce an updated flood risk model for the Upper Mole. This may identify that large scale storage in this area is not viable, though it would be prudent to wait for the results of this study before making a final decision on this point. It should be noted that the updated modelling may also alter the extent of the floodplain and it is possible the flood risks areas could increase based upon updated information and the collation and inclusion of historic data.</p> <p>Should a proposal for development on this site be furthered, a robust assessment of flood risk and impacts of proposed development would need to be undertaken. We would expect the developer to fund or make a significant contribution to any flood alleviation works required as part of their proposal.</p> <p>A robust surface water management and drainage solution will be required for any proposed development, to ensure that both the proposed development site and adjacent areas are not placed at risk to inundation. It is likely that the use of SuDS, where conditions allow, will be an important component of any development strategy to achieve runoff no greater than the Greenfield rate, with the aim to reduce this further where possible.</p> <p><u>Option H – Langley Green</u></p> <p>This site is split by a Main River and its associated floodplain. We would seek to actively protect Main River and its associated Byelaw Margin from any development. Any development on this site should not result in a loss of flood storage capacity or increase the risk of flooding elsewhere.</p> <p>There is a known history of flooding in this location, including during 1968 and over the winter of 2013/14.</p> <p>Should a proposal for development on this site be furthered, a robust assessment of flood risk and impacts of proposed development would need to be undertaken. We would expect the developer to fund or make a significant contribution to any flood alleviation works required as part of their proposal.</p> <p>A robust surface water management and drainage solution will be required for any proposed development, to ensure that both the proposed development site and adjacent areas are not placed at risk to inundation. It is likely that the use of SuDS, where conditions allow, will be an important component of any</p>	

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	<p>development strategy to achieve runoff no greater than the Greenfield rate, with the aim to reduce this further where possible.</p> <p>With Options F, G &amp; H (with an Option to extend E) being proposed in a linear fashion along the same or adjacent watercourses, as well as considering impacts from individual Options, we would expect you to consider the wider and more strategic impacts to the north-western area of Crawley.</p> <p><u>Option I – North of Manor Royal</u>                      This site is split by a Main River and its associated floodplain. We would seek to actively protect Main River and its associated Byelaw Margin from any development. Any development on this site should not result in a loss of flood storage capacity or increase the risk of flooding elsewhere.</p> <p>Should a proposal for development on this site be furthered, a robust assessment of flood risk and impacts of proposed development would need to be undertaken. We would expect the developer to fund or make a significant contribution to any flood alleviation works required as part of their proposal.</p> <p>A robust surface water management and drainage solution will be required for any proposed development, to ensure that both the proposed development site and adjacent areas are not placed at risk to inundation. It is likely that the use of SuDS, where conditions allow, will be an important component of any development strategy to achieve runoff no greater than the Greenfield rate, with the aim to reduce this further where possible.</p> <p><u>Option J – Pease Pottage</u>                      This site contains the upper reaches of the Stanford Brook, at this location it is classified as an ordinary watercourse and becomes classified as a Main River to the north of the M23, just outside of this site boundary. Any development on this site should not result in a loss of flood storage capacity or increase the risk of flooding elsewhere.</p> <p>Should a proposal for development on this site be furthered, a robust assessment of flood risk and impacts of proposed development would need to be undertaken. We would expect the developer to fund or make a significant contribution to any flood alleviation works required as part of their proposal.</p> <p>A robust surface water management and drainage solution will be required for any proposed development, to ensure that both the proposed development site and adjacent areas are not placed at risk to inundation. It is likely that the use of SuDS, where conditions allow, will be an important component of any development strategy to achieve runoff no greater than the</p>	

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	<p>Greenfield rate, with the aim to reduce this further where possible. As this site is located above Crawley, a poor surface water management solution would have negative consequences for the communities downstream.</p> <p><u>Option K – East of Brighton Road</u>                      A robust surface water management and drainage solution will be required for any proposed development, to ensure that both the proposed development site and adjacent areas are not placed at risk to inundation. It is likely that the use of SuDS, where conditions allow, will be an important component of any development strategy to achieve runoff no greater than the Greenfield rate, with the aim to reduce this further where possible.</p> <p><u>Extension to Option E – West of Kilnwood Vale</u>                      We are aware that development is ongoing within this general area. Although this site is above the Main River limit of the Bewbush Brook, this watercourse become Main River a short distance downstream and an area of floodplain is identified as being present within the site. Any development on this site should not result in a loss of flood storage capacity or increase the risk of flooding elsewhere.</p> <p>Should a proposal for development on this site be furthered, a robust assessment of flood risk and impacts of proposed development would need to be undertaken. We would expect the developer to fund or make a significant contribution to any flood alleviation works required as part of their proposal. Awareness of the drainage solutions for the existing development should be shown, and how proposals for this site take not only the sit specific but strategic view.</p> <p>A robust surface water management and drainage solution will be required for any proposed development, to ensure that both the proposed development site and adjacent areas are not placed at risk to inundation. It is likely that the use of SuDS, where conditions allow, will be an important component of any development strategy to achieve runoff no greater than the Greenfield rate, with the aim to reduce this further where possible. As this site is located above Crawley, a poor surface water management solution would have negative consequences for the communities downstream.</p> <p><b><u>Groundwater Protection</u></b>                      The majority of the site options are located on clay and therefore are a lower risk to groundwater.</p> <p>Development Site Option Area B and D are located on a secondary aquifer and contain historic landfills. The previous land use may have left contamination which could impact on the proposed</p>	



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	<p>development. An assessment into the past uses of site and any potential risks arising from the site area for the proposed end use should be carried out prior to the change of use and/or development works proposed. Please ensure all developments areas comply with the NPPF.</p> <p>Please note that we will provide site specific comment at the planning stage.</p>	
<p>Thames Water Utilities Ltd.</p>	<p><b><u>Sewerage Network</u></b>                      Developers will be required to demonstrate that there is adequate capacity both on and off the site to serve the development and that it would not lead to problems for existing users. In some circumstances this may make it necessary for developers to carry out appropriate studies to ascertain whether the proposed development will lead to overloading of existing water &amp; sewerage infrastructure. Where there is a capacity problem and no improvements are programmed by the water company, then the developer needs to contact the water company to agree what improvements are required and how they will be funded prior to any occupation of the development.</p> <p><b><u>Sewage treatment</u></b>                      Crawley Sewage Treatment Works has recently been upgraded and has a capacity for a total Population Equivalent (PE) of approximately 170,000. Thames Water’s forecasting predicts that the will reach that limit between 2021 &amp; 2026 (from a current PE of approx 153,000).                      It is anticipated that Crawley STW will not meet the demand forecasted to 2030. Upgrades of Thames Water’s assets will therefore be required.</p> <p>Further expansion of the Crawley STW should be possible subject to land availability and STW consent permissions being granted by the Environment Agency. Land availability at Crawley STW is reaching its limits and it may be necessary to extend beyond the sites boundary, but this would need further confirmation nearer the time as technologies are changing all the time, it may be able to accommodate upgrades which require a smaller foot print.</p> <p>Nonetheless, consultations have taken place with Gatwick Airport regarding their proposal of a new runway. They have been made aware of what capacity is available and when upgrades to Crawley STW are forecasted.</p> <p>Thames Water would look to promote any future upgrades/extensions to Crawley STW within its draft business plan sometime between AMP7 (2020-2025) and AMP8 (2025-2030), which are subject to funding approval by Ofwat.</p>	<p>05/09/14</p>



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West Sussex County Council Local Education Authority	<p>Position Statement:</p> <p><b>Future Provision</b></p> <p>It is anticipated that current changes in the demography of Crawley experienced over the last two to three years will continue with increasing numbers of children requiring school places at both primary and secondary level arising from the existing housing stock. WSCC have produced a document entitled "Planning School Places 2014" which provides forecasts of future pupil numbers and how any changes could be addressed. These include an estimate of the number of school places required as a result of demographic change and housing growth.</p> <p><u>Early Years</u></p> <p>As set out above, there is likely to be a future shortfall in early year's provision within the Borough, which WSCC is seeking to address.</p> <p><u>Primary Schools</u></p> <p>Including the demand for Primary School places arising from the Kilnwood Vale development, WSCC estimate that an additional 10 forms of entry to primary schools will need to be provided over the plan period depending on how large the new developments eventually become.</p> <p>The development of new neighbourhoods in the North East Sector and Kilnwood Vale to the west, include the provision of primary schools by the developer to meet the primary needs of the new neighbourhoods. Primary schools of up to three forms of entry are to be provided as part of the North East Sector development and Kilnwood Vale.</p> <p>Additional forms or half forms of entry have been provided at Milton Mount, Hill Top, Seymour and Three Bridges Primary Schools. Proposals to expand a further five primary schools will be consulted upon shortly for 2015 and 2016. In the meantime, bulge classes have been accommodated at several schools. Pupil numbers will continue to be monitored and projected to estimate future demand.</p> <p><u>Secondary Schools</u></p> <p>Including the demand for secondary school places arising from Kilnwood Vale, it is estimated that provision for an additional 8 - 10 forms of entry to secondary schools will need to be provided over the plan period. This is to meet demand from pupils already in primary schools as well as from the additional housing proposed.</p> <p>Four forms of entry are to be provided at The Gatwick Free School for September 2014 and some additional capacity maybe found at Thomas Bennett Community School by reallocating space designated as Adult Education to secondary school provision.</p>	September 2014

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	<p>Discussions are currently taking place to explore the potential for providing further additional forms of entry at existing secondary schools in the town.</p> <p>However, over the plan period it has been identified that some of the additional provision required will need to be provided in the form of a new secondary school. Potential locations for a new school are currently being investigated by WSCC and may involve cross border co-operation with neighbouring authorities.</p> <p>The developers of the North East Sector and Kilnwood Vale will make financial contributions to increase the provision of secondary school places to meet the need generated by the developments.</p>	
West Sussex County Council Waste and Recycling	<p>Position Statement:</p> <p><b>Future Provision</b></p> <p>West Sussex County Council currently has no proposals for additional waste facilities in the town following the provision of the replacement facilities at the County Oak location. Consequently, Crawley Borough Council's Planning Obligations and S106 Agreements Supplementary Planning Document (SPD), which was adopted in August 2008, does not currently include any requirement for contributions towards this service.</p> <p>With the town set to grow significantly up to 2026 it is possible that additional facilities may be needed in the future, in which case there may be a future requirement for developer contributions towards the service. The position is kept under review but currently, taking a trigger level of 5000 additional homes in the site's 5 mile radius catchment, a need for some infrastructure improvement at the existing site is anticipated after that additional housing level is reached. The need for and nature of such improvement will be considered at that time.</p> <p>In terms of decentralised energy provision West Sussex County Council entered into a contract in 2010 with Biffa West Sussex Ltd for the design, construction and operation of a Mechanical Biological Treatment Facility at the Brookhurst Wood site, North Horsham, and it is expected that this facility will be fully operational in late 2014. This facility will process and treat non-recycled household waste arising in West Sussex that would otherwise be sent to landfill, and as part of this scheme a number of products, including a Refuse Derived Fuel (RDF), will be created. The Authority has been seeking to secure an off-take arrangement for the treatment of this RDF, although this process is currently on-hold whilst the Authority reviews its waste strategic aims in relation to increasing diversion from landfill and improving recycling. The exact nature and location of any off-take arrangement is therefore unknown at this time. However if, for instance, a thermal treatment facility receives this fuel it could have the potential to generate both heat and power. The</p>	September 2014

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	owner/operator of the facility could export those outputs to suitable markets/users, subject to any necessary contract arrangements.	
NHS 5 Communities Executive Summary 2014/15: consultation Plan for Crawley, Horsham and Mid Sussex CCGs.	<p>The Future for Crawley communities (page 20)</p> <p>In West Green access to GP services for specific patient groups has been identified as a priority following the move of the branch surgery onto the main Langley Green site.</p> <p>Bewbush Medical Centre is a high priority for review as the number of patients registered here continues to grow, but the practice is heavily constrained by the size of its building. Whether or not the practice includes the new residents of Kilnwood Vale in its catchment area must be confirmed swiftly. New housing at Forge Wood could impact on Pound Hill Medical Group and Copthorne Branch Surgery, which require an assessment as to capacity and fitness for purpose. The same applies to additional housing west of Ifield and impact on Ifield Medical Practice. There is potential to boost the current walk-in service provided at Crawley Health Centre by moving this to Crawley Hospital, linked to the Urgent Treatment Centre. The future sustainability of Northgate Surgery (a branch surgery of Saxonbrook Medical Centre is being assessed.</p>	